

**SUMMARY COMMENTS**

**Various State Forests    Ash Reduction/Ash Salvage    30 Day Comment Period Ending: 1/3/2015    Comments Received: 5**

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
<p><b>Comment Summary:</b></p> <ul style="list-style-type: none"> <li>• A science based statewide control plan needed to conserve the Ash species. As an alternative to this plan, proposes that the DOF draft a comprehensive statewide EAB management plan that encompasses all private and public forestland in the state.</li> <li>• The RMG does not evaluate alternative courses of action</li> <li>• Suggests EAB is being used as excuse to cut down more trees. Recommends annual pesticide spraying as an alternative.</li> <li>• Questions if removal of healthy (or unhealthy) ash trees will have an impact on reducing the proliferation of EAB. And, concern that removals may spread EAB.</li> <li>• Concern on harvest impacts to soil erosion, compaction, proper use of BMPs and spread of invasive species.</li> <li>• Concern on impact of harvest road building in search of low number of trees to salvage.</li> </ul>	<ul style="list-style-type: none"> <li>• There are a variety of EAB measures being undertaken State and region wide. This RMG is not intended to be a statewide or comprehensive strategy for the management of EAB and the Ash species in Indiana. The focus of this RMG is EAB risk and outbreaks on State Forests which affect areas of relatively high populations of Ash and where recovery of Ash material is given due consideration, rather than losing opportunities for significant recovery.</li> <li>• Salvage of EAB affected Ash is one of several alternative approaches on the State Forest system. Approaches include firewood restrictions in place on all DNR properties, integration of Ash considerations in development of tract level management guides, regeneration harvest strategies in areas with significant Ash seed sources and regeneration potential, and a ‘no action’ response where no salvage of Ash occurs.</li> <li>• This proposal will not increase the current harvest levels on State Forests. It will increase the amount of EAB affected Ash that is removed from the woods and recovered for use in woods products, but will not increase overall timber harvest levels.</li> <li>• Annual pesticide treatments are not a cost effective or practical option in forest environments to prevent tree losses due to EAB.</li> <li>• EAB is now found in 82 of Indiana’s 92 counties. And, in all counties where State Forests are located except, Parke County.  <a href="http://www.in.gov/dnr/entomolo/files/ep-EABstate.pdf">http://www.in.gov/dnr/entomolo/files/ep-EABstate.pdf</a> Since State Forests are a relatively small part of the forest make up in Indiana the</li> </ul>

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<ul style="list-style-type: none"><li>• The RMG lacks detail on the scale, scope, timing, how much Ash will be salvaged, how much will be left unsalvaged, and how trees are selected for salvage.</li><li>• Removing healthy Ash may remove EAB resistant Ash trees ('lingering Ash'). By assuring no undesignated "study stands", the plan may decrease and negate the viability of immune ash populations.</li><li>• Proposal disrupts a natural ecological response for regeneration of the ash species.</li><li>• RMG lacks impact and benefit/cost analysis</li><li>• DoF mission includes private forestlands. Plan needed that also addresses privately owned land.</li><li>• Questions how EAB quarantines are enforced.</li><li>• Opposes the Ash salvage logging.</li></ul>	<p>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.</p> <ul style="list-style-type: none"><li>• BMPs for water quality will be included in timber sale contracts and monitored for implementation and effectiveness.</li><li>• Operation areas will be evaluated for invasive species occurrence before and after harvests and appropriate control measures.</li><li>• Ash management and utilization will generally occur at a tract level and incorporated into tract management guides. Salvage undertakings are assessed as discovered.</li><li>• Salvage harvests concentrate on EAB areas with higher numbers of affected Ash trees rather than scattered and small number of trees. This approach will greatly reduce and eliminate need for road building.</li><li>• Salvage operations inherently respond to outbreaks that are both accessible and of significant impact. Response timeframe is inherently constricted due to EAB progression that is often not visible until tree infestation is high. Once discovered the impacts are evaluated and decision made if salvage is practicable and warranted within the constricted window of opportunity. Salvage should generally occur with 1 year of signs of heavy infestation. The first salvage harvest under this RMG will be at Jackson Washington State Forest in an area heavily infested with EAB. Infestation was discovered in 2014 with over 100,000 board feet of Ash on 44 acres. Timber sales are posted at <a href="http://www.in.gov/dnr/forestryexchange/INForestryX/TimberSales.aspx">www.in.gov/dnr/forestryexchange/INForestryX/TimberSales.aspx</a></li><li>• Each Ash tree to be salvaged is inspected and evaluated by a professional forester and each individual tree to be removed is marked by the forester to clearly define the scope of each salvage.</li></ul>
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- Managed harvests, which include lingering Ash and regeneration strategies to capture seed viability will be incorporated into the implementation of the RMG to help preserve genetic diversity of the Ash species as the EAB wave passes over the next 10-15 years.
- Across the State Forest system there is/was an estimated 1.6 million Ash trees prior to EAB containing 34 million board feet. It is expected that well over 90% of these will be lost to EAB and **not** salvaged. (CFI data)
- The EAB wave has already spread across the Salamonie River State Forest in Northern Indiana resulting in loss of nearly all Ash greater than 1” in diameter. No salvage or pre harvesting was done at this location. Resulting loss of economic value has not been determined, but could be assessed. The extent of devastation there is a leading indicator of what to expect across the State and warrants a proactive approach to reduce impacts and losses. DoF will review inventory data and identify tracts of high risk and high opportunity.
- Once heavily infested, Ash sawtimber begins to lose wood value quickly. 1 year after mortality it has greatly reduced or no value for wood products.
- EAB information and management options for private woodland owners is readily available. One source is [www.in.gov/dnr/entomolo/3443.htm](http://www.in.gov/dnr/entomolo/3443.htm) The DoF will look at adding additional web information on State Forest Ash management.
- EAB quarantines are managed by and under the authority of the USDA and DNR Division of Entomology and Plant Pathology. See [www.in.gov/dnr/entomolo/3443.htm](http://www.in.gov/dnr/entomolo/3443.htm)
- Comments received have been reviewed in their entirety and may be given further consideration as the RMG is implemented.