Indiana Department of Natural Resources
Division of Forestry
State Forest Resource Management Guide Public Comment Summary

SUMMARY COMMENTS

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

- Opposes prescribed managed harvest, citing:
 - Potential impacts to global environment, climate change and carbon sequestration
 - Potential impacts to wildlife and RTE species (e.g. forest interior bird species, Indiana Bat).
 - Potential impacts on soils and water quality in the White River
- Suggests DRMG evaluate habitat composition on the surrounding landscape and consider possible set aside of tract for long rotation management (100+ years) values.
- Recommends following US Fish & Wildlife Service habitat guidelines (canopy cover, snags, etc) to prevent take of the Indiana bats. Suggests additional measures.
- 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. Recommends avoiding or buffering riparian areas.
- Concern on potential spread and introduction of invasive species as result of management activity. Supports efforts to control invasives (by manual methods only).
- 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.

Division of Forestry Response

- 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.
- 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 forests were noted on this tract.
- Detailed flora, fauna and landscape level habitat 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
- Wildlife research indicates that ephemeral soft edge created by harvesting similar to that proposed is much different than hard edge which is more permanent. As such does not support the assertion that certain parasitizing bird species increase disproportionally to habitat benefits.
- 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.
- Invasive species presence and control needs are incorporated in the management guide. The species noted are 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.
- EAB is widespread throughout Indiana, including heavy presence in

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 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. 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.

- Assessing climate change and carbon sequestration is beyond the scope of tract level RMGs.
- 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.