

February 19, 2024

Keystone Woods Input
Minnesota DNR
546-C West Broadway Ave.
Forest Lake, MN 55025

Saint Paul Bird Alliance, Land of Lakes Bird Alliance, Sustainable Stillwater/Bird City, and Urban Bird Collective are environmental organizations representing over 5,000 residents. Our chapters and membership are committed to protecting birds, the habitat all living things need to thrive, and our inherent right to nature-based recreation.

Preserving extensive areas of any habitat is vital for maintaining the health and continued growth of native wildlife¹ and plants. The Keystone WMA offers a unique opportunity to safeguard one of our state's rarest and most vulnerable habitats: grasslands.

Only 1% of Minnesota's native prairies remain due to extensive human development. According to the Minnesota Department of Natural Resources, protecting grassland "is one of the most critical environmental challenges facing Minnesota."² By prioritizing conservation-based land use and management, we can help restore biodiversity to this area.

Many grassland bird species are sensitive to human disturbance. Much of their life occurs on the ground, including nesting, raising young, hunting, foraging for food, and defending against predators—our coalition advocates for land management practices that prioritize the survival needs of these species.

We urge the DNR to manage the land primarily to protect the long-term health of wildlife and plant biodiversity in the following manner:

- 1) In the spring and summer of 2025, conduct a thorough inventory of plants and wildlife to understand the property's current and potential biodiversity. Use these findings to develop a comprehensive wildlife and plant management plan. We have resources to support the DNR in this activity.
- 2) Oppose leasing any part of the property to private groups, including dog training and trialing clubs, for the following reasons:
 - a. Leasing public land to private clubs establishes a challenging precedent. This could lead to additional requests and possible legal actions from clubs or individuals who support hunting, fishing, or other outdoor activities

and seek similar considerations. How will the DNR determine which entities deserve special treatment?

- b. The rationale that dog clubs attract new participants to a sport and generate revenue for the DNR conflicts with the purpose of public lands. The DNR has been allocated funds and resources to promote hunting and other outdoor activities without using this property as a recruitment tool or a source of income.
 - c. All conservation and outdoor organizations are making efforts to attract a more diverse group of participants to outdoor activities. Should the hunting community take advantage of this additional recruiting tool, even if it negatively affects other groups? For example, what if the birding community seeks to designate part of the property as off-limits to protect sparrows or short-eared owls to aid in attracting new members?
 - d. The reasoning that "they have been doing it for many years, so it probably is OK" is invalid. Until a comprehensive property inventory is completed and the impact of this specific activity on the property's current and **potential** biodiversity is assessed, we will not know how destructive the dog club activities have been and will continue to be on the property.
 - e. It is unacceptable for the DNR to proceed with this action unilaterally, as this activity's potential negative impact on the property will affect all users.
 - f. If the DNR decides to consider this proposed lease, it should form a working group with equitable representation from conservation, hunting, and resident stakeholder groups to provide further input and monitoring.
- 3) Manage all activities on the property not to disturb bird nesting activities and promote a healthy ecosystem.
- a. Mowing and haying can harm grassland birds during the nesting season. We advocate that the DNR follow the Board of Soil and Water Resources guidelines ³, which states that no haying or grazing should occur between May 15 and August 1.
 - b. Per standard WMA regulations, strict enforcement of off-leash dog activities anywhere in the park during bird nesting season.
 - c. When cutting down and/or removing dead trees and snags, carefully consider nests and nestlings. These trees and snags offer a habitat for cavity-nesting birds.
 - d. Now that grazing has been removed from the property, the plant and soil composition will change rapidly if not managed proactively.
 - e. Withhold leasing for nonregenerative agriculture.
- 4) Prohibit motorized vehicles on the WMA except for DNR vehicles, licensed DNR contractors, and emergency vehicles.

- 5) Continue the prohibition of lead/toxic ammunition and extend this to include **lead/toxic fishing tackle.**
- 6) Install signs in parking areas to educate all visitors about the park's diverse wildlife, how they can help protect it, and park policies. How can we help?

Our coalition wishes to arrange a meeting in early April of 2025 with MNDNR in local and regional leadership to continue discussing the plans and decision-making process for Keystone Woods WMA, along with how our groups can collaborate for the most significant benefit to prairie ecosystem health and all people who want to visit Keystone WMA.

We understand that the hardworking and dedicated DNR staff must balance many stakeholder interests and face tough choices. We want to partner with the DNR and other groups to make our resources available to support these proposed guidelines. We look forward to your response and further discussion.



Saint Paul Bird Alliance –
Greg Burnes, President, gburnes@comcast.net 612-205-3071



Land of Lakes Bird Alliance –
Marian Weidner, President, mpweidner@gmail.com, 415-913-0444



Sustainable Stillwater/Bird City –
Allison McGinnis, lead coordinator, allison@sustainablestillwatermn.org, 651-206-6207,



Urban Bird Collective
Monica Byrand, Executive Director, mjbryand@gmail.com, 651-246-5522

¹ Keystone is a birding hotspot, with 169 species reported on eBird. An example of the diversity of avian life present at Keystone: barred, great horned, and short-eared owls, bobolinks, dickcissels, rough-legged hawks, bald eagles, kestrels, harrier hawks, ibises, meadowlarks, Say's Phoebe, a variety of sparrows, and Trumpeter Swans, along with numerous common and rare duck and shorebird species.

² <https://www.dnr.state.mn.us/prairieplan/index.html>

³ [BWSR guidelines that there is no haying or grazing between May 15 and August 1](#)