

9-10-03; 1:05PM;StLouisCoLandDept

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218 726 2600



Saint Louis County

Land Department • 320 West 2nd Street, Room 607, Gov't. Serv. Cntr. • Duluth, MN 55802
Phone: (218) 726-2606 • Fax: (218) 726-2600

David J. Epperly
Land Commissioner

Mark R. Reed
Deputy Land Commissioner

September 10, 2003

Forest Plan Revision	Randy Moore	Jim Sanders
c/o Chippewa National Forest	Eastern Regional Forester	Forest Supervisor
200 Ash Avenue NW	Suite 580	8901 Grand Ave. Place
Cass Lake, MN 56633-8929	Milwaukee, WI 53203	Duluth, MN 55808-1102

St. Louis County does not support the proposed alternative in its entirety. Reductions in General Forest Emphasis acreage and Available Sale Quantities (ASQ), from levels in the current plan, are unacceptable. It is our position that more active management will be required to support those activities necessary to adequately manage for sustainable forest health and productivity. Dollars spent on fire fighting, insect and disease control (due to lack of management) will quickly outweigh value returned, under this proposal. This will especially be true if delays in active management become excessive. This costly effect is evidenced by budget deficits resulting from fighting fire and the numerous appeals in National Forests across the nation. This will also have immediate, direct and negative impacts on our programs because of the interconnected land management patterns with the Superior National Forest and St. Louis County.

Expanded Comments

- Forest-wide objectives should focus on obtaining the **optimum** return of value the forest land is capable of producing. The key word is optimum, which we define as; **that condition which provides the greatest cumulative value of both commodity and intangible values, sustainable into the future.** The future condition of the forest will be determined by actions taken in the present. Given this, actions not taken, or benign neglect of forest conditions, may jeopardize the future availability for any of these values and commodities. The proposed alternative has a tendency to promote benign neglect, instead of active management and further reinforces the perception of the loss of available resources.

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- Regardless of the product or value, whether it relates to wildlife habitat or timber, resource availability goes directly to the local quality of life. Strong communities attract interest from industries and companies which provide high paying jobs and value-added economic opportunities for a significant cross section of the public. Vital communities in our National Forests are also in the best interest of non-residents who visit and use the forest.
- Active and tangible management of forest resources are necessary to ensure that resources and values are consistently available. This management objective should be the **highest** priority of the Superior/Chippewa National Forests Plan.
- The proposed alternative implies that silviculture and timber harvest are restricted under Special Emphasis acreage. St. Louis County agrees that placing an emphasis on the environmental integrity of the Superior/Chippewa National Forest is imperative; however, this should not mean that forest values and products become, in any way, less available. This could be the result if Special Emphasis acreage is promoted over General Forest Emphasis acreage and is not clarified in the plan.
- The failure (*weakness*) of policies that divide the land base into a series of special use areas, is increasingly evident, as we see significant increases in disastrous fires, blow downs, and insect caused mortality. Retention of the majority of land for General Forest Emphasis will provide the optimum balance between commodities and intangible values.
- St. Louis County supports the professional judgement of USFS personnel. However, we have observed that Forest Service personnel and their professional judgement is often second-guessed or undermined by unclear and cumbersome regulation promoting court review and judgements for resolution. This is a waste of precious time and carries a high cost, and must be overcome. The Forest Service must continue to find (*actively seek*) ways to streamline processes to secure funding and reduce appeals which so often gridlock the agency.
- The proposed alternative also fails to provide convincing support for objectives/projects which require funding in order to meet stated goals. Funding of projects will ensure resource availability and will help imply a commitment for long-term, multiple-use management of the forest's resources.
- St. Louis County is concerned that if a primary industry cannot be reasonably assured of long term availability of affordable resources, that industry will either choose not to locate in the region or perhaps move its existing operations elsewhere.
- In addition, a reduction in resource availability can have detrimental impacts on land management programs controlled by other agencies. Other resource managers may be forced to make up the difference and provide more resources to attract and/or retain an industry, due to this pressure. Therefore, the perception and the existence of a stable long-term supply of available resources

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is critically important and currently lacking from the Superior/Chippewa National Forest Plan Proposed Alternative.

- Forest management ensures environmental integrity. The proposed alternative implies that significantly more land will be unavailable for active management. It is a false notion that land can be preserved from multiple use or influences. Active professional management of the resource should be of the highest priority. Therefore, a majority of land should be classified as General Forest Emphasis. We support the current plan in this regard.

St. Louis County agrees with:

- The 4 Basic Principles of Management outlined on page 1-8 of the printed text.
- The proposed alternative outcome on reducing General Forest Emphasis aspen type acreage to jack pine/spruce type acreage and longer rotation emphasis for higher value product and older age class production (where pertinent).
- Increased emphasis in semi-primitive motorized and non-motorized recreation as a means to encourage designated trail use (as proposed).
- Increased emphasis acreage of Conservation and Rare Features (as proposed).

St. Louis County does not agree with:

- The section entitled: Tools and Techniques, first Paragraph, "*The Forest will reach its desired conditions for vegetation through natural ecological processes and by using a diverse range of management tools and techniques.*" This statement is missing a temporal component and may inadvertently eliminate the use of some management and silvicultural techniques and tools. For example, a silvicultural technique or management tool may not be perceived as a natural, ecological process that improves the growth of timber to enhance its size class and product class in a shortened time frame. We strongly recommend the use of silviculture prescriptions to be the predominant tool, with silvicultural objectives being used as the techniques, to accomplish the goals, targets or objectives; no matter what the emphasis.
- The reduction of General Emphasis Acreage in amounts less than the current plan (with the exception of deductions allowed for proposed acreage for semi-primitive motorized and non-motorized acreage) or Conservation and Rare Features acreage, as stated above.
- Increasing the acreage above what is proposed for semi-primitive motorized and non-motorized and Rare Feature emphasis.

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- Any increases in Research and Natural Areas (RNA), or potential Research and Natural Areas or Experimental Forests (EF). The Forest Service should look to fund existing RNAs and EFs first. In our own region, the future of the Argonne Experimental Forest is in doubt, and would be a tremendous loss. In our opinion, new and underfunded RNAs or EFs are simply non-designated wilderness areas.
- Any increases in Wilderness Emphasis beyond what already exists.
- Any decrease of Available Sale Quantity less than the current plan, except that which applies to the decreased acreage described above.

Respectfully submitted,



David J. Epperly
Land Commissioner

c:\e\lo3\USFScomment

cc: County Commissioner Fay
County Commissioner Fink
County Commissioner Kron
County Commissioner Sweeney
County Commissioner Forsman
County Commissioner Raukar
County Commissioner Plesha
County Administrator David Twa

STEVE LUDWIG - FILE 104177

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Administrator's Office

Our mission is to deliver quality public services to the citizens in an effective, professional and efficient manner.

PO Box 3000, 303 Minnesota Avenue, Walker, MN 56484-3000
Phone: 218-547-7419 Facsimile: 218-547-7455 TDD: 218-547-1424
E-Mail: robert.yochum@co.cass.mn.us Web site services: www.co.cass.mn.us



EXTRACT OF MINUTES

August 5, 2003 - Cass County

Mr. Moody presented comments on the proposed USDA Forest Service Proposed Forest Plan Revisions for the Chippewa National Forest.

M/S/P Dowson, Lilyquist - To respectfully request that the USDA Forest Service Plan Revisions for the Chippewa National Forest incorporate the following Cass County principles:

1. We believe Alternative C is the most logical recommendation in the proposed forest plan for Chippewa National Forest;
2. We believe Alternative C provides the optimum socio/economic benefits to the communities surrounding the forest and that the level of harvest associated with Alternative will not result in any quantifiable negative ecological impacts;
3. We strongly support sustainable forest management and believe Alternative C will provide this sustainability while providing a superior socio-economic benefit than the other alternatives;
4. We oppose conversion of aspen type and recommend maintaining the aspen on all existing productive aspen sites. We do not oppose conversion of the off site aspen to more appropriate tree species;
5. We recommend that the sustainable harvest level for your aspen type be a minimum of 4,000 acres per year, we support an overall harvest level of a minimum of 6,500 -7,000 acres per year; Recommend the maintenance and/or development of adequate destination trail corridors be provided for in the plan and that continued cooperation between the Forest Service, DNR, and County be emphasized in the development or relocation of existing trails or corridors; and
6. We believe payments-in-lieu should be funded at 100% of the formula approved by law.

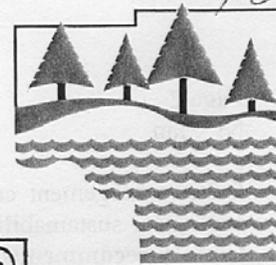
Unanimous.

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I do hereby certify that the foregoing is a true and correct copy of the Transcript of Proceedings of the Cass County Board of Commissioners Meeting held on Tuesday, August 5, 2003 at the Cass County Board of Commissioners Board Room, Courthouse, Walker, Minnesota. The minutes will be submitted for County Board approval on Tuesday, August 19, 2003.

ATTEST: Robert H. Yochum
Robert H. Yochum
Cass County Administrator

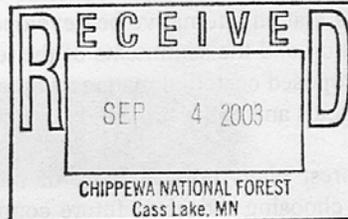
ITASCA COUNTY

Itasca County Courthouse
123 N.E. 4th Street
GRAND RAPIDS, MINNESOTA 55744-2600



September 3, 2003

Forest Plan Revision
Chippewa National Forest
200 Ash Avenue NW
Cass Lake, MN 56633-8929



Dear Sir/Madam,

The Itasca County Board of Commissioners and staff have been active participants in the process of reviewing Minnesota's national forest plans and have greatly appreciated the opportunity to work with line and staff representatives in their preparation of the new plans. The County has made personal visits, hosted forums and submitted numerous letters in an effort to make clear the views of officials who represent citizens of the county and the importance of the national forest's role in maintaining local community stability. Unfortunately, the views of county officials have been largely ignored.

Early on in the process, the County stated that the range of alternatives was inadequate and even offered to develop an additional alternative. The forest supervisor stated that the range of alternatives were "just preliminary" and could still be worked on. A matching book end alternative to the no-harvest alternative D would have appropriately proposed a level of active management much closer to the maximum biological potential of each forest. This was never developed which consequently resulted in alternative C to D being the range and E becoming some kind of compromise. Without a matching book end alternative to D, an adequate range of alternatives was never proposed or analyzed by the Forest Service.

The revised plans for the Chippewa and Superior National Forest are inconsistent with the direction of the Bush administration. The Healthy Forests Initiative is moving national forest policy in a direction of active management that will address hazardous fuel buildup and control of insect and disease problems associated with lack of management. At a time when there is broad-based local community support for this initiative throughout the United States, the forest supervisors and their planning teams are proposing a level of management that could best be described as custodial. The resulting quality of the forest is in sharp contrast to the growing demand for more timber volume with increased quality. At the same time the Bush administration is trying to remove unnecessary administrative obstacles, national forest personnel are rolling obstacles and constraints in the way. The cumulative effect of harvest constraints imposed on national

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forest management creates an imbalance to the three pillars of sustainability. Placing ecological sustainability over social and economic sustainability is unacceptable. **Itasca County recommends** that an alternative be developed that better reflects the direction of the Bush Administration and the sentiments of the local community. Active management is favored over the proposed custodial management and will result in a better contribution to overall landscape goals and better protection to non-federal forest resources.

Basing the forest plans on the range of natural variability concept, the Forest Service is arbitrarily choosing a desired future condition based on an estimated historic condition that is inherently flawed with assumptions, bias and missing information. When does a forest begin to provide the values of an old forest? The recommended age class distribution of timber types presents too wide of a range and amounts to excessive consideration for old forest values. The Forest Service Research and Development Team stated *“the concept and reference point of historic range of variability has little value in terms of reality in the 21st century. There is little utility in using them as a reference. In fact, there is great harm in suggesting them as ideals”*. **Itasca County recommends** that an additional alternative be developed with a desired future condition that is based on 21st century climate conditions and sustainable development principles that will provide for the present and future needs of citizens as well as scientifically-based consideration for maintaining species viability.

The forest supervisors are proposing to reduce the allowable sale quantity (ASQ) with little regard to the biological potential productivity of the respective forestland. On the Chippewa, Alternative E proposes an annual harvest ceiling of 50 MMBF out of 172 MMBF annual growth (29%). At this proposed harvest schedule, 23,000 acres out of 80,000 acres of over-mature aspen type will not be treated prior to natural mortality...left to naturally convert to brush or at best, under-stocked stands. **Itasca County does not support** converting aspen type by allowing aspen to simply over-mature and die.

Species viability concerns are based on predictions, subjective reasoning and opinion. Given such an important topic, some degree of *“benefit of the doubt”* may need to occur. However, certain harvest constraints being proposed with the intent of protecting species viability are not justified and are excessive. For example, Alternative E proposes a no-harvest treatment of large patches of existing old forest for the next 30+ years to protect species viability. With the majority of timber types being aspen, these stands will have little or no trees to harvest in 30 years. What will the old forest value of these acres be then? In addition, the collective amount of Alternative E no-harvest treatment #17 is 113,000 acres. This is in sharp contrast to the 62,255 acres of proposed harvest treatments. **Itasca County recommends** that the forest be treated today and live its useful life as an old forest until it is harvested and then again 50-100 years from now (depending on species).

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The 219 planning regulations allow the regional forester to depart from the non-declining even flow constraint if it will lead to better attaining the overall objectives of multiple-use management. The Organic Act states that: "*No national forest shall be established except to improve and protect the forest within the boundaries or for the purpose of securing favorable conditions of water flows and to furnish a continuous supply of timber.*" Presently, the custodial management trend has resulted in more trees lost to mortality from diseases, insects, wind and fire than is harvested by wood processors. That mortality of trees has created an enormous hazard for epidemics of diseases and insects that could rapidly spread to adjoining forestland owners. Those trees are also a major fire hazard with a high risk of fires burning into other ownerships and threatening the safety of citizens living in the forest, threatening private dwellings and destroying valuable wood products. (See attachments) Under these forest conditions and based on Section 219.16 (3) (ii) (iii), **Itasca County recommends** that the regional forester exercise this authority and depart from the non-declining even flow constraint to significantly reduce high mortality losses and subsequent buildup of hazardous fuels. Departure would also mitigate the adverse economic impacts to local communities that result from massive areas of forest being left to fall apart while trying to apply the non-declining even flow constraint to an unregulated forest.

Itasca County recommends increasing by 50% the miles of new ATV (135) and snowmobile trails (150 and 195) that *can be* constructed and/or designated on each forest. The projected increase in demand for recreational use justifies more designated trails. **Itasca County recommends** that ATV use of new, low standard roads be allowed until site-specific decisions are made for each road. Itasca County generally does not support reducing access by decommissioning of roads. **Itasca County recommends** that consideration for decommissioning of roads be made on a case by case basis, with site-specific information, rather than a target of 200 miles. **Itasca County recommends** that ATV use of unclassified and existing low standard roads on the Chippewa be allowed until site-specific decisions are made on each road. All site-specific decisions should include input from neighboring land management agencies and local recreational organizations.

Itasca County supports the use of prescribed fire as a management tool when it is used in connection with active timber harvesting and most preferably to prepare a site for regeneration after harvest. However, millions of dollars are spent in the National Forest System on prescribed fire to reduce hazards at a time when forest supervisors state that there is inadequate funding for increasing volume of wood for harvest. **Itasca County supports** increasing the harvest of wood to reduce hazardous fuel buildup. The preferred alternative E proposes to burn about 20,000 acres/year for the next ten years, and at what cost? **Itasca County opposes** the intentional burning of commercial forestland prior to harvest.

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The national Scenery Management System standards appear to have been developed for application in some other part of the country. For example, buffers of ¼ mile are required for high scenic value corridors. This is excessive when one can often only see tens of feet. **Itasca County recommends** that the Forest Service use visual quality guidelines that were developed by a broad cross-section of local community members who live here and are interested in forestry and tourism.

Prescriptive management based on biophysical information and proven silvicultural practices will produce high quality habitat, rich autumn colors and exceptional scenery. Timber harvesting plays an important role in balancing these environmental quality values. You can have both.

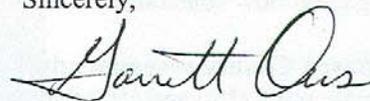
We are optimistic that with new leadership, the local community will not be ignored. Thank you for the opportunity to provide comments on the management of Minnesota's national forests.

Sincerely,



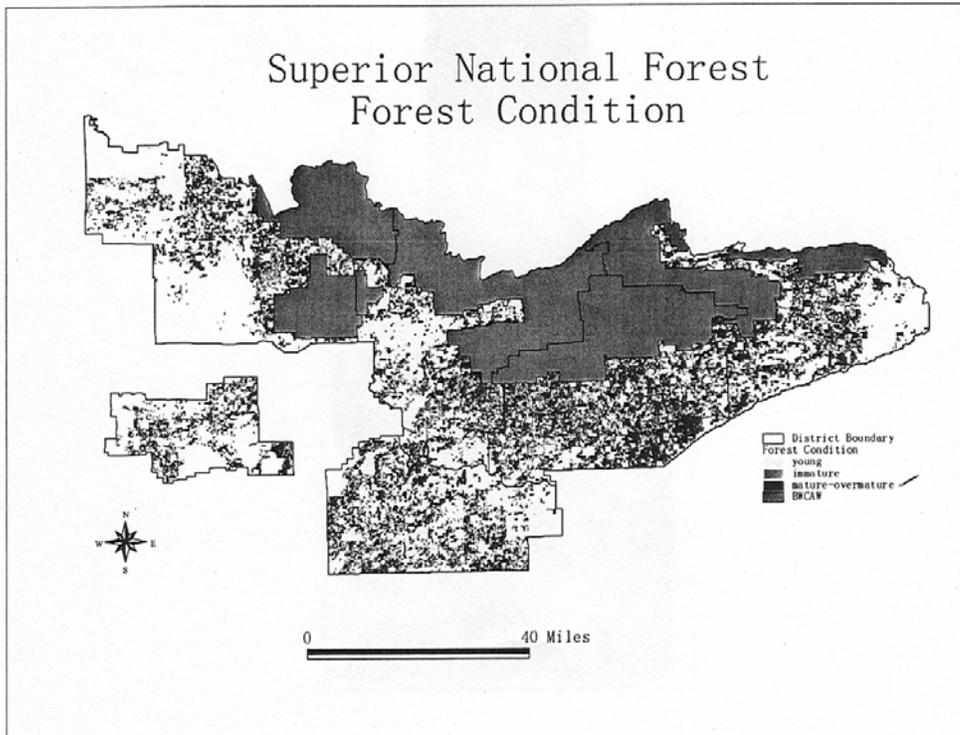
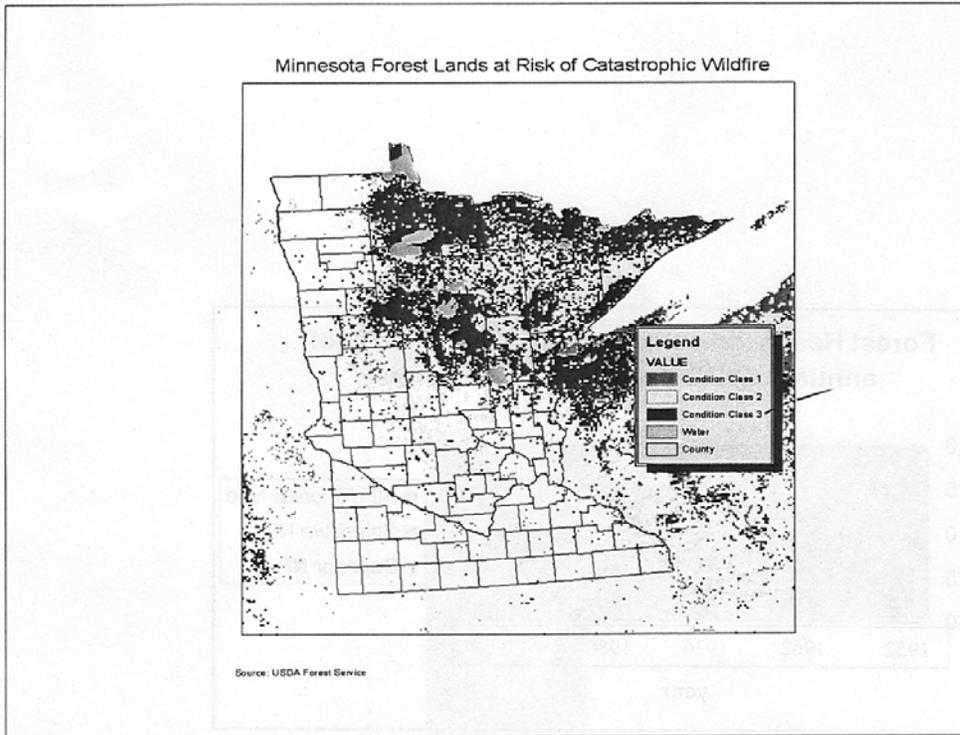
Mark Mandich, Chair
Itasca County Board of Commissioners

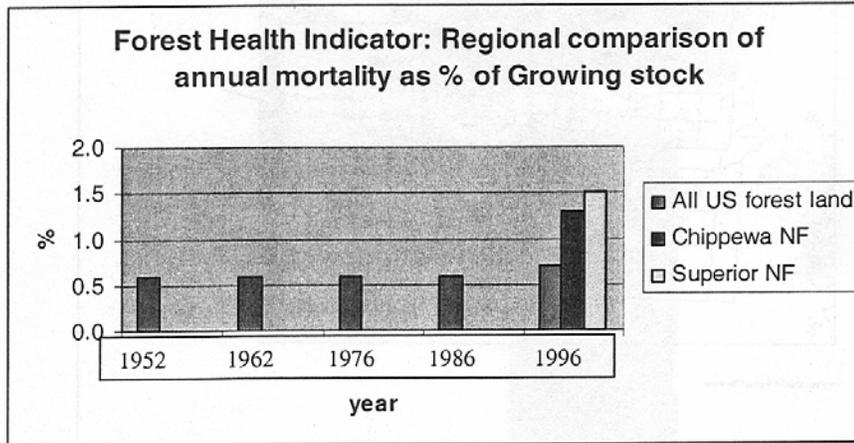
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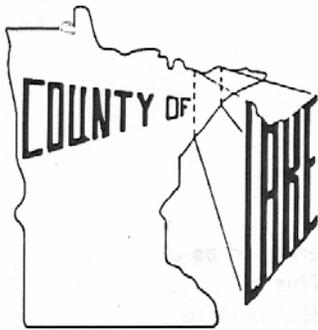


Garrett Ous
Itasca County Land Commissioner

- C:
- Norm Wagoner, CNF Supervisor
 - Jim Sanders, SNF Supervisor
 - Randy Moore, Region 9 Forest Supervisor
 - Dale Bosworth, Chief of the Forest Service
 - David P. Tenny, Deputy Under Secretary
 - Mark E. Rey, Under Secretary for Natural Resources and Environment
 - Honorable Senator Norm Coleman
 - Honorable Senator Mark Dayton
 - Honorable Representative James Oberstar







COMMISSIONERS' OFFICE
County of Lake

Courthouse
 601 Third Avenue
 Two Harbors, MN 55616
 (218) 834-8320 FAX (218) 834-8360

1091

FIRST DISTRICT
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 SECOND DISTRICT
 DERRICK L. GOUTERMONT, SILVER BAY
 THIRD DISTRICT
 LARRY LARSON, TWO HARBORS
 FOURTH DISTRICT
 WILLARD M. CLARK, TWO HARBORS
 FIFTH DISTRICT
 LENORE M. JOHNSON, TWO HARBORS

September 9, 2003

Forest Plan Revision
 Chippewa National Forest
 200 Ash Avenue, NW
 Cass Lake, MN 56633-8929

RE: Comments on United States Forest Service Plan for the Superior National Forest

These comments concern the proposed Alternative E for the Superior National Forest and how it affects Lake County, Minnesota.

The percentage of federal land managed by the Forest Service in Lake County is 58%. Included in this percentage is the BWCAW which accounts for 25% of the county land base which cannot be managed for timber or fiber. Special interest groups state that the loss of Forest Service timber is of no consequence because it is only 4% of the land base in Minnesota. There is a tremendous impact on Lake County and Northeastern Minnesota when the amount of federal timber is limited by special interest group timber sale appeals, the NEPA process, limited appropriate personnel and budget constraints. The concerns and suggestions listed below are meant to ensure not only the ecological viability of the forest but also the economic and social viability of local communities.

- The mission of the Forest Service is to provide local economies with an even flow of timber. This has not been happening, resulting in very high stumpage prices, and economic hardship on loggers, industry, and local communities.
- In the Boundary Waters Canoe Area Wilderness Act of 1978 it states in part, "The Secretary shall ... expedite the intensification of resource management including emphasis on softwood timber production and hardwood utilization on the national forest lands in Minnesota outside the wilderness to offset, to the extent feasible, the reduction in the programmed allowable timber harvest resulting from reclassification of

Forest Plan Revision
September 9, 2003
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the Boundary Waters Area..." In recent years, the BWCAW has been used as a means to curtail logging rather than to intensify timber utilization. This mindset should change and timber utilization should increase outside of the BWCAW to provide all age classes and cover types across the landscape to move toward the RNV.

- Eighty percent of the land base of Lake County is within the boundaries of the Superior National Forest. Despite this, two ranger stations in Lake County, located in Two Harbors and Isabella, have been permanently closed. The stations are gone, along with the loss of jobs, taxes, citizens for our community, and students for our schools.
- Lake County has lost approximately 50 businesses due to the BWCAW legislation and the configuration of federal lands in Lake County.
- Although approximately 33 percent of the BWCAW is located in Lake County, the existing businesses that benefit local economies and communities are located in St. Louis and Cook Counties. Lake County provides search and rescue efforts for the people that spend money in St. Louis and Cook Counties but get lost or hurt in Lake County.
- The Forest Service plan needs to address this imbalance of economic responsibility that is placed on all three Northeastern counties, and especially on Lake County, by the preponderance of federal lands. The new plan should address the current and future economic and social needs of the three counties that shoulder the responsibility of providing services for the people of our state and nation that utilize and recreate on federal lands.
- There should be no additional wilderness added to the Superior National Forest. More wilderness would have a negative affect on forest health and local economies and would negatively affect some recreational opportunities. More wilderness would not add value to the BWCAW and would restrict local day use.
- Scenic areas should be managed for aesthetics by timber management rather than by costly salvage after a blow down, or insect and disease damage. We should learn a lesson from the Gunflint Trail experience and manage for aesthetics by timber harvest, to work towards a healthier forest.
- The salvaging of downed or diseased timber is not in the plan. A salvage strategy should be addressed as it applies to forest health issues.

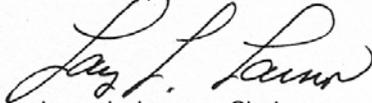
Forest Plan Revision
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- In alternative E, there are 366,037 acres of Longer Rotation Emphasis forest. As stated in the proposed plan, endemic insect and disease populations exist in these stands. Forests in this category should be routinely inventoried to enable the salvaging of merchantable resources before they are not able to be utilized. Prompt utilization of these resources can provide much needed timber and fiber and can negate the need for costly mechanical piling and burning. A routine monitoring schedule for longer rotation stands would benefit forest health by preventing the spread of disease and insect infestation. Prompt salvaging would benefit industry and local communities by increased fiber, timber and jobs. Prompt salvaging would decrease fuel loading, reduce fire danger and reduce costly cleanup costs.
- Old growth should continue to be transient on the landscape. Permanently located old growth does not allow the flexibility of salvaging areas hit by catastrophic events. Permanent designations tend to be permanent no matter the condition of the forest.
- The designation of Research Natural Areas (RNAs) and Proposed Research Natural Areas (PRNAs) should be discontinued. The PRNAs in Alternative E are described as not suitable for timber management. However, 54 percent of the 18,217 acres listed are in an upland ecosystem. When areas are designated as RNAs or PRNAs, all flexibility is lost and these areas cannot be managed when needed, such as after natural disturbances.

Since the onset of the anti-timber harvest special interest group lawsuits and appeals, there has been a lack of land management of Forest Service lands. Alternative E has a goal of 13,000 acres of timber harvest per year. The ASQ of 82 million board feet per year needs to be met or exceeded if local communities are to survive. The timely salvaging of merchantable downed or diseased timber in addition to the 82 MBF ASQ could have a positive affect on the economic and social health of communities if provided in an even flow over the duration of the life of the plan. Timber harvests of 13,000 acres per year, done in the proper manner, would move the forest towards the Range of Natural Variation.

Sustainability is defined as the balancing of social, economic and ecological objectives. Lake County is committed to working with the Forest Service, now and in the future, but would like to have social and economic objectives take an equal share of the planning process and future implementation.

Sincerely,



Larry L. Larson, Chairman
Lake County Board of Commissioners

LLL/whr



COMMISSIONERS' OFFICE
County of Lake

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 Two Harbors, MN 55616
 (218) 834-8320 FAX (218) 834-8360

FIRST DISTRICT
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 LARRY LARSON, TWO HARBORS
 FOURTH DISTRICT
 WILLARD M. CLARK, TWO HARBORS
 FIFTH DISTRICT
 EUGENE M. JOHNSON, TWO HARBORS

RECEIVED: 7/30/03
 INITIALS: JRW

**RESOLUTION NO. 03072403
 OPPOSING THE PREFERRED ALTERNATIVE
 OF THE PROPOSED SUPERIOR NATIONAL FOREST PLAN
 AS SELECTED BY THE U.S.F.S.**

WHEREAS, the Proposed Alternatives are not consistent with the historic and agreed upon principles for the establishment of the Superior National Forest; and

WHEREAS, Lake County turned over land and sold land to the U.S.F.S. to improve the forest and provide economic benefits to Lake County and the State of Minnesota; and

WHEREAS, the lack of management of the Superior National Forest negatively affects the forest health and the economic viability, and social well-being of the local area; and

WHEREAS, if the Proposed Alternative E includes any increase in special areas or wilderness the result will be a greater negative impact on the local jobs and economy; and

WHEREAS, if the Forest Service continues to reduce the supply of wood fiber resulting in the loss of jobs and an increased need for imports to supply our people, forest health will continue to decline due to age and disease.

NOW THEREFORE BE IT RESOLVED, that the Lake County Board of Commissioners recognizes the great importance of the Superior National Forest as an exceptional natural resource which provides economic, social and biological benefits on a sustainable basis.

BE IT FURTHER RESOLVED, that it is Lake County's desire to continue to work in partnership with the U.S.F.S. to ensure that the Superior National Forest is managed to become a healthy forest for the present and future to provide recreation and jobs for Lake County and the entire region.

Adopted: July 24, 2003

WILMA H. RAHN, CLERK OF THE BOARD

AN EQUAL OPPORTUNITY EMPLOYER

RESOLUTION NO. 03072403

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Commissioner Nelson moved the adoption of the foregoing resolution and the same was declared adopted upon unanimous yea vote of all members present. Absent: None

State of Minnesota)

ss.

County of L A K E)

I, Wilma H. Rahn, Clerk of the Board, Lake County Minnesota, do hereby certify that I have compared the foregoing resolution with the original filed in my office on the 24th day of July 2003 and that the same is a true and correct copy of the whole thereof.

WITNESS my hand and seal of office at Two Harbors, Minnesota this 28th day of July 2003.



Wilma H. Rahn
Clerk of the Board



1084

Beltrami County

Natural Resource Management

September 8, 2003

General Information (218) 759-4210

(800) 439-0898
Fax (218) 759-8137

nrm.beltrami@co.beltrami.mn.us

*Robert Milne
Director of Resource Management /
Land Commissioner
(218) 759-4160*

*Kelly Brown
Natural Resource Manager
(218) 759-4514*

*Paul Lundin
Natural Resource Manager
(218) 759-4513*

*Greg Snyder
Natural Resource Planner
(218) 759-4163*

*Jim Pietruszewski
Natural Resource Manager
(218) 759-4164*

*Pat Churack
Natural Resource Manager
(218) 759-4536*

*Debra Tweet
Natural Resource Clerk
(218) 759-4210*

*John Mueller
Recreation Technician
(218) 759-4165*

Forest Plan Revision
Chippewa National Forest
200 Ash Avenue NW
Cass Lake, MN 56633-8929

As the Land Commissioner for Beltrami County and Certified Forester through the Society of American foresters, I would like offer comments on the proposed Forest Plan Revision.

Alternatives C vs. Alternative E

Based on my background as a land manager and a Certified Forester, I believe that Alternative C would be an appropriate choice. However, if Alternative E is selected, there should be assurance for the local communities that the "allowable" harvest levels would be goal oriented. The Chippewa National Forests has struggled with providing local communities with support through their harvest program. This is a local resource that can and should be managed through the application of appropriate silvicultural prescriptions for the local economies.

Fire as a Management Tool

Fire can be appropriate in certain circumstances. It should be used for site preparation and to reduce vegetation competition. Planned burns or "let burn" policies should not be used if it will destroy merchantable timber. This should be harvested through appropriate silvicultural applications.

Visual Quality

The forest service should not only use the Minnesota Visual Quality Guidelines for management around its lakes, streams, and roads, but it should also support and use "Sustaining Minnesota Forest Resources: Voluntary Site-Level Forest Management Guidelines". These "Guidelines" have been cooperatively developed for management of Minnesota's forest resources and are very applicable to the management of the Chippewa National Forest.

Please consider the needs of the local communities. Appropriate forest management will benefit everybody. Thank you for considering these comments in your forest plan revision.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Milne".

Robert Milne, CF
Director of Resource Management / Land Commissioner

1251



Cook County Board of Commissioners

COURT HOUSE • 411 W. 2nd St. • GRAND MARAIS, MINNESOTA 55604 • (218) 387-3602 • FAX (218) 387-3042

District 1	Janice Hall
District 2	Walter Mianowski
District 3	Robert Fenwick
District 4	Gene Erickson
District 5	Bruce Martinson

August 27, 2003

Forest Plan Revision
Superior National Forest
8901 Grand Avenue
Duluth, MN 55808

Dear Sir/Madam:

Cook County submits the following comments regarding the proposed management plan (Alternative E) for the Superior National Forest.

The comments challenge the Forest Service to process the potential of the different alternatives outside of the traditional parameters that have existed with the present management plan. This challenge requires all participants to keep an open mind the review all possibilities.

Cook County wishes to acknowledge the Forest Service efforts to work with the county in understanding the review process as well as the proposed alternatives.

Respectfully,

Robert Fenwick
Cook County Board Chair

– An Equal Opportunity Employer –

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ALTERNATIVE E

“Compared to other alternatives, the Forest would be managed in a way that provides the most kinds of economic opportunities. Promotes timber and tourism revenues by emphasizing timber management, recreational opportunities, scenic landscapes and diverse wildlife habitats”

The 7 different alternatives vary little for the first 20 years but the importance of what alternative is chosen today is the management philosophy that directs the future. Yet, the philosophy that is the basis of management needs to be a flexible guideline. If the alternative becomes a rigid boundary for management then the Forest Service will have issues. Flexibility needs to prevail in this period of public ground swells that strongly influence management practices.

Timber:

Alternative E promotes timber and tourism revenues by emphasizing timber management ----

The language in this statement advocates emphasizing timber management. The discussions between Cook County and the Forest Service have been dominated by the Forest Service management philosophy that timber production is not the priority but to manage what is on the ground. Managing what is on the ground does not appear to emphasize timber management but finding a balance between National Forest issues.

The past ASQ was set at 96 MMBF. This guideline has not been obtained for many years. Alternative E set a new ASQ at 82 MMBF. Again this guideline is not a guarantee but a benchmark. Obtaining this benchmark is questionable relative to budgets, weather, insect infestations, disease, and fire. To read that Alternative E promotes timber management but supports a 15% reduction in the ASQ does not appear to be congruent. Cook County challenges the Forest Service to achieve the stated guideline of 82MMBF per year if not exceed this guideline. Cook County believes the Forest Service has an obligation to fulfill because the Forest Service is the predominant landowner in the county. This ownership dictates a management philosophy that supports the local timber industry.

Cook County challenges the Forest Service to define a flexible policy based on common sense when defining buffer areas. Alternative E was developed with a parameter that defined buffer zones to be ¼ mile. This ¼ mile potentially limits timber harvest as well as recreational opportunities. Many buffer zones do not need the requirement due to location or topography.

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Vegetation:

Alternative E uses primarily even-aged management and some uneven-aged management to shape the forest of tomorrow. There would not be drastic changes for 20 years but the forest footprint would be cast. The present forest would be directed towards the 70% conifer, 30% deciduous, older trees guideline. This process supports vegetation towards a range of natural variation. This range of natural variation under the constraints of legislation may appear to be appropriate but Cook County has concerns about the Forest Service response to the times. The old conifers were harvested with the orientation to natural regeneration of the aspen stand. Aspen became the prominent production species while pine, though important became a secondary species. Alternative E rebounds from this philosophy by projecting a 100-year goal of 70% conifer/30% deciduous. Cook County believes the pendulum should not swing to this end but find a balance at 60% conifer/40% deciduous. This guideline would provide the opportunity for older growth in a range of natural variation.

Clearcut Acres:

The percentage of clearcuts does not change significantly between the present management plan and the proposed Alternative E. Further, Cook County does support alternate management practices (i.e. select cut) where appropriate and the practices support a range of natural variability. The spatial management or fragmentation is important with the harvesting objectives. Reviewing what is on the ground and how the ground is managed for future contribution to this natural resource is important. This review will continue to support the management tool of clearcutting and selective cutting. This treatment is especially true with the 10 decade forest goals.

Wildlife Habitat:

The proposed alternative supports a range of natural variability that enhances the range of wildlife species. This statement projects a potential that can be acquainted with any major philosophical change in management. The range of wildlife species is important but what seems even more critical is maintaining a balance. As indicated, wildlife species are affected by habitat changes, predation, weather, insects, and disease. For migratory species, the issue may not be local as much as it is foreign (i.e. another country). To pursue maintenance of wildlife species that rarely frequent the forest at the cost of balance of other species is defeating. Nature has adapted to civilization development for centuries and will continue to do so. Areas have been set aside as wilderness and other areas have been isolated for semi-wilderness. In addition, there are wooded areas rarely influenced by human activity. These areas provide

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the wilderness for the unique species and no further steps need to be taken to invent/create/protect special wildlife areas that support a very minimal population.

Fire:

Alternative E proposes to use fire as a management tool. This tool would be used to create natural disturbances, site prep, and fuel reduction. This tool provides a low/moderate risk and should be used more often as a preventive measure by reducing fuels. Cook County concern is that this tool can be over used. MFI states that Alternative E supports the burning of 20,000 acres a year – 200,000 acres in the first decade. Cook County cannot verify these figures but would certainly oppose this extensive use if the numbers are accurate.

There are MA of over mature vegetation that are accumulating fuels that are a potential hazard. These must be addressed with an aggressive management plan to prevent the complete loss of resource. The management plan can include harvesting as well as fuel reduction via fire.

These over mature MA must be addressed to prevent catastrophic fire and protect community resources.

Riparian:

Alternative E proposes to make more riparian areas available for recreational pursuits. These riparian areas would be approached via proactive management versus mitigation. Cook County is an advocate for a proactive approach rather than spending revenues in mitigation.

Recreation:

Alternative E responds to those individuals who seek recreational opportunities and lifestyles that include motored activities such as snowmobiles and ATVs' in a more developed forest setting. The recreation choices available to individuals should be supported within the resources of the Superior National Forest. The importance being that a balance be found between the different recreational opportunities. The BWCAW exists for the canoe/kayak wilderness experience. How much acreage and resources are used to maintain this opportunity? Is this recreational allocation equivalent to other recreational opportunities? Balance. Every individual should have an opportunity to experience their recreational pursuit as long as that pursuit is associated with the Superior National Forest agenda.

**All Terrain Vehicles:
Snowmobiles:**

Alternative E advocates use of motorized vehicles in the Superior National Forest. Cook County supports the use of motorized vehicles in the Superior National Forest. Cook County recognizes that with motorized vehicles there are issues. Issues which require monitoring and enforcement yet designated trails do assist in concentrating use to particular areas.

Cook County supports efforts made to provide a balanced recreational spectrum. This spectrum ranges from the wilderness experience to the motorized trails. These recreational opportunities are important because recreation is a prime industry in Cook County.

Water Access:

Increasing water access influences recreational opportunities. Since recreation is a primary industry in Cook County, the county supports this recreational enhancement. Again, Cook County identifies that there will be more issues arising due to the improved water access. But, providing additional recreational opportunities will have an economic influence.

Potential Wilderness:

Cook County supports no increase in the wilderness area.

Recommended

SMC:

RNA:

Cook County understands that research natural areas assist the Forest Service in understanding the natural process of the forest/wildlife species. Alternative E recommends 11 RNA's consisting of 19,000 acres. This acreage has not been defined. Cook County would oppose these RNA's if harvestable timber is removed from the market. There are 660,000 federal acres in Cook County. Approximately 250,000 acres are available for timber management. There is no reason to decrease this acreage. These acres are the economic base for the timber industry in Cook County.

CERTIFIED COPY OF RESOLUTION OF COUNTY BOARD OF COOK COUNTY, MINNESOTA
RESOLUTION # 2003-59 ADOPTED July 22, 2003

By Commissioner Erickson

RECEIVED: 8/6/03
INITIALS:

RESOLUTION # 2003-59

WHEREAS, 261,286 acres of federal land in northeastern Minnesota are designated as wilderness area in the BWCAW; and

WHEREAS, the privately-owned acreage in Cook County is 87,018 acres, or 9.18% of the total county; and

WHEREAS, the Superior National Forest management alternative presently proposed suggests no additional wilderness acres; and

WHEREAS, land managed for multiple use is important for supporting various commercial, agricultural and recreational activities; and

WHEREAS, the Cook County Board of Commissioners believes that land managed for multiple use is vital to the economic, social, and cultural health of Cook County.

NOW, THEREFORE BE IT RESOLVED, that the Cook County Board of Commissioners strongly supports that part of the proposed plan which calls for no further wilderness area designation, and further, encourages no further net loss in multiple use managed lands.

Commissioner Mianowski seconded the motion for the adoption of the resolution and it was declared adopted upon the following vote:

- Ayes: Erickson, Mianowski, Hall, Fenwick, Martinson.
- Nays: None.
- Absent: None.

STATE OF MINNESOTA)
County of Cook) ss.
Office of County Auditor,)

I, Braidy Powers, Auditor of the County of Cook, do hereby certify that I have compared the foregoing with the original resolution filed in my office on the 22nd day of July, 2003, and that the same is a true and correct copy of the whole thereof.

WITNESS MY HAND AND SEAL OF OFFICE at Grand Marais, Minnesota, this 22nd day of July 2003.

County Auditor Braidy Powers
By Amel Wick Deputy

SEP-10-2003 11:51

IND SCHOOL DIST #166

1169 2.02/02



COOK COUNTY SCHOOLS

INDEPENDENT SCHOOL DISTRICT 166

P.O. BOX 1030, GRAND MARAIS, MINNESOTA 55604
 PHONE 218-387-2271 FAX 218-387-1093

CHUCK FUTTERER, Superintendent/Elementary Principal
 EMAIL cfutterer@isd166.k12.mn.us

Forest Plan Revision
 Chippewa National Forest
 200 Ash Avenue NW
 Cass Lake, MN 56633-8929

RE: Superior National Forest Plan Revisions DEIS

We, the Board of Education at ISD 166 in Cook County are commenting on the Superior National Forest plan revision. We recommend that the U.S. Forest Service implement alternative C. We believe that this alternative provides the best balance between social, economic and environmental concerns.

Alternative C is designed to maintain a sustainable harvest without depleting forest resources. The proposed low timber volume sales of alternative plans would have a negative impact on our school district through the potential loss of students as their parents become unemployed and move and with the loss of school district revenue that is tied to timber sales.

We voted at our September 8th meeting to express our support for alternative C. This plan harvests approximately 50% of the annual growth, provides substantially more economic activity than other alternatives and establishes healthy and productive forest conditions.

Sincerely,

Jane Mianowski
 School Board Chair

September 9, 2003

COOK COUNTY
 MIDDLE / HIGH SCHOOL
 387-2273

SAWTOOTH MOUNTAIN
 ELEMENTARY
 387-1273

GRAND PORTAGE
 ELEMENTARY
 475-2345

BIRCH GROVE
 ELEMENTARY
 663-7636