

SUMMARY COMMENTS

Yellowwood State Forest Compartment 11 Tract 3 30 Day Comment Period Ending: 5/20/2016 Comments Received: 4

The table below is a summary of public comments received concerning the draft Resource Management Guide. 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"> • Opposes prescribed managed harvest for following reasons: <ul style="list-style-type: none"> ○ Potential impacts to forest ecology and habitat. ○ Potential impacts to global environment, climate change and carbon sequestration ○ Potential impacts to wildlife and RTE species (e.g. Indiana Bat, Cerulean Warbler). ○ Potential impacts on soils and water quality ○ Potential impacts on recreation • Suggest tract be evaluated and considered for possible set aside for conservation, old or wild forest values. • Concerns about sustainability of harvest practices and State Forest timber harvest levels. • Recommends following US Fish & Wildlife Service Management Guidelines to prevent take of the Indiana bat. Also, recommends hands off approach. • Recommends detailed flora and fauna inventory be conducted/included in RMG. • Suggests DoF should focus management on interior forest habitats. • Concern on potential for soil erosion and sedimentation and the effective implementation of BMPs. Recommends avoiding or buffering sensitive features. • Concern on potential spread and introduction of invasive species as result of management activity. Supports efforts to control invasives (by manual methods only). • Supports the management and retention of snags and cavity trees for wildlife values as outlined in the RMG. • Concerned that the management prescriptions are being driven by the income needs. Suggests State Forest 	<ul style="list-style-type: none"> • As standard practice, the Division of Forestry consults with and utilizes guidance from the US Fish and Wildlife Service and other sources to conserve habitat and avoid take impacts to the Indiana bat. • Habitats, communities and wildlife 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. As a protective measure the location of RTE species (if any) are not disclosed in the RMG. • Detailed flora and fauna inventories are beyond the scope of tract level management guides. • 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 • Best management practices will be implemented and monitored to address the soil erosion and sedimentation concerns. BMPs will be required of operator and included in timber sales contracts. DoF will respond to reported BMP departures. • Invasive species presence and control needs are incorporated in the management guide. The species noted are widespread in the County. A variety of management measures are considered in an overall integrated pest control strategy. Strictly manual measures are seldom effective control strategies by themselves. • There is limited recreational use of this tract (primarily hunting and foraging). Access will be limited during management operations for safety reasons. • Assessing climate change and carbon sequestration is beyond the scope of tract level RMGs. • State budgeting is outside the scope of RMGs. • Indiana State Forests contain approximately 1.15 billion board feet of timber and add an additional 24 million board feet of growth annually.

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Division of Forestry
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<p>budgets be increased.</p> <ul style="list-style-type: none">• Objects to harvest and utilization of Ash trees ahead of Emerald Ash Borer infestations. Concern that removals will eliminate potentially resistant trees and not slow the spread of EAB• Suggests DoF evaluate impacts on climate change and carbon sequestration. Or, put in place evaluation standards to consider the cumulative impacts of all state and federal forest management projects across the state on carbon sequestration and climate change.	<p>Current harvest levels only remove an average of 14 million board feet/year- a fraction of the annual new growth. Timber harvest levels on State Forests are currently set at a level where approximately half the annual growth is utilized. 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</p> <ul style="list-style-type: none">• EAB is now found in nearly all of Indiana's 92 counties and widespread across Indiana forests. State Forests are a relatively small part of the forest make up in Indiana. While the prescription will remove many infected Ash trees it will not slow the spread of EAB. Prescribed regeneration opening will capture some ash seed and regeneration which will escape the initial wave of EAB. Recruiting Ash regeneration ahead of the EAB wave is an expected and desired outcome of group selection silviculture.• The prescribed management activities are supported by inventory data and field assessments. The concerns expressed have been considered and may be further addressed during plan implementation.
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