

SUMMARY COMMENTS

Yellowwood State Forest Compartment 3 Tract 27 30 Day Comment Period Ending: 4/4/2015 Comments Received: 3

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"> • Concern on impacts to old growth forest • Concern of potential impacts to undocumented RTE species. RMG indicates NH data base review was done in Y1413- not Y0327. • Suggests the prescribed harvest be delayed 14 years and harvest frequency should be adjusted to what it was in 1st century of State Forest management. • Concern of potential impact to Indiana and Northern long eared bat. Recommends detailed environmental inventory of birds, wildlife and plants be conducted/included in DMG. Concern on reliability of the NHDB. • Concern on potential impacts to Yellowwood trees that have been documented in nearby tracts. • Concern on impacts to soil and water resources and effective implementation and monitoring of BMPs. Suggests steepest slopes be avoided. Specific BMPs to be used are not mentioned in the RMG. • Commenter would like more details than provided in the guide as it relates to wildlife and timber inventories and assessments. • Concern on level of harvests on State Forest system • Questions importance of and need for early successional habitat. Suggests tract be managed for interior forest habitat and that F&W lands be managed to satisfy early successional habitat needs 	<ul style="list-style-type: none"> • Site assessments indicate old growth forests are not present on the tract • Yellowwood trees, if found on this tract, will be buffered from direct impacts. Prescribed management is consistent with Cladastris sp. conservation. • During the first century of State Forest management, forests were recovering from land clearing, worn out agricultural use, abandonment, landscape grazing and fire. Today’s forests demonstrate the amazing resiliency of forests. There was little harvesting of timber during these years of recovery. • A NH data base search was conducted on Y0327. The RMG reference to Y1413 was typographic error and will be corrected. • The proposed management will temporarily impact recreational use of the area, during which the area and trails will be closed to public access for safety reasons. Project implementation will consider approaches to minimize trail impacts. Where practicable, alternate temporary trail routes will be identified. • 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. Concerns also addressed in the DoF Environmental Assessment. All DNR lands contribute to providing a diversity of habitats across the landscape.

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- Concern the prescribed management may lead to less genetically diverse and less resilient forest ecosystems
- Concerned about utilitarian terminology used to describe trees and forest conditions and that full range of values are not considered. Concern about utilitarian (tree farm) management philosophy.
- Concern on potential introduction and spread of invasive species as result of management activity.
- Contends the removal of Ash through the prescribed sanitation 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 species. Suggests more detail be provided on how much ash would be harvested.
- Would like longer comment period
- Concern on impacts to recreation, existing trails and aesthetics. Recommends excluding tracts that have heavy recreation use from regular harvest cycle.
- Asks DoF to endorse an interest group 'state wild area' proposal for this tract.
- 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.
- Opposes the harvest prescription within the RMG citing general concerns on impacts to climate change, environmental pollution, wildlife, forest ecosystems, and 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.
- 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 BMP guidebook can be found at www.in.gov/dnr/forestry/2871.htm
- 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 wildlife data/assessments are available.
- Timber harvest levels on State Forests are currently set at a level where tree growth greatly exceeds removals. These levels are periodically reviewed as new inventory data is collected. See [www.in.gov/dnr/forestry/files/fo-State Forest CFI Report 2010 2014.pdf](http://www.in.gov/dnr/forestry/files/fo-State%20Forest%20CFI%20Report%202010%202014.pdf)
- The RMG uses forest terminology which integrates many considerations including biological, human utility and more. The scope of considerations is not always fully portrayed by the terminology.
- Invasive species presence, management and control are incorporated in the RMG.
- 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.

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	<p>Slow the spread benefits would be limited to localized benefits (tract and compartment level) and those affects are expected to be minimal given current spread of EAB in Indiana. Prescribed regeneration openings will capture some ash seed and regeneration which will escape the initial wave of EAB. Not all Ash trees will be removed. Recruiting ash regeneration is an expected and desired outcome of group selection silviculture.</p> <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)• 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.
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