

August 3, 2017

Mr. John Korzeniowski  
Minnesota Department of Natural Resources  
6543 Haven Road  
Little Falls, MN 56345

RE: Revised Sand Dunes State Forest Operational Plan

Mr. Korzeniowski,

We, the undersigned organizations and the members we represent, provide the following comments during the open public comment period for the “Revised Operational Plan for the Management of Sand Dunes State Forest, 2013-2022.”

### **Vegetation Management Action Plan (Part A)**

- We support the decision to adopt a shorter timeframe to guide management decisions in the SDSF. We feel the plan, while doing a good job in accommodating local concerns, has the potential to set a statewide precedent; restricting what is best in the interest of the state’s resources when bowing to the “not in my backyard” pressure applied by adjacent landowners. We can’t forget that the SDSF is a state property that has been present many years before most of the residents in the area.
- The proposed Final Harvest (clearcut) of 236 acres of oak woodland within DNR identified High Conservation Value Forest will adversely affect those features DNR identified as having High Conservation Value. An alternative prescription is advised to balance timber harvest and stand regeneration goals with those of the High Conservation Value Forest. A suggested alternative is to limit final oak-stand harvest to patches 10 acres or smaller, and leave at least 660’ buffer between neighboring patches.
- None of the Species in Greatest Conservation Need found within SDSF require pine stands to complete their lifecycle. Specify within the plan that timber stands located within DNR identified High Conservation Value Forest not be replanted with pine, and that pine regeneration and spread be controlled in these areas.
- Many species of plant and wildlife may be adversely affected by summer timber harvest practices. In addition, unfrozen ground is more susceptible to erosion by logging equipment. The Plan should state that timber stands located within DNR identified High Conservation Value Forest first be offered for sale with a winter harvest (December 1 to March 1, inclusive) restriction. If these stands go unsold with the harvest timing restriction, work with biologists/botanists from the Division

of Ecological and Water Resources to develop an alternative prescription to allow summer harvest. Contracts should clearly identify measures to avoid and minimize impacts to features having High Conservation Value, and should include penalties for violating avoidance and minimization measures.

- Site A on Map 10: Modify boundary to encompass the entire area of oak savanna that was treated via a commercial timber sale in the last 36 months to avoid further fragmentation within the site by burn breaks, etc. The entire area should be evaluated for site maintenance and treated to control invasive species and enhance habitat for Species in Greatest Conservation Need.

### **Recreation Action Plan (Part B)**

- More clearly identify Nature Viewing as an important recreational activity within the forest, and discuss current trends and economic benefits in Minnesota and beyond.
- Develop periodic “educational tours” with emphasis on rare features in the SDSF, to be conducted annually to introduce new residents and remind visitors of these resources. The signatories to this letter could be contacted to assist DNR in such endeavors, if needed.
- Identify the Horse Campground as an area requiring maintenance action to enhance habitat (i.e., invasive species control, reseed with native grasses and forbs) and to improve aesthetics. In addition to a popular recreational destination, this area is home to several Species in Greatest Conservation Need that may benefit from habitat enhancement.
- The trail system within SDSF is already quite extensive. Any proposed expansion of the trail system within SDSF should undergo careful review to avoid and minimize adverse affects to rare features and other sensitive areas.
- Implement additional signage explaining the value of the rare features within the SDSF at equestrian trailheads, campgrounds, and at locations where trails pass adjacent sensitive habitats. Signage is also important where trails enter from adjacent residential areas, since many users enter from these locations.
- We recommend DNR monitor trail-use at, and adjacent to, sensitive areas and to identify steps to address trail usage that adversely affects sensitive areas.

### **Permanent School Trust Lands (Part C)**

- Explicitly commit that no additional Trust lands be added to SDSF, given the current challenges of managing SDSF for its DNR identified High Conservation Values while meeting the fiduciary Trust responsibility.
- Clearly identify a plan to compensate and/or buyout the Trust lands located within the forest.

### **Forest Roads (Part D)**

- Many Species in Greatest Conservation Need occur in, or immediately adjacent to, roadsides within SDSF. For existing Orrock Township roads within SDSF that lack easements, it is recommended that DNR provide an easement to the Township for only the driving surface of the roadway and the first eight feet of the roadside (inslope). This will minimize adverse effects to rare plants and wildlife inhabiting ditch bottoms and backslopes, and provide the Township the ability to maintain a safe driving surface.
- Specify that mowing roadsides with easements shall follow the state mowing law. As required by state law, require that reseeded soils shall use seed mixes from native species of a local ecotype to Sherburne or Benton County.
- To reduce traffic volume and speed, identify a plan to work with the Township to reclaim portions of 253<sup>rd</sup> Ave. NW as a gravel forest road (between 180<sup>th</sup> and the existing gravel to the east). Reducing traffic speed and volume will increase recreational forest-user safety, and reduces the likelihood of wildlife-vehicle collisions.
- Post a sign at the entrance to SDSF on 253<sup>rd</sup> Ave. NW that the road is closed to through traffic to reduce wildlife-vehicle collisions.

### **Additional Comments**

- The Rusty-patched Bumble Bee (*Bombus affinis*), a species recently listed as "endangered" under the federal Endangered Species Act (ESA), has recently been found within Sand Dunes State Forest. The Operational Plan should include a process through which this species receives the appropriate protection under the ESA.
- It is important to ensure statewide stakeholders as well as local constituencies continue to be informed when making decisions regarding public use and management of the lands and resources within the SDSF.

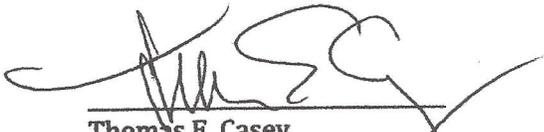
We appreciate DNR's willingness to engage citizens of Minnesota in the development of the Revised Operational Plan for the Management of Sand Dunes State Forest, and appreciate your consideration of the comments and recommendations included here.

Sincerely,



Kyle Arola  
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Minnesota Chapter, The Wildlife Society

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