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. 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 for following reasons:
  - Potential impacts to Indiana Bat and potentially other RTE species
  - Potential impacts to forest ecosystem, biodiversity, habitat composition and wildlife
  - Potential impacts on climate change and carbon sequestration
  - Potential impacts on forest recreation and aesthetics
  - Potential impacts on soils and water quality
- Suggest tract be evaluated and considered for possible set aside for conservation, old or wild forest values
- Concerns about stainability of clearcutting and overall State Forest timber harvest levels
- 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
- Concern on potential spread and introduction of invasive species as result of management activity. Supports efforts to control invasives (by manual methods only)
- 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.
- Recommends longer than a 30 day public comment period

## **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. As a protective measure the location of
  RTE species (if any) are not disclosed in the RMG.
- 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.
   <a href="http://www.in.gov/dnr/forestry/files/fo-StateForests">http://www.in.gov/dnr/forestry/files/fo-StateForests</a> 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 respond to reported BMP departures.
- Invasive species presence and control needs are incorporated in the management guide. The primary species of concern noted is multi flora rose which is widespread in the County.
- Assessing climate change and carbon sequestration is beyond the scope of tract level RMGs.
- Recreation disruption will occur during management activities. The tract's forest management road is used by recreationists and will be closed to public access for safety reasons during operations.
- The RMG does not prescribe clearcutting for this tract.
- Indiana State Forests contain approximately 1.15 billion board feet of timber and add an additional 24 million board feet of growth annually. Current harvest levels only remove an average of 14 million board feet a year- a fraction of the annual new growth. Timber harvest levels on State Forests

