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 for following reasons:
 - 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).
 - Potential impacts on soils and water quality
 - Potential impacts on forest recreation
- Recommends following US Fish & Wildlife Service Management Guidelines to prevent take of the Indiana bat. Also, recommends hands off approach.
- Should consider 20 year reentry period as opposed to the prescribed 15 year period.
- Suggestions more than 30 day comment period.
- Log trucks will present issues with local vehicle traffic.
- Opposes the system wide effort to manage for oak and hickory at the expense of other species.
- 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 sensitive features.
- Concern on potential spread and introduction of invasive species as result of management activity. Supports efforts to control invasives (by manual methods only).

Division of Forestry Response

- Many of the state forest tracts are slowing converting to a more climax forest condition which we believe will result in a less diverse forest for both the flora and fauna components. Maintaining and enhancing this forest structure will allow for more diversity. Over 26% of all state forest lands are over 100 years of age.
- Inventory and growth data suggests that the 15 year reentry period will allow the forest to become fully stocked again. Allowing trees to grow beyond that period could result in increasing mortality due to competition and reduced soil moisture and nutrients.
- 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. http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf
- See also Forest based research at: https://heeforeststudy.org/ and https://heeforeststudy.org/publications/
- 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

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- Supports the management and retention of snags and cavity trees for wildlife values as outlined in the RMG.
- Concerned that the management prescriptions are being driven by the income needs. Suggests State Forest budgets be increased.
- 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.
- 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.
- 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

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.