

SUMMARY COMMENTS

Harrison Crawford State Forest Compartment 28 Tract 2 30 Day Comment Period Ending: 9/16/2016 Comments Received: 3

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"> • 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, cave fish) ○ Potential impacts on soils and water quality ○ Potential impact to karst resources and the Blue River ○ Potential impacts on forest recreation, trails and aesthetics • Suggest tract be evaluated and considered for possible set aside for conservation, old or wild forest values – deep woods habitat. • Recommends following US Fish & Wildlife Service Management Guidelines to prevent take of the Indiana bat. • 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. Contends BMP violations elsewhere on SF lands. Recommends harvest buffers around karst and intermittent stream features. Concern on potential spread and introduction of invasive species as result of management activity. Supports efforts to control invasives (by manual methods 	<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. This includes seasonal harvesting restrictions for known Indiana bat locations and around hibernacula. • 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. • 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, including karst buffers, will be required of operator and included in timber sales contracts. DoF will respond to reported BMP departures. • The Blue River is ½ mile distant from the tract. The tract contains no major watercourses. • EAB is widespread throughout Indiana, including heavy presence in Monroe, Brown, Morgan and surrounding counties. 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 slow the spread of EAB. The prescription does not and is not able to remove all Ash trees.

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only).

- Contends the removal of Ash through the prescribed sanitation removals will not slow the spread of Emerald Ash Borer. Suggests harvest of all Ash may reduce ash genetic diversity important to long term survival of the species.
- Recommends no timber harvests along the Adventure Hiking Trail (AHT).
- Supports the management and retention of snags and cavity trees for wildlife values as outlined in the RMG.
- 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.

- Recreation disruption will occur during management activities. Hunting access and trails will be temporarily closed or rerouted for safety reasons during operations. The AHT rework will include interpretive information on forest resource management, habitat diversity and sustainability.
- Invasive species presence and control needs are incorporated in the management guide. The primary species of concern noted is Ailanthus and Japanese stilt grass which is 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.
- Assessing climate change and carbon sequestration is beyond the scope of tract level RMGs.
- Indiana State Forests contain approximately 1.15 billion board feet of timber. Managed harvest levels on State Forests are currently 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
- There are over 7.3 million trees 11" and greater on the state forest system. Less than 1% is harvested annually.
- The 30 day public comment period will remain as standard procedure. However, if individuals have information that is pertinent and specific to the area they can present that information at anytime. (example: Cemetery information)
- 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.
- Old growth forests and/or no harvest areas are represented on other DNR lands which include Nature Preserves, State Parks and Fish & Wildlife.
- The Division of Forestry has about 26% of all its lands in forests 100 years and older. No HCVF or old growth forests were noted on this tract.
- 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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