



Department of Natural Resources Timber Harvest Decisions in Wildlife Management Areas

Special Review

October 2025

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Office of the Legislative Auditor
State of Minnesota**

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October 14, 2025

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Sarah Strommen, Commissioner
Department of Natural Resources

For many years, the Department of Natural Resources (DNR) has received federal grant funds to pay for administering timber sales and conducting other wildlife habitat management activities in wildlife management areas (WMAs). In August 2023, the U.S. Fish and Wildlife Service—the federal entity that oversees these grants—temporarily suspended DNR’s 2021–2023 grant, delayed approval of its 2023–2025 grant, and prohibited timber sales from WMAs due to the Service’s concerns about DNR’s compliance with grant requirements.

By law, DNR is authorized to harvest timber in WMAs only to protect, perpetuate, or reestablish habitat to produce wildlife, including for public hunting, fishing, trapping, and similar outdoor recreational uses. We found that a lack of plans, poor documentation, unclear guidance, and conflicting goals have resulted in uncertainty as to whether DNR has met these statutory requirements. We make recommendations to DNR and the Legislature related to WMA planning, and we make several additional recommendations to DNR.

This special review was conducted by Katherine Theisen and Joel Alter. DNR cooperated fully with our review, and we thank them for their assistance.

Sincerely,



Judy Randall
Legislative Auditor



Katherine Theisen
Deputy Legislative Auditor



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Department of Natural Resources Timber Harvest Decisions in Wildlife Management Areas

A lack of plans, poor documentation, unclear guidance, and conflicting goals have resulted in uncertainty as to whether the Department of Natural Resources (DNR) has met statutory requirements to harvest timber in wildlife management areas (WMAs) only for the benefit of wildlife and related recreation.

Report Summary

Federal Grant Suspension

For many years, Minnesota has received federal grant funds to pay for administering timber sales in WMAs, among other wildlife habitat management activities. In August 2023, the U.S. Fish and Wildlife Service—the federal entity that oversees these grants—suspended DNR’s 2021–2023 grant, delayed approval of its 2023–2025 grant, and prohibited timber sales from WMAs due to the Service’s concerns about DNR’s compliance with grant requirements.

- From 2020 through 2023, the U.S. Fish and Wildlife Service repeatedly told DNR that the department was not properly documenting the wildlife benefits of timber harvests in WMAs prior to initiating those harvests. DNR did not take the steps necessary to comply with federal grant requirements for several years, claiming that its noncompliance was due to misunderstandings. However, there were numerous opportunities for DNR to clarify any confusion it may have had regarding the grant conditions. (p. 10)

Recommendation ► DNR should ensure it understands the U.S. Fish and Wildlife Service’s expectations for its documentation and use of federal grant funds, and it should comply with federal grant requirements. (p. 24)

Wildlife Management Area Planning

WMA plans specify the wildlife habitats a WMA is intended to protect, the goals and objectives of DNR’s wildlife habitat management in the WMA, the activities DNR will undertake to achieve its goals, and the metrics DNR will use to measure its progress toward meeting its goals.

- DNR has developed plans for a small number of the state’s WMAs. Without such plans, it is difficult to determine whether timber harvesting benefits the wildlife habitats WMAs are intended to protect. For the WMAs that have had plans, DNR did not update the plans for several decades. (pp. 25, 29)

Recommendation ► DNR should maintain current plans for all WMAs that have resident managers, as required by state statute; complete its plans for all WMAs it has designated as major units; and work with the Legislature to determine the scale, scope, and frequency of plans for all other WMAs. (p. 33)

Background

DNR manages about 5.6 million acres of land in Minnesota. WMAs constitute a large portion of this land, over 1.3 million acres.

By law, WMAs must be managed for the benefit of wildlife and related recreation. DNR policies and procedures direct staff from multiple divisions to work together to make decisions about whether, when, and how much timber to harvest in WMAs.

In recent years, federal officials, DNR staff, and other stakeholders have expressed concerns about whether DNR timber-harvesting decisions in WMAs have been consistent with legal requirements. In 2023, these concerns led the U.S. Fish and Wildlife Service to impose additional requirements on DNR and temporarily withhold federal funding for WMA activities.

- State and federal laws have few requirements about which WMAs must have plans, what they should include, and when they must be updated. (p. 26)

Recommendation ► The Legislature should specify which WMAs should have individual plans, indicate what DNR should include in the plans, and require DNR to update plans on a specified periodic basis. (p. 33)

Leadership and Decision-Making

By law, DNR is authorized to harvest timber in WMAs only to protect, perpetuate, or reestablish habitat to produce wildlife, including for public hunting, fishing, trapping, and similar outdoor recreational uses.

- DNR’s procedures and guidelines do not provide clear direction to staff on how to prioritize the statutory purpose of WMAs when making decisions about harvesting timber in WMAs. Further, a lack of plans and poor documentation make it difficult to assess whether DNR’s timber harvesting decisions have been consistent with the statutory purpose and wildlife habitat goals of WMAs. (pp. 37, 39)
- Decisions regarding timber harvests in WMAs are a shared responsibility across different DNR divisions. However, guidance from DNR leadership about roles and responsibilities regarding timber harvesting in WMAs has been unclear and insufficient. (p. 44)
- In response to our survey, many staff expressed deep dissatisfaction with DNR’s management of timber harvests in WMAs. (p. 47)

Recommendation ► DNR should ensure that timber stands in WMAs that are identified for potential harvest are subject to additional scrutiny to ensure wildlife considerations are prioritized over other competing interests. (p. 50)

Recommendation ► DNR should amend its policies and procedures to clearly state that timber will be harvested in WMAs only to the extent that the decision to do so is consistent with the statutory purpose for WMAs and the documented wildlife habitat goals of the given WMA. DNR should also specify in its policies and procedures how the agency will ascertain and document the purpose of each proposed harvest, among other things. (p. 51)

Recommendation ► DNR should ensure that its WMA forest habitat management policies and procedures are readily available to staff and are the subject of ongoing leadership attention and staff training. (p. 52)

Summary of Department Response

In a letter dated October 10, 2025, DNR Commissioner Sarah Strommen said “DNR is confident we have met all statutory and grant requirements related to timber harvest in Wildlife Management Areas.” She acknowledged that “some members of the public and DNR staff have raised questions about compliance” and that there have been “significant differences between DNR leaders’ intent for forest management coordination and our staff’s experience with implementation.” Commissioner Strommen said DNR is working towards “revising guidance documents, developing and implementing training around forest habitat related policy and procedures, and continuing our commitment to clear and consistent communications to all staff involved in forest coordination.”

The full special review report, *Department of Natural Resources Timber Harvest Decisions in Wildlife Management Areas*, is available at 651-296-4708 or:

www.auditor.leg.state.mn.us/sreview/2025/DNR-WMA-timber.htm

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Chapter 1: Background and Scope

The Department of Natural Resources (DNR) has far-reaching authority to oversee natural resources throughout Minnesota. Specifically, state law says the DNR commissioner “shall have charge and control of all the public lands, parks, timber, waters, minerals, and wild animals of the state and of the use, sale, leasing, or other disposition thereof...”¹

Further, state law designates DNR as the primary agency responsible for managing an “outdoor recreation system” to “(1) preserve an accurate representation of Minnesota’s natural and historical heritage...and (2) provide an adequate supply of scenic, accessible, and usable lands and waters to accommodate [Minnesotans’] outdoor recreational needs....”² The law gives DNR sole responsibility within this system to administer state parks, state recreation areas, state scientific and natural areas, and state wildlife management areas, among other types of public lands.³

Wildlife Management Areas

DNR manages about 5.6 million acres of land in Minnesota. Wildlife management areas (WMAs) constitute a large portion of this land, over 1.3 million acres. By law, WMAs must be managed for the benefit of wildlife and related recreation.⁴ The Appendix shows the location of Minnesota’s approximately 1,500 WMAs.

¹ *Minnesota Statutes* 2024, 84.027, subd. 2.

² *Minnesota Statutes* 2024, 86A.02, subd. 3; and 86A.05.

³ *Minnesota Statutes* 2024, 86A.05, subds. 2(c), 3(c), 5(c), and 8(c). DNR is also solely responsible for administering state wilderness areas; outdoor recreation areas within state forests; state wild, scenic, and recreational rivers; aquatic management areas; and state boater waysides (*Minnesota Statutes* 2024, 86A.05, subds. 6(c), 7(c), 10(b), 14(d), and 15(c)). DNR shares with other agencies the administrative responsibilities for state trails, state water-access sites, and state historic sites (*Minnesota Statutes* 2024, 86A.05, subds. 4(c), 9(c), and 11(c)). The Minnesota Department of Transportation administers state rest areas (*Minnesota Statutes* 2024, 86A.05, subd. 12(c)).

⁴ *Minnesota Statutes* 2024, 86A.05, subd. 8(a). In addition to WMAs, DNR manages a number of aquatic management areas (AMAs) that are also intended to provide wildlife habitat. While 42 percent of AMA acreage consists of deciduous, evergreen, or mixed forests, the state’s total acreage in AMAs (approximately 45,900 acres) is equivalent to only 3 percent of the state’s total acreage in WMAs (approximately 1,383,900). As such, we generally excluded timber harvests on AMAs from the scope of this review.

According to DNR, Minnesota's WMA system dates back to 1951, when the state began buying land, through a program known as "Save the Wetlands," from willing sellers to address the loss of wildlife habitat in the state.⁵ Initially, DNR's predecessor agency (the Minnesota Department of Conservation) used federal funds to make these purchases; in total, more than 30 percent of the state's current WMA acreage was acquired using federal funds.

State law authorizes the DNR commissioner to acquire and designate WMAs, and DNR has sole authority under state statutes to manage WMAs.⁶ As we discuss in Chapter 3, DNR is required by statute to develop "master plans" for certain WMAs.⁷



Facts About WMAs

- There is at least one WMA in every Minnesota county except Ramsey. Beltrami County has the most WMA land-acres (287,900); Lake of the Woods County has the second-most WMA land-acres (143,600).
- The state's total acreage in WMAs has grown 10 percent since 2000.
- Ten percent of WMA acreage consists of deciduous, evergreen, or mixed forests.
- Ninety-eight percent of WMA land-acres are state-owned. DNR manages the remaining acres through agreements, easements, or leases.
- About 5 percent of WMA land-acres are designated as "school trust land." School trust lands are public lands established for the specific purpose of generating revenues on an ongoing basis to support public education in Minnesota.

Source: Office of the Legislative Auditor, analysis of Department of Natural Resources data.

Minnesota law directs DNR to manage WMAs to promote wildlife habitat for the production of wildlife; for public hunting, fishing, and trapping; and for other compatible outdoor recreational uses.

Minnesota statutes establish WMAs to:

protect those lands and waters which have a high potential for wildlife production and to develop and manage these lands and waters for the production of wildlife, for public hunting, fishing, and trapping, and for other compatible outdoor recreational uses.⁸

DNR must manage WMAs "in a manner which is consistent with" these purposes in order to "perpetuate, and if necessary, reestablish quality wildlife habitat for maximum production of a variety of wildlife species."⁹

Although statutes direct DNR to manage state forest lands using the principles of "multiple use" and "sustained yield," WMAs are excluded from this requirement.¹⁰ Multiple use

⁵ "More About Wildlife Management Areas," Department of Natural Resources, accessed January 4, 2024, <https://www.dnr.state.mn.us/wmas/description.html>.

⁶ *Minnesota Statutes* 2024, 86A.05, subd. 8(c); 86A.07, subd. 3; and 97A.135, subd. 1(a).

⁷ *Minnesota Statutes* 2024, 86A.09, subd. 1.

⁸ *Minnesota Statutes* 2024, 86A.05, subd. 8(a).

⁹ *Minnesota Statutes* 2024, 86A.05, subd. 8(c).

¹⁰ *Minnesota Statutes* 2024, 89.001, subd. 13; and 89.002, subd. 1.

refers to a forest management principle by which forest resources are used in a way that “best meet[s] the needs of the people of the state”—such as for recreation, wildlife habitat, and timber production—without necessarily prioritizing economic return.¹¹ Sustained yield refers to managing forest resources in a way that produces consistently high volumes of forest resources without impairing the productivity of the land.¹²

Timber Harvests in Wildlife Management Areas

In addition to hunting, fishing, and other recreational pursuits, timber harvesting often takes place in WMAs. Ten percent of Minnesota’s WMA acreage consists of deciduous, evergreen, or mixed forest.

Harvesting timber can be an important part of managing habitat for the benefit of wildlife. For example, harvesting timber can create openings in dense forests, which extends the availability of grass and other foliage in early spring and late fall, providing food to white-tailed deer. These openings can also benefit woodcock by providing habitat for roosting and breeding.

According to DNR forest wildlife habitat guidelines, “Managing wildlife habitat via commercial logging is the most economical and efficient method, and affects the greatest amount of habitat on an annual basis.”¹³ As a result, DNR has included WMAs in its long- and short-term plans for harvesting timber, along with school trust lands and state forests.¹⁴



A “**cord**” is a unit of volume for measuring stacked wood. A cord is generally equivalent to a stack that measures four feet high by eight feet long by four feet deep (128 cubic feet).

A “**stand**” is a part of a forest. Stands are typically fairly uniform in their tree species, age, and condition.

Three DNR divisions play a role in the selection of timber harvests in WMAs: (1) DNR’s Fish and Wildlife Division, which administers the state’s WMAs; (2) DNR’s Forestry Division, which oversees sales of timber harvested from all DNR-administered land, including WMAs; and (3) DNR’s Ecological and Water Resources Division, which developed DNR’s most recent wildlife action plan and manages the state’s nongame wildlife program.¹⁵ As we discuss further in Chapter 4, DNR policies and procedures direct staff from the Fish and Wildlife Division and the Forestry Division to jointly decide to harvest timber from any given WMA. DNR policies and procedures also require those divisions to consult with the Ecological and Water Resources Division during the decision-making process.

¹¹ *Minnesota Statutes* 2024, 89.001, subd. 9.

¹² *Minnesota Statutes* 2024, 89.001, subd. 10.

¹³ Minnesota Department of Natural Resources, Division of Fish and Wildlife, *Forest Wildlife Habitat Management Guidelines* (2012), 10.

¹⁴ Certain other DNR-administered lands (such as state parks and scientific and natural areas) are excluded from this planning process. The director of DNR’s Forestry Division told us that state parks and scientific and natural areas do not typically use timber harvests to achieve their goals.

¹⁵ DNR’s wildlife action plan “focuses on wildlife species in greatest need of conservation” (Minnesota Department of Natural Resources, Division of Ecological and Water Resources, *Minnesota’s Wildlife Action Plan 2015–2025* (2016), iii).

In 2018, DNR set targets for the amount of timber to be harvested over the next 10 years from lands administered by DNR, including WMAs.

In 2018, DNR defined a statewide strategic direction for timber harvesting in certain DNR-managed forest lands, including WMAs, school trust lands, and state forests. According to DNR, the department’s strategic direction—which pertained to the 10-year period between fiscal years 2019 and 2028—was based on state and federal laws and policies; input provided by partner organizations, stakeholders, and the public; and an analysis of the possible effects of different environmental and economic conditions on the amount of timber that could be sustainably harvested from select lands. The analysis is commonly referred to as the “Sustainable Timber Harvest Analysis.”¹⁶



DNR has historically set goals for the number of cords it can offer sustainably from state lands. For example, DNR’s strategic plans for 2009–2013 and 2015–2025 stated that the department planned to offer 800,000 cords annually from state lands during the years covered by the plans.

Through the Sustainable Timber Harvest Analysis, the department determined it could sustainably offer for sale 870,000 cords of timber harvested annually from some DNR-managed lands, stating that “This [target amount] strikes an appropriate balance among the needs of wildlife, biodiversity, forest industry, clean water, and recreation.”¹⁷ DNR also determined that it would offer for sale an additional 30,000 cords of ash and tamarack each year between fiscal years 2019 and 2023, in “an effort to make productive use of these two species, which face significant insect threats.”¹⁸ DNR determined that 12 percent of the annual total (108,000 cords in fiscal years 2019 through 2023 and 104,400 cords in fiscal years 2024 through 2028) could come from lands administered by its Fish and Wildlife Division, which are primarily WMAs.¹⁹

DNR’s overarching strategic direction has influenced decisions made about harvesting timber on individual WMAs through a series of planning steps, as depicted in Exhibit 1.1.

¹⁶ In late 2016, Governor Mark Dayton asked DNR to determine whether it would be sustainable to harvest one million cords of wood annually from state-administered lands, and if not, identify an amount of cords that would be sustainable. The 2017 Legislature appropriated funding to DNR to conduct an analysis of this question, and the Sustainable Timber Harvest Analysis was the result (*Laws of Minnesota* 2017, chapter 93, art. 1, sec. 3, subd. 4(e)).

¹⁷ Minnesota Department of Natural Resources, Division of Forestry, *Sustainable Timber Harvest Determination: Companion Document to Mason, Bruce & Girard Sustainable Timber Harvest Analysis* (2018), 1.

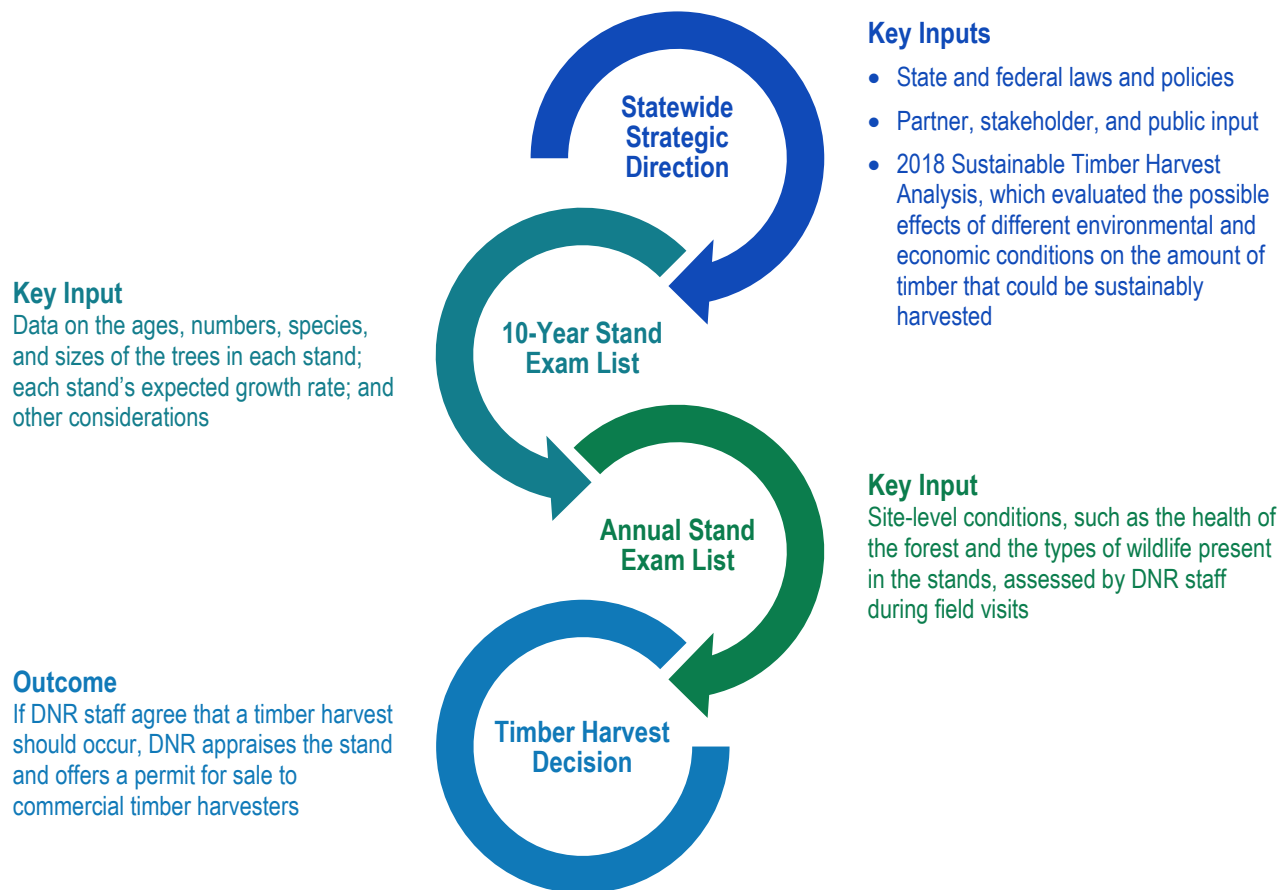
¹⁸ DNR, *Sustainable Timber Harvest Determination: Companion Document*, 1.

¹⁹ According to DNR, the number of cords that could come from WMAs reflects the amount of timber harvest necessary to maintain a balance of tree age and species that supports diverse wildlife habitats. A 2023 DNR report said that the department offered for sale an amount of timber nearly equal to its overall timber harvest target for the period covering fiscal years 2019 through 2022. According to this report, the volume of timber offered for sale from lands administered by the Fish and Wildlife Division during those years was 93 percent of the total amount DNR had originally targeted for that division, while the volume harvested from lands administered by the Forestry Division was 99 percent of what DNR had targeted. Department of Natural Resources, *Midpoint Assessment of Forest Management Strategic Direction: Sustainable Timber Harvest Implementation—Fiscal Years 2019–2022* (2023), 7–8.

Once DNR established the **statewide strategic direction** in 2018, DNR's Forestry Division generated a **10-year stand exam list** specifying the forest stands the department would consider for harvest or other forest management activities each year, over 10 years.²⁰ DNR used a computer model to select stands based on the ages, numbers, species, and sizes of the trees in each stand; a stand's expected growth rate; and other considerations. Staff from the three DNR divisions responsible for managing forest land (Ecological and Water Resources, Fish and Wildlife, and Forestry) were asked to identify stands on the 10-year stand exam list about which they had concerns or comments.

Exhibit 1.1

DNR's current process to plan for and select timber to harvest in WMAs is informed by the 2018 Sustainable Timber Harvest Analysis and several other key inputs.



Note: DNR policies and procedures direct staff to consider broader forest resource management plans and more specific WMA plans or guidance documents when deciding whether to harvest timber in WMAs.

Source: Office of the Legislative Auditor.

²⁰ Forest management activities other than harvests include prescribed burns, thinning, and forest regeneration.

Each year, DNR's Forestry Division has produced an **annual stand exam list** based on the 10-year list. After the annual list is produced, staff from the Fish and Wildlife Division and Ecological and Water Resources Division have one month to respond with requests for joint site visits or with other comments. If staff from these divisions request a site visit, Forestry Division staff schedule the visit to discuss the best way to manage the stand, based on site-level conditions such as the health of the forest and the types of wildlife present in the stand. If DNR staff **agree that a timber harvest should occur**, DNR appraises the stand and offers it for sale to commercial timber harvesters.²¹

Various groups—including the federal government, DNR employees, and wildlife advocacy groups—have raised concerns about the potential impact of DNR's timber harvest decisions in WMAs.

The U.S. Fish and Wildlife Service within the U.S. Department of the Interior has expressed deep misgivings about DNR's WMA timber harvest policies and practices. In 2023, the Service temporarily suspended payments on a federal grant awarded to DNR due to its concerns. We discuss the federal grant suspension in more detail in Chapter 2.

In 2019, a group of 28 DNR employees sent an internal memo to DNR leadership that raised concerns about possible impacts to wildlife and wildlife habitat in WMAs due to the planned timber harvests. The memo said:

If [the Sustainable Timber Harvest Initiative] continues as currently planned, the 870,000(+) cord goal will possibly be met, but we do not believe it is scientifically honest or transparent to say that the 10-year timber plan is “beneficial to wildlife,” especially on WMAs.²²

The employees committed to achieving the direction they received to harvest 870,000 cords of wood annually over 10 years, but they criticized its implementation in WMAs. They recommended: (1) adopting a reduced timber harvest target for WMA acres; (2) allowing the Fish and Wildlife Division to decide where to harvest timber—and which species to harvest—on the lands it managed; and (3) excluding stands in WMAs if they were not needed to meet the overall timber harvest goals and the harvests would not result in a net benefit to wildlife habitat.

In addition to the concerns raised by DNR employees, some interest groups have expressed concerns about the WMA timber harvests. For example, in a 2019 letter to the DNR commissioner, the Minnesota Chapter of The Wildlife Society (MNTWS) said:

MNTWS is concerned that if proposed [sustainable timber harvest] implementation proceeds, WMAs will not be managed for their primary

²¹ If agreement is not reached, DNR policy directs staff to initiate a dispute resolution process. We discuss this process further in Chapter 4.

²² Jaime Edwards, Becky Eckstein, and 26 other Department of Natural Resources employees, memorandum to Sarah Strommen, Commissioner, and Bob Meier, Assistant Commissioner, Department of Natural Resources, *RE: STHA and WMA Management*, July 17, 2019, 1.

purpose and that DNR may be in non-compliance with the intent of WMA statutes and policies.²³

Scope and Methods of OLA Review

We initiated this special review in March 2024 to examine DNR's compliance with state and federal requirements related to the use of public funds for timber harvests in WMAs. We examined the following issues:

- **Why did the federal government delay payment of wildlife grant money to DNR in 2023?**
- **To what extent has DNR complied with federal and state requirements to have wildlife management plans in place?**
- **Has DNR approved timber harvests in WMAs in a manner consistent with legal requirements?**
- **To what extent are DNR field staff satisfied with the department's timber harvesting policies and practices in WMAs?**

We did not evaluate the content of Minnesota's plans for WMAs. We also did not evaluate the effectiveness of DNR's habitat management practices in WMAs.

To conduct our review, we examined documents and correspondence related to DNR's federal wildlife-related grants. We reviewed federal and state statutes, regulations, and other requirements. We interviewed and corresponded with current and former DNR staff, as well as officials currently and formerly with the U.S. Fish and Wildlife Service. In the spring of 2024, we conducted surveys of field staff in DNR's divisions of Ecological and Water Resources, Fish and Wildlife, and Forestry.²⁴

²³ Bruce D. Anderson, Forest Committee Chair, Minnesota Chapter of The Wildlife Society, letter to Sarah Strommen, Commissioner, Department of Natural Resources, *RE: Minnesota Department of Natural Resources (DNR) Sustainable Timber Harvest Implementation on Wildlife Management Areas (WMAs)*, September 29, 2019, 2.

²⁴ We invited 213 field staff to participate in the surveys, and we received responses from 85 percent of survey recipients. We summarize the survey results in Chapter 4.



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Chapter 2: Federal Grant Suspension

In 1937, the U.S. Congress passed the Federal Aid in Wildlife Restoration Act, also known as the Pittman-Robertson Wildlife Restoration Act (Pittman-Robertson).¹ The Act provides funding to states and territories to support wildlife habitat conservation and restoration and hunter education and safety training. The revenues for Pittman-Robertson allocations come from federal excise taxes on certain firearms, ammunition, and archery equipment.

One of the Department of Natural Resources’ (DNR’s) largest grant awards funded by Pittman-Robertson allocations is its Statewide Wildlife Habitat Management Grant. DNR uses Minnesota’s grant funds to pay for administering timber sales in wildlife management areas (WMAs), among other wildlife habitat management activities. The table at the right shows the amounts awarded to Minnesota in recent years for this grant.²

Nearly all WMAs in Minnesota are subject to federal requirements.³ In general, these requirements indicate how DNR must account for income generated by activities conducted in WMAs and assess the environmental impacts of proposed activities, among other things.

Additionally, federal regulations specify allowable uses for federal wildlife restoration grant funds, including activities to “Restore, rehabilitate, improve, or manage areas of lands or waters as wildlife habitat.”⁴

DNR’s Statewide Wildlife Habitat Management Grant Awards, Fiscal Years 2016–2025

State Fiscal Years	Millions of Dollars
2016–2017	\$ 23.3
2018–2019	26.5
2020–2021	26.5
2022–2023	26.4
2024–2025	36.6
Total	\$139.4

Note: Amounts include federal and state shares, plus estimated “program income” (which can include revenues from timber sales, peat royalties, and road easements).

Source: Office of the Legislative Auditor, analysis of state accounting system records.

¹ Federal Aid in Wildlife Restoration Act of 1937, Public Law 75–415, 50 Stat. 917, codified as amended at 16 U.S. Code, sec. 669 et. seq. (2024).

² Minnesota receives additional Pittman-Robertson funding for other wildlife-related purposes, such as grants to assist with developing plans for WMAs.

³ According to DNR staff, at least 31 percent of Minnesota’s WMA acreage was acquired as part of a federal wildlife restoration grant. However, because DNR (1) does not have complete historical records to definitively indicate the sources of funds that were used to acquire other WMA lands and (2) uses federal wildlife restoration grant funds and state license revenues to manage most WMAs, DNR and the U.S. Fish and Wildlife Service consider nearly all WMA acreage in Minnesota as assets subject to federal requirements. School trust lands within WMAs, which constitute about 5 percent of WMA land-acres, are an exception.

⁴ 50 CFR, sec. 80.50(a)(5) (2023). Other eligible activities include conducting research to study issues related to managing wildlife habitats; obtaining data to inform the regulation of hunting; acquiring property suitable for wildlife habitat or wildlife-oriented recreation; and building structures or acquiring equipment, goods, and services to improve wildlife habitat or provide public access for wildlife-oriented recreation (50 CFR, sec. 80.50(a)(2), (a)(3), (a)(4), and (a)(6) (2023)).

A recent DNR proposal for wildlife restoration grant funds indicated that it intended to use the funds to establish, improve, and maintain wildlife habitat in WMAs and other state lands across the state. DNR's proposal said the department would accomplish these objectives by using a variety of habitat management techniques, such as prescribed burns, timber harvests, invasive species removal, and reforestation.

Three recent DNR wildlife restoration grants covered (1) July 1, 2019, to June 30, 2021; (2) July 1, 2021, to June 30, 2023; and (3) July 1, 2023, to June 30, 2025.⁵ In August 2023, the U.S. Fish and Wildlife Service suspended DNR's 2021–2023 wildlife restoration grant, delayed approval of its 2023–2025 grant, and prohibited timber sales from WMAs due to the Service's concerns about DNR's compliance with grant requirements. As of October 2025, DNR's wildlife restoration grant was still subject to extensive conditions, including that proposed timber harvests must be reviewed and approved by the U.S. Fish and Wildlife Service prior to DNR offering stands for sale or auction.

For several years, DNR did not take the steps necessary to comply with federal grant requirements—requirements that were repeatedly communicated to DNR.

From 2020 through 2023, the U.S. Fish and Wildlife Service repeatedly told DNR that the department was not properly documenting the wildlife benefits of timber harvests in WMAs prior to initiating those harvests. DNR has claimed that its noncompliance was due to misunderstandings, but there were numerous opportunities for DNR to clarify any confusion it may have had regarding the grant conditions. DNR had much at stake with this grant—including the grant funding and its ability to undertake forest habitat management in an efficient and timely manner—and it did not take the necessary steps to fully and promptly ensure its compliance.

In this chapter, we detail the events over the more than three-year period from February 2020 to August 2023 that resulted in the grant suspension and other federal sanctions. We also explain what occurred between August 2023 and August 2025. We then discuss possible consequences of the federal compliance actions and offer a recommendation to DNR.

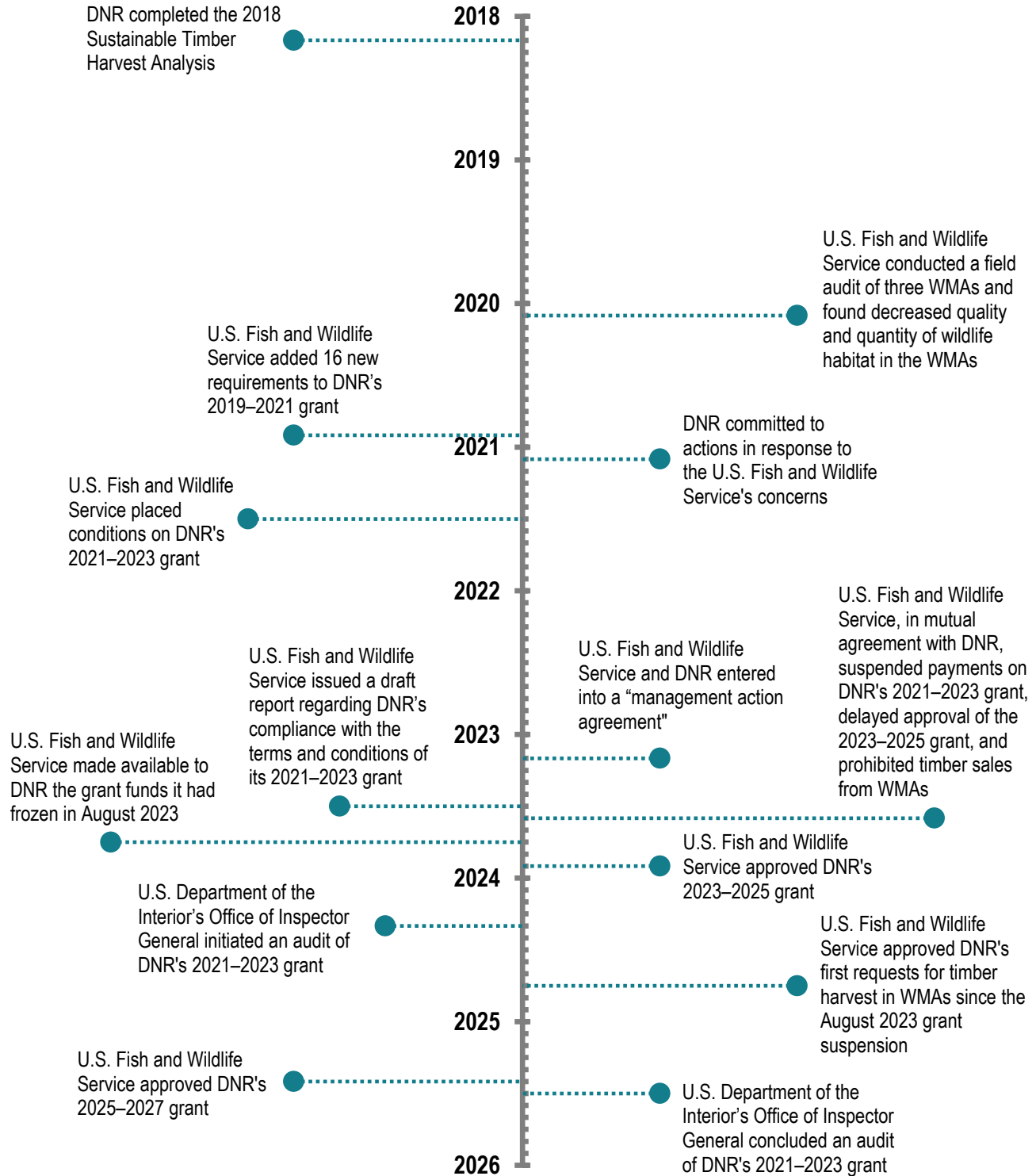
Federal Compliance Actions

To better understand why in 2023 the federal government suspended Minnesota's federal wildlife restoration grant, delayed the approval of the subsequent grant, and prohibited timber sales from WMAs, we examined DNR and U.S. Fish and Wildlife Service documents and correspondence dating back to 2020. Exhibit 2.1 provides a summary of key events related to DNR's Statewide Wildlife Habitat Management Grants, and a more in-depth discussion of these events follows.

⁵ For simplicity, we refer to the grants by the calendar years covered by the grant awards. For example, we specify the grant covering July 1, 2019, to June 30, 2021, as the "2019–2021 grant."

Exhibit 2.1

Timeline of Key Events Related to DNR's Statewide Wildlife Habitat Management Grants, January 2018 to October 2025



Source: Office of the Legislative Auditor.

February 2020: Field Audit

The U.S. Fish and Wildlife Service's concerns about DNR's timber harvests in WMAs date back to at least 2020.

In February 2020, U.S. Fish and Wildlife Service staff conducted a field audit of three Minnesota WMAs. Following this audit, federal staff informed DNR of draft findings that included the following:

[The U.S. Fish and Wildlife Service] had difficulty determining governance, records of decisions, responsibilities, and processes. Therefore, [DNR's Fish and Wildlife Division] appears to have "lost control of land" acquired or managed with [Pittman-Robertson] funding and license revenue as a result of timber harvest planning and practices in violation of grant agreements.

In addition, [DNR's Fish and Wildlife Division] appears to have used State hunting and fishing license revenues, including real property, for commercial timber harvests that interfere with the purposes for which the land was purchased[,] creating a potential diversion situation....

[The U.S. Fish and Wildlife Service] observed grant-funded timber harvests that loggers have completed, abandoned, or are actively working on without identified wildlife plans with wildlife management or population objectives that appears to decrease the quality and quantity of wildlife habitat on the WMAs. We observed that the logger does not complete the typical contract requirement for initial site restoration, instead appears to be leaving [DNR's Fish and Wildlife Division] with this extra expense and effort....⁶

DNR officials believed the draft report was inaccurate and asked federal officials to amend the report. The U.S. Fish and Wildlife Service did not issue a revised or final report.⁷

⁶ "WSFR Field Audit/Review, February 25–27, 2020" (PowerPoint slides, U.S. Fish and Wildlife Service, Wildlife and Sport Fish Restoration Program, July 22, 2020), slides 17 and 18. The slides are marked with the phrase "For Discussion Purposes Only—Pre-Decisional Draft."

⁷ In a February 2024 letter to federal officials, the DNR commissioner expressed concerns that a final, revised version of the draft report was never released. She said: "We had considerable concerns with the resulting draft site visit monitoring report, which we believe lacked context, contained factual errors, pulled in issues outside the scope of the habitat grant, lacked adherence to basic monitoring standards, and therefore drew unfounded conclusions. Additionally, we were surprised by the draft report's conclusions, because the Department of the Interior's Office of Inspector General had recently completed an audit of our grants and reported no findings around our habitat grant.... [R]etired Regional Director Charlie Wooley acknowledged its shortcomings and committed to appending the file to make clear to future readers that the report was incomplete and would not be made final. Based on this commitment, DNR did not submit written objections to the monitoring report." Sarah Strommen, Commissioner, Department of Natural Resources, letter to Martha Williams, Director, and Will Meeks, Regional Director, U.S. Fish and Wildlife Service, February 1, 2024. In a March 2024 letter to DNR, the director of the U.S. Fish and Wildlife Service wrote to DNR "...as the report is out of date and no longer relevant, and our on-going grant improvement work has addressed the issues in that report, we do not intend to finalize this draft report." Martha Williams, Director, U.S. Fish and Wildlife Service, letter to Sarah Strommen, Commissioner, Department of Natural Resources, March 29, 2024.



Federal Requirements Related to DNR's Use of Hunting License and Timber Harvest Revenues

As a condition of receiving federal wildlife grants, Minnesota must ensure that state hunting license fees are used to serve wildlife purposes. The Pittman-Robertson Wildlife Restoration Act requires states receiving funds under the Act to pass legislation that prohibits the diversion of state hunting license fees for any purpose other than the administration of the state's game and fish department. 16 *U.S. Code*, sec. 669 (2023). Consistent with these requirements, Minnesota law says: "Money accruing to the state from fees charged for hunting...licenses shall not be used for any purpose other than game...activities and related activities under the administration of the commissioner." *Minnesota Statutes* 2024, 97A.057, subd. 2.

Further, the federal government regards timber on lands acquired with Pittman-Robertson funds to be "real property." According to the U.S. Department of the Interior's Office of the Solicitor, when harvesting this timber, "the State must account for the income generated from timber sales and apply it according to the federal regulations with respect to program income." Karen Sprecher Keating, Associate Solicitor, and Pete Raynor, Acting Associate Solicitor, U.S. Department of the Interior, Office of the Solicitor, memo to Bob Lamb, Deputy Assistant Secretary, *Timber Policy*, December 5, 2000. As a result, DNR must use income generated from timber sales from WMAs to support the wildlife purposes for which the land was acquired.

December 2020: Additional Requirements

In a December 2020 email to DNR, the U.S. Fish and Wildlife Service listed multiple requirements it was imposing on DNR's 2019–2021 grant due to the Service's continuing concerns about grant compliance. For example, the email said:

[The DNR Fish and Wildlife Division] must document it has control of all phases of planned timber harvests on [Fish and Wildlife] properties, and that activities benefit fish and wildlife to ensure that 2020–21 timber harvests are eligible for [Wildlife and Sport Fish Restoration Program] funding.⁸

In a detailed response to the U.S. Fish and Wildlife Service, the director of DNR's Fish and Wildlife Division committed to actions to address the federal concerns. For instance, he said DNR would improve documentation demonstrating that timber harvests in WMAs serve wildlife interests and complete plans for certain WMAs.

July 2021: Grant Conditions

In July 2021, the U.S. Fish and Wildlife Service placed 16 conditions on DNR in its next award of a Statewide Wildlife Habitat Management Grant to Minnesota (see the box on the next page for examples). This grant covered the period from July 1, 2021, through June 30, 2023.

⁸ Jim Hodgson, Regional Manager, Wildlife and Sport Fish Restoration Program, U.S. Fish and Wildlife Service, email to Dave Olfelt, Director, Fish and Wildlife Division, Department of Natural Resources, "Points on Minnesota Grants and Timber from December 7, 2020 Phone Conversation," December 11, 2020.

In July 2021, the U.S. Fish and Wildlife Service prohibited timber harvests in WMAs until DNR met specific conditions. DNR continued to harvest timber in WMAs without meeting those conditions.

The grant award stated that the federal government needed to receive documentation of DNR's compliance with the 16 conditions before DNR could undertake timber harvests on properties administered by the DNR's Fish and Wildlife Division during the grant period. The federal government said the reason it imposed these conditions was:

...concerns over eligibility and regulatory compliance of [DNR's] management of forests on Wildlife Management Areas (WMAs) and Aquatic Management Areas (AMAs) starting in late 2019 which were acquired with [federal] grant funds and potentially charged to the Statewide Wildlife Habitat Management grant.⁹



Select Conditions Placed on Minnesota's 2021–2023 Statewide Wildlife Habitat Management Grant

DNR's Fish and Wildlife Division must:

- Provide documentation showing that the division has "maintained control" over WMAs with a federal interest or that were acquired with state license fees, and that it has control of all phases of planned timber harvest activities on these WMAs.
- Provide documentation showing that it conducts timber harvest activities primarily to benefit wildlife and consistent with all federal, state, and local laws and regulations.
- Show, where wildlife habitat management plans exist, how timber harvests implement specific objectives. Where wildlife habitat management plans do not exist, the division must document how the timber harvests benefit native birds and mammals. Further, the division must show how planned timber harvest activities excluded areas with high fish and wildlife value and irreplaceable forest types.
- Provide documentation that prove grant activities comply with the Endangered Species Act and National Environmental Policy Act.

Source: Notice of Award, Statewide Wildlife Habitat Management, U.S. Fish and Wildlife Service grant to Minnesota Department of Natural Resources for July 1, 2021, through June 30, 2023 (July 13, 2021).

The U.S. Fish and Wildlife Service told us that its Midwest regional office had never previously required a state to stop timber sales on state lands. Furthermore, the Service told us it was unusual for the Service to place the number and scope of conditions on grants that it placed on Minnesota's grant.

The restriction on timber harvesting did not apply only to WMAs that made use of the 2021–2023 federal grant funds. It applied to harvesting in nearly all WMAs in

⁹ U.S. Fish and Wildlife Service, Wildlife and Sport Fish Restoration Programs, Region 3 – Midwest Region, *Assessment of Minnesota Department of Natural Resources Compliance with F21AF02911, Statewide Wildlife Habitat Management Grant Conditions* (Minneapolis, July 18, 2023), draft report, 5. The Service told us in May 2024 that it had not finalized this report.

Minnesota. An email sent by the U.S. Fish and Wildlife Service to DNR less than one month after it imposed conditions stated:

I communicated the expectation that timber harvest activities will stop on WMAs with [Wildlife and Sport Fish Restoration Program] interest (through acquisition and management) and license fee acquired lands until [the DNR Fish and Wildlife Division] can provide documentation that shows they have control of planning and implementing forest management. The other condition statements, while also important, are secondary to this. We need to have documentation to show that [the division] plans, initiates, and implements timber harvest activities on these lands.¹⁰

However, according to data it later furnished to the U.S. Fish and Wildlife Service, DNR sold 40 permits to cut timber in WMAs with a federal interest between July 1, 2021, and December 31, 2022. A DNR official told us this timber harvest work was paid for using state-generated funds.

In later correspondence with the U.S. Fish and Wildlife Service, DNR indicated that it initiated timber harvest activities in WMAs without first complying with documentation-related conditions “due to a misunderstanding on our part of the language in the grant agreement...”¹¹ DNR further stated “Never was it our intent to ignore grant conditions or question the validity of grant conditions.”¹²

Throughout 2021 and 2022, and despite multiple requests that DNR document how it intended to show wildlife-related purposes for each timber harvest before it occurred, DNR did not provide documentation that met the Service’s expectations. For example, DNR told the U.S. Fish and Wildlife Service in mid-2022 that these purposes were identified in existing documents—specifically, “management guidance documents” and “habitat management reports” that had been developed for individual WMAs.¹³ But a federal official informed DNR that this response was inadequate.

¹⁰ Kyle Daly, Fish and Wildlife Biologist, U.S. Fish and Wildlife Service, email to Heather Kieweg, Department of Natural Resources, “Follow up from July 19 call regarding Timber management grant condition,” August 6, 2021. As we stated earlier in this chapter, DNR and the U.S. Fish and Wildlife Service assume that nearly all WMA lands in Minnesota have a federal interest (that is, they were acquired using federal grant funds or state license revenues, or DNR uses federal wildlife restoration grant funds and state license revenues to manage these lands).

¹¹ Dave Olfelt, Director, Fish and Wildlife Division, Department of Natural Resources, letter to Jim Hodgson, Assistant Regional Director, Wildlife and Sport Fish Restoration Program, U.S. Fish and Wildlife Service, October 6, 2023.

¹² Olfelt, letter to Hodgson, October 6, 2023.

¹³ Heather Kieweg, Federal Assistance Coordinator, Department of Natural Resources, email to Kyle Daly, Fish and Wildlife Biologist, U.S. Fish and Wildlife Service, and Ted Dick, Department of Natural Resources, “Re: SEL, auctions, and logging contracts,” May 26, 2022. According to DNR, about 13 percent of Minnesota’s WMAs have “management guidance documents” that have been approved by DNR management. We observed that the “habitat management reports” tend to be brief (one or two pages) and general. For instance, the habitat management report for one of the state’s largest WMAs (Wapiti WMA in Beltrami, Marshall, and Roseau counties) says only the following regarding timber harvests: “...commercial timber harvest will be used to promote natural regeneration and create a variety of sizes and ages of vegetation” and “Timber management will be planned in large blocks in some areas, and in smaller blocks with high age class diversity between blocks in others.” “Habitat Management Report: Wapiti WMA,” Department of Natural Resources, accessed May 14, 2025, https://www.dnr.state.mn.us/wmas/habitat_management_report.html?pgm_prj=WMA01106.

March 2023: Management Action Agreement

In March 2023, the U.S. Fish and Wildlife Service and DNR entered into a “management action agreement.”¹⁴ This agreement enumerated five actions that DNR would take by specified deadlines. Notably, the agreement required DNR to clarify, by May 2023, the roles and responsibilities of three DNR divisions (Ecological and Water Resources, Fish and Wildlife, and Forestry) in planning, scheduling, implementing, monitoring, and assessing forest habitat management activities in WMAs.



Actions Agreed on by U.S. Fish and Wildlife Service and DNR

1. DNR will prepare and deliver a leadership intent message to staff concerning forest habitat management in WMAs by April 14, 2023.
2. DNR will complete plans for “major unit” WMAs by dates specified in the agreement, spanning from June 30, 2023, to June 30, 2025.
3. By May 26, 2023, DNR will clarify the roles and responsibilities of staff in three different divisions with respect to planning, scheduling, implementing, monitoring, and assessing forest habitat management activities in WMAs.
4. U.S. Fish and Wildlife Service and DNR will provide training to staff on federal requirements that need to be followed in WMAs, spanning from October 31, 2023, to October 31, 2025, and annually thereafter by October 31, if needed.
5. U.S. Fish and Wildlife Service and DNR will develop and implement joint protocols for field monitoring visits that assess forest habitat management activities in WMAs. Protocols were to be developed by August 1, 2023, and the first joint monitoring visit was to occur before August 31, 2023.

Source: U.S. Department of the Interior, U.S. Fish and Wildlife Service, Midwest Region, and Minnesota Department of Natural Resources, *Management Action Agreement*, March 30, 2023.

In May 2023, DNR revised its procedure regarding forest habitat management on lands administered by DNR’s Fish and Wildlife Division, which includes timber harvesting in WMAs.¹⁵ Like the directive that preceded it, the 2023 procedure assigned shared responsibility for many WMA timber management-related decisions to the DNR Forestry and Fish and Wildlife divisions.¹⁶ The amended DNR procedure did not address federal concerns about unclear authority for making timber harvesting decisions in WMAs. In May 2023, less than one week after DNR adopted the revised procedure for WMA forest habitat management, a U.S. Fish and Wildlife Service official informed DNR that:

[T]he current document does not satisfy our concerns. In fact, we are having a difficult time in identifying where our [previous] comments were addressed in the document.¹⁷

Later in 2023, the DNR commissioner expressed to a federal official a willingness to explore ways to address the U.S. Fish and Wildlife Service’s concerns with the WMA forest habitat management procedure document. However, the commissioner also seemed to suggest that the

¹⁴ U.S. Department of the Interior, U.S. Fish and Wildlife Service, Midwest Region, and Minnesota Department of Natural Resources, *Management Action Agreement*, March 30, 2023.

¹⁵ Department of Natural Resources, Interdisciplinary Forest Management Policy System, *Procedure: Forest Habitat Management on Lands Administered by the Fish & Wildlife Division*, effective May 25, 2023, 10. This procedure superseded the procedures section of a Fish and Wildlife Division directive, *Forest Management on WMAs and AMA/FMAs*, issued in 2009.

¹⁶ For example, the procedure said that the Forestry Division and Fish and Wildlife Division were both responsible for making decisions to appraise stands for commercial harvests or to defer stands for consideration at a later date. We discuss this procedure further in Chapter 4.

¹⁷ Jim Hodgson, Assistant Regional Director, Wildlife and Sport Fish Restoration Program, U.S. Fish and Wildlife Service, email to Dave Olfelt, Director, Fish and Wildlife Division, Department of Natural Resources, “Procedures Document—Current form does not meet USFWS needs,” May 25, 2023.

Service was trying to micromanage DNR: “We simply cannot have [the U.S. Fish and Wildlife Service] writing day-to-day work procedure documents for state staff.”¹⁸

July 2023: Compliance Review

In July 2023, the U.S. Fish and Wildlife Service provided DNR with a draft of its assessment of DNR’s compliance with the terms of its 2021–2023 Statewide Wildlife Habitat Management Grant. The draft report said:

To date, the Minnesota Department of Natural Resources (MNDNR), Division of Fish and Wildlife (FAW) has not fulfilled any of the 15 conditions placed on the Statewide Wildlife Habitat Management grant...dealing with timber harvests.¹⁹

Furthermore, the draft report said:

[Minnesota DNR] violated the Statewide Wildlife Habitat Management...grant agreement, Federal Regulations..., [the National Environmental Policy Act], and other federal grant requirements by improperly disposing of federal real property without prior approval. ...

Improper disposal of federal real property and license revenue may require repayment, replacement, or place a state into diversion and therefore no longer able to receive the benefits of the [Wildlife Restoration] Act. ...

Throughout our discussions and information exchange from late 2019 to present on this topic, the [Minnesota DNR] has not provided any additional substantive information that would lead us to conclude that forest management decisions are based on [Wildlife Restoration] Act eligible purposes of fish and wildlife management as primary purposes. In contrast, information presented throughout this period by [Minnesota DNR] staff has shown the Area Wildlife Managers are pressured to provide timber harvests regardless of fish or wildlife management or other eligible purposes being identified. As a result, and after

¹⁸ Sarah Strommen, Commissioner, Department of Natural Resources, email to Charles Traxler, Acting Regional Director, Midwest Region, U.S. Fish and Wildlife Service, “FW: Procedures Document—Current form does not meet USFWS needs,” September 5, 2023. The commissioner told us she does not understand why the Service wants to see control for WMA timber decisions reside with DNR’s Fish and Wildlife Division rather than the department head. She also questioned why the Service has raised concerns about Minnesota’s WMA forest management practices in recent years, despite the fact that a federal audit covering DNR practices in prior years (under similar DNR policies and federal grants) did not raise comparable concerns. While we cannot speak to the findings of a prior federal audit, the U.S. Fish and Wildlife Service reiterated to our office its expectation that the DNR Fish and Wildlife Division exercise control over lands acquired with federal wildlife grants and lands acquired with hunting and fishing license fees to prevent competing interests within DNR from interfering with the authorized purpose of these lands. Stuart Radde, Office of the Solicitor, U.S. Department of the Interior, email to Joel Alter, Office of the Legislative Auditor, “Response [on behalf of Regional Director] Will Meeks, USFWS,” May 13, 2024.

¹⁹ U.S. Fish and Wildlife Service, *Compliance with F21AF02911 Grant Conditions*, 3. The report noted that one grant condition related to farmland and grassland management had been satisfied and, therefore, removed from the grant.

comprehensive internal review, discussions, and Solicitor’s Office input[,] the Service has determined that the [Minnesota DNR’s] adherence to current forest management practices on lands purchased with State hunting and fishing license revenues and federally encumbered by the Service violates the requirements of [federal and state laws and regulations]. These forest management practices create a loss of control resulting in a diversion of license revenues and a misuse of grant funds by the DNR.²⁰

The draft report identified two possible consequences: suspension of federal grant funds and withholding reimbursement until DNR took corrective actions. The draft report also stated that DNR “must cease all timber harvest activities on lands with [a federal] interest until the [2021–2023] grant terms and conditions are satisfied, and the [2023–2025] habitat management grant is approved.”²¹

August 2023: Grant Suspension

In August 2023, the U.S. Fish and Wildlife Service suspended Minnesota’s Statewide Wildlife Habitat Management Grant because DNR had not complied with requirements of its 2021–2023 grant.

As specified in an August 7, 2023, letter to the DNR commissioner, the U.S. Fish and Wildlife Service and DNR agreed that DNR would “submit documentation to fulfill the remaining grant conditions in the [2021–2023] grant...before any additional disbursements will be approved.”²² The letter also stated that the Service would hold Minnesota’s 2023–2025 grant “until both the Service and DNR agree all grant compliance and documentation issues are agreed to....”²³ In addition, the Service prohibited DNR from offering timber for sale from “any State Wildlife Management Areas and Aquatic Management Areas” until compliance issues were resolved.²⁴ The letter said these actions were based on “mutual agreement” between the Service and DNR about “a series of next steps to reach timely resolution on outstanding issues.”²⁵

In September 2023, DNR circulated to federal officials a form that its staff could use to (1) document wildlife benefits associated with proposed WMA timber harvests and (2) provide evidence in the form of a DNR area manager signature that the decision to proceed with the sale was made by Fish and Wildlife Division staff. The U.S. Fish and Wildlife Service agreed to release DNR’s frozen grant funds in the wake of this plan for improved documentation.

²⁰ U.S. Fish and Wildlife Service, *Compliance with F21AF02911 Grant Conditions*, 6–7.

²¹ U.S. Fish and Wildlife Service, *Compliance with F21AF02911 Grant Conditions*, 7.

²² Charles W. Traxler, Acting Regional Director, U.S. Fish and Wildlife Service, letter to Sarah Strommen, Commissioner, Department of Natural Resources, August 7, 2023, 2.

²³ Traxler, letter to Strommen, August 7, 2023, 2.

²⁴ Traxler, letter to Strommen, August 7, 2023, 1.

²⁵ Traxler, letter to Strommen, August 7, 2023, 1.

October 2023 to December 2023: Reinstatement of Grant Funding and Subsequent Grant Award

On October 3, 2023, the U.S. Fish and Wildlife Service notified the DNR commissioner that more than \$21 million in federal grant funds that had previously been suspended would be made available to DNR. The Service's acting regional director said that, as a result of discussions subsequent to the August 7 letter, "I am confident that future actions will comply with the grant and that there is a shared commitment to continue working together to improve grant management..."²⁶ However, this letter did not lift the federal oversight of DNR's timber harvests in WMAs.

Later, in December 2023, the U.S. Fish and Wildlife Service approved DNR's 2023–2025 Statewide Wildlife Habitat Management Grant. The Service imposed extensive conditions on DNR's grant, as it had in the previous grant. For example, for DNR's 2023–2025 grant, the Service required DNR to provide "site-by-site documentation of the purpose and objectives" of all timber harvest management actions in most WMAs "in advance of stands being offered for sale or auction."²⁷ The Service would then review the proposed timber sale and approve or disapprove of it.²⁸ As a result, DNR was still prohibited from administering timber sales in most WMAs without prior federal approval.

January 2024 to August 2025: Ongoing Federal Oversight

In May 2024, the U.S. Fish and Wildlife Service told us it had requested that the U.S. Department of the Interior's Office of Inspector General further examine compliance issues during an upcoming audit of DNR.²⁹ In July 2025, the U.S. Department of the Interior's Office of Inspector General released an audit of DNR's use of federal grant funds and state license revenues. The Office of Inspector General concluded that DNR "ensured that grant funds and license revenue were used for allowable activities and complied with applicable laws and regulations, [U.S. Fish and Wildlife Service] guidelines, and grant agreements."³⁰ However, the report also stated:

During our audit, we learned that [the U.S. Fish and Wildlife Service] was concerned that the Department's timber harvest activities in the Minnesota WMAs may not have aligned with [Wildlife and Sport Fish Restoration] Program purposes. ...

²⁶ Charles W. Traxler, Acting Regional Director, U.S. Fish and Wildlife Service, letter to Sarah Strommen, Commissioner, Department of Natural Resources, October 3, 2023.

²⁷ Notice of Award, Statewide Wildlife Habitat Management, U.S. Fish and Wildlife Service grant to Minnesota Department of Natural Resources for July 1, 2023, through June 30, 2025 (December 7, 2023).

²⁸ Notice of Award, December 7, 2023.

²⁹ Radde, email to Alter, May 13, 2024.

³⁰ U.S. Department of the Interior, Office of Inspector General, *Wildlife and Sport Fish Restoration Grants Awarded to the State of Minnesota by the U.S. Fish and Wildlife Service* (2025), memorandum.

[The Service] has valid concerns regarding potentially competing priorities within the Department and the ability to ensure timber harvest activities on lands with a Federal nexus maintain wildlife conservation and management objectives. ...

Our interactions with the Department's area wildlife supervisors support [the Service's] concerns, as [DNR Fish and Wildlife Division] staff indicated that they felt they did not have the ability to deny harvests on WMAs and felt pressure to meet cordage targets, regardless of the impact to wildlife habitat. ...[A]s part of their role in grant administration, it will be beneficial for States that intend to adopt a more sustainable, centralized approach to timber harvest activities to work closely with [the Service] to ensure that controls are in place to protect lands with a Federal nexus for conservation purposes.³¹

The U.S. Fish and Wildlife Service continues to scrutinize DNR's proposed harvests in WMAs.

The U.S. Fish and Wildlife Service awarded DNR's 2025–2027 Statewide Wildlife Habitat Management Grant on June 26, 2025. The Service awarded the grant with the same extensive conditions as were in place for DNR's prior grant. Most notably, DNR is still required to submit site-by-site documentation for federal review and approval prior to offering stands for sale or auction.

As we will discuss in the next section, few timber harvests have taken place in WMAs since mid-2023. Although the U.S. Fish and Wildlife Service and DNR agreed in September 2023 on a form DNR would use to document wildlife benefits associated with proposed WMA timber harvests, it was not until June 2024 when DNR first submitted the requested documentation. This submission was for 10 stands in two WMAs, and the Service approved the harvest of these stands in October 2024. As of May 2025, DNR was reviewing—but had not yet submitted—an additional 80 forms.

Another ongoing issue relates to how DNR will be expected to demonstrate compliance with the National Environmental Policy Act (NEPA). Federal agencies are required to consider how this act may apply to recipients of their grants. In its applications for wildlife habitat management grants in 2021 and 2023, DNR declared that its grant proposals were covered by "categorical exclusions" to NEPA requirements.³² Such exclusions indicate that an applicant's actions will not have a significant effect on the human environment, and applicants excluded from NEPA requirements do not have to prepare environmental assessments or environmental impact statements.

³¹ U.S. Department of the Interior, *Wildlife and Sport Fish Restoration Grants Awarded to Minnesota*, 4–5.

³² A DNR official told us that DNR has declared such exclusions for its wildlife habitat management grants for more than 20 years, saying that federal guidance may have been partly responsible for DNR's initial use of the exclusions.



Federal Requirements Related to Environmental Assessments

The National Environmental Policy Act (NEPA)—requires federal agencies to consider possible environmental impacts of actions that are subject to federal control and responsibility. Unless actions are exempt from NEPA requirements, federal agencies must complete environmental assessments or environmental impact statements before taking any actions that could affect the environment.

Environmental assessments are documents that describe the purpose and need for a proposed action, identify alternatives to the proposed action, and examine the environmental impacts of the proposed action and alternatives, among other things. Unlike more in-depth environmental impact statements, environmental assessments do not involve a public review and comment period.

U.S. Fish and Wildlife Service officials have communicated to DNR several times since 2021 that timber harvests in Minnesota’s WMAs may require additional review under NEPA. The Service also conveyed to us in May 2024 its expectation for DNR to conduct WMA-related environmental assessments. The Service said:

During [our] recent review of Minnesota DNR’s timber harvests and procedures for conducting timber sales and harvests on wildlife management areas and aquatic management areas, it became apparent that certain extraordinary circumstances may be occurring due to these actions. The presence of extraordinary circumstances requires additional review under NEPA.... At this time, it is the USFWS decision to require environmental assessment(s) for timber harvests that will either be funded with grants or on lands with USFWS interest. Minnesota DNR is aware of this decision.³³

In contrast to the above communication, when the U.S. Fish and Wildlife Service approved the harvest of 10 timber stands in October 2024, it indicated that DNR would not be required to conduct additional environmental assessments for the 10 proposed harvests. In May 2025, the director of DNR’s Fish and Wildlife Division told us that DNR had not received any additional information from the Service related to compliance with NEPA.

³³ Radde, email to Alter, May 13, 2024. Examples of extraordinary circumstances include actions that “Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks” or “Have significant impacts on species listed, or proposed to be listed, on the List of Endangered or Threatened Species or have significant impacts on designated Critical Habitat for these species.” 43 *CFR*, sec. 46.215(d) and (h) (2024).

Consequences of the Federal Actions

Between August and October 2023, the federal government withheld about \$4.1 million of Minnesota's 2021–2023 Statewide Wildlife Habitat Management Grant. After the federal government unsuspended the grant in early October, it transferred nearly all of these funds to DNR for grant expenditures DNR had incurred through the end of State Fiscal Year 2023.³⁴

The temporary suspension of DNR's grant in 2023 did not reduce Minnesota's overall grant funding, but the conditions the U.S. Fish and Wildlife Service placed on timber sales from Minnesota's WMAs have had important consequences.

The grant suspension delayed the start of DNR's Statewide Wildlife Habitat Management Grant for the subsequent two-year period. DNR had requested that this grant be approved by July 1, 2023, but the federal government did not award the grant until December 7, 2023. In January 2024, DNR received reimbursement from this grant for eligible expenditures for non-forest habitat work (such as prairie restoration, wetland restoration, and prescribed burns) it had incurred since July 1, 2023. The federal government did not allow the grant to reimburse expenditures related to forest habitat work (such as timber harvests) because DNR did not yet comply with the forest-related grant conditions.³⁵

In addition, for more than one year, DNR did not receive federal approval to initiate timber harvests to help accomplish its typical habitat management in WMAs. DNR guidelines on forest wildlife habitat state: "Managing wildlife habitat via commercial logging is the most economical and efficient method, and affects the greatest amount of habitat on an annual basis."³⁶ However, some DNR officials downplayed the impact of the slowing of timber harvests, commenting to us that a delay of months or even years would not necessarily have a significant impact on WMA forest habitat.

³⁴ According to DNR, the federal government transferred about \$3.9 million to DNR on October 23, 2023. The remainder of the suspended funds were "deobligated" from the grant. A DNR grant official told us that deobligations are a standard procedure for unspent funds at the end of a grant period, and that the deobligated funds will be made available to DNR in the future as a part of other federal wildlife restoration grants.

³⁵ DNR sought reimbursement in January 2024 for only non-forest types of habitat work. DNR has not received reimbursements for forest habitat management work under the federal wildlife habitat management grants since July 1, 2021, due to the conditions that have been on the federal grant since that time. In fiscal years 2018 through 2021, DNR was reimbursed for an annual average of \$518,000 in forest habitat work through the Statewide Wildlife Habitat Management Grant. Since mid-2021, DNR's forest habitat work in WMAs has since been paid for entirely with state funds, as these expenses were no longer eligible for federal reimbursement.

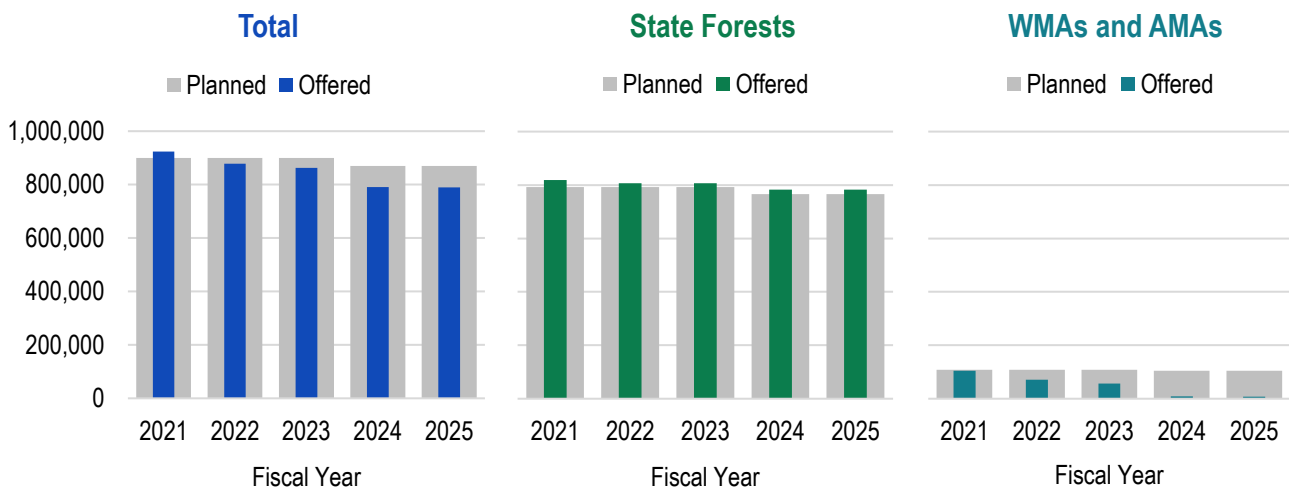
³⁶ Minnesota Department of Natural Resources, Fish and Wildlife Division, *Forest Wildlife Habitat Management Guidelines* (2012), 10. The document says: "Wild animals need food, water, cover and space in the proper arrangement. Forest management directly affects these needs."

Nevertheless, the delays to timber harvests in WMAs have made it more difficult for DNR to meet its overall cord harvest targets.³⁷ Exhibit 2.2 shows the total cords of timber offered for sale from WMAs and aquatic management areas (AMAs) in recent years.³⁸ In Fiscal Year 2024, DNR offered only 8 percent of the cords it had previously planned for that year (104,400 cords) from WMAs and AMAs. Ten months into Fiscal Year 2025, the amount of timber sold from WMAs for the year was almost 100,000 cords short of DNR's target for the year. This contributed to an overall shortfall of cords offered for sale from all DNR lands in recent years. DNR's Forestry Division director told us her division expects WMA timber sales amounts to be below what DNR expected to achieve for several years.

Some Forestry Division officials have expressed concern that fewer timber harvests in WMAs could threaten the viability of logging companies in parts of the state that rely considerably on WMA timber. Additionally, one DNR staff person told us that restrictions on WMA timber sales have created tensions between some DNR wildlife employees and the communities where they work that rely considerably on logging.

Exhibit 2.2

New Cords of Timber Offered for Sale from Lands Administered by the Forestry Division and Fish and Wildlife Division, Fiscal Years 2021–2025



Notes: Fiscal Year 2025 data are current as of May 13, 2025. "AMA" refers to aquatic management area. DNR manages a number of AMAs that are also intended to provide wildlife habitat. As stated in footnote 38 in this chapter, we generally excluded timber harvests on AMAs from the scope of this review. However, because AMAs are included in DNR's planning for timber harvests, we included them in this chart.

Source: Office of the Legislative Auditor, analysis of Department of Natural Resources data.

³⁷ As we discussed in Chapter 1, DNR in 2018 set an overall target for the annual cords to be harvested from DNR-managed lands; this target was intended to reflect a balance among the needs of wildlife, biodiversity, forest industry, water quality, and recreation.

³⁸ DNR manages a number of aquatic management areas (AMAs) that are also intended to provide wildlife habitat. While 42 percent of AMA acreage is forested, the state's total acreage in AMAs (approximately 45,900 acres) is equivalent to only about 3 percent of the state's total acreage in WMAs (approximately 1,383,900). Unless otherwise noted, we generally excluded timber harvests on AMAs from the scope of this review.

Recommendation

As we explained in this chapter, the temporary suspension of DNR’s Statewide Wildlife Habitat Management Grant in 2023 was the culmination of longstanding compliance concerns expressed by the U.S. Fish and Wildlife Service. DNR did not take the steps necessary to comply with federal grant conditions—conditions that were repeatedly communicated to DNR—and at times indicated that it had misunderstood federal direction.

RECOMMENDATION

DNR should ensure it understands the U.S. Fish and Wildlife Service’s expectations for its documentation and use of federal grant funds, and it should comply with federal grant requirements.

DNR should take immediate steps to come into compliance with federal requirements. If DNR believes the U.S. Fish and Wildlife Service’s expectations are not clear, DNR should clarify its understanding with the Service. The risks of noncompliance are significant, further jeopardizing federal grant awards and the wildlife habitats WMAs were created to preserve.

Chapter 3: Wildlife Management Area Planning

The Department of Natural Resources (DNR) periodically engages in planning to establish goals and inform decisions about how to allocate its resources. For example, as we discussed in Chapter 1, DNR develops forest resource management plans on a 10-year cycle to plan for when, where, and how much timber to harvest from DNR-administered lands. As another example, DNR produces a wildlife action plan every 10 years to focus the department’s conservation activities on native wildlife species that are rare, declining, or vulnerable to decline.

Planning also provides an important tool for DNR to measure its performance and be accountable to the Legislature and the public. Many of DNR’s responsibilities in law are stated broadly—for example, to “perpetuate...quality wildlife habitat for maximum production of a variety of wildlife species” within wildlife management areas (WMAs).¹ The terms “quality wildlife habitat,” “maximum production,” and “a variety of wildlife species” can be interpreted in many ways. A robust planning process can clarify what specifically DNR hopes to accomplish on a given tract of land over a specified time period.

DNR has developed plans for a small number of the state’s WMAs. Without such plans, it is difficult to determine whether timber harvesting benefits the wildlife habitats WMAs are intended to protect.

As we discussed in Chapter 2, in 2023, the U.S. Fish and Wildlife Service temporarily suspended a federal grant DNR uses to pay for administering timber sales in WMAs, among other wildlife habitat management activities. One of the concerns the Service repeatedly expressed was DNR’s lack of WMA master plans.²

As of August 2025, DNR had master plans for only 7 of Minnesota’s over 1,500 WMAs.³ These master plans specify the wildlife habitats the WMAs are intended to protect, the goals and objectives of DNR’s wildlife habitat management in the WMAs, the activities DNR will undertake to achieve its goals, and the metrics DNR will use to measure its progress toward meeting its goals.

¹ *Minnesota Statutes* 2024, 86A.05, subd. 8(c).

² As discussed later in this chapter, state law refers to the preparation of “master plans” for WMAs. However, DNR staff and representatives of the U.S. Fish and Wildlife Service also use “management plans,” “wildlife plans,” or other terms interchangeably with the term “master plan.” In this chapter, we use the term “master plan.”

³ These seven WMAs account for just over 40 percent of the state’s total WMA acreage. About 200 WMAs have internal “management guidance documents” developed by field staff. DNR’s former director of the Fish and Wildlife Division told us the WMA management guidance documents are purposely not called plans and have not undergone adequate internal or external review.

A lack of master plans makes it difficult to assess whether DNR has successfully accomplished what it set out to do, because any activity affecting the environment will likely benefit some species while disadvantaging others. For example, a current master plan for the Mille Lacs WMA calls for thinning dense oak stands so that the remaining trees produce more acorns—thus increasing food sources for deer, black bears, ruffed grouse, gray squirrels, and wild turkeys.⁴ On the other hand, maintaining dense oak stands might be beneficial to some wildlife species, such as raptors, interior forest birds, and shade-tolerant plant species. Without a standard against which to measure, DNR could plausibly say that *some* forms of wildlife have benefited, regardless of the department’s actions (or inaction). Similarly, the department could be criticized for allowing the decline of certain species that were never intended to benefit from the department’s activities.

In this chapter, we discuss state and federal requirements for WMA plans, as well as DNR’s failure to ensure its WMA plans were kept up to date. We offer recommendations to the Legislature and to DNR at the conclusion of this chapter.

State and Federal Requirements

State and federal laws have few requirements about which WMAs must have master plans, what they should include, and when they must be updated.

Since 1977, state law has prohibited “construction of new facilities” in and “other development of” certain WMAs until DNR prepared a “master plan.”⁵ Specifically, state law requires DNR to prepare master plans only for WMAs with a “resident manager.”⁶ However, state law does not define the term “resident manager” or designate which WMAs should have one.⁷ According to DNR, resident managers are wildlife managers who live on-site at a WMA. Resident managers assist first responders with emergency response; protect equipment and facilities from theft or destruction; and provide information to the public regarding hunting, trapping, and habitat work, among other things.

By law, each master plan must provide for WMA management that is “consistent with the purposes for which the [WMA] was authorized....”⁸ Further, state law requires DNR to “present the information [in the plan] in a format and detail that is appropriate to the size and complexity” of the WMA.⁹ Other than these requirements, state law does not contain specific requirements for the contents of WMA master plans. For example, the

⁴ Department of Natural Resources, *Mille Lacs Wildlife Management Area Master Plan, 2024–2033* (2023), 74–75.

⁵ *Laws of Minnesota* 1975, chapter 353, sec. 9, codified as *Minnesota Statutes* 2024, 86A.09, subd. 1. While this law passed in 1975, it did not require DNR to prepare master plans until August 1, 1977.

⁶ *Minnesota Statutes* 2024, 86A.09, subd. 1.

⁷ DNR policy also does not define the term “resident manager.”

⁸ *Minnesota Statutes* 2024, 86A.09, subd. 3(1).

⁹ *Minnesota Statutes* 2024, 86A.09, subd. 2.

law does not require DNR to identify the wildlife habitats or species within WMAs, specify goals for WMAs, or indicate how DNR plans to achieve its goals.

DNR must make draft master plans available for public review and comment.¹⁰ In addition, state law requires DNR to prepare master plan amendments for any proposed changes to a WMA that would vary from an approved master plan; plan amendments must “address the impacts of the proposed changes to the natural and cultural resources, interpretive services, recreational opportunities, and administrative activities at the unit.”¹¹ State law does not establish a timeline by which DNR must update existing plans.

As we discussed in Chapter 2, Minnesota has received grant funding through the federal Pittman-Robertson Wildlife Restoration Act for more than 80 years. A stated purpose of this assistance is “to assure sound conservation policies through the development, revision, and implementation of a comprehensive wildlife conservation and restoration plan.”¹² Federal law requires states applying for federal funding through this act to either (1) submit a comprehensive statewide fish and wildlife resource management plan, or (2) make requests for funding on a project-by-project basis.¹³ While federal law contains some specific requirements for comprehensive plans, DNR has chosen the latter approach.

Rather than use the “resident-manager” requirement established in law, in recent years, DNR used “major unit” status to determine whether a WMA should have a master plan.

DNR currently considers eight WMAs to be major unit WMAs; all WMAs that currently have a resident manager are also major units, but some major unit WMAs do not have a resident manager. Exhibit 3.1 shows Minnesota’s eight major unit WMAs, as designated by DNR. These WMAs account for about 581,600 acres, or over 40 percent of the total acres in Minnesota’s WMAs.

¹⁰ *Minnesota Statutes* 2024, 86A.09, subd. 2.

¹¹ *Minnesota Statutes* 2024, 86A.09, subd. 6.

¹² Pittman-Robertson Wildlife Restoration Act, 16 *U.S. Code*, sec. 669, Statutory Note: Statement of Purpose and Definition in Pub. L. 106–553 (2023).

¹³ 16 *U.S. Code*, sec. 669e(a) (2023).

Exhibit 3.1

WMAs with Resident Managers or Major Unit Status, 1977–2024

WMA	Counties	Number of Acres	The WMA Had a Resident Manager In:		DNR Currently Considers the WMA a “Major Unit” WMA
			1977	2024	
Carlos Avery	Anoka, Chisago	24,600	Yes	Yes	Yes
Hubbel Pond	Becker	3,500	Yes	No	No
Lac qui Parle	Big Stone, Chippewa, Lac qui Parle, Swift	33,600	Yes	Yes	Yes
Mille Lacs	Kanabec, Mille Lacs	38,700	Yes	No	Yes
Red Lake	Beltrami, Lake of the Woods	324,600	Yes	Yes	Yes
Roseau River	Kittson, Roseau	75,200	Yes	Yes	Yes
Talcot Lake	Cottonwood, Murry, Nobles	5,300	Yes	No	No
Thief Lake	Beltrami, Marshall, Roseau	54,700	Yes	Yes	Yes
Vermillion Highlands ^a	Dakota	2,800	—	No	Yes
Whitewater	Olmsted, Wabasha, Winona	27,500	Yes	No	Yes

^a The Vermillion Highlands WMA was created after the 2006 Legislature set aside land owned by the University of Minnesota for joint management by the University and DNR for conservation, research, and outdoor recreation.

Source: Office of the Legislative Auditor, analysis of Department of Natural Resources documents.

Neither state law nor DNR policy define what constitutes a major unit WMA. In a recent WMA plan, DNR described major unit WMAs as WMAs that may have staff who live on-site; greater than average WMA acreage; on-site heavy equipment; large staff complements; or many buildings, facilities, and roadways for public and operational uses.¹⁴

Because state law does not specify which WMAs should have resident managers or should be designated as a major unit WMA, DNR has discretion to decide which WMAs have resident managers and which WMAs should be designated as a major unit. In other words, DNR determines which WMAs should have management plans.

DNR has reduced its use of resident managers over time, effectively reducing the number of WMAs for which DNR must develop master plans.¹⁵ As Exhibit 3.1 shows, in 1977, nine WMAs in Minnesota had resident managers, compared with five in 2024. For example, the 27,500-acre Whitewater WMA (in Olmsted, Wabasha, and Winona counties) has not had a resident manager since about 1991, and the 38,700-acre Mille Lacs WMA (in Kanabec and Mille Lacs counties) has not had a resident manager since 2006. Some large WMAs, such as the 30,800-acre Beaches Lake WMA (in Kittson County) or the 31,800-acre Wapiti WMA (in Beltrami, Marshall, and Roseau counties), have never had a resident manager or been designated as a major-unit WMA.

¹⁴ DNR, *Mille Lacs Wildlife Management Area Master Plan, 2024–2033*, 8.

¹⁵ The former director of DNR’s Fish and Wildlife Division told us that requiring managers to live in WMAs can be a recruiting barrier and that DNR has considered whether these living arrangements should become optional.

In recent years, DNR’s WMA planning has been driven by whether it designated specific WMAs as major unit WMAs. While the Pittman-Robertson Wildlife Restoration Act does not require states to develop plans for individual WMAs, Minnesota has received more than \$1 million in federal grants since 2016 for the explicit purpose of developing WMA plans for seven of the eight major unit WMAs.

Revision of WMA Plans

Between 1977 and 1980, DNR developed master plans for all nine of the WMAs with resident managers at that time. However, none of these plans were updated when they reached the end of their original 10-year planning horizon.

DNR did not update most WMA master plans for several decades.



In a 2010 evaluation report, the Office of the Legislative Auditor expressed concern about the lack of WMA management plans. The report referenced backlogged activities in WMAs, such as brushland management and removal of trees, and it recommended: “As soon as possible, DNR should identify and quantify the overall management needs and funding shortfalls for the state’s system of Wildlife Management Areas.”

Source: Office of the Legislative Auditor, Program Evaluation Division, *Natural Resource Land* (2010), 47–48.

DNR updated a plan that included the Lac qui Parle WMA in 1997, but DNR did not address the other outdated plans until the late 2010s to mid-2020s. Between 2017 and 2025, DNR updated the plans for four additional WMAs that have resident managers (Carlos Avery, Red Lake, Roseau River, and Thief Lake), all decades after the prior plans expired. Two WMAs (Mille Lacs and Whitewater) that do not currently have resident managers—but that are considered to be major units—also did not have updated plans for nearly 40 years.¹⁶ Exhibit 3.2 shows when plans were updated for all WMAs DNR has designated as major units.

Exhibit 3.2
Status of Plans for WMAs Currently Classified as a Major Unit

WMA	Number of Acres	Resident Manager	Date of Most Recent Plan	Date of Previous Plan(s)
Carlos Avery	24,600	Yes	2025–2034	1977–1986
Lac qui Parle	33,600	Yes	2024–2034	1977–1986 and 1997–2017 ^a
Mille Lacs	38,700	No	2024–2033	1977–1986
Red Lake	324,600	Yes	2023–2033	1980–1989
Roseau River	75,200	Yes	2025–2035	1980–1989
Thief Lake	54,700	Yes	2017–2027	1980–1989
Vermillion Highlands	2,800	No	—	—
Whitewater	27,500	No	2023–2033	1977–1986

^a The 1997 *Lac qui Parle Area Management Plan* addressed both the Lac qui Parle WMA and the adjacent state park.

Source: Office of the Legislative Auditor, analysis of Department of Natural Resources documents.

¹⁶ In addition, the Whitewater WMA and Mille Lacs WMA did not have up-to-date master plans during several years when they still had managers who lived on-site (1987 to 1991 and 1987 to 2006, respectively).

Wildlife habitat can change over time as vegetation matures, invasive species proliferate, the climate changes, or natural disasters occur. Additionally, social changes, such as changes in WMA users' recreation preferences, can affect how DNR manages WMAs. Updating master plans is essential to effectively addressing these changes; it also enables the Legislature and the public to evaluate how well DNR has adapted to these changes.

Further, a lack of planning can make it difficult for DNR staff to coordinate effectively when determining whether, where, and when to harvest timber in WMAs. To learn about the perspectives of DNR staff on planning and timber harvesting in WMAs, we surveyed DNR field staff in three DNR divisions (Ecological and Water Resources Division, Fish and Wildlife Division, and Forestry Division).¹⁷ In response to our survey, one Forestry Division employee said:

Management activities are based on managers' interests and feelings. ... If a WMA had a management plan to indicate what the goals are, we would have something to work towards together.

Another Forestry Division respondent stated:

...the biggest problem has been knowing what the specific desired future condition is, and what species are those that are supposed to be benefiting.

Further, one Fish and Wildlife Division respondent wrote:

Little to no documentation [on how timber harvests could improve habitat] occurred prior to late 2023. We need to develop WMA plans (not just for major units) that help define habitat goals and subsequent timber harvest opportunities that benefit wildlife.

DNR sought and received federal funding to update WMA master plans but then struggled to meet deadlines.

DNR received an initial grant from the U.S. Fish and Wildlife Service in 2016 to revise two major unit WMA plans by June 30, 2017. DNR received a second federal planning grant in 2018 to revise five WMA plans by June 30, 2021.

In 2016, DNR's project statement for its initial WMA planning grant said it would complete two plans—for the Red Lake and Whitewater WMAs—by June 30, 2017. DNR then decided to work on the Thief Lake WMA plan rather than the Red Lake WMA plan, and it submitted to the U.S. Fish and Wildlife Service an amended project statement to remove the Red Lake WMA plan from the grant. The completed Thief Lake WMA plan was approved by the DNR commissioner in December 2017. The Whitewater WMA plan was not completed until January 2023.

¹⁷ In April 2024, we sent survey invitations to staff working in DNR's Ecological and Water Resources Division, Fish and Wildlife Division, and Forestry Division. We received responses from 181 of the 213 staff we surveyed (85 percent).

In 2018, DNR’s project statement for its second WMA planning grant said it would complete plans for five WMAs—Carlos Avery, Lac qui Parle, Mille Lacs, Red Lake, and Roseau River—by June 30, 2021. In 2021, DNR twice set new target completion dates for the plans, first pushing the deadline for some of the plans to 2023 and then moving the deadline for all five plans to June 30, 2024.

In March 2023, DNR committed to the U.S. Fish and Wildlife Service that it would complete the last of the five plans by the end of June 2025.¹⁸ DNR issued all five plans by June 30, 2025. Exhibit 3.3 shows the time between DNR’s initial schedule for completing each of the seven plans and the plans’ actual completion dates.

Exhibit 3.3

WMA Plans: Initial Scheduled and Actual Completion Dates

Major Unit WMA	Initial Scheduled Completion Date	Actual Completion Date	Difference
Carlos Avery	June 2021	December 2024	3 years, 6 months
La qui Parle	June 2021	June 2024	3 years
Mille Lacs	June 2021	December 2023	2 years, 6 months
Red Lake	June 2017	June 2023	6 years
Roseau River	June 2021	June 2025	4 years
Thief Lake	June 2017	December 2017	5 months
Whitewater	June 2017	January 2023	5 years, 7 months

Notes: DNR has also designated Vermillion Highlands WMA as a major unit WMA, but it has not scheduled plan development. As a result, we did not include it in the above table.

Source: Office of the Legislative Auditor, analysis of Department of Natural Resources documents.

Additionally, one WMA that DNR has designated as a major unit—Vermillion Highlands WMA—does not have a master plan, and there is no schedule for developing such a plan. In 2006, the Legislature required the University of Minnesota and DNR to cooperatively oversee roughly 2,800 acres of land in Dakota County until a future date when the land would transfer from university ownership to the State of Minnesota.¹⁹ This land became known as Vermillion Highlands, and DNR classifies this as one of the state’s major unit WMAs. After the legislation was enacted, the university, DNR, and Dakota County undertook an assessment of the programmatic needs for this land. The assessment discussed the need to develop a master plan in the future, saying:

A Master Plan is necessary to assess natural resource inventories and estimate [capital] expenditures associated with restoration of native plant communities and diversified use of the land. The DNR, University of Minnesota, and Dakota County are linking together to complete this plan.²⁰

¹⁸ U.S. Department of the Interior, U.S. Fish and Wildlife Service, Midwest Region, and Minnesota Department of Natural Resources, *Management Action Agreement*, March 30, 2023, sec. III(B)(2).

¹⁹ *Laws of Minnesota* 2006, chapter 247, secs. 1 and 2.

²⁰ Minnesota Department of Natural Resources, in cooperation with the University of Minnesota and Dakota County, *Creating Common Ground: A report to the Minnesota Legislature on joint management opportunities related to the 2,840 acres of conservation, research and recreation land owned by the University of Minnesota in Dakota County* (2007), 16.

Likewise, a formal management agreement between DNR and the University of Minnesota in January 2007 said that a master plan would be developed for this conservation land. However, no plan has been developed, and DNR is not currently pursuing development of a plan.

Recommendations

One of DNR’s principal roles is to serve as a steward for land owned and managed by the state. DNR protects this land for the benefit of current and future generations. For the state-managed lands examined in this special review—WMAs—statutory requirements regarding planning have lacked clarity in key ways, functionally giving DNR wide latitude. The law does not clearly identify WMAs subject to planning requirements, and instead excepts those areas without resident managers—a staffing decision that is wholly at DNR’s discretion. The law also does not provide DNR with clear direction regarding what it should include in WMA plans. Further, the law does not require regular updating of master plans, instead requiring only that DNR update plans as needed when it is proposing changes to how the land is managed.



[W]e need individual plans for all of our WMAs, and they need to be written at the local level by biologists who understand their lands. It is blatantly irresponsible that the DNR has operated for so long without WMA plans. What other agency is allowed to dispense tens of millions of dollars per year without a plan? We need plans written at local levels and local managers with the authority to enact the plans.

— Fish and Wildlife Division
survey respondent

Although DNR has had difficulties meeting deadlines, it has made efforts to update master plans for the first time in decades for the WMAs it has designated as major units. It has also begun work on a statewide WMA plan, set to be completed in 2027. But despite these efforts, DNR still has current plans for only 7 of Minnesota’s over 1,500 WMAs. There are many large WMAs for which DNR has made no efforts to develop WMA-specific plans, such as the 30,700-acre Beaches Lake WMA in Kittson County and the 31,800-acre Wapiti WMA in Beltrami, Marshall, and Roseau counties.

Without master plans, it is challenging for the federal government, the Legislature, and the public—and even the department itself—to evaluate DNR’s effectiveness at achieving the statutory purpose of WMAs: to preserve and enhance wildlife habitat. And, as we discuss further in Chapter 4, a lack of plans also makes it difficult to assess

whether DNR’s timber harvesting decisions have been consistent with the statutory purpose or wildlife goals of WMAs. The U.S. Fish and Wildlife Service has indicated that it views updating WMA master plans as a priority because plans are critical for determining the effectiveness of DNR’s management of WMAs. At the conclusion of a 2020 field audit of three large WMAs, federal officials said in a draft review:

The lack of completed or approved plans for the WMAs or other types of plans, whether grant funded or not, prevented the accurate analysis of the habitat conditions, goals and objectives, governance, and eligibility or appropriateness of the on the ground management activities on the three (3) WMAs.²¹

²¹ “WSFR Field Audit/Review, February 25–27, 2020” (PowerPoint slides, U.S. Fish and Wildlife Service, Wildlife and Sport Fish Restoration Program, July 22, 2020), slide 15. The slides are marked with the phrase “For Discussion Purposes Only—Pre-Decisional Draft.” The WMAs included in the audit were Mille Lacs, Red Lake, and Whitewater.

Consistent with the Service's concerns we outlined in Chapter 2, the Service said, "The plans must show that timber harvest locations and methods are planned in advance with the purpose of increasing the value of wildlife habitat and recreational opportunity."²²

RECOMMENDATIONS

The Legislature should:

- **Specify which WMAs should have individual master plans based on criteria that are independent of DNR staffing decisions.**
 - **Indicate what DNR should include in the plans.**
 - **Require DNR to update master plans on a specified periodic basis.**
-

Statutes use the term "resident manager" to specify which WMAs should have plans, but the statutes do not define this term, nor do they specify which WMAs should have such managers. DNR does not have resident managers at all large WMAs and has gradually moved away from the residential staffing model. DNR has committed to develop master plans for each WMA that the department has designated as a major unit, but there is no definition of "major unit" in DNR policy or state statutes.

We recommend that the Legislature amend the law so that the WMAs required by law to have master plans are clearly specified and based on criteria that are independent of DNR staffing decisions. The Legislature should also specify any requirements for the contents of the plans, such as statements identifying the wildlife habitats the WMAs are intended to protect, the goals for the WMAs, or how DNR plans to achieve its goals.

Further, the Legislature should specify in law a timeline by which DNR must update WMA plans. Each of the WMA plans DNR has developed in recent years cover a roughly 10-year period. Accordingly, the Legislature could require DNR to update plans either (1) when proposed changes to the WMA vary from the approved master plan (as the law currently requires) or (2) every 10 years, whichever is sooner.

RECOMMENDATIONS

DNR should:

- **Maintain current plans for all WMAs that have resident managers, as required by state statute.**
 - **Complete its plans for all WMAs designated as major units.**
 - **Work with the Legislature to determine the scale, scope, and frequency of plans for all other WMAs.**
-

Regardless of whether the Legislature addresses our recommendations above, DNR still must meet the requirements of existing state law. Although DNR failed to maintain up-to-date master plans for WMAs over the course of many years, it has completed

²² "WSFR Field Audit/Review, February 25–27, 2020," slide 20.

plans for the WMAs that are currently required by state law to have them. Given that DNR's current plans cover periods of roughly 10 years, DNR should take steps to ensure that it updates its WMA plans in a timely manner in the future.

DNR should also ensure a master plan is developed for the Vermillion Highlands WMA to comply with its previous commitments.²³ Because DNR currently manages this property together with the University of Minnesota, the two entities will need to develop the plan jointly.²⁴

Finally, to ensure commonly understood and shared goals for the state's WMAs, DNR should work with the Legislature to determine the scale, scope, and frequency of plans for all other WMAs. DNR and the Legislature could address this recommendation through a combination of joint plans for small WMAs grouped together by region or land type and individual plans for large, complex, or heavily used WMAs that require more tailored plans. Such plans would provide an important form of accountability for the agency by committing DNR to the goals it is trying to accomplish on the lands it manages. The planning process could also permit the public and interested parties to provide input through comments and public meetings.²⁵

Such a requirement would also be consistent with a 2023 agreement between DNR and the U.S. Fish and Wildlife Service. In the agreement, the two parties agreed that:

Plans will be developed for WMAs/AMAs that are not considered to be "major units." For planning purposes WMAs/AMAs may be grouped geographically by ecoregion, management region, or other similarities.²⁶

We are aware that good planning is a process that takes time, expertise, and resources. We recommend that DNR work with the Legislature to determine appropriate timelines so that DNR is not expected to produce large numbers of plans in a short period of time.

²³ As we explained earlier in this chapter, a management agreement between DNR and the University of Minnesota in January 2007 said that a master plan would be developed for the Vermillion Highlands WMA. Additionally, a March 2023 management action agreement between DNR and the U.S. Fish and Wildlife Service committed DNR to "finishing master plans for 'major unit' WMAs...." U.S. Department of the Interior and Minnesota Department of Natural Resources, *Management Action Agreement*, March 30, 2023, sec. III(B)(1). While the agreement does not explicitly name Vermillion Highlands WMA, completing a master plan for the WMA would be consistent with the agreement.

²⁴ *Laws of Minnesota* 2006, chapter 247, sec. 2, subd. 2, provides for how ownership of the land may transfer from the University of Minnesota to DNR after the State of Minnesota makes its final payments to the university for the university's stadium.

²⁵ For example, under *Minnesota Statutes* 2024, 86A.09, subd. 2, DNR is required to engage in a review-and-comment process when adopting a master plan, as well as a local public meeting for major unit plans.

²⁶ U.S. Department of the Interior and Minnesota Department of Natural Resources, *Management Action Agreement*, March 30, 2023, sec. III(B)(1).

Chapter 4: Leadership and Decision-Making

As we have discussed throughout this report, state law requires DNR to manage wildlife management areas (WMAs) for the benefit of wildlife and related recreation, including the perpetuation of wildlife habitats for the benefit of a variety of wildlife species.¹ And, as we explained in Chapter 2, federal law requires DNR to use federal grant funds it receives, as well as income generated from timber sales from WMAs, to support the wildlife purposes for which the land was acquired.² Despite this clear direction, federal officials, DNR staff, and other stakeholders have expressed concerns about whether DNR timber-harvesting decisions in WMAs have been consistent with legal requirements. Indeed, as described in Chapter 2, these concerns led the U.S. Fish and Wildlife Service to impose additional requirements on DNR and temporarily withhold federal funding for WMA activities.

In light of these concerns, we examined the process DNR uses to determine whether, when, and how much timber to harvest in WMAs. DNR policies and procedures direct staff from multiple divisions to work together when making forest management decisions generally and WMA timber harvest decisions specifically. As noted in a February 2025 letter from the DNR commissioner to our office, “DNR has taken an integrated and interdisciplinary approach to forest management for more than three decades. This involves coordinating across divisions, disciplines, and administrative land types.”³ However, for several reasons, the department’s consensus-style model of decision-making has not worked effectively with regard to WMA timber harvest decisions.

Unclear guidance and conflicting goals have caused uncertainty as to whether DNR has met statutory requirements to harvest timber in WMAs only for the benefit of wildlife and related recreation.

In this chapter, we explore how and why DNR’s decision-making process is problematic. In the first section, we examine the policies and procedures that guide DNR decisions regarding WMA timber harvests. Then, we explain DNR’s consensus-based model of decision-making and describe how final authority for decisions has become muddled. Next, we discuss the guidance that DNR leadership has provided staff, which has at times been contradictory. Finally, we explore how unclear authority, conflicting guidance, and weak policies and procedures have led to ongoing dissatisfaction among DNR staff. We conclude the chapter with several recommendations for DNR.

¹ *Minnesota Statutes* 2024, 86A.05, subd. 8(a) and (c).

² 16 *U.S. Code*, sec. 669 (2023); and 50 *CFR*, secs. 80.10, 80.120, 80.121, and 80.123.

³ Sarah Strommen, Commissioner, Department of Natural Resources, letter to Nathan Shepherd, General Counsel, Office of the Legislative Auditor, February 7, 2025, 1.

Basis for Decisions

Minnesota statutes establish that DNR’s commissioner has “charge and control of all the public lands, parks, timber, waters, minerals, and wild animals of the state and of the use, sale, leasing, or other disposition thereof...”⁴ Additionally, state law delegates jurisdiction over the state’s fish and wildlife to DNR’s commissioner—including the discretion to “do all things the commissioner determines are necessary to preserve, protect, and propagate desirable species of wildlife.”⁵ In addition to these broad authorities, state law contains specific requirements related to how DNR must manage wildlife habitat in WMAs.

Under Minnesota law, any habitat management action DNR takes in WMAs—including timber harvesting—must protect, perpetuate, or reestablish wildlife habitat.

Under state law, WMAs “shall be...administered to accomplish the purpose and objectives of [their] classification.”⁶ The purpose and objective of WMAs is set forth explicitly in statute:

A state wildlife management area shall be established to protect those lands and waters which have a high potential for wildlife production and to develop and manage these lands and waters for the production of wildlife, for public hunting, fishing, and trapping, and for other compatible outdoor recreational uses.⁷

DNR must “administer” WMAs “in a manner which is consistent with” these purposes in order to “perpetuate, and if necessary, reestablish quality wildlife habitat for maximum production of a variety of wildlife species.”⁸ By definition, “administering” includes any part of the process of managing or operating WMAs and their natural resources.⁹

Therefore, by law, DNR is authorized to harvest timber in WMAs only to protect, perpetuate, or reestablish habitat to produce wildlife, including for public hunting, fishing, trapping, and similar outdoor recreational uses. DNR can harvest timber in WMAs for this purpose *and* receive secondary benefits, including financial benefits

⁴ *Minnesota Statutes* 2024, 84.027, subd. 2.

⁵ *Minnesota Statutes* 2024, 97A.045, subd. 1(a).

⁶ *Minnesota Statutes* 2024, 86A.05, subds. 1 and 8.

⁷ *Minnesota Statutes* 2024, 86A.05, subd. 8(a). Courts have interpreted the phrase “shall be established to” as used throughout *Minnesota Statutes* 2024, 86A.05, as stating the mandatory purpose of each type of outdoor recreational unit. See *Green-Glo Turf Farms, Inc. v. State*, 347 N.W.2d 491, 493 (Minn. 1984) (stating that WMAs must be “developed and managed for ‘the production of wildlife, for public hunting, fishing, and trapping, and for other compatible outdoor recreational uses.’”); *Zacharias v. Minnesota Dep’t of Nat. Res.*, 506 N.W.2d 313, 317 (Minn. Ct. App. 1993) (describing the purpose of recreational state parks, now called state recreation areas); and *Johnson v. State*, 478 N.W.2d 769, 771–772 (Minn. Ct. App. 1991) (describing the purpose of state rest areas).

⁸ *Minnesota Statutes* 2024, 86A.05, subd. 8(c).

⁹ *Minnesota Statutes* 2024, 86A.03, subd. 4.

from selling timber from the lands. But DNR may not harvest timber in WMAs if habitat for wildlife species is not protected, perpetuated, or reestablished by that harvest. Additionally, when considering other possible secondary benefits from harvesting timber in WMAs, the law requires DNR to prioritize the statutory purpose of WMAs over other factors.

DNR’s procedures and guidelines do not provide clear direction to staff on how to prioritize the statutory purpose of WMAs when making decisions about harvesting timber in WMAs.

DNR has developed several guidelines, plans, policies, and procedures intended to guide staff in determining when, where, and how much timber to harvest from WMAs. Three key documents include:

- DNR’s *Interdisciplinary Forest Management Coordination Framework*, last updated in 2015. The stated purpose of the framework is “to ensure effective coordination between the Divisions of Forestry, Fish and Wildlife, and Ecological and Water Resources as a means to improve decision-making and achieve sustainable forest management” on lands administered by the Fish and Wildlife and Forestry divisions.¹⁰
- A Fish and Wildlife Division directive, *Forest Management on WMAs and AMA/FMAs*, issued in 2009.¹¹ This directive was intended to guide forest management on lands administered by the Fish and Wildlife Division, including WMAs.
- A DNR procedure, *Forest Habitat Management on Lands Administered by the Fish & Wildlife Division*, issued in 2023. This procedure replaced a section of the 2009 directive and was intended to add “clarity on roles and responsibilities for completing forest habitat management activities on lands administered by [the Fish and Wildlife Division].”¹²

All three documents emphasize the importance of an interdisciplinary approach to ensuring DNR achieves multiple natural resource goals. For example, the 2015 framework states that three DNR divisions are mutually responsible for

- [1] Sustaining and enhancing functioning forest ecosystems and providing a sustainable supply of forest resources to meet human needs;
- [2] managing, protecting, and regulating the state’s fish and wildlife

¹⁰ Department of Natural Resources, Divisions of Forestry, Fish and Wildlife, and Ecological and Water Resources, *Interdisciplinary Forest Management Coordination Framework*, revised December 2015, 1.

¹¹ In addition to WMAs, DNR manages a number of aquatic management areas (AMAs) that are also intended to provide wildlife habitat. While 42 percent of AMA acreage consists of deciduous, evergreen, or mixed forests, the state’s total acreage in AMAs (approximately 45,900 acres) is equivalent to only 3 percent of the state’s total acreage in WMAs (approximately 1,383,900). As such, we generally excluded timber harvests on AMAs from the scope of this review.

¹² Department of Natural Resources, Interdisciplinary Forest Management Policy System, *Procedure: Forest Habitat Management on Lands Administered by the Fish & Wildlife Division*, effective May 25, 2023, 10.

resources, often using forest management as a tool; and [3] conserving native plant communities, native plant species, and nongame wildlife.¹³

However, none of the three documents clearly indicate that wildlife-related purposes must be the top priority or deciding factor in DNR’s consideration of any activity in WMAs, as state law requires. Additionally, none of the documents clearly indicate *how* staff should ensure wildlife considerations are prioritized over other competing interests within the department’s interdisciplinary approach to forest habitat management. While two of the documents direct staff to use timber harvests in WMAs only to achieve wildlife habitat goals, the documents also direct staff to follow plans or standards that do not necessarily prioritize the statutory purpose of WMAs.

As shown in the callout boxes in this section, many DNR field staff commented in response to our survey that DNR has either balanced or prioritized other DNR interests—including timber production—over wildlife habitat goals when making management decisions in WMAs.¹⁴ We asked DNR about the legal basis for considering factors other than benefits to wildlife and wildlife habitat when making timber harvesting decisions in WMAs. In response, DNR wrote:



Current forest practices are to maximize harvest goals, not to maximize the habitat benefits associated with a timber harvest.

— Fish and Wildlife Division
survey respondent

The commissioner may only undertake management actions in WMAs that advance the purposes for their establishment as set forth in Minn. Stat. § 86A.0[5], subd. 8. However, this subdivision does not direct the commissioner to conserve certain species, develop specified habitat, or to use or refrain from using certain habitat management practices or tools, of which commercial timber harvest is one. ... Habitat is not a singular concept. There are many types of habitat, supporting very different species assemblages, and producing a range of ancillary, non-habitat benefits. Wildlife and habitat are inextricably linked to factors such as biodiversity, climate, water quality and quantity, etc. Therefore, habitat management decisions always will consider these multiple factors.¹⁵

¹³ DNR, *Interdisciplinary Forest Management Coordination Framework*, 1.

¹⁴ In April 2024, we sent survey invitations to staff working in DNR’s Ecological and Water Resources Division, Fish and Wildlife Division, and Forestry Division. We received responses from 181 of the 213 staff we surveyed (85 percent). For the Ecological and Water Resources Division, the division director identified the field staff we surveyed, and we received responses from 11 of the 14 (79 percent) staff surveyed. For the Fish and Wildlife Division, we surveyed staff who primarily work in the field, including tasks related to wildlife habitat and forest management/coordination. We received responses from 61 of the 67 (91 percent) Fish and Wildlife Division field staff we surveyed. For the Forestry Division, the division director recommended that we consider limiting our survey to field staff for whom at least 26 percent of their geographic work areas were WMAs to help ensure that our survey focused on staff who work regularly with WMAs. Although we surveyed all Forestry Division field staff, our analysis in this chapter reports only the responses of the subgroup that the Forestry Division director had recommended. We received responses from 109 of the 132 (83 percent) Forestry Division staff we surveyed, including 37 of the 44 (84 percent) field staff for whom at least 26 percent of their work areas were WMAs.

¹⁵ Strommen, letter to Shepherd, February 7, 2025.

We agree with DNR that the law “does not direct the commissioner to conserve certain species, develop specified habitat, or to use or refrain from using certain habitat management practices or tools.” However, we do not believe that this lack of specificity gives DNR discretion to make decisions regarding WMAs considering other factors (such as social or economic benefits) with equal or greater priority than protecting, perpetuating, or reestablishing wildlife habitat. We believe the law requires the protection, perpetuation, or reestablishment of wildlife habitat to *always* be the top priority or deciding factor in DNR’s consideration of any activity in WMAs.

A lack of plans and poor documentation make it difficult to assess whether DNR’s timber harvesting decisions have been consistent with the statutory purpose and wildlife habitat goals of WMAs.

As we stated in Chapter 3, DNR did not have updated master plans for WMAs for several decades, and as of August 2025, DNR had current plans for only 7 of Minnesota’s over 1,500 WMAs.¹⁶ In other words, for most WMAs, DNR does not have a formal plan outlining the department’s goals and objectives for the WMAs, the activities DNR will undertake to achieve its goals, or the metrics DNR will use to measure its progress toward meeting its goals.

Without an articulation of the wildlife habitat goals for many WMAs, it is impossible to determine whether timber harvesting has been consistent with these goals. For some wildlife species, harvesting timber may be helpful; for other species, however, harvesting timber could be detrimental. For example, raptors such as the red-shouldered hawk prefer mature, dense forest stands for nesting and foraging. If DNR decides to thin or clear a forest stand in which the red-shouldered hawk lives, hawk populations within the WMA could be negatively affected. If DNR had intended to protect habitat for red-shouldered hawks in the WMA, this timber harvest would be inconsistent with the purpose of the WMA. But if DNR intended to improve habitat for white-tailed deer—which can benefit from thinning dense forests—the harvest would be consistent with the purpose of the WMA.

In the absence of master plans, we turned to our survey of DNR field staff to examine whether staff believed recent timber harvests were consistent with wildlife habitat goals. As Exhibit 4.1 shows, almost three-fourths (73 percent) of staff in the Fish and Wildlife and Ecological and Water Resources divisions said that WMA timber harvests had “sometimes” or “rarely or never” been consistent with a goal of improving



Wildlife values are not the primary reason for our management. Economics of the logging industry are driving the rotation ages and management on WMAs.

— Fish and Wildlife Division
survey respondent



Is wildlife the only goal within these WMA's??? Heck no. ... Water, aesthetics, recreation, wildlife, and soils are some of the many multiple use aspects that we should be managing for on WMAs.

— Forestry Division
survey respondent

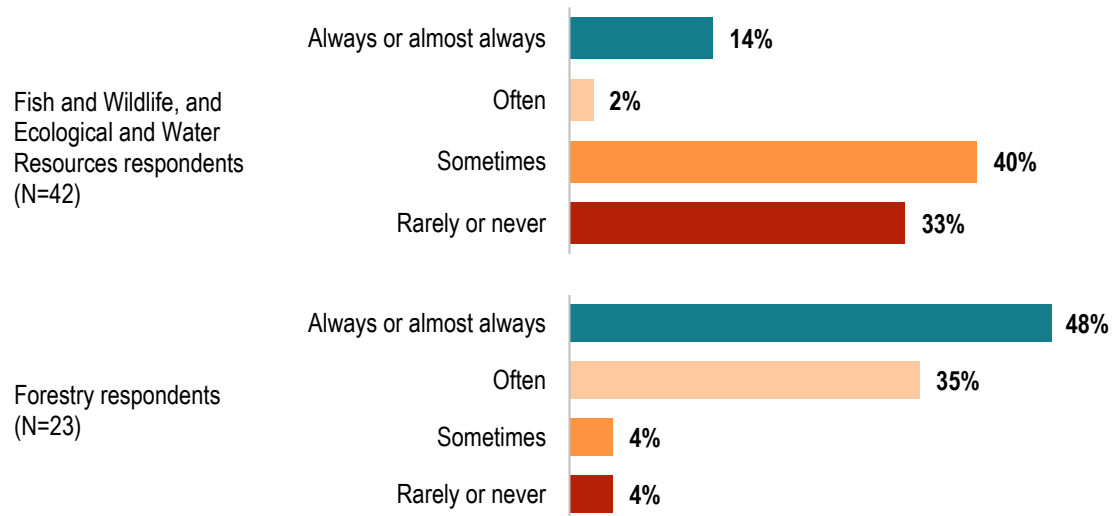
¹⁶ These seven WMAs account for just over 40 percent of the state’s total WMA acreage.

wildlife habitat.¹⁷ Although Forestry Division field staff were far more likely to say that WMA timber harvests were “always or almost always” consistent with wildlife habitat goals, 43 percent of Forestry Division field staff said that timber harvests were “often,” “sometimes,” or “rarely or never” consistent with a goal of improving wildlife habitat. As we explained above, DNR is authorized to harvest timber in WMAs only to protect, perpetuate, or reestablish wildlife habitat.¹⁸

Exhibit 4.1

Many DNR field staff we surveyed thought timber harvests in WMAs since January 2022 were not always consistent with wildlife habitat goals.

Survey question: To what extent have the timber harvests since January 2022 been consistent with the goals of those WMAs for improving wildlife habitat?



Notes: Only respondents who said there had been timber harvests since January 2022 in the WMAs where they worked were asked this question. See footnotes 14 and 17 in this chapter for more information about the survey. “Don’t know or no opinion” responses are not shown.

Source: Office of the Legislative Auditor, analysis of Department of Natural Resources field staff survey, April 2024.

¹⁷ Because we surveyed only a small number of Ecological and Water Resources Division field staff (we received responses from 11 of the 14 staff to whom we sent surveys), we combined the responses from Ecological and Water Resources Division field staff with responses from Fish and Wildlife Division field staff when reporting survey results to protect the identities of individual survey respondents. Responses from Ecological and Water Resources Division staff were more similar to responses from Fish and Wildlife Division staff than to responses from Forestry Division staff.

¹⁸ *Minnesota Statutes* 2024, 86A.05, subd. 8.

Further, as we discussed in Chapter 2, the U.S. Fish and Wildlife Service—the federal agency that has made grants to DNR for wildlife habitat management activities in WMAs—had for years expressed serious concerns that DNR had not adequately documented how proposed timber harvests would result in wildlife habitat benefits. In our survey, we asked staff about DNR’s documentation of proposed harvests. In the Fish and Wildlife and Ecological and Water Resources divisions, 70 percent of field staff whose WMAs had timber harvests between January 2022 and April 2024 said the wildlife benefits of those harvests were “sometimes” or “rarely or never” adequately documented. In the Forestry Division, 22 percent of field staff who had handled timber harvests in WMAs thought that the wildlife benefits had been “sometimes” or “rarely or never” adequately documented. Without documentation, it is challenging for anyone—including DNR leadership, the Legislature, and the public—to be certain that activities in WMAs are consistent with the primary purpose of these lands.



Particularly recently (since the sustainable timber harvest decision and its implementation) timber harvest on WMAs has been primarily driven by cord goals which are decided upon...without regard to wildlife habitat value, rare wildlife protection, or ecosystem protection and enhancement.

— Ecological and Water Resources
Division survey respondent

Decision-Making Authority

DNR’s policies and procedures direct staff from two separate divisions—the Fish and Wildlife Division and the Forestry Division—to share responsibility for the decision to harvest any given timber stand in a WMA. Further, DNR policies and procedures also require those divisions to consult with a third division, the Ecological and Water Resources Division, during the decision-making process. According to DNR’s *Interdisciplinary Forest Management Coordination Framework*, “While each [DNR] division has different mandates and functions, they have *mutual* responsibility for sustainable forest management.”¹⁹

DNR’s interdisciplinary approach exists up and down the hierarchical chain of command. DNR holds annual “joint coordination meetings” with field staff from the Ecological and Water Resources, Fish and Wildlife, and Forestry divisions regarding forest management activities within forestry areas. An Executive Forest Resources Issues Team—composed of the directors of the Ecological and Water Resources, Fish and Wildlife, and Forestry divisions and supported by subject matter experts from those divisions—meets monthly to discuss forest management issues.

In line with this consensus-building approach, DNR’s stated preference for resolving any timber harvesting dispute is for staff to work informally with their supervisors and other DNR staff to address differences of opinion.²⁰ If staff remain at an impasse after informal efforts, they may initiate a formal dispute resolution process. However, the dispute resolution process is not designed to decide in favor of one side or the other. Instead, it involves efforts by increasingly more senior management to bring the sides

¹⁹ DNR, *Interdisciplinary Forest Management Coordination Framework*, 1 (emphasis in original).

²⁰ DNR, *Interdisciplinary Forest Management Coordination Framework*, 12.

together to achieve consensus. Even the ultimate stage of the dispute process—an appeal to the division directors—is resolved by a joint decision of the directors of the Ecological and Water Resources, Fish and Wildlife, and Forestry divisions.

Although the consensus model may have been intended to ensure that all relevant constituencies within DNR have input into timber harvesting decisions, many DNR field staff have found the resulting process to be confusing and unclear.

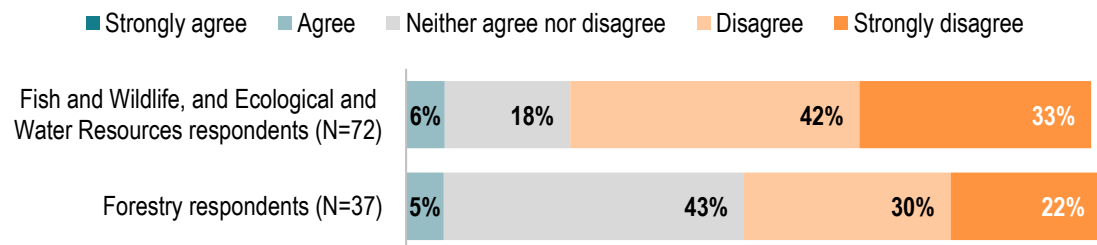
A large percentage of the DNR field staff we surveyed did not believe that it is clear who has authority within DNR to make WMA timber harvest decisions.

As Exhibit 4.2 shows, majorities of staff who responded to our survey disagreed or strongly disagreed that there was sufficient clarity about the authority of the three divisions in WMA timber harvest decisions. Three-quarters of Fish and Wildlife and Ecological and Water Resources Division field staff (75 percent) and a majority of Forestry staff (52 percent) indicated that clarity in decision-making authority was lacking.

Exhibit 4.2

Most DNR field staff we surveyed thought lines of authority were unclear.

Survey question: There is sufficient clarity about the respective authority of the Division of Fish and Wildlife, the Division of Forestry, and the Division of Ecological and Water Resources in WMA timber harvest decisions.



Notes: See footnotes 14 and 17 in this chapter for more information about the survey. “Don’t know or no opinion” responses are not shown.

Source: Office of the Legislative Auditor, analysis of Department of Natural Resources field staff survey, April 2024.

In written comments, numerous survey respondents indicated that it can be difficult to work in the cooperative decision-making model when it is not clear who has to listen to whom, or what the end goal should be for particular tracts of land. For example, in response to a survey question about areas of authority that need clarification, one Fish and Wildlife Division field staff person wrote:

Do WMA managers have the authority to initiate a harvest of “less desirable” species to benefit wildlife and the habitat in general? For Forestry initiated stands, do WMA managers have the authority to

decline proceeding with the harvest if there is a management reason? When sales do happen, how much authority do WMA managers have in designing how the sale is conducted? What are the responsibilities of the Forester and Wildlife Manager in communicating with the logger and ensuring the sale is completed appropriately?

In another response, a Forestry Division field staff respondent wrote:

It can be hard to find direct, concise information (via the DNR intranet, other online resources, or via email/asking questions up the chain) regarding forest management in any location, but particularly when there are multiple ownerships/stakeholders that should have input on land management. Some proposed harvests have gone to [the Forest Resources Issues Team] for a year or longer as no one could be sure what the scope of [Ecological and Water Resources], [Forestry], or other division's influence should be.

Because DNR's approach to making timber harvest decisions in WMAs involves coordination among staff in different divisions and who have different expertise, we asked DNR field staff about their relationships with staff in other divisions. Across all divisions combined, roughly one-third of staff said they were satisfied or very satisfied with the willingness of staff in other divisions to consider their ideas, suggestions, or opinions about timber harvests in WMAs. About one-third of staff said they were dissatisfied or very dissatisfied, and one-third said they were neither satisfied or dissatisfied or had no opinion.

However, staff who were dissatisfied often expressed significant frustration in written comments about the actions of staff in other divisions. For example, some staff frustrated with Forestry Division staff accused them of being biased toward the needs of the logging industry. Some staff frustrated with Fish and Wildlife Division or Ecological and Water Resources Division staff accused them of disregarding others' perspectives or advice, or being unwilling to compromise.

Some staff who provided positive responses further noted in written comments that their own working relationships were good, but they were aware of serious tensions among staff working in other WMAs. Several survey respondents suggested that tensions among the divisions have existed for many years. Some staff indicated that working relationships had improved since the U.S. Fish and Wildlife Service temporarily suspended DNR's wildlife habitat management grant in 2023.

Guidance to DNR Staff

There are a myriad of reasons that could explain staff concerns about unclear lines of authority over timber harvesting decisions. For example, differences in understanding among field staff are partly due to differences in background and expertise. They have also been driven by mixed messages from DNR leaders.

Guidance from DNR leadership about roles and responsibilities regarding timber harvesting in WMAs has been unclear and insufficient.

Based on the responses we received from our survey, it appears that DNR's 10-year timber harvesting strategic plan (developed in part based on the 2018 Sustainable Timber Harvest Analysis) has been a persistent source of disagreement and dissatisfaction. As we described in Chapter 1, DNR set a goal in 2018 of annually offering for sale an average of 870,000 cords of wood from DNR lands over a 10-year period, of which 12 percent would come from WMAs.²¹ DNR then produced a 10-year stand exam list specifying the forest stands the department would consider for harvest or other forest management activities each year over 10 years. Each year, the Forestry Division has pulled from the 10-year list to create an annual stand exam list.



Since [the Sustainable Timber Harvest Analysis] we have been asking questions to clarify our flexibility and authority over WMA harvest, and have been receiving vague answers throughout the process, or mixed messages from leadership across the divisions, or no answers.

— Forestry Division
survey respondent

DNR's planning documents for the 10-year stand exam list explicitly state that the list was a mostly final decision. Although DNR foresters were to consult Fish and Wildlife and Ecological and Water Resources division field staff regarding the stands that were selected each year, those field staff were expected to endorse the lists they were provided, only making changes in "rare" circumstances:

Each year, annual stand exam lists will be pulled from the 10-year list.... Local Ecological and Water Resources and Fish and Wildlife Division staff will have the opportunity to review annual stand exam lists with Forestry Area staff using the Interdisciplinary Forest Management Coordination Framework. **Stand swapping or dropping should have occurred primarily during adjustment of the 10-year list**, and coordination on annual stand exam lists is expected to revolve primarily around stand-level issues, such as harvest prescriptions. **Although rare, some stand adjustments may also occur during annual review.**²² (Emphasis added.)

²¹ See Chapter 1 for definitions of "cords" and "stands."

²² Minnesota Department of Natural Resources, Divisions of Ecological and Water Resources, Fish and Wildlife, and Forestry, *Sustainable Timber Harvest: Development of the DNR 10-year Stand Exam List* (2020), 25.

The planning documents also said that any modifications made during the annual exam process “must incorporate flexibility in a way that adheres to the intent of [Sustainable Timber Harvest] decision elements and allows the DNR to meet [Sustainable Timber Harvest] targets, recognizing that all objectives cannot be achieved everywhere at all times.”²³

From the point of view of some Forestry Division staff, this guidance was unambiguous—decisions had already been made regarding timber harvest targets, and other DNR staff were supposed to abide by those decisions. But for some staff in other divisions, this guidance contradicted their ongoing professional and legal responsibilities to prioritize wildlife habitat in their day-to-day and year-to-year decisions about managing WMAs.



There is pressure on Wildlife managers to harvest timber on WMAs to reach cord targets even if there is no desire to harvest to benefit wildlife. If we want to defer cutting the stand, we were told we must then come up with a replacement with the same number of acres, the same timber type and the same number of cords on the same WMA. This is impossible to do. If we didn't want to harvest the stand in the first place, why would [we] want to cut a replacement that is essentially the same?

— Fish and Wildlife Division
survey respondent



...there has been some mixed messaging with how these things are talked about and it is frustrating. We're told by the commissioner that cords were chosen because they can be measured, but what's really important is that we're managing our acres. That's a nice concept but we also have industry to keep happy. We can say that cord targets don't matter but our area is still expected to hit that cord target and we have to explain ourselves when we aren't able to. I just wish that we could stop sugar-coating it and be straight-forward. There is a cord target and we are expected to meet it.

— Forestry Division
survey respondent

DNR documents and statements by administrators have sometimes denied the existence of targets for the amount of timber to be harvested on DNR lands. For example, a 2023 status report on DNR's 10-year forest management strategic plan said that “producing a specific timber harvest volume was never the goal of the strategic direction.”²⁴ Nonetheless, in some geographic areas, Forestry Division staff and other DNR officials have periodically reminded Fish and Wildlife Division staff how the amount of timber actually harvested in WMA lands has compared with the targets that have been set.

²³ DNR, *Sustainable Timber Harvest: Development of the DNR 10-year Stand Exam List*, 24.

²⁴ Department of Natural Resources, *Midpoint Assessment of Forest Management Strategic Direction: Sustainable Timber Harvest Implementation—Fiscal Years 2019–2022* (2023), 5. DNR's commissioner told us in 2024 that when DNR transitioned from the Sustainable Timber Harvest analysis in 2018 to ongoing forest management, the analysis' stated target of 870,000 cords was intended to serve as one of many metrics for assessing how DNR was managing forests. She said the cord metric was a proxy for the desired level of disturbance DNR wanted to achieve in its forest lands. She said DNR did not communicate this adequately.

DNR updated its procedure for forest management in WMAs in 2023. However, following the updated procedure's adoption, there was little effort to inform or train field staff about its contents, according to Fish and Wildlife Division administrators. One top Fish and Wildlife Division official told us that failure to communicate with division staff in a timely manner—including about this procedure—has been a “chronic problem” within the division. Similarly, the Forestry Division director told us in April 2024 that the procedure document was available to that division's field staff, but they had not been trained or given direction regarding it.

As we discussed in Chapter 2, DNR has also introduced a new form to document the wildlife benefits of timber harvests in WMAs. However, as of May 2025, DNR had not yet amended its policies and procedures to require DNR staff to complete (and get federal approval of) documentation that each proposed WMA timber harvest will serve a wildlife habitat purpose prior to implementation of a harvest.



They sent out something called the “procedures” document. That, to my knowledge, is the first time an attempt [was made] to ferret out each Division's role, but the document is confusing. It also seems almost impossible to meet the deadlines listed unless we do nothing but forest-related work.... I am not even sure if that document is done/ finalized or in play. The communication from leadership is almost non-existent. When we do get something, it doesn't make sense. I have given up trying to understand it.

— Fish and Wildlife Division
survey respondent



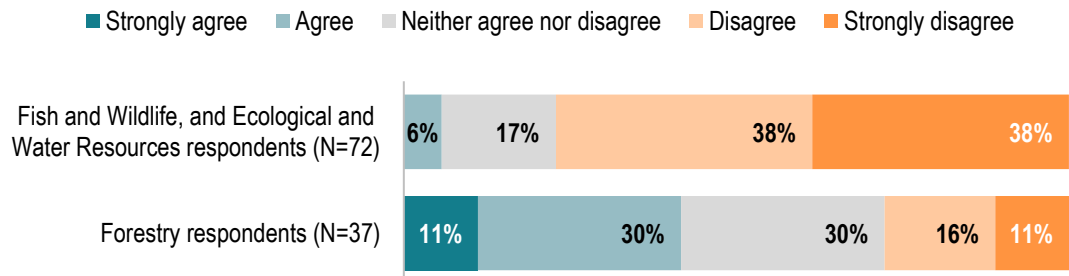
As wildlife managers, we all entered this field with an educational background and knowledge of how to adequately manage forests and landscapes to provide habitat for a wide variety of both game and non-game wildlife populations. ... However, the training and guidance/ direction regarding timber harvest on WMAs as it relates to changes since [the Sustainable Timber Harvest Analysis] have been vague at best and not consistent between Divisions.

— Fish and Wildlife Division
survey respondent

Many DNR staff who responded to our survey indicated they had received inadequate training and guidance about timber harvests in WMAs. As Exhibit 4.3 shows, 76 percent of respondents from the Fish and Wildlife and Ecological and Water Resources divisions disagreed or strongly disagreed that leaders of their divisions had provided sufficient training and guidance regarding timber harvesting in WMAs. Less than 30 percent of respondents from the Forestry Division responded similarly.

Exhibit 4.3**Most DNR field staff we surveyed indicated division leaders had not provided them with sufficient training and guidance regarding timber harvests in WMAs.**

Survey question: Leaders in [your] Division have provided field staff in your division with sufficient training and guidance regarding timber harvests in WMAs.



Notes: See footnotes 14 and 17 in this chapter for more information about the survey. “Don’t know or no opinion” responses are not shown.

Source: Office of the Legislative Auditor, analysis of Department of Natural Resources field staff survey, April 2024.

Staff Dissatisfaction

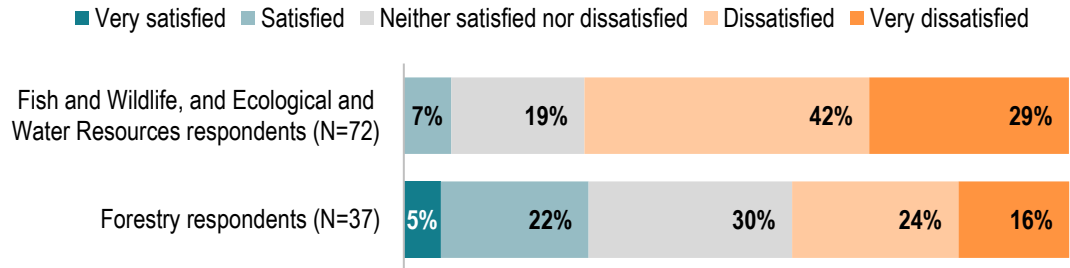
Conflicting goals and unclear guidance on policies and procedures and decision-making authority related to timber harvesting in WMAs has impacted staff satisfaction.

Many staff expressed deep dissatisfaction with DNR’s management of timber harvests in WMAs.

In our survey, field staff from all three divisions expressed significant levels of dissatisfaction with DNR’s forest habitat management in WMAs. As Exhibit 4.4 shows, 71 percent of Fish and Wildlife and Ecological and Water Resources division field staff who responded to our survey said that, overall, they are dissatisfied or very dissatisfied with DNR’s forest habitat management in WMAs. Among Forestry Division field staff, those dissatisfied with WMA forest habitat management outnumbered those who said they were satisfied (40 percent to 27 percent).

Exhibit 4.4**Large shares of DNR field staff we surveyed were dissatisfied or very dissatisfied with forest habitat management in WMAs.**

Survey question: Overall, how satisfied are you with DNR's forest habitat management in the WMAs with which you regularly work?



Notes: See footnotes 14 and 17 in this chapter for more information about the survey. "Don't know or no opinion" responses are not shown.

Source: Office of the Legislative Auditor, analysis of Department of Natural Resources field staff survey, April 2024.

Respondents to our survey expressed their dissatisfaction differently, depending on their division. Their comments often suggested that actions taken regarding forest management by staff in other divisions conflicted with their own responsibilities: sustainably managing the state's forest resources for multiple uses (Forestry Division); conserving and enhancing the state's fish and wildlife and the habitats on which they depend (Fish and Wildlife Division); managing and protecting ecosystems and endangered species (Ecological and Water Resources Division).

For example, several responses from Forestry Division employees suggested that field staff in other divisions were reluctant to approve timber harvests even when they were needed for forest health (and thus, in their opinion, for the benefit of wildlife). Some suggested that wildlife managers' resistance to harvesting timber could result in threats to forest health, such as invasive species outbreaks or fires. One respondent from the Forestry Division stated:

My professional experience...indicates that the DNR's forest habitat management in the WMAs is sorely deficient and lacking. The lack of appropriate cutting regimes for the cover types involved and an extreme hesitancy to cut any timber is negatively impacting the landscape. It also has led to insect and disease outbreaks that have impacted adjacent ownerships.

In contrast, responses from employees of the Fish and Wildlife Division and the Ecological and Water Resources Division suggest their high level of dissatisfaction was due to timber harvesting decisions that disregarded wildlife or wildlife habitat in

WMAs—the very reasons these lands exist. One respondent from the Fish and Wildlife Division wrote:

...wildlife managers get minimal to no control over when, how, where, why timber is harvested. Even with a good working relationship with our local foresters..., the current policies are written [so] we do not have control of the forested habitat in our WMAs. When we are given a stand to harvest via the stand exam list, there is zero ecological reason to harvest. And when we have a stand we want to propose to forestry for harvest for ecological reasons, we are typically ignored because the stand is deemed unlikely to sell or too unprofitable. Even on those occasions when we agree on a stand to harvest, when it comes time to make the timber harvest plan, wildlife staffs' input is considered an afterthought.

Further, one respondent from the Ecological and Water Resources Division stated:

[Timber] harvest activities [on state-managed lands] are often done in a way that disrupts wildlife ranges, homes and food sources, removing shelter and travel corridors. Due to this poor management, many species (and their habitats) have moved significantly closer to extinction or certainly extirpation from a region or even the whole state of [Minnesota].

Recommendations

DNR leadership initiated efforts in late 2023 to improve staff coordination on forest management. In September 2023, following a meeting with Fish and Wildlife Division staff, the DNR commissioner asked the directors of the three DNR divisions involved in forest management to develop a “forest management continuous improvement action plan” specific to WMAs.

The action plan developed by the division directors set a goal of improving “the experience staff have” while managing forests for a range of benefits. The plan listed various strategies for achieving this goal over the course of a year, such as “Establish accountability metrics and systems so that staff across the three divisions understand their role in achieving DNR’s forest management strategic direction” and “Explore opportunities/methods to build and maintain trust.”²⁵

We think these steps are a good start to addressing the findings in this chapter. However, we think DNR needs to do more to address the fundamental issues that underlie our findings.

²⁵ Department of Natural Resources, “Forest Management Coordination Continuous Improvement Action Plan,” November 17, 2023.

In our view, the department's interdisciplinary, consensus-style model of decision-making has not worked effectively with regard to WMA timber harvest decisions. The problem is not with the interdisciplinary model itself. We believe interdisciplinary decision-making models, which bring together individuals with different perspectives and expertise, can be effective at achieving organizational goals.

Regardless of the type of decision-making model DNR uses, the resulting process must effectively implement the law. In recent years, federal officials, DNR staff, and other stakeholders have expressed concerns about whether DNR timber-harvesting decisions in WMAs have been consistent with legal requirements. This uncertainty is rooted in the lack of clarity about the department's goals for WMAs, poor documentation of the wildlife habitat benefits of proposed timber harvests, and a lack of clear guidance about whether and how staff should prioritize the statutory purpose of WMAs when making decisions about harvesting timber in WMAs.



We sure have been trying to tell [DNR senior leadership] how badly it's going for a long, long time and yet things only get worse. I am not sure they are able to listen to and believe staff or stand up to the pressure from industry enough to make good decisions about how timber on WMAs is managed. Now that this issue is "out in the light of day" mostly what we hear from senior leadership is how surprised they are that staff are so upset and confused about timber management and how we really are just wrong, that DNR is doing everything right as far as forest management and those of us that think otherwise are just confused or wrong.

— Ecological and Water Resources
Division survey respondent

RECOMMENDATION

DNR should ensure that timber stands in WMAs that are identified for potential harvest are subject to additional scrutiny to ensure wildlife considerations are prioritized over other competing interests.

For the past seven years, DNR's Sustainable Timber Harvest model has included WMAs, and WMA harvests have been a component of DNR's efforts to produce an average of 870,000 cords of timber per year. However, including WMA lands along with other DNR-managed lands in the same 10-year timber harvest selection process—without providing clear guidance on policies and procedures, and decision-making criteria or authority—does not effectively ensure that DNR only initiates timber harvests in WMAs that protect, perpetuate, or reestablish wildlife habitat.

We think it is reasonable for DNR to incorporate WMAs in its long-term planning for forest habitat management. Timber harvesting is an important tool to manage habitats to benefit certain species of wildlife.

However, because state law contains specific requirements related to how DNR must manage wildlife habitat in WMAs, DNR should take additional steps to scrutinize proposed timber harvests in WMAs to ensure the harvests do not conflict with the statutory purpose and wildlife habitat goals of a given WMA.

There are several ways in which DNR could implement this recommendation. For example, DNR could use its existing computer model to select stands in state forest and school trust lands for possible harvest and a separate computer model to select stands in WMAs. For the WMA model, DNR could develop a decision-making process centered on wildlife habitat goals—and not timber harvesting targets—as the primary basis for harvesting timber in WMAs.

As another example, DNR could continue implementing a form it recently developed in response to grant conditions established by the U.S. Fish and Wildlife Service. The form, which we discuss in Chapter 2, is intended to document wildlife benefits associated with proposed WMA timber harvests. If DNR makes no changes to its decision-making process other than continuing to implement the form, DNR should regularly evaluate whether the addition of the form into its process is effective in ensuring that DNR only initiates timber harvests in WMAs that protect, perpetuate, or reestablish wildlife habitat.

RECOMMENDATION

DNR should amend its policies and procedures to:

- **Clearly state that timber will be harvested in WMAs only to the extent that the decision to do so is consistent with the statutory purpose for WMAs and the documented wildlife habitat goals of the given WMA.**
 - **Specify how the agency will ascertain and document that each proposed WMA timber harvest is consistent with the statutory purpose for WMAs and the documented wildlife habitat goals of the given WMA.**
 - **Specify that the statutory purpose of WMAs and the documented wildlife habitat goals of the given WMA will be the primary criteria for resolving differences regarding WMA management decisions.**
-

DNR has asked staff with different disciplinary objectives, different conservation motivations, and different chains of authority to work together to make timber harvest decisions in WMA lands. At the same time, DNR has not given these staff clear collective priorities or a clear roadmap for how to make such decisions, but has instead provided mixed messages. It is not surprising that agreements have been difficult to reach and that some staff have developed dissatisfaction and distrust toward one another.

DNR should develop policies and procedures for how to determine whether a timber harvest in a WMA is consistent with wildlife habitat protection and enhancement, in accordance with its obligations under state law. As we discussed at the end of Chapter 3, formal management plans for WMAs would provide an important basis for such decision-making. Clear written guidance should exist about which wildlife habitats should be protected or enhanced on each WMA. With those goals in place, proposed timber harvests could then be assessed for consistency with existing guidelines.

We agree that collaboration among DNR divisions in the department's forest management practices is appropriate, and such collaboration should continue. But even with improved guidance, there may still be instances where competing interests make reaching consensus difficult. In instances where WMA-related decisions are brought to the dispute resolution process, DNR should provide clear guidance to administrators that a final resolution should rest upon the department's statutory responsibility to manage WMA land to protect, perpetuate, and reestablish wildlife habitat—even if such a path does not result in a consensus decision.

RECOMMENDATION

DNR should ensure that its WMA forest habitat management policies and procedures are readily available to staff and are the subject of ongoing leadership attention and staff training.

Many DNR staff who responded to our survey indicated a desire to get more support, training, and guidance from DNR management regarding timber harvesting in WMAs. In addition to clarifying—in policy—responsibility for WMA timber harvest decisions, DNR should ensure that field staff understand these responsibilities. This will require that the policies and procedures are disseminated and explained and are the subject of regular DNR training.

List of Recommendations

- The Department of Natural Resources (DNR) should ensure it understands the U.S. Fish and Wildlife Service's expectations for its documentation and use of federal grant funds, and it should comply with federal grant requirements. (p. 24)
- The Legislature should:
 - Specify which wildlife management areas (WMAs) should have individual master plans based on criteria that are independent of DNR staffing decisions.
 - Indicate what DNR should include in the plans.
 - Require DNR to update master plans on a specified periodic basis. (p. 33)
- DNR should:
 - Maintain current plans for all WMAs that have resident managers, as required by state statute.
 - Complete its plans for all WMAs designated as major units.
 - Work with the Legislature to determine the scale, scope, and frequency of plans for all other WMAs. (p. 33)
- DNR should ensure that timber stands in WMAs that are identified for potential harvest are subject to additional scrutiny to ensure wildlife considerations are prioritized over other competing interests. (p. 50)
- DNR should amend its policies and procedures to:
 - Clearly state that timber will be harvested in WMAs only to the extent that the decision to do so is consistent with the statutory purpose for WMAs and the documented wildlife habitat goals of the given WMA.
 - Specify how the agency will ascertain and document that each proposed WMA timber harvest is consistent with the statutory purpose for WMAs and the documented wildlife habitat goals of the given WMA.
 - Specify that the statutory purpose of WMAs and the documented wildlife habitat goals of the given WMA will be the primary criteria for resolving differences regarding WMA management decisions. (p. 51)
- DNR should ensure that its WMA forest habitat management policies and procedures are readily available to staff and are the subject of ongoing leadership attention and staff training. (p. 52)



OLA

Appendix: Location of Minnesota's Wildlife Management Areas

Wildlife management areas (WMAs) constitute approximately 1.4 million acres in Minnesota. By law, WMAs must be managed for the benefit of wildlife and related recreation.

This appendix shows the location of Minnesota's approximately 1,500 WMAs, divided into individual maps based on the state's ecological sections. Minnesota has 10 ecological sections defined by similar patterns in the land, vegetation, and climate, among other things.

WMAs are indicated in the maps with a dark teal color. Eight WMAs—WMAs that the Department of Natural Resources (DNR) has classified as “major unit” WMAs—are colored green. Light blue shapes denote lakes that are 2,500 acres or larger in size.

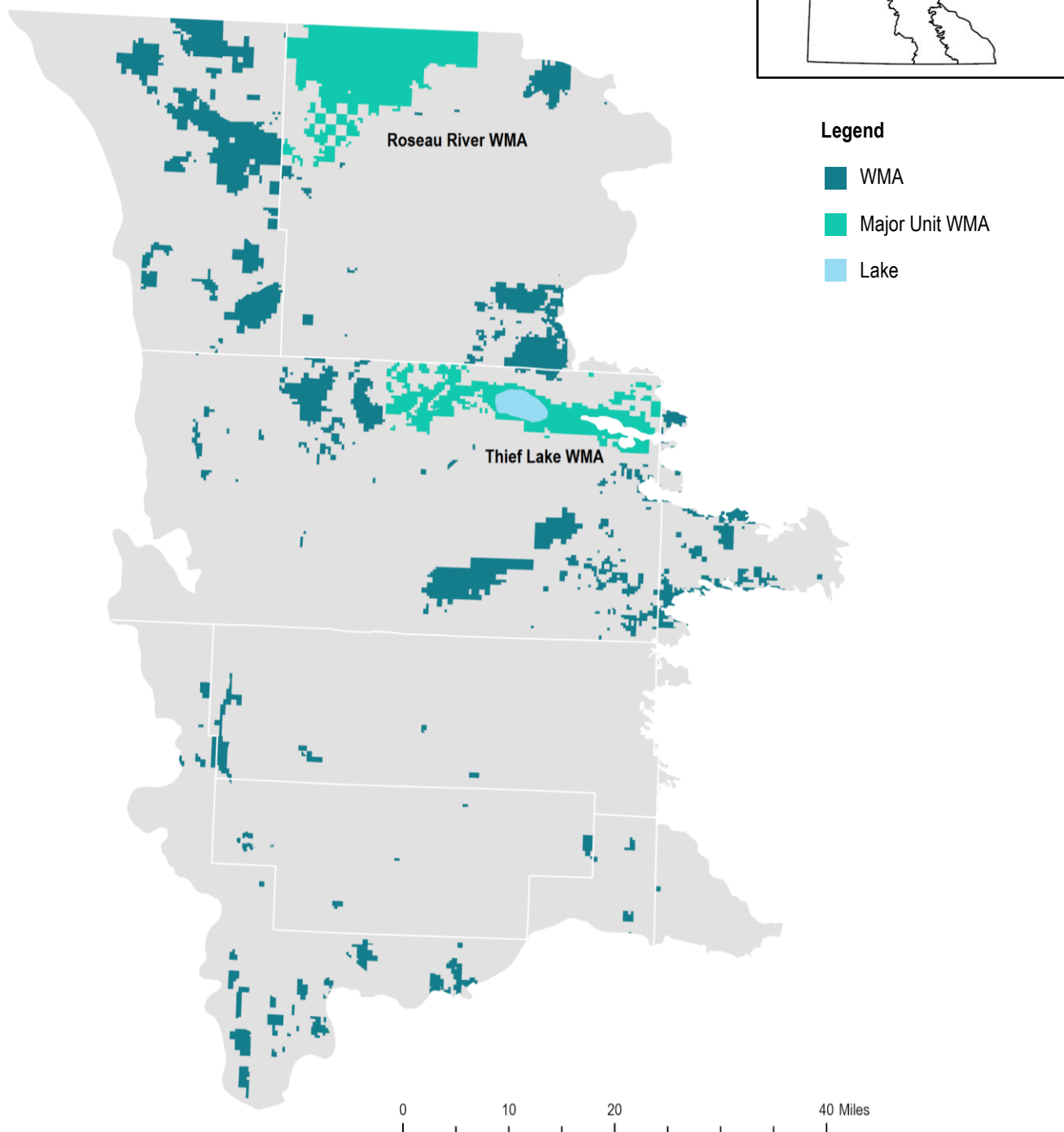
Exhibit A.1**Lake Agassiz, Aspen Parklands Section**

Section size: 2.9 million acres

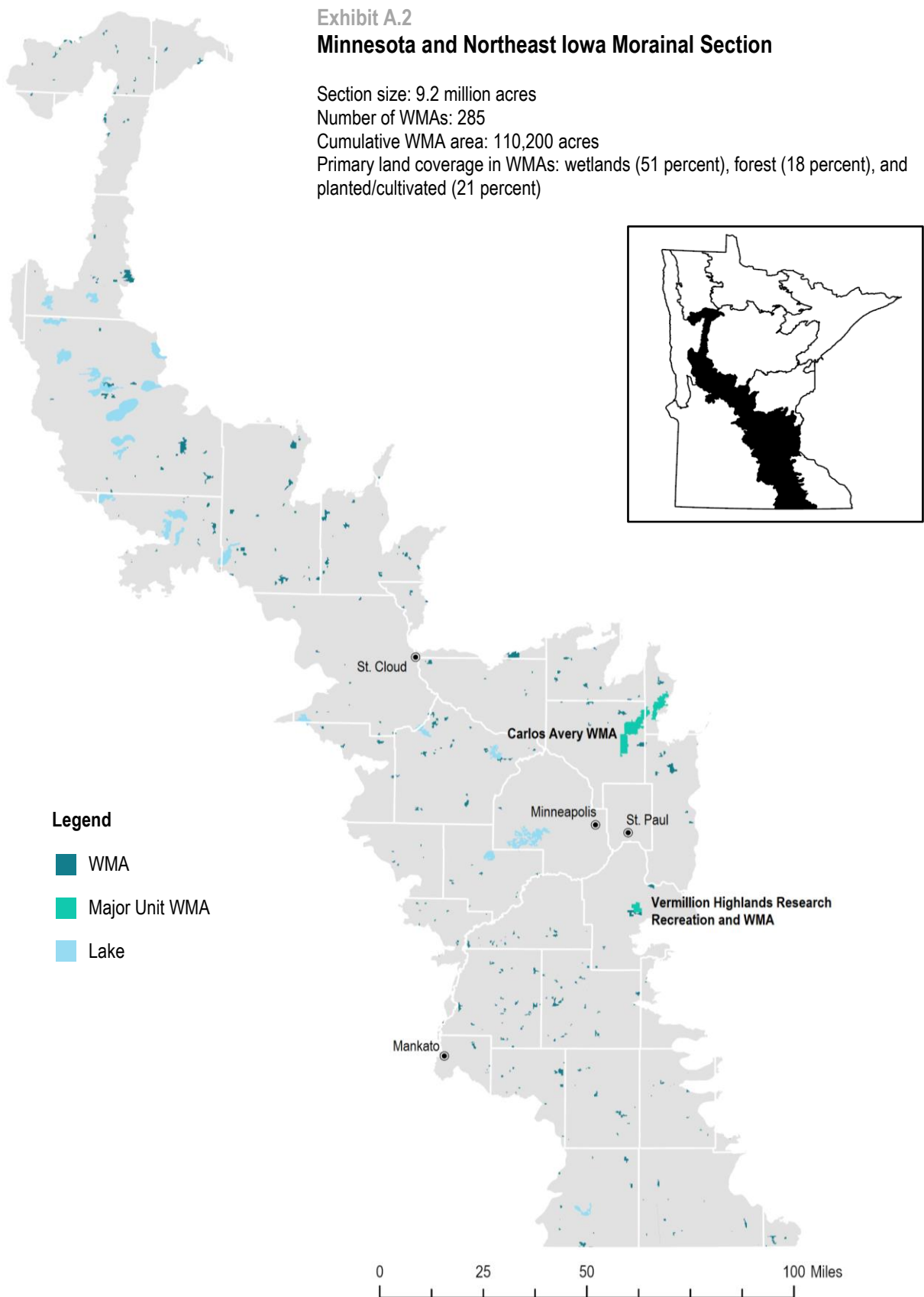
Number of WMAs: 90

Cumulative WMA area: 332,100 acres

Primary land coverage in WMAs: wetlands (84 percent), forest (7 percent), and planted/cultivated (5 percent)



Source: Office of the Legislative Auditor, based on Department of Natural Resources data.



Source: Office of the Legislative Auditor, based on Department of Natural Resources data.

Exhibit A.3

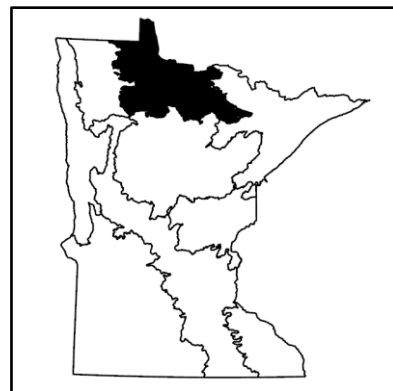
Northern Minnesota and Ontario Peatlands Section

Section size: 5.3 million acres

Number of WMAs: 37

Cumulative WMA area: 433,400 acres

Primary land coverage in WMAs: wetlands (99 percent)



Legend

- WMA
- Major Unit WMA
- Lake

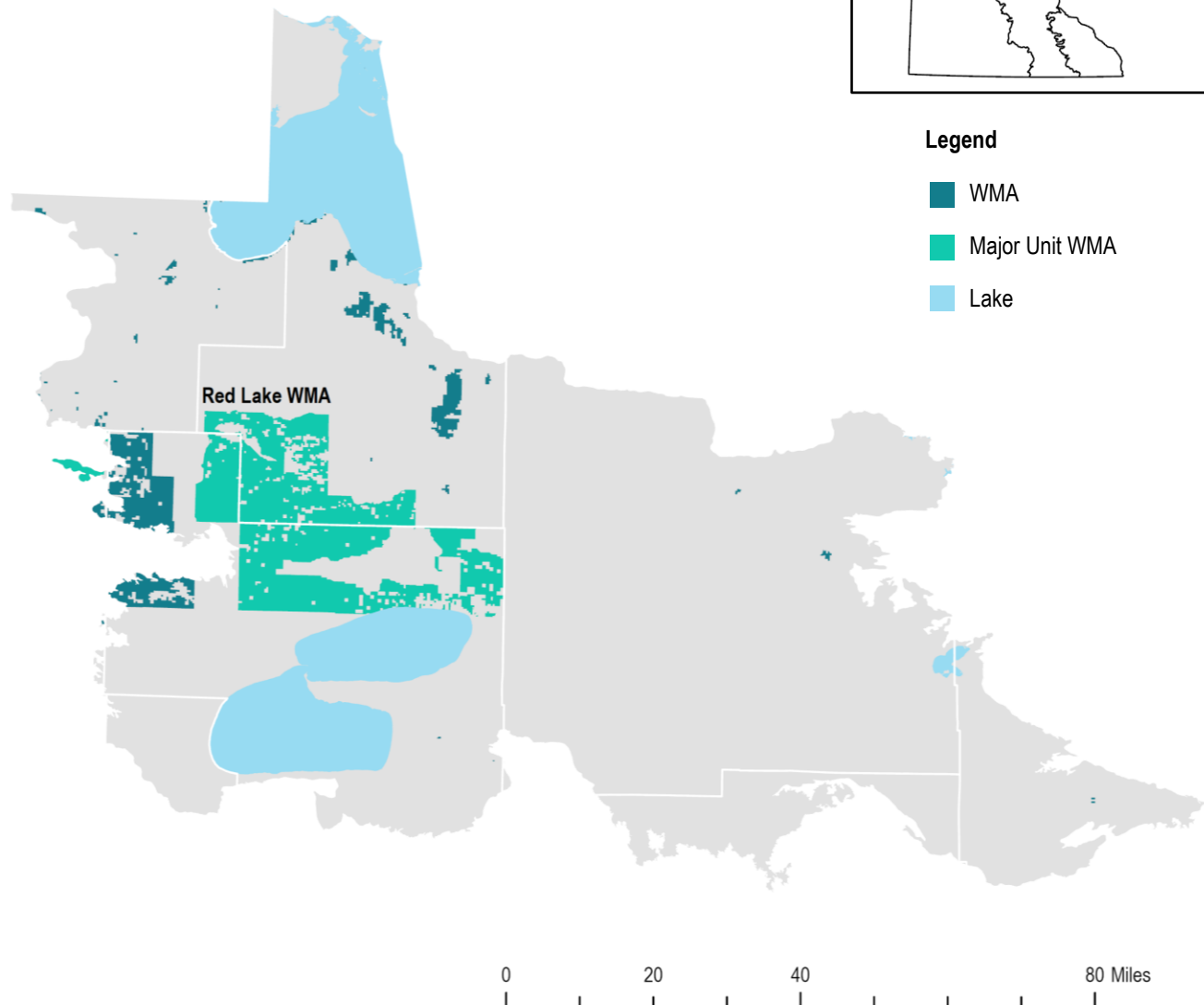


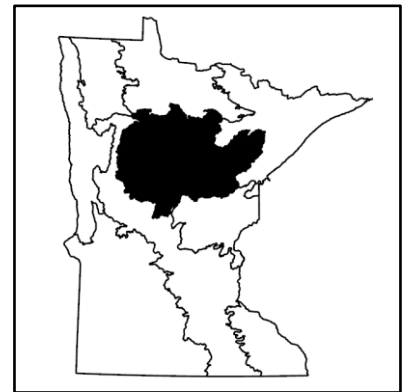
Exhibit A.4**Northern Minnesota Drift and Lake Plains Section**



Section size: 8.4 million acres

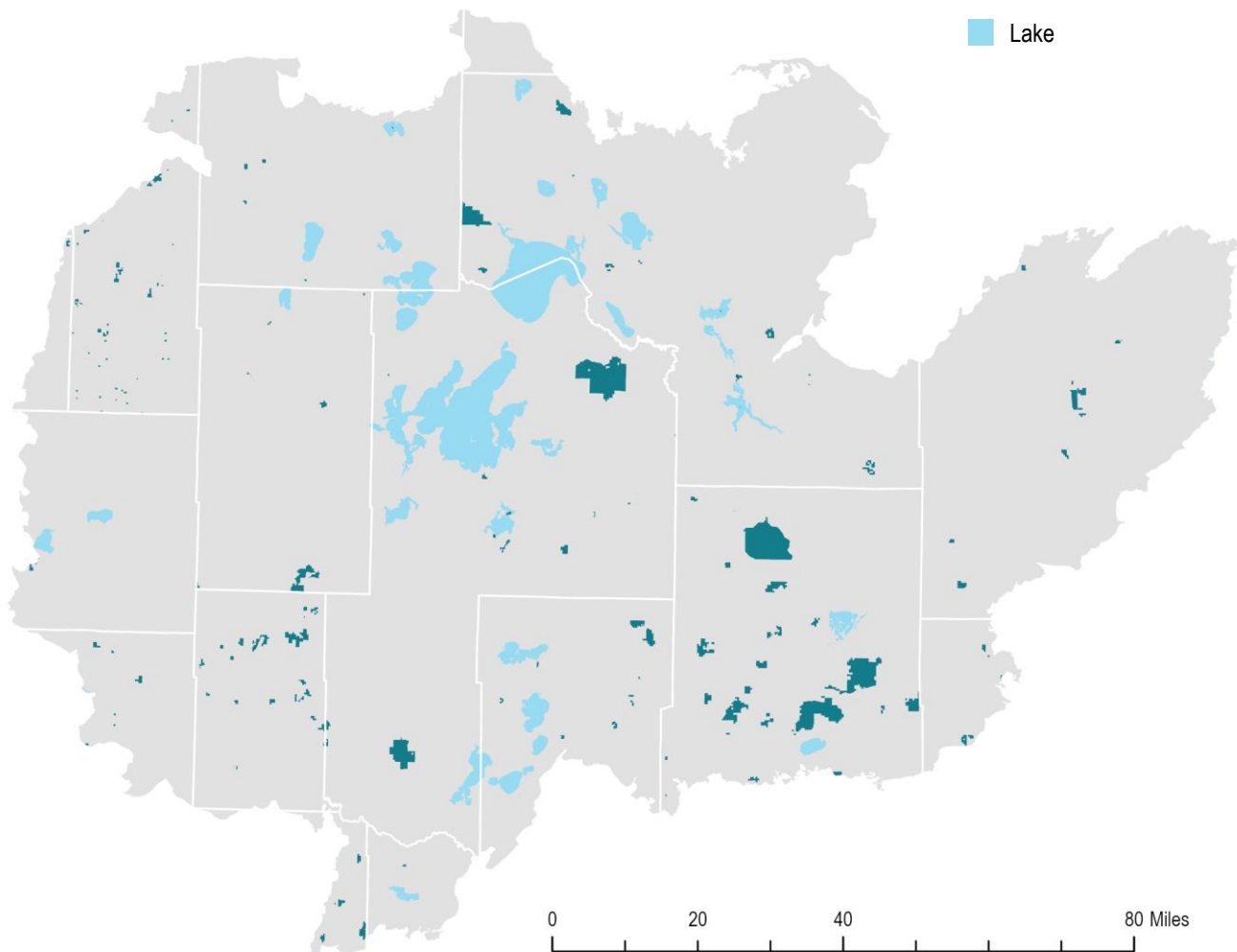
Number of WMAs: 131

Cumulative WMA area: 115,400 acres

Primary land coverage in WMAs: wetlands (71 percent), forest (22 percent), and planted/cultivated (3 percent)

**Legend**

-  WMA
-  Major Unit WMA
-  Lake



Source: Office of the Legislative Auditor, based on Department of Natural Resources data.

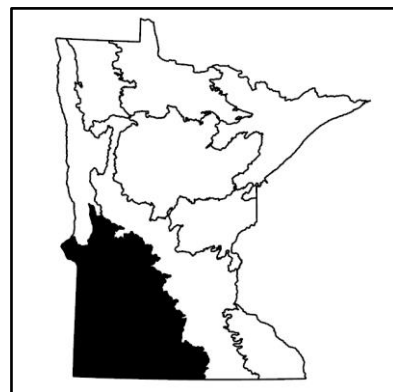
Exhibit A.5**North Central Glaciated Plains Section**




Section size: 12.1 million acres

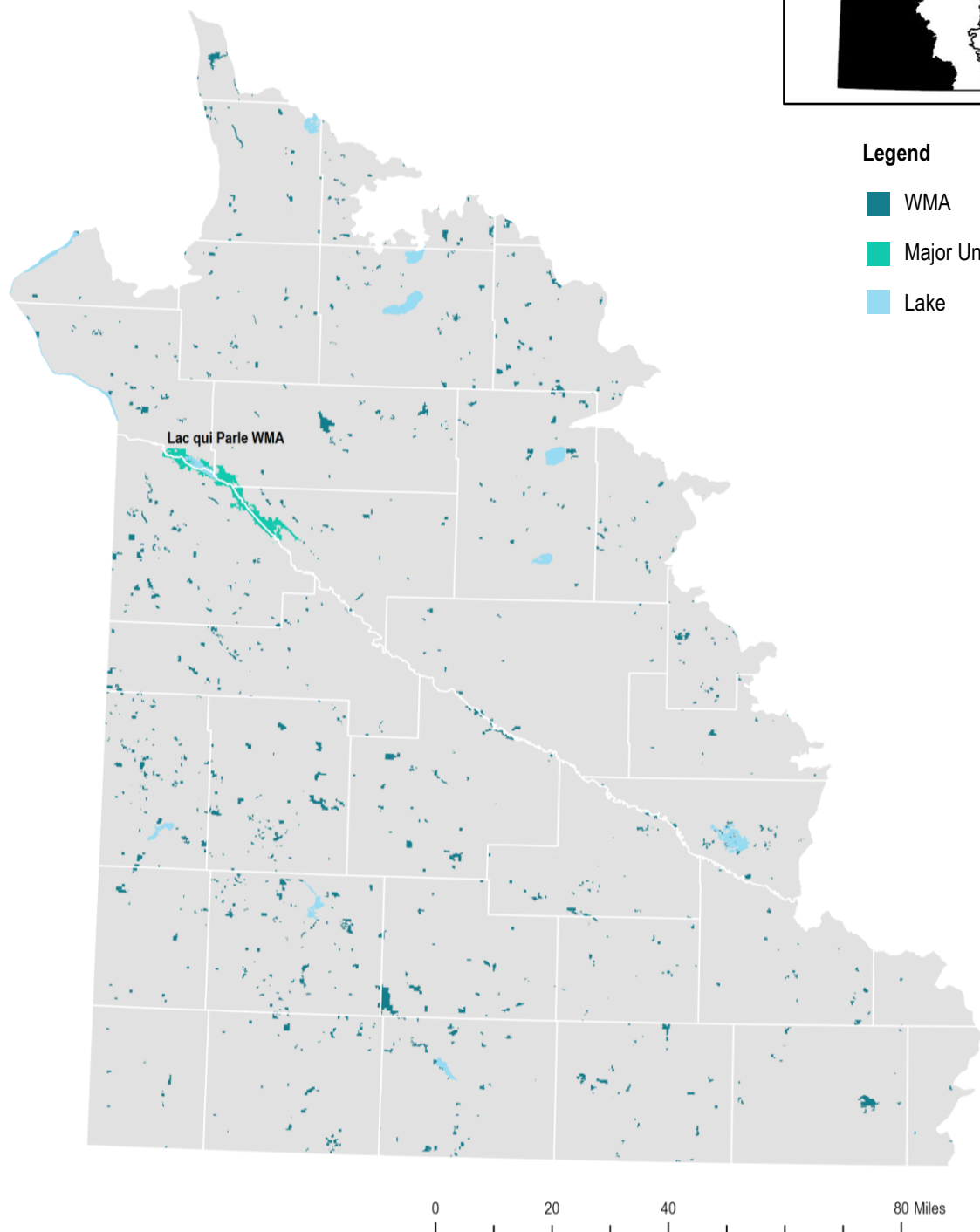
Number of WMAs: 724

Cumulative WMA area: 200,500 acres

Primary land coverage in WMAs: wetlands (45 percent), planted/cultivated (31 percent), water (15 percent)

**Legend**

-  WMA
-  Major Unit WMA
-  Lake



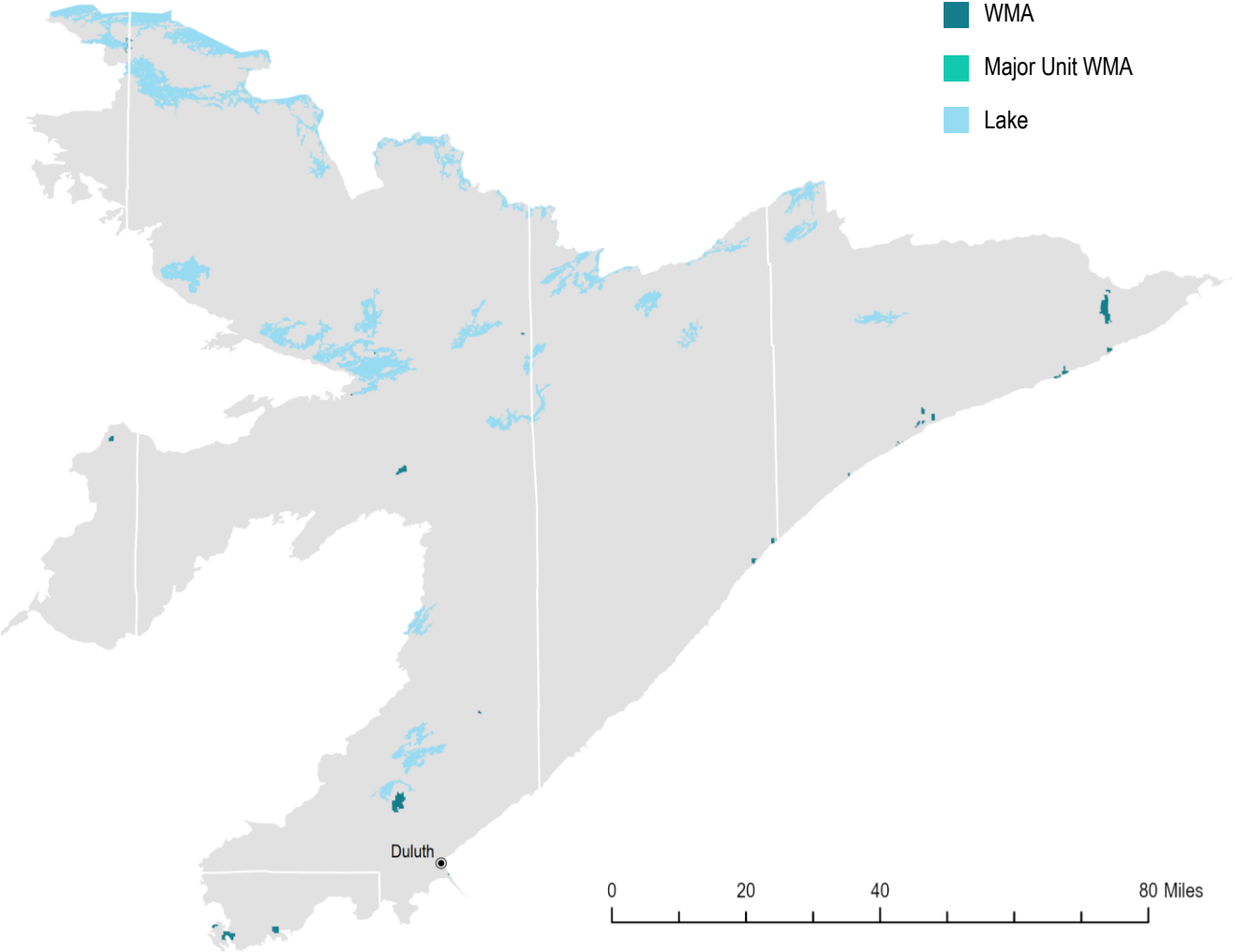
Source: Office of the Legislative Auditor, based on Department of Natural Resources data.

Exhibit A.6
Northern Superior Uplands Section

Section size: 6.0 million acres
Number of WMAs: 20
Cumulative WMA area: 10,800 acres
Primary land coverage in WMAs: wetlands (54 percent), forest (37 percent), and water (6 percent)



- Legend
- WMA
 - Major Unit WMA
 - Lake



Source: Office of the Legislative Auditor, based on Department of Natural Resources data.

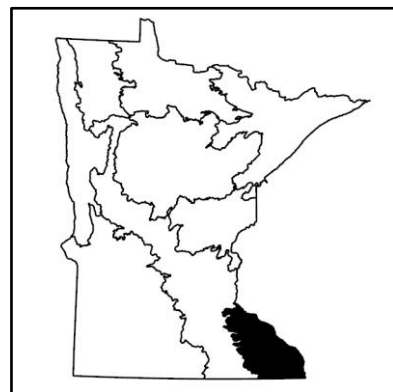
Exhibit A.7**Paleozoic Plateau Section**




Section size: 2.6 million acres

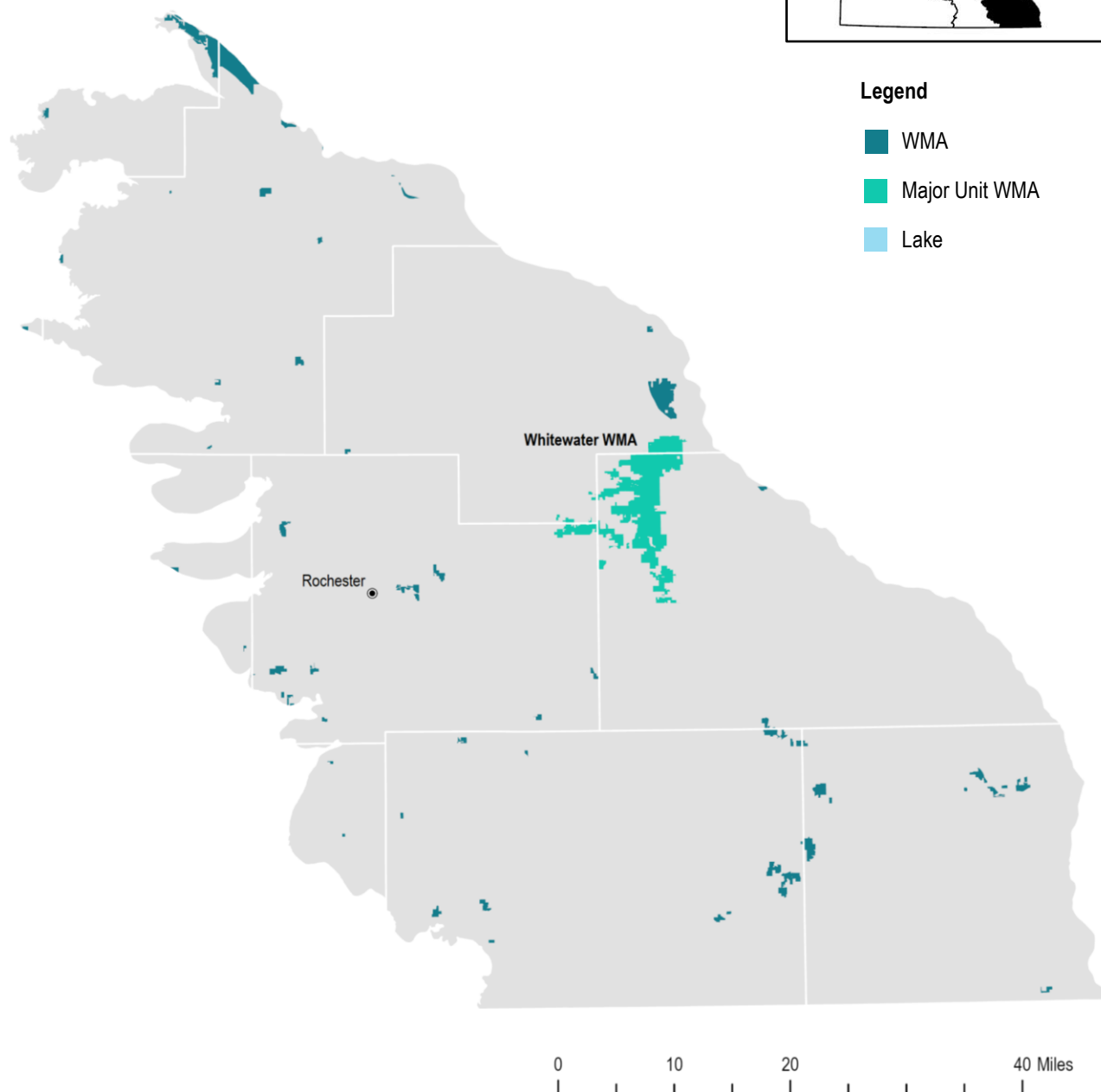
Number of WMAs: 50

Cumulative WMA area: 50,500 acres

Primary land coverage in WMAs: forest (48 percent), wetlands (27 percent), and planted/cultivated (14 percent)

**Legend**

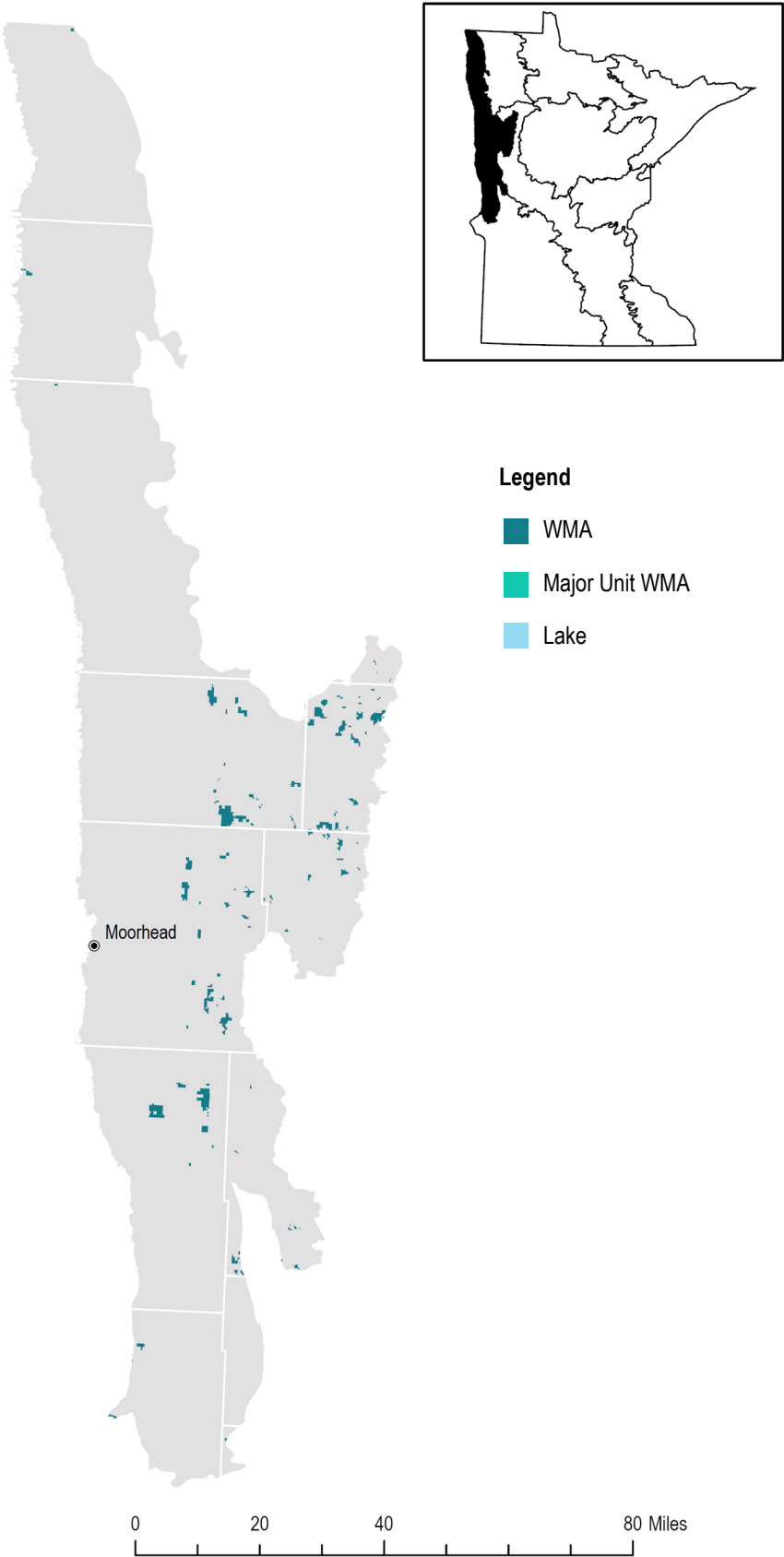
-  WMA
-  Major Unit WMA
-  Lake



Source: Office of the Legislative Auditor, based on Department of Natural Resources data.

Exhibit A.8
Red River Valley Section

Section size: 4.0 million acres
Number of WMAs: 82
Cumulative WMA area: 44,500 acres
Primary land coverage in WMAs:
wetlands (60 percent),
planted/cultivated (28 percent),
and water (4 percent)



Source: Office of the Legislative Auditor, based on Department of Natural Resources data.

Exhibit A.9**Southern and Western Superior Uplands Sections**

Combined section size: 3.5 million acres

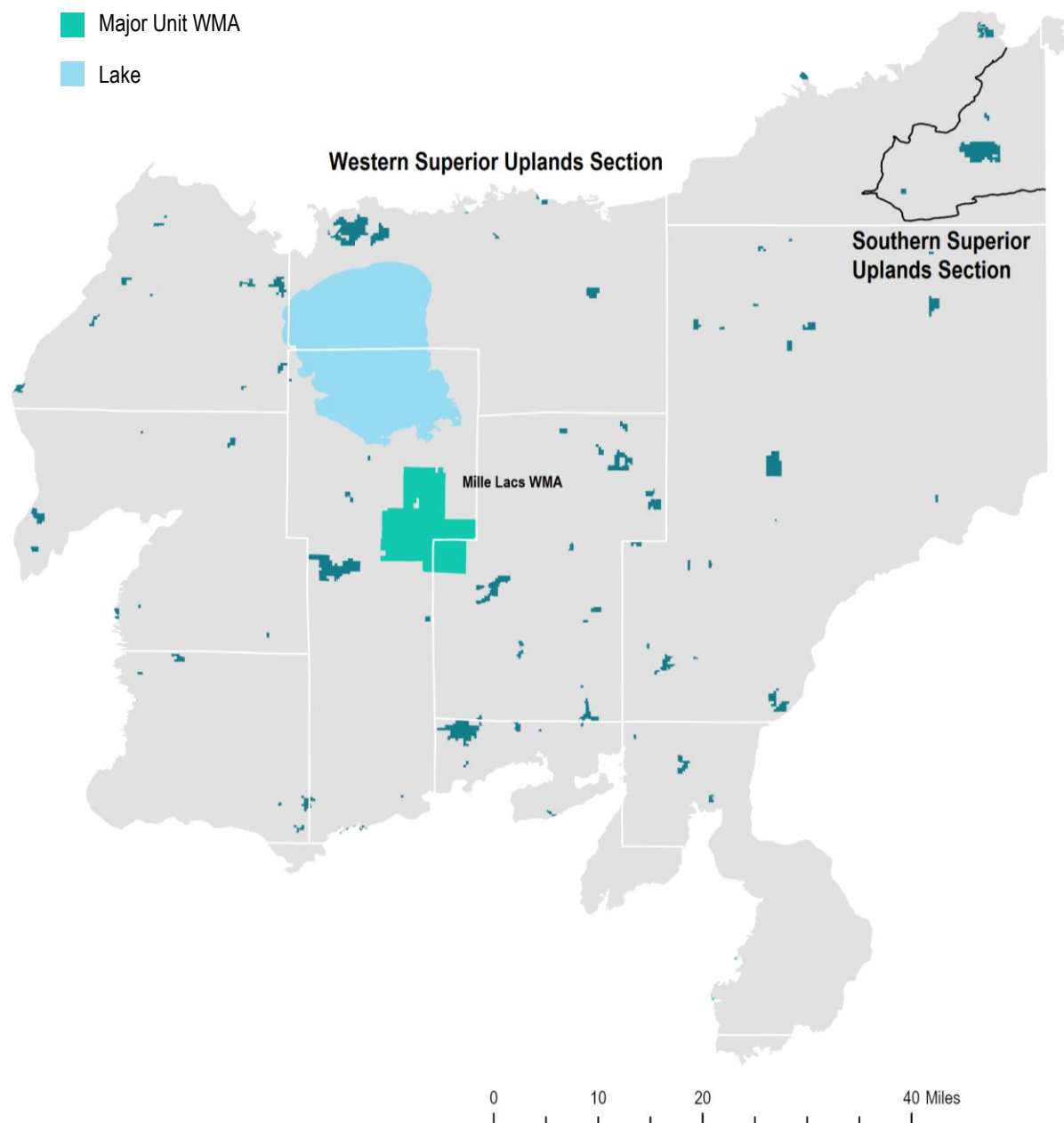
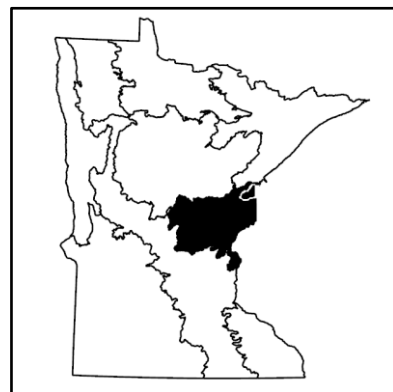
Number of WMAs: 71

Cumulative WMA area: 81,000 acres

Primary land coverage in WMAs: wetlands (50 percent), forest (41 percent), and planted/cultivated (5 percent)

Legend

- WMA
- Major Unit WMA
- Lake



Source: Office of the Legislative Auditor, based on Department of Natural Resources data.



October 10, 2025

Judy Randall, Legislative Auditor
Office of the Legislative Auditor
Room 140 Centennial Office Building
658 Cedar Street
Saint Paul, MN 55155-1603

Dear Auditor Randall:

Thank you for the opportunity to review and respond to the Office of the Legislative Auditor's (OLA's) special review on *Department of Natural Resources Timber Harvest Decisions in Wildlife Management Areas*. The Minnesota Department of Natural Resources (DNR) appreciates your office's thorough review of this aspect of DNR's interdisciplinary forest management. DNR is confident we have met all statutory and grant requirements related to timber harvest in Wildlife Management Areas. We recognize that some members of the public and DNR staff have raised questions about compliance. Since 2022, DNR has been working to address the underlying issues that led to these questions. We're pleased that this is the second recent independent review that did not find statutory or grant compliance issues. We greatly value your recommendations and are pleased they generally align with areas of improvement DNR independently identified and is actively working to address.

We have been engaged actively with the U.S. Fish and Wildlife Service (USFWS) to improve clarity of grant conditions and establish consistent documentation of grant activities. In 2023, DNR and USFWS signed a Management Action Agreement outlining specific actions each entity would take. All actions were completed by the deadlines outlined in the agreement. This work led former USFWS Director Martha Williams to state in her March 29, 2024, letter, "We now have a mutual understanding and agreement about DNR procedures and our agency's grant processes. Considering the current Statewide Wildlife Habitat Management grant in place, I am confident we are on a path forward that works toward our shared missions of conserving fish, wildlife, and their habitat for future generations."

We also have engaged directly with DNR staff involved in interdisciplinary forest management work, beginning in 2023 by holding leadership conversations with staff from each of the involved divisions of Fish and Wildlife, Forestry, and Ecological and Water Resources. In those conversations, it became clear there were significant differences between DNR leaders' intent for forest management coordination and our staff's experience with implementation. Therefore, in September 2023, I directed the three division directors to initiate a continuous improvement action plan (CIAP) to address the implementation issues identified by both staff and leadership. This adaptive work involves staff across the three divisions and most recently included a formal root cause analysis. Ongoing work

in the CIAP includes revising guidance documents, developing and implementing training around forest habitat related policy and procedures, and continuing our commitment to clear and consistent communications to all staff involved in forest coordination. While our continuous improvement commitment is ongoing, we intend to close out the remaining tasks in this project by the end of May 2026.

We appreciate the OLA's acknowledgement in the special review of the DNR's continuous improvement project and look forward to the many benefits we anticipate from its implementation.

Below please find DNR's perspectives regarding your report's recommendations.

Response to the OLA's Recommendations

OLA Recommendation pertaining to Federal Grant Suspension

- DNR should ensure it understands the U.S. Fish and Wildlife Service's expectations for its documentation and use of federal grant funds, and it should comply with federal grant requirements.

Agency Response to Recommendation pertaining to Federal Grant Suspension

- **Narrative Response:** The DNR appreciates the strong partnership we have with the USFWS, and our agencies have worked in close coordination to clarify expectations and improve communications. Notable accomplishments in this area include:
 - DNR and USFWS collaborated in rewriting grant conditions to ensure there was agreement on language and what it meant.
 - DNR worked with the USFWS to develop documentation standards for forest habitat management conducted through timber sales on Wildlife Management Areas (WMAs) and Aquatic Management Areas (AMAs). Since that time, the DNR and USFWS have been working together to ensure that our documentation and protocols meet requirements, and that all relevant grant reporting standards are met.
 - Relevant members of DNR leadership completed training on the Wildlife and Sportfish Restoration Act provided by the USFWS and DNR sent staff to USFWS program-specific training for grant management and land acquisition.
 - DNR leadership has communicated to staff in all three divisions responsible for interdisciplinary forest management the expectation that WMAs and AMAs will be managed for fish and wildlife management purposes.
 - Together, the DNR and USFWS developed a protocol for site visits to ensure discussion of forest habitat management continues, and to reduce opportunities for miscommunication. Annual site visits in accordance with this protocol have been conducted in 2024 and 2025.

As your review identified, compliance with federal grant requirements was confirmed by a letter from former USFWS Acting Regional Director in October 2023 and by the award two months later of DNR's 2023-2025 Statewide Wildlife Habitat Management Grant. Subsequently, in closing its routine audit of DNR in July 2025 audit, the Department of the Interior's Office of the Inspector General found as follows: *"We found that the Department ensured that grant funds and license revenue were used for allowable activities and complied with applicable laws*

and regulations, FWS guidelines, and grant agreements.” Thus, DNR believes we are currently operating with agreement on documentation and in compliance with all grant requirements.

- **Current Status:** Resolved

OLA Recommendation 1 pertaining to Wildlife Management Area Planning

- DNR should maintain current plans for all WMAs that have resident managers, as required by state statute; complete its plans for all WMAs it has designated as major units; and work with the Legislature to determine the scale, scope, and frequency of plans for all other WMAs.

Agency Response to Recommendation 1 pertaining to Wildlife Management Area Planning

- **Narrative Response:** In May 2022, I directed DNR’s Fish and Wildlife Division to complete major unit WMA plans according to a schedule that had the final plan being completed by June 30, 2025. Consistent with that direction, major unit master plans are now complete in accordance with state statute and our commitment to USFWS. This includes completion of plans for all WMAs with resident managers. Development of these major unit plans involved staff from across DNR and incorporated insights from our Tribal and conservation partners, as well as members of the public through extensive input opportunities. These plans are scheduled to be updated every ten years.
- **Current Status:** Partially resolved.
- **Corrective Action:** For the remaining WMAs and AMAs, we are currently working on a system-wide planning effort that began with an internal project team in 2023. The project is divided into three phases with external public engagement set to begin yet this calendar year.
- **Completion Date:** The overall system-wide planning project is scheduled for completion by December 31, 2027.

OLA Recommendation 2 pertaining to Wildlife Management Area Planning

- The Legislature should specify which WMAs should have individual plans, indicate what DNR should include in the plans, and require DNR to update plans on a specified periodic basis.

Agency Response to Recommendation 2 pertaining to Wildlife Management Area Planning

- **Narrative Response:** We appreciate the OLA’s suggestion for legislative involvement with the scope, content and periodicity of the DNR’s WMA plans. As noted above, DNR has completed major unit plans and is engaged in a system-wide planning initiative. Should the Legislature decide to consider whether additional legislative direction is needed, DNR would welcome the opportunity to participate in that conversation.

OLA Recommendation 1 pertaining to Leadership and Decision Making

- DNR should ensure that timber stands in WMAs that are identified for potential harvest are subject to additional scrutiny to ensure wildlife considerations are prioritized over other competing interests.

Agency Response to Recommendation 1 pertaining to Leadership and Decision Making

- **Narrative Response:** DNR agrees that forest management, including timber harvests, on WMAs

must be conducted to advance wildlife values, and this is consistent with our policy. DNR's implementation ensures special scrutiny for WMAs at multiple points in the forest management process. First, the model used to generate stand exam lists uses different parameters for WMA and AMA lands that reflect consideration of the purposes of those lands. Second, site level coordination provides for interdisciplinary assessment of proposed management actions and wildlife values. Third, DNR has a dispute resolution process through which management decisions can be elevated when there is not site-level concurrence. Finally, we now have an agreed-upon form with USFWS for consistently documenting the wildlife purposes of timber harvests on WMAs and AMAs in advance of any management action.

- **Current Status:** Partially resolved.
- **Corrective Action:** DNR believes the elements described in the narrative response above are complete. As a final step, we will work through the CIAP to ensure that these elements achieve the clarity and consistency recommended by the OLA and desired by DNR staff and leadership.
- **Completion Date:** The CIAP will be completed by May 31, 2026.

OLA Recommendation 2 pertaining to Leadership and Decision Making

- DNR should amend its policies and procedures to clearly state that timber will be harvested in WMAs only to the extent that the decision to do so is consistent with the statutory purpose for WMAs and the documented wildlife habitat goals of the given WMA. DNR should also specify in its policies and procedures how the agency will ascertain and document the purpose of each proposed harvest, among other things.

Agency Response to Recommendation 2 pertaining to Leadership and Decision Making

- **Narrative Response:** We recognize that interdisciplinary forest management is inherently complex with policies, procedures, plans, and standards that have developed and evolved over time. This has given rise to uncertainty and confusion for some staff. The expression of this uncertainty and confusion is what led me to direct the three divisions to initiate the CIAP. The CIAP is intended to result, among other things, in the updating and alignment of policies and procedures for timber harvest in WMAs and AMAs and for documenting decisions related to timber harvest.
- **Current Status:** Unresolved.
- **Corrective Action:**
 - Division Directives: Fish and Wildlife Division will update its 2009 Directive regarding forest management on WMAs and AMAs. The three divisions will also issue a common directive to ensure staff engaged in forest management have the same baseline understanding of how DNR approaches forest management, including special considerations related to WMAs and AMAs and the purposes of and restrictions on those areas.
 - Procedure for Forest Habitat Management on Lands Administered by the Fish and Wildlife Division: This procedure will outline the process, roles and responsibilities of staff involved in forest coordination and include guidance for the use of the Habitat Value Form to document the fish and wildlife objectives met by proposed timber harvest.
 - Other policy/procedure updates as needed: In addition to completing the two items

above, the three division directors will evaluate whether further policy and procedure updates are warranted as part of the CIAP.

- **Completion Date:**
 - Division Directives – November 21, 2025
 - Procedure for Forest Habitat Management – January 31, 2026
 - Other policy/procedure updates – May 31, 2026

OLA Recommendation 3 pertaining to Leadership and Decision Making

- DNR should ensure that its WMA forest habitat management policies and procedures are readily available to staff and are the subject of ongoing leadership attention and staff training.

Agency Response to Recommendation 3 pertaining to Leadership and Decision Making

- **Narrative Response:** The CIAP includes work to ensure all policies, procedures, plans, and standards are available and staff know how to access them. Additionally, the CIAP anticipates comprehensive training to staff responsible for forest management activities so that they understand how to integrate and apply the various elements of our planning framework.
- **Current Status:** Unresolved.
- **Corrective Action:** The divisions of Fish and Wildlife, Forestry, and Ecological and Water Resources will provide staff involved in forest management work with clear access to all relevant documents and provide training for those same staff.
- **Completion Date:** March 31, 2026. Ongoing training thereafter.

Once again, we appreciate the opportunity to respond to your recommendations as well as the opportunity to work with your office and staff throughout this special review.

Sincerely,



Sarah Strommen
Commissioner

CC: Katherine Theisen, Deputy Legislative Auditor
Barb Naramore, Deputy Commissioner



OLA

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LEGISLATIVE AUDITOR



Office of the Legislative Auditor
Suite 140
658 Cedar Street
Saint Paul, MN 55155