

SUMMARY COMMENTS

Jackson Washington State Forest Compartment 12 Tract 4 30 Day Comment Period Ending: 9/24/2016 Comments Received: 2

The table below is a summary of public comments received concerning the draft Resource Management Guide (DRMG). The public comments received have been reviewed in their entirety and given due consideration summarized in the Division of Forestry response below.

Comment Summary	Division of Forestry Response
<ul style="list-style-type: none"> • Concern of potential impact to interior species, Indiana and Northern long eared bat and other RTE species. Recommends detailed environmental inventory of birds, wildlife and plants be conducted/included in DRMG. Concern on reliability of the NHDB • Suggests DRMG evaluate habitat composition on the surrounding landscape and consider possible set aside of tract for long rotation management (100+ years) values. • Recommends following US Fish & Wildlife Service habitat guidelines (canopy cover, snags, etc) to prevent take of the Indiana bats. Suggests additional measures. Notes a shortage of snags was commented upon in the RMG. • Suggests DoF focus management on interior forest habitats. • Concern on impacts to soil and water resources and effective implementation and monitoring of BMPs. Suggests riparian areas be avoided or buffered during harvests • Concerns about long term forest sustainability and harvest levels on State Forests. • Concern potential spread of invasive species as result of management activity. • Contends the removal of all Ash through the prescribed managed harvest will not slow the spread of Emerald Ash Borer. Suggests harvest of Ash may reduce ash genetic diversity important to long term survival of the 	<ul style="list-style-type: none"> • Habitats, communities and species are considered as part of the management planning process. Along with field observations, Natural heritage data has been reviewed to check for threatened or endangered bird and wildlife species on or near the management unit. No HCVF or old growth forests were noted on this tract. • Wildlife research indicates that ephemeral soft edge created by harvesting similar to that proposed is much different than hard edge which is more permanent. As such does not support the assertion that certain parasitizing bird species increase disproportionately to habitat benefits. • Further information on direct and indirect impacts on species and habitats are found in the Indiana State Forest Environmental Assessment. http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf • Detailed flora, fauna and landscape level habitat inventories are beyond the scope of tract level management guides. • Implementation of the DRMG will utilize guidance from the US Fish and Wildlife Service and other sources to avoid take impacts to the Indiana bat and other listed species. The RMG prescribes an increase in snag habitat features. • Best management practices will be implemented and monitored to address the soil erosion and sedimentation concerns, including buffers. BMPs will be required of operator and included in timber sales contracts. DoF will respond to reported BMP departures. BMP guidance can be found at: http://www.in.gov/dnr/forestry/files/fo-

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species.

- Concern DRMG does not address impacts on climate change and carbon sequestration. Suggests DoF put in place evaluation standards to consider the cumulative impacts of all state and federal forest management projects across the state on climate change and include evaluation results in the DRMG.
- Opposes the harvest prescription within the DRMG due to potential impacts to plants, animals, habitat, aesthetics and ecological services.

[2005 Forestry BMP Field Guide.pdf](#)

- Indiana State Forests contain approximately 1.15 billion board feet of timber. Managed harvest levels on State Forests are set at a level to insure long term sustainability. These levels are periodically reviewed as new inventory data is collected. See http://www.in.gov/dnr/forestry/files/fo-State_Forest_CFI_Report_2010_2014.pdf
- Invasive species presence and control needs will be monitored as part of normal operations. A variety of management measures are considered in an overall integrated pest control strategy, including manual controls, defensive plantings and treatments with approved herbicides. Strictly manual measures are seldom effective control strategies by themselves.
- EAB is widespread throughout Indiana. <http://www.in.gov/dnr/entomolo/5349.htm> Recruiting ash regeneration is an expected and desired outcome of the prescribed treatment. While the prescription will remove many infected Ash trees it will not slow the spread of EAB. The prescription does not and is not able to remove all Ash trees.
- Assessing climate change and carbon sequestration is beyond the scope of tract level RMGs.
- The prescribed management activities are consistent with silvicultural principles, promotes habitat diversity and supported by inventory data and field assessments. The concerns expressed have been considered and may be further addressed during plan implementation.