

SUMMARY COMMENTS

Morgan Monroe State Forest Compartment 3 Tract 3 30 Day Comment Period Ending: 9/10/2016 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 area be evaluated for potential High Conservation Value or old forest designation. • Suggests DRMG evaluate habitat composition on the surrounding landscape and consider possible set aside of tract for long rotation management (100+ years) values. • Supports the retention of snags and other habitat features and would like more related information be included in the DRMG. • Recommends following US Fish & Wildlife Service habitat guidelines (buffers, canopy cover, snags, etc) to prevent take of the Indiana bats. Suggests additional measures and contends there is a shortage of required snags in the tract. • 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. Would like more information on specific BMPs. • Concerns about long term forest sustainability and harvest levels on State Forests. 	<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 and Long-eared bat. Snag levels are addressed in the management guide. • 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. No HCVF or old growth were noted on this tract. • Detailed flora, fauna and landscape level habitat inventories are beyond the scope of tract level management guides. • Wildlife research indicates that soft edge, edge created by harvesting 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 the species positively impacted by the soft edge. • 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

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- 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 species.
- Concern DRMG does not address role of forests and 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.

- respond to reported BMP departures. BMP guidance can be found at: http://www.in.gov/dnr/forestry/files/fo-2005_Forestry_BMP_Field_Guide.pdf
- Invasive species presence and control needs will be monitored as part of normal operations. The species noted are widespread in the County. 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.
 - Assessing climate change and carbon sequestration is beyond the scope of tract level RMGs.
 - EAB is widespread throughout Indiana, including the counties surrounding the State Forest. <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 and is not able to remove all infested Ash trees.
 - 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
 - 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.