

SUMMARY COMMENTS

Yellowwood State Forest Compartment 15 Tract 1 30 Day Comment Period Ending: 1/18/2014 Comments Received: 6

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"> • Supports the RMG and the prescribed harvests. • Early successional species suffering from habitat loss due to forest aging. Harvesting on State Forests needed for early successional habitat. State Parks and Nature Preserves help meet other needs. • Supports the RMG recommendations and science based silviculture to achieve multi-succession forest and the inherent benefits. Elimination of State Forest timber harvests would be detrimental to many species. • Wildlife need a diversity of habitats (mix of forest types) and early successional habitats have greatly declined. From habitat viewpoint clearcuts are beautiful too. • Concerned on disruptive impacts of prescribed harvests to other forest users. Concern on impacts to aesthetics and wildlife. • Supports multiple use on public lands. Suggests harvest levels on State Forest be lowered. • Concern that some tree marking may have occurred in this tract or another referenced tract during the comment period. • Concern that tract is part of a proposed wild area plan. • Concern on impacts to backcountry areas. • State Forests should be preserved from harvests as much as possible. Cites general concerns on impacts to climate change, environmental pollution, wildlife, invasive species, forest ecosystems, and aesthetics. 	<ul style="list-style-type: none"> • The 30 day public comment period will remain as standard procedure. However, if individuals have information that is pertinent and specific to the tract they can present that information at anytime. (e.g. Cemetery information) • Recreation use of this outlying tract is low- primarily hunting and forging. There are no recreation trails on the tract. The proposed management will temporarily impact recreational use of the area, during which the area will be closed to public access for safety reasons. Closure would likely be 2-6 months in duration. • 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. • The management guide provides an overview of wildlife and timber resources rather than full data and details utilized for guide development and implementation. Timber inventory and assessments are available. • There are no designated backcountry recreation areas on this tract, and no DNR wild area plan for this area. • 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

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- Would like comment period to be longer than 30 days.
- Concern on impacts to soils, erosion, sedimentation and effective use of BMPs.
- Concern of potential impact to endangered/threatened species. Recommends detailed environmental inventory of birds, wildlife and plants be conducted/included in DMG.
- Concern on impacts to fragmentation and closed canopy wildlife habitat.
- Commenter would like more details than provided in the guide as it relates to wildlife and timber inventories, assessments and specific measures to manage potential impacts.
- Concern on potential spread of invasive species as result of management activity.
- Objects to prescribed harvest and utilization of Ash trees (Emerald Ash Borer infestations). Concern that removals will eliminate potentially resistant trees and not slow the spread of EAB.
- Concern RMG 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.
- Apposes prescribed managed harvest

or endangered bird and wildlife species on or near the management unit. Concern also addressed in the DoF Environmental Assessment.

- Fragmentation concern in this area is agricultural and residential in nature. Prescribed regeneration openings are temporary in nature. HEE research has indicated such openings are consistently utilized by a broad array of species and add to overall habitat diversity.
- Implementation of the RMG will utilize guidance from the US Fish and Wildlife Service and other sources to avoid take impacts to the Indiana and other listed bat species.
- Invasive species presence will be monitored as part of normal operations.
- EAB is now found in 82 of Indiana's 92 counties. And, in all counties where State Forests are located except, Parke County. <http://www.in.gov/dnr/entomolo/files/ep-EABstate.pdf> Since State Forests are a relatively small part of the forest make up in Indiana the removals of Ash under these salvage operations will have little impact of slowing the spread of EAB across the State. Slow the spread benefits would be limited to localized benefits (tract and compartment level) and those affects are not expected to be long lasting given current spread of EAB in Indiana. Prescribed regeneration opening will capture some ash seed and regeneration which will escape the initial wave of EAB. Most ash trees in this tract won't be harvested. Recruiting Ash regeneration ahead of the EAB wave is an expected and desired outcome of group selection silviculture.
- Assessing climate change and carbon sequestration is beyond the scope of tract level RMGs.

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- Timber harvest levels on State Forests are currently set at a level where approximately half of annual growth is utilized. These levels are periodically reviewed as new inventory data is collected. See www.in.gov/dnr/forestry/files/fo-CFI_Report_2008-12.pdf
- 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.