

Michigan Department of Natural Resources

Response to Public Comments on Draft Regional State Forest Management Plans

Introduction

Comments received on the Draft Regional State Forest Management Plans (RSFMPs) were essential in the development of the Final Draft RSFMPs for the northern Lower Peninsula, eastern Upper Peninsula and western Upper Peninsula regions. The comments were important for DNR planning staff to assess the clarity of the plans, public understanding of what was being proposed and in assessing whether or not there were important aspects that the public thought were missing or not completely dealt with in the draft plans. The comments were also essential for meeting the public and indigenous peoples' consultation requirements of the Sustainable Forestry Initiative and Forest Stewardship Council forest certification standards.

This document describes the process used to analyze public comments submitted on the Draft RSFMPs and to develop agency responses to these comments.

Copies of all documents referenced in this document are located in the official planning record, and are available upon request from the Forest Resources Division in Lansing, Michigan.

Analysis of Public Comments

Comments on the Draft RSFMPs were received by the Michigan DNR in many forms, including letters, e-mails and comment sheets available during public meetings. All comments were compiled, organized, read and analyzed by the DNR planning team.

Direction

Direction for the development of management plans for State Forest resources is provided in Part 525, Sustainable Forestry on State Forestlands, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Part 525 requires the DNR to communicate with the public by (in part) preparing, implementing and keeping current a management plan that clearly states the long-term objectives of management and the means of achieving those objectives.

Possible responses to comments considered include:

- Improvement or modification of analyses.
- Substantive modifications of plan content
- Factual and other such editorial corrections.
- Explanation of why a comment does not warrant further agency response, citing the sources, authorities or reasons, which support the agency's position.

Comment Letter Processing and Analysis

The public comment period ran from October 1, 2012 through until March 8, 2013. The DNR received 188 comment submissions during the comment period. Each comment letter was read in its entirety. The DNR transcribed comments into a database to allow the creation of subsequent queries and reports. The DNR used the following process to organize responses to comments:

- Each comment author or respondent was given a unique number.
- Each comment submission was organized by region (where specified) and categorized by distinct subject matter or topics.
- The categorized comments were then grouped together by similar concerns into major categories (i.e., recreation, timber harvesting, wildlife habitat and featured species) and further refined and summarized to eliminate redundancy.
- Public concern statements were then written to represent the concerns.

The database of comments is available as a public record.

Public Concern Statements

The content analysis process involved developing summary statements representing public comments. DNR staff identified issues and developed 180 public concern statements to summarize comments representing similar issues, arguments or positions. The team determined whether comments were within the scope of the plans and revision process and whether refinement to management direction, supporting analysis or other plan element was needed.

Because each public concern statement is a summary it can represent one or many comments, depending on the actual comments submitted. Public concern statements range from extremely broad generalities to extremely specific points because they reflect the content of verbatim public comments. In the interest of space limitations for this document, the verbatim comments are not presented, but are represented only by the public concern statement.

DNR Response to Comments

Once comments were reviewed and issues were identified, DNR responses to the public concern statements were developed. Where applicable, responses include references to sections within the Draft RSFMPs. Where warranted, responses note modifications to proposed actions and/or additional analyses conducted in response to comments received. Any resulting clarifications, corrections and/or changes made to the final draft plans are also provided for each concern statement. Not all concern statements resulted in changes to one or more of the plans and this is so stated for each instance.

Public Concern Statements

The public concern statements, the DNR responses to these statements and any resulting change to the plans are presented in the remainder of this document. Public concern statements are numbered for agency use.

<i>Concern Statement No. 1.1.1</i>	<i>Certification implies that practices are sound, comprehensive and sustainable, so why change the plan and why search out and protect biodiversity with more standards?</i>
DNR Response	Certification does imply sound and comprehensive practices; but, it does not define the conditions that the DNR is trying to manage for in the forest. Sound and comprehensive practices need to be employed to move the forest to some defined level of conditions and then maintain those conditions. Ensuring that there is adequate conservation of biodiversity is part of this process that is not yet complete.
Resulting Change to Plan	Section 1 has been rewritten and reorganized to better articulate the purpose of the plan which should make it clearer in relation to certification, sustainability and biodiversity.

<i>Concern Statement No. 1.1.2</i>	<i>Forest management has changed for the better with certification so why has forest health declined and aspen aged?</i>
DNR Response	Certification deals primarily with the process and practices. Implementation of the process and practices are somewhat dependent upon financial resources and the knowledge and ability to carry out treatments. The effects of exotic forest pests and diseases (like Emerald Ash Borer and Beech Bark Disease) are a major cause of decline in the effected cover types. Some aspen resources that cannot be accessed or are other managed for other values may be aging, but the overwhelming majority of state forest aspen resources are being actively and sustainably managed as part of a healthy forest resource.
Resulting Change to Plan	Some aspen rotations were shortened in the northern Lower Peninsula and western Upper Peninsula plans.

<i>Concern Statement No. 1.1.3</i>	<i>Why does Michigan need to be certified as having a responsible management system? Will dual certification be maintained and chain-of-custody added?</i>
DNR Response	Michigan currently has legislation requiring certification of the state forest and there is market demand for certified wood, so certification will continue for the foreseeable future. The Michigan DNR is presently in compliance with chain-of-custody certification standard requirements, and has actively worked with the forest products industry to strengthen the chain of custody of certified forest products in Michigan.
Resulting Change to Plan	No changes were made to the plan.

Concern Statement No. 1.2	Bring MA prescriptions and other DNR plans together in a regional "forest strategy."
DNR Response	DNR will be considering the development of a state wide strategy in the near term and this will provide direction for revisions to the 2008 State Forest Plan and ultimately strategic direction for each region. Future versions of the regional forest management plans will reflect this direction.
Resulting Change to Plan	Forest Resources Division has started the process to develop a comprehensive and up-to-date Forest Strategy for Michigan.

<i>Concern Statement No. 1.3.1</i>	<i>Work with private sector and use venture capital to support oriented strand board and bioenergy to create demand for these and non-commercial species.</i>
DNR Response	This topic is beyond the scope of the regional forest plans and is better dealt with in a different in a different forum and perhaps by a different agency leading the discussion - i.e. Michigan Economic Development Commission.
Resulting Change to Plan	No changes were made to the plan. Refer to the response to this issue statement.

<i>Concern Statement No. 1.3.2</i>	<i>Hunting and timber sales contribute to economic health and jobs for local communities.</i>
DNR Response	The management of hunting (licenses, access, and quotas) and timber sales is outside the scope of these plans although it would not hurt to discuss these values and their link to economic health and jobs for local communities.
Resulting Change to Plan	The importance of both timber harvesting and hunting to local economies is already addressed in sub-sections 3.5.1, 3.5.2 and 3.5.3 of Section 3.

<i>Concern Statement No. 1.3.3</i>	<i>Investments need to be based on sound economic principles.</i>
DNR Response	This topic is beyond the scope of the regional forest plans and is better dealt with in a different forum and perhaps by a different agency leading the discussion - i.e. Michigan Economic Development Commission.
Resulting Change to Plan	No changes were made to the plan. Refer to the response to this issue statement.

<i>Concern Statement No. 1.4.1</i>	<i>Manage based on amalgamated cover types rather than on an ecological basis.</i>
DNR Response	Management of forests and their multiple benefits is very complex and Michigan has determined that ecosystem management is the most appropriate approach. Management solely on the basis of cover types is not adequate to account for the management of multiple values for multiple benefits.
Resulting Change to Plan	A definition of the ecosystem approach to forest management has been included in the Introduction - Section 1 which addresses the need for an ecological approach.

<i>Concern Statement No. 1.4.2</i>	<i>Tie management areas to landforms - use ecological basis.</i>
DNR Response	This is a good suggestion and fits well with the ecosystem approach to forest management. It should have been done as part of the rationalization of the management areas. Further review and rationalization of the management areas needs to be done as other higher level planning documents are created (Forest Strategy) or revised (2008 State Forest Plan); but, this task is really outside the scope of these plans.
Resulting Change to Plan	The foundation for this type of approach should be set in a comprehensive and up-to-date Forest Strategy for Michigan that is currently under development and in a future revision of the 2008 State Forest Plan before incorporating into management area direction. No change was made in the plans.

<i>Concern Statement No. 1.4.3</i>	<i>Ensure that ecological functions and values are maintained, extended, or restored.</i>
DNR Response	Certification and the ecosystem approach to forest management are both intended to ensure that ecological functions and values are maintained or restored and both allow for the improvement or enhancement of those values depending upon the desired future conditions.
Resulting Change to Plan	This has been stated more clearly in the Introduction - Section 1 as part of the discussion associated with the ecosystem approach and included with the discussion of desired future conditions.

<i>Concern Statement No. 1.4.4</i>	<i>Manage to return to pre-settlement conditions.</i>
DNR Response	Re-establishment of pre-settlement forest conditions does not reflect the desires of the current users of the state forest nor is it possible to re-establish those conditions in the face of a changing climate. The conditions for which we will manage need to be defined based on the desired values of the forest users tempered by what has a high probability of success in future, given a changing climate. These future conditions should be defined by the suite of "desired future conditions."
Resulting Change to Plan	The fact that we are not intending to manage for pre-settlement forest conditions has been clearly stated in the Introduction - Section 1.

<i>Concern Statement No. 1.4.5</i>	<i>Manage for early successional forests and not pre-settlement conditions.</i>
DNR Response	Re-establishment of pre-settlement forest conditions does not reflect the desires of the current users of the state forest nor is it possible to re-establish those conditions in the face of a changing climate. The conditions for which we will manage need to be defined based on the desired values of the forest users tempered by what has a high probability of success in future, given a changing climate. These future conditions should be defined by the suite of "desired future conditions."
Resulting Change to Plan	The fact that we are not intending to manage for pre-settlement forest conditions been clearly stated in the Introduction - Section 1. No changes are required in the current plan.

<i>Concern Statement No. 1.4.6</i>	<i>Split the Chatham-AuTrain management area into two sections - east and west.</i>
DNR Response	Further review and rationalization of the management areas needs to be done as follow up or adaptive revision based on monitoring and assessment activities that will be developed and implemented after this plan is approved; but, this task is really outside the scope of these plans.
Resulting Change to Plan	No changes were made to the plan. Development and implement a monitoring protocol complete with associated reporting functions may actually cause the lumping of management areas rather than splitting.

<i>Concern Statement No. 1.4.7</i>	<i>What is the point of having management areas?</i>
DNR Response	The identification of management areas was intended to create areas that had similar goals, objective and targets within an ecological framework tempered by similar multiple values. Although management area boundaries may need to be refined it is up to our management system to ensure that consistent application of management tactics is oriented towards achieving the goals and objectives for the management area.
Resulting Change to Plan	No changes were made to the plan. May need to include something within the internal audit structure to address this issue. There is a need to demonstrate utility of the approach or change it.

<i>Concern Statement No. 1.4.8</i>	<i>Is the plan really about protecting/enhancing/and maximizing natural resources or is it a 'ticket' to exploit our resources?</i>
DNR Response	Certification and the ecosystem approach to forest management are both intended to ensure that ecological functions and values are maintained or restored and both allow for the improvement or enhancement of those values depending upon the desired future conditions. This process is designed to permit consumptive use of our resources while maintaining sustainability. The sustainability of these practices must be demonstrated through monitoring.
Resulting Change to Plan	Development and implement a monitoring plan complete with associated reporting functions will help to will demonstrate that the plans really do address conserving natural resources on the state forest. No changes were made to the plan.

<i>Concern Statement No. 1.5</i>	<i>Multidivisional implementation has been less than optimal when staffs are located in different locations.</i>
DNR Response	It is up to our management system to ensure that consistent application of management tactics is oriented towards achieving the goals and objectives for the management area. Management of the state forest is clearly a joint responsibility between Forest Resources Division and Wildlife Division. Implementation should be consistent throughout any given management area regardless of the staff involved.
Resulting Change to Plan	May need to include something within the internal audit structure to address this issue. Consistency of implementation is critical to success. No changes were made to the plans.

<i>Concern Statement No. 1.6</i>	<i>Future planning must support the recommendations of this plan.</i>
DNR Response	An integrated planning hierarchy where higher level strategies and plans provide support for lower level plans is important. The lower level plans must support the direction and recommendations of the higher level plans. As plans are revised, lower level plans must also be revised to continue the supporting alignment. Implementation monitoring (or certification auditing) plays a very important role in determining if 'we did what we said we were going to do.' The plans, at all levels, really represent (along with the complete set of associated guidelines) what we say we are going to do. Effectiveness monitoring examines whether or not the desired or expected results were achieved and provides the basis for making positive feedback into our plans and ultimately our future actions.
Resulting Change to Plan	The development of a monitoring plan and reporting structure are important components of addressing this concern and are outlined further in Section 6.

<i>Concern Statement No. 1.7</i>	<i>Focus appears to be on other animals (other than deer and game) for which there is not mandate and is an abuse of Michigan hunter dollars. Follow Deer Range Improvement Project policy not some new one.</i>
DNR Response	Michigan has a mandate to manage for all species as part of ecosystem and sustainable forest management. That said, the featured species selected to guide these plans has clearly included all the important game species associated with state forests. The Pittman-Robertson Act funding direction speaks to wildlife in general and clearly does not mention a restriction to game species. The Deer Range Improvement Project has been superseded by a much broader habitat policy to account for other wildlife resources on the landscape consistent with the ecosystem approach to forest management.
Resulting Change to Plan	A statement about the Pittman-Robertson Act has been added to the featured species sub-section of Section 3. It states that the act applies to all wildlife rather than just game species.

<i>Concern Statement No. 1.8</i>	<i>What is the role of science? It appears to have taken a back seat.</i>
DNR Response	Although it may appear to have taken a back seat, science is at the basis of certification, ecosystem management, goals, objectives, habitat specifications, and all of the standards use in the implementation of the plan direction.
Resulting Change to Plan	No changes were made to the plan. Refer to the response to this issue statement.

<i>Concern Statement No. 1.9</i>	<i>There is a need to present and discuss the multiple benefits of forests, especially ecological.</i>
DNR Response	The benefits of forests are addressed in the management are write-ups to a certain degree; but, a more detailed discussion might be useful, including an expansion of the ecological benefits.
Resulting Change to Plan	A presentation of the uses or values of the forest has been added at the beginning of Section 3 that includes ecological (ecosystem services), social and economic uses of state forests.

<i>Concern Statement No. 1.10</i>	<i>If sustainability is to be a principle tenant of the plan, it needs to be more specifically mentioned and discussed.</i>
DNR Response	Sustainability is a very important principle and it does need to be expanded upon in the text and a future monitoring plan and reporting framework that is to be developed after plan approval.
Resulting Change to Plan	A more detailed discussion is included in the Introduction - Section 1 with linkages to legislation and certification. There is also a reference to a discussion in Section 6 dealing with monitoring, evaluation and reporting.

<i>Concern Statement No. 1.11</i>	<i>There is a need to take a landscape approach to setting goals and objectives for state forest land in terms of cover type and wildlife habitat management.</i>
DNR Response	This need for a landscape level approach and analysis is acknowledged and does represent a gap in knowledge. It is a pre-requisite to the development of both better goals and objectives related to cover type and wildlife habitat management, definition of desired future conditions and ultimately for monitoring.
Resulting Change to Plan	This shortcoming and need has been recognized in both Sections 1 and 6. The following statement reflects the knowledge gap and future issue: Completion of a landscape level analysis of forested land in Michigan for use in determining the contributions being made by non-state forest land and helping to inform the definition of the desired future conditions and related management objective on state forest lands.

<i>Concern Statement No. 2</i>	<i>Since implementation will be limited by funding, the plans should develop an Forest Resources Division budget showing what is funded, what is unfunded, and what are the future funding needs.</i>
DNR Response	Although funding should be discussed in the Introduction of the plans, it does not usually for an integral part of such a plan. That said, the plans should form a basis for the annual budgeting process but maybe it is more appropriate at the management area scale. We may not be able to do this yet; but, it is something to keep in mind as the planning structure is further developed and refined.
Resulting Change to Plan	No changes were made to the plan. Refer to the response to this issue statement.

<i>Concern Statement No. 3.1</i>	<i>A description of what the plan is and is not is needed since it is unclear and confused.</i>
DNR Response	The primary purpose of the plan was not clearly stated in Section 1 and does need to be improved.
Resulting Change to Plan	Section 1 has been rewritten and reorganized to better articulate the purpose of the plan which should make it clearer.

<i>Concern Statement No. 3.2</i>	<i>Doesn't like the planning process or the plans - logging is main purpose - ecosystem management is a farce. Call them Timber plans.</i>
DNR Response	The process used to develop the plans is not explained in Section 1 and it should be included for clarity.
Resulting Change to Plan	The ecosystem management approach has been defined in the Introduction (Section 1); and, a description of the planning process has also been added (also to Section 1).

<i>Concern Statement No. 3.3</i>	<i>Are all stakeholders considered - why weren't representatives of other values included in development of the plans?</i>
DNR Response	Development of the regional forest management plans followed a different approach than some of the plans for other values like recreation and trails. Rather than involving stakeholder representatives on the planning teams, they have been involved based on a much longer public comment period. The final products will reflect input from a broad range of stakeholders, much broader than could have been included on a planning team.
Resulting Change to Plan	A description of the planning process has been included in the Introduction - Section 1.

<i>Concern Statement No. 3.4</i>	<i>Recreation and other values are dealt with in other plans - needs to be stated.</i>
DNR Response	The discussion of the purpose in Section 1 of the plans should discuss how planning for values other than timber and wildlife habitat are being is being approached and how those values will be considered in these plans.
Resulting Change to Plan	The purpose of these plans has been more clearly stated in the introduction of Section 1. The relationship to other plans has also been clarified in the text and with the addition of a planning process diagram.

<i>Concern Statement No. 3.5</i>	<i>Does the plan accommodate all values called for in the 2008 State Plan?</i>
DNR Response	The values discussed in the 2008 Michigan State Forest Plan are addressed in this plan through the direction in the management area write-ups, through the direction for other values in the management area write-ups, through the special resource area direction or through the application of associated guidelines during the implementation of the plans.
Resulting Change to Plan	No changes were made to the plan. Refer to the response to this issue statement.

<i>Concern Statement No. 4</i>	<i>Plans do not explicitly describe on-going involvement, consultation, or assess cultural and subsistence resources of affected Tribes.</i>
DNR Response	Interaction with the various tribes of Michigan is not well discussed in the plans and what is presented is in Section 5. Although the draft plan was provided to each tribe, only two tribes submitted comments and there were some discussions with a third tribe. The material on tribal relations should be move from Section 5 to Section 1 and should be expanded.
Resulting Change to Plan	

<i>Concern Statement No. 5</i>	<i>Add discussion of importance of bioenergy for power and heat to Section 3.</i>
DNR Response	Markets for fuel wood and chips for bioenergy will play an increasingly important role in supporting forest management in the future. In the context of sustainable forest management, bioenergy markets will provide an outlet for products from low value timber sales, and may make some types of treatments feasible that had formerly been considered non-commercial or uneconomical. The availability of bioenergy markets for whole-tree chips, and woody biomass from shrubs may make some types of wildlife habitat treatments possible in the future, and may play an important role in the maintenance of Kirtland's warbler habitat.
Resulting Change to Plan	The area of bioenergy is something that is beyond the scope of the plans and is a developing area in Michigan. There are guidelines currently in place to guide biomass harvest and these should be adequate for the short-term. Should this situation change in the future, the plans can be revised or it can be accounted for in future plans.

Concern Statement No. 6	State's various plans that have a bearing on forest resources should be integrated and referenced, including the Deer Plan, Statewide Comprehensive Outdoor Recreation Plan, Blue Ribbon Panel on State Parks, trail plan, and Land Management Plan.
DNR Response	The relationship to other plans has been clarified in the text and with the addition of a planning process diagram. Other plans that provide some additional direction are listed. The Blue Ribbon Panel on State Parks covers a separate land base. The state trail plan is in an early draft form. The Land Management Plan also has not been approved in time for inclusion in this version of the regional forest management plans.
Resulting Change to Plan	Discussion of the purpose has been expanded in the introduction to Section 1 as has the discussion related to how other values are being planned for and accommodated in these plans.

<i>Concern Statement No. 7.1</i>	<i>How was it determined that the present acreage by cover type is the best for the next ten years? There is little if any change.</i>
DNR Response	The present acreages by cover type are not necessarily the best and definition of the desired future composition has been identified as a knowledge gap and something that needs to be addressed in the future and integrated into the plan through a revision. Recognizing that there is really very little change in cover types over a ten-year period, the issue of climate change will complicate management and what impacts this will have on what can be achieved in the long-term is still very much unknown. The uncertainties around the impacts of climate change would minimize the chances of attaining any desired future conditions that we could develop now in the absence of more knowledge about where climate change is going to push the composition of our forests.
Resulting Change to Plan	Resolution of this issue cannot be addressed in the plans right now. The issues around climate change will be included in Sections 1, 2, 3 and 6 to more clearly identify the issues around this knowledge gap. Also, Section 6 speaks to the development of a monitoring plan that will include some aspects of monitoring change that could be driven by climate change and that can serve as somewhat of an early warning system.

<i>Concern Statement No. 7.2</i>	<i>The plans should have included a discussion of how many acres of each cover type was desirable in the future condition by region and management area rationalized against public preferences.</i>
DNR Response	This is a desirable and highly supported suggestion that will need to be addressed after assessing landscape context, the current status (largely accomplished in this planning process) and where climate change might push our forests. We also need to further assess the complete scope of public preferences given the assessments suggested above. Acquiring a forest management model capable of modeling the forest over a long period of time that accounts for climate change influences is an important step in ultimately presenting, reviewing and deciding upon a suite of attainable future conditions. We will also need to develop and implement a monitoring plan that will help assess progress.
Resulting Change to Plan	The need for a landscape analysis and monitoring plan has been identified in Sections 1 and 6 of the plans. These aspects will be worked on and integrated into the plan as part of upcoming revisions. The climate change issues will also be addressed and relevant aspects will be integrated into the plan and the monitoring plan as they become available. The issue around public preferences for future conditions will be addressed as part of the development of a monitoring plan. A forest management model is being and will be pursued for future use.

<i>Concern Statement No. 7.3</i>	<i>The time-line for future condition has not and should be defined.</i>
DNR Response	Typically the future conditions should represent the conditions out about 100 years to be consistent with part of the definition of forest sustainability. The potential implications of climate change may make a time period of this length difficult to use. Certainly the period can and should be longer than ten years. Perhaps a 30-year period would be more appropriate.
Resulting Change to Plan	

Concern Statement No. 7.4	The potential impact of climate change on desired future conditions needs to be discussed.
DNR Response	Typically the future conditions should represent the conditions out about 100 years to be consistent with part of the definition of forest sustainability. The potential implications of climate change may make a time period of this length difficult to use. Certainly the period can and should be longer than ten years. Perhaps a 30-year period would be more appropriate.
Resulting Change to Plan	Definition of any desired future conditions has been identified as a shortcoming of the plans and as something that could cause a future revision. This has been added to Section 1 and the new Section 5.

<i>Concern Statement No. 7.5</i>	<i>How is the state forest being used - the attributes are being described but the use is not.</i>
DNR Response	Although most of the uses of the forest can be listed, we do not have the quantitative data to draw any conclusions on forest uses. This subject represents a gap in our knowledge and is something that can possibly be addressed in future plans; but, not necessarily regional forest management plans.
Resulting Change to Plan	A quantitative analysis of state forest uses would be an important step in addressing the definition of the ranges in desired future conditions of the state forest and are an important component in defining sustainability. This is a future item that has not been addressed in these plans.

<i>Concern Statement No. 7.6</i>	<i>Is increasing mortality in the forest being addressed?</i>
DNR Response	Increasing mortality is being addressed through the application of control measures (i.e., oak wilt), training to resource professionals and land owners about invasive species and control/mitigation techniques and through salvage operations to minimize economic impacts. Ensuring diversity in the state forest will also help to address this issue.
Resulting Change to Plan	These techniques are an ongoing part of our forest management activities and hence no changes were made to these plans.

<i>Concern Statement No. 7.7</i>	<i>How do natural disturbance patterns influence desired future conditions?</i>
DNR Response	There is no assessment of natural disturbance patterns available for Michigan that could be used to help articulate desired future conditions. Although historic patterns would be useful to understand forest dynamics in Michigan, the future impacts related to climate change will define a new pattern that is quite different from historic patterns.
Resulting Change to Plan	No changes were made to the plan. Refer to the response to this issue statement.

<i>Concern Statement No. 8.1</i>	<i>Goals and objectives are poorly articulated and appear only for timber management at the management area scale. There are no goals or objectives at the regional scale.</i>
DNR Response	Goals and objectives for featured species habitat are problematic. Addressing this issue will require the development of Michigan specific habitat models or the acquisition and calibration of existing models for use in Michigan. This would then provide the ability to estimate current habitat suitability and allow for the development of realistic goals and objective. It is difficult to rationalize the cover type goals and objectives without the similar information for wildlife habitat regardless of scale.
Resulting Change to Plan	The gap represented by the lack of wildlife habitat goals and objectives has been identified in Sections 1 and 6 and will be addressed in the future and will be integrated into the plans through periodic revisions.

<i>Concern Statement No. 8.2</i>	<i>Goals and objectives need to be established that reflect the strategic direction, the desired future conditions and the needs/wants expressed by the public.</i>
DNR Response	A new forest strategy is currently under development but will not be ready in time to influence this version of the plans. Also, an assessment and accounting of public preferences and their reflection in terms of a suite of desired future conditions is a gap that will need to be addressed as part of the development and implementation of a monitoring plan.
Resulting Change to Plan	Statements have been added to Sections 1 and 6 that reflect these knowledge gaps and identify them as items that could result in a future revision of the plans.

<i>Concern Statement No. 8.3</i>	<i>Plans are too complex to be implemented.</i>
DNR Response	Forest management is a complex business and the plans do indeed seem very complex. However, the DNR has very skilled and highly trained staff with abundant experience. Despite the complexity of the plans, they really represent adjustments and revision to the current system. We also have implantation monitoring systems in place to monitoring implementation of the provisions of the plans. We will also be developing an effectiveness monitoring plan that when implemented will help to assess whether or not our management practices are having the desired effect. Both these monitoring efforts will help to improve management of our state forest.
Resulting Change to Plan	No changes were made to the plan. Refer to the response to this issue statement.

<i>Concern Statement No. 8.4</i>	<i>Metrics need to be developed to allow for periodic review to assess progress towards the objectives.</i>
DNR Response	This is an important point - these metrics do need to be developed. The size of the project to do so is rather large and there are a suite of needs larger than just these plans. The intent is to develop a monitoring protocol for the state that will encompass the total suite of needs. Future regional plans or versions of this plan will include key metrics from the monitoring protocol.
Resulting Change to Plan	Development of the complete suite of metrics associate with a monitoring plan will be developed after these plans area approved because development of the monitoring plan will require information contained in this plan. Section 6 has been modified by the addition of two tables that include a list of best-bet-metrics that will undoubtedly become part of the monitoring framework.

<i>Concern Statement No. 8.5</i>	<i>The objectives related to timber management (i.e. balancing age classes) need to reflect or take into consideration the probability of achievement.</i>
DNR Response	This is a good observation and one that needs to be reconsidered in light of the knowledge gaps around landscape inferences; manageable acreage assessments; the broad suite of goals, objectives and desired future condition; and the impacts of climate change. All of these aspects have been identified as knowledge gaps that need to be addressed, assessed and integrated back into the plans as revisions or in future editions of the plans.
Resulting Change to Plan	The need to address these knowledge gaps has been recognized and stated in Sections 1 and 6.

<i>Concern Statement No. 8.6</i>	<i>Compartment review strategies have not changed and do not reflect any new direction.</i>
DNR Response	The compartment review strategies are still being driven by previous direction and will not reflect the provision of these plans until the 2016 year-of-entry.
Resulting Change to Plan	The fact that the provisions of these plans will actually effect implementation of forest management operations from 2016 to 2026 is now stated in Section 1, sub-section 1.1 describing the purpose of the plans.

<i>Concern Statement No. 8.7</i>	<i>There is a need for reserves to serve as benchmarks against which managed conditions can be compared.</i>
DNR Response	It is intended that the identification of ecological reference areas (ERAs) will serve this need as described in the Introduction to Section 4 of the plans. The network of ERAs is not complete and identification of additional areas and the development of individual management plans for these areas will continue over the life of the plans.
Resulting Change to Plan	<i>A more detailed discussion of the role of ecological reference areas will be included in any new planning process that is developed for special resource areas as well as in the management plans for each ecological reference area that will be developed over the next ten years. No changes were made to the plans.</i>

<i>Concern Statement No. 9.1</i>	<i>There is no greater landscape level assessment of forest resources/values to provide context for management direction and desired future conditions at the various scales for state forest land.</i>
DNR Response	This is indeed a shortcoming and has been identified in Sections 1 and 6 as a knowledge gap that needs to be addressed. This gap will need to be addressed before a meaningful discussion can be had related to the development of public preferences for a suite of desired future conditions. These conditions are required for the development of a monitoring plan, also addressed in Section 6.
Resulting Change to Plan	The need to address these knowledge gaps has been recognized and stated in Sections 1 and 5.

<i>Concern Statement No. 9.2</i>	<i>What is the role of Albert's Ecological Classification and Kotar's vegetation classification in management of the state forest?</i>
DNR Response	Albert's Ecological Classification was one of the factors used in determining boundaries for the ecoregions and the ecological classification is one of the considerations in designation of the management areas along with landforms, cover types and other local use patterns. The Kotar vegetation classification is loosely associated with spatial distribution of cover types and local staff can use the Kotar classification to determine site suitability.
Resulting Change to Plan	No changes were made to the plans; however, these tools can be used in the future to project conversion pathways and moving species on the landscape to get the right species on the right sites.

<i>Concern Statement No. 9.3</i>	<i>No mention is made of the remarkable recovery and growth of the forest from the post-settlement disturbances.</i>
DNR Response	The recovery of the forest from post-settlement disturbances is a result of the resilience of many forest cover types, human effort to make things better, and a host of supporting legislation all of which has been successful in returning much of the landscape to forested conditions. These conditions are different from pre-settlement conditions.
Resulting Change to Plan	No changes were made to the plans.

<i>Concern Statement No. 9.4</i>	<i>There is support for longer rotation ages to better reflect natural disturbance patterns.</i>
DNR Response	Longer rotations for specific cover types are required for some of the featured species and have been prescribed for some management areas in the Upper Peninsula as well as the northern Lower Peninsula. Further assessment of natural disturbance patterns and habitat needs of featured species could produce extended rotation ages for a variety of cover types in the future.
Resulting Change to Plan	Support is acknowledged. No changes were made to the plans.

<i>Concern Statement No. 10.1</i>	<i>The model used to generate harvest numbers needs to be better explained, made more prominent and made spatial. The outputs also need better explanation.</i>
DNR Response	The model used to generate harvest levels is relatively complex and a more complete discussion, of how it works and what its assumptions are, have been developed and included in the introduction to Section 4 and in Appendix D.
Resulting Change to Plan	The description related to the model used to generate harvest levels has been revised. The complete description is still in Appendix D; but, a brief discussion has been added to the Introduction to Section 4 to make it readily accessible prior to the management area discussions.

<i>Concern Statement No. 10.2</i>	<i>Outreach and education is not addressed and is part of the reason why the public is uninformed and misinformed and cannot input on the purpose.</i>
DNR Response	Outreach, education and partnerships are not discussed in the plans; but are important and need to be addressed in a more comprehensive manner to address the issues identified in this concern.
Resulting Change to Plan	Outreach and education are addressed to some degree in the Forest Action Plan (Michigan Forest Resources Assessment and Strategy) and were deemed out-of-scope for these regional plans. Further efforts in these areas may be developed during revisions to that plan. Partnerships are also important and are sought when opportunities are presented. Most involve non-state forest land. No changes were made to the plans.

<i>Concern Statement No. 10.3</i>	<i>Increase consistency among plans and between the executive summary and the plans.</i>
DNR Response	Inconsistency in and among the plans was an issue.
Resulting Change to Plan	A greater effort has been made to ensure that there is consistency among plans and within plans for the new drafts.

<i>Concern Statement No. 10.4</i>	<i>Recreation treatment varies among plans.</i>
DNR Response	Although recreation planning is not a component of this plan, describing how forest management activities will be mitigated against recreational facilities and other values should be addressed in a consistent fashion.
Resulting Change to Plan	Recreational opportunities vary by management area. Recreational facilities, including campgrounds, access points, motorized trails and non-motorized trails have now been identified in the text of each management area and on a revised management area map or on a new special resource area map for each management area write-up in Section 4 of each plan.

<i>Concern Statement No. 10.5</i>	<i>Little treatment of riparian management zones.</i>
DNR Response	Management of riparian areas is important in terms of minimizing soil damage through compaction and active erosion as well as for providing habitat for woodcock and protecting high priority trout streams. Conceptually this is addressed in the plans; but, the specifics are guided by the implementation of management guidelines which is done at the local scale during the compartment review.
Resulting Change to Plan	The treatment of riparian management zones has been revised in Section 3 to focus more on forest management activities. Specific treatments and locations will still be addressed during the compartment review and will be subject to future monitoring activities.

<i>Concern Statement No. 10.6</i>	<i>No treatment of spiritual solitude.</i>
DNR Response	Spiritual solitude is addressed as a special conservation area discussed and described under the special resource area category when they have been identified. No such areas on state forest land were brought to our attention during this planning process. We will continue to work with tribal representatives to identify and protect these special areas during our planning processes.
Resulting Change to Plan	No changes were made to the plan.

Concern Statement No. 10.7	Plan implementation process is not clear.
DNR Response	The implementation of the provisions of these plans will be through the compartment review process beginning with the 2016 year-of-entry.
Resulting Change to Plan	A statement to this effect has been added to sub-section 1.1 dealing with the purpose of the plan in Section 1.

<i>Concern Statement No. 11</i>	<i>There is no discussion of the potential impacts of climate change on forest area, cover type acreage, habitat, wetlands, growth, mortality, invasives, and hence on desired future conditions and objectives or a discussion of adaptation and mitigation of practices or planning contingencies.</i>
DNR Response	A discussion of climate change and its potential impacts on forest parameters have been added to Sections 2, 3 and 6. We are not yet ready to identify modified goals and objectives at the management area scale, although we expect the next ten-year plan to have some modified provisions. It has also been identified as a knowledge gap in Sections 1 and 6.
Resulting Change to Plan	

<i>Concern Statement No. 12.1</i>	<i>Concern that the timber harvest projections are significantly above recent harvest amounts, and that harvest projections through clearcutting have increased significantly over the harvest projections in the first plan draft.</i>
DNR Response	The projections for timber harvest are higher than recent levels in order to help achieve a balanced age-class structure in less time. The increased harvest levels for aspen, for instance, are recommended in order to provide a larger age class behind one or more age classes that are well below the balanced harvest level in order to provide additional harvest are on better sites to off-wet the deficit in the older age classes once they reach rotation age. The increase in clearcut area is related to the increase in the harvest level for aspen (described above) since clearcut is the most appropriate silvicultural treatment for early successional species like aspen.
Resulting Change to Plan	An explanation based on this rationale has been added to the Introduction to Section 4 of each plan.

<i>Concern Statement No. 12.2</i>	<i>Support for increased harvest levels for economic reasons, forest health and wildlife habitat in early successional cover types.</i>
DNR Response	The projected harvest levels are calculated based on levels needed to balance the age class distributions which will produce an even flow of forest products and wildlife habitat. The rotation age, which greatly influences the harvest acres, was selected to balance economic returns for timber and wildlife habitat needs based on the species and the site potential by management area. The model has been overridden to accelerate harvests to include age classes that may be more susceptible to mortality due to forest health issues.
Resulting Change to Plan	No changes were made to the plan.

<i>Concern Statement No. 12.3</i>	<i>The plan does not specify the spatial details for projected timber harvest acres.</i>
DNR Response	Harvest prescriptions at the compartment level are developed and approved through the compartment review process based on projected acres needed to meet objectives in the RSFMP.
Resulting Change to Plan	No changes were made to the plan.

<i>Concern Statement No. 12.4</i>	<i>The plan does not specify the sustainable levels of harvest or the sustainability of harvest methods.</i>
DNR Response	The sustained yield for each of the major cover types for each management area is specified in each management are write-up in Section 4 of each plan. This harvest level is indicated by the red line in the age-class distribution graph and is calculated by the model which is fully described in Appendix D. The silvicultural techniques used for each cover type are scientifically sound.
Resulting Change to Plan	The description of the model used to calculate the sustained yield has been revised and updated in Appendix D - Qualitative Description of the Forest Model. The description explains the forest inventory system and how the model produces estimates of timber harvests necessary to achieve balanced age-class distributions.

<i>Concern Statement No. 12.5</i>	<i>It is not apparent whether harvest levels account for growth and mortality rates.</i>
DNR Response	The DNR's current inventory does not model growth and mortality nor is the current model able to account for these factors. The current management philosophy is one of area regulation which is an indirect method that does not use growth or mortality information.
Resulting Change to Plan	The DNR is working with the U.S. Forest Service to identify forest inventory and assessment plots on state owned land that can provide suitable cover type measurements for use in growth and yield modeling. The DNR is also working with Michigan State University to investigate the potential to develop a future model that will also produce growth and yield estimates. This work is ongoing; but, is outside the scope of the current plans and hence no changes were made to the plans.

<i>Concern Statement No. 12.6</i>	<i>It is not apparent whether harvest levels are based on science and that the harvest levels are not justified or well explained.</i>
DNR Response	The model used to generate harvest levels is relatively complex and is based upon sound science related to the management philosophy of area regulation. The description of how the model generates harvest levels is explained fully in Appendix D.
Resulting Change to Plan	Appendix D - Qualitative Description of the Forest Model - which explains the forest inventory system and the model used to project timber harvests necessary to achieve balanced age-class distributions, was updated and revised.

<i>Concern Statement No. 12.7</i>	<i>Noted that the cover type acreages vary little if any from the beginning of the planning period to the end of the planning period.</i>
DNR Response	There is a great deal of uncertainty associated with defining the desired future range of conditions that area desirable on the state forest and there are some knowledge gaps that need to be addressed before a reasonable definition can be attempted. Also, there is only a minimal amount of change that can be expected in a ten-year period.
Resulting Change to Plan	The future impacts of climate change introduce a great deal of uncertainty around what is possible in terms of future conditions and those conditions may not be predictable with any degree of certainty beyond the next 30 years. Other knowledge gaps include a thorough landscape assessment, wildlife habitat goals and objectives and a clear definition of socio-economic desires from the state forest system. No changes were made to the plans; but, future versions of the plan will start to incorporate new knowledge into the provisions of the plan.

<i>Concern Statement No. 13.1</i>	<i>The plan (model) does not account for conversion between forest types.</i>
DNR Response	The model is capable of accounting for conversions between cover types; but, this feature was used only minimally because it was decided to maintain the current cover type composition through this planning period given the uncertainty around climate change and knowledge gaps related to landscape assessment, wildlife goals and objectives and socio-economic desires.
Resulting Change to Plan	The DNR will continue to partner with the USFS and academia to address climate change issues as well as to carry out landscape assessments and address wildlife habitat goals and objectives to be in a better position to describe the desired range of future conditions for future plans. No changes were made to these plans.

<i>Concern Statement No. 13.2</i>	<i>Support for maintaining red pine on "off sites" and jack pine on sandy-low fertility sites.</i>
DNR Response	The plans specify following the red pine project recommendations and using the Kotar vegetation classification system to determine site suitability.
Resulting Change to Plan	This is being done as standard practice and no changes were made to the plans.

<i>Concern Statement No. 14</i>	<i>"Other" cover types should be broken out in a table as they can be important for wildlife habitat and some have harvests scheduled.</i>
DNR Response	Other cover types are generally under % of the total acreage in a management area. Generally the details of the management of these minor types will be directed at the unit level.
Resulting Change to Plan	No changes were made to the plan.

<i>Concern Statement No. 15</i>	<i>There is an issue with regenerating lowland conifer and a questioning of harvesting as long as this is the case. How can it be possible to balance the age-class structure in the face of regeneration failure?</i>
DNR Response	No large scale regeneration failures of the lowland conifer type have been noted.
Resulting Change to Plan	No changes were made to the plan.

<i>Concern Statement No. 16.1</i>	<i>There is concern that the rotation age for aspen varies from that (50 years) recommended by the silvicultural criteria and Appendix D. The rotation age varies between 50 and 70 years with no explanation as to why the rotation age is beyond the silvicultural criteria.</i>
DNR Response	The current silvicultural Guidelines recommend rotation ages between 40 and 60 years depending on site conditions and management objectives.
Resulting Change to Plan	Appendix D uses aspen as an example of varying rotation age by management area. The aspen rotation age varies between 40 and 60 based on forest health, timber value, and habitat requirements.

<i>Concern Statement No. 16.2</i>	<i>There is some support for shorter rotations (that the recommended silvicultural criteria) for the purposes of carbon sequestration and for early successional wildlife habitat.</i>
DNR Response	The harvest of aspen for the purposes of carbon sequestration is not a covered in the plan and is really out-of-scope right now.
Resulting Change to Plan	No changes were made to the plan.

<i>Concern Statement No. 16.3</i>	<i>There is an issue with leaving anything as residual in aspen clear cuts other than oak. Concern is related to aspen stand conversion.</i>
DNR Response	No significant net conversion of aspen is expected in the plans. In stand retention of less than 7% provide structure and cover habitat for game and other species.
Resulting Change to Plan	No changes were made to the plan.
<i>Concern Statement No. 16.4</i>	<i>There is support for no-net-loss of aspen acreage but it is not clear that the plans recognize this or describe how it will be accomplished.</i>
DNR Response	No significant net conversion of aspen is expected in the plans. Based on modeling work aspen is likely to increase slightly over the next decade.
Resulting Change to Plan	Appendix D explains how the model projects harvest acres based on inventory data to manage aspen and other cover types for sustainability.

<i>Concern Statement No. 16.5</i>	<i>There is a concern that aspen acreage will in fact decline.</i>
DNR Response	The plans support the maintenance of the current amounts of aspen.
Resulting Change to Plan	No changes were made to the plan.

<i>Concern Statement No. 16.6</i>	<i>It is recommended that the inventory be changed to permit identification of stands that could be converted to aspen, including poor quality red maple sites.</i>
DNR Response	This type of evaluation would be accomplished based on inventory data and site type information. This type of site specific assessments is carried out through the compartment review process.
Resulting Change to Plan	No changes were made to the plan.

<i>Concern Statement No. 16.7</i>	<i>There is a concern over converting aspen stands to mesic-conifer through the use of herbicides and cutting mixed aspen stands.</i>
DNR Response	No large scale conversion of aspen to mesic conifer types is recommended in the plans.
Resulting Change to Plan	No changes were made to the plan.

<i>Concern Statement No. 16.8</i>	<i>There is general support for balancing the age-class structure of aspen and accelerating the process by cutting under rotation age aspen.</i>
DNR Response	Balancing age-class distributions and providing a sustainable, even flow of timber and non-timber products is a primary goal in most management areas in all three planning regions. The model inputs have been adjusted to produce harvest levels for this planning period that are designed to help accelerate achieving a balanced age-class structure for at least the aspen cover type.
Resulting Change to Plan	Many aspen rotations in the northern Lower Peninsula were shortened to capture timber volume and to provide additional early successional habitat. The plans acknowledged the need to consider harvest below the rotation age to expedite the balancing of age class distributions.

<i>Concern Statement No. 16.9</i>	<i>Restrict aspen management to upland sites in the Black River riparian management zones in the northern Lower Peninsula management areas 5, 6, 7, 8 & 10.</i>
DNR Response	Management activities in riparian management zones will attempt to balance the need to provide woodcock and ruffed grouse habitat and minimize soil compaction, active erosion and potential impacts related to the creation of potential beaver habitat adjacent to high priority trout streams. These issues will be addressed at the local scale through the compartment review process.
Resulting Change to Plan	No changes were made to the plan.

<i>Concern Statement No. 16.10</i>	<i>Recommendations for aspen management - cut at greater than or equal to 10 inches in diameter at breast height and cut using strips cut 10-year intervals.</i>
DNR Response	Specific stand level prescriptions are out-of-scope for these plans.
Resulting Change to Plan	No changes were made to the plan.
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<i>Concern Statement No. 16.11</i>	<i>Concern about attempting to manage aspen based on clones at the operational scale - more of an academic curiosity.</i>
DNR Response	DNR is unaware of any effort to manage aspen based on clones at the operational scale. The practice should remain in the realm of research, perhaps related to adaptive practices to accommodate climate change impacts.
Resulting Change to Plan	No changes were made to the plan.
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<i>Concern Statement No. 16.12</i>	<i>Support for managing jack pine on a rotation that has harvest occurring at biological and economic maturity to avoid heart rot.</i>
DNR Response	In response to potential forest health issues, the model inputs have been adjusted to project harvest of older jack pine where present in management areas specifically where the model did not automatically project harvests from the oldest age classes due to a surplus of acres in the youngest age classes.
Resulting Change to Plan	Support is acknowledged. No changes were made to the plans.
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<i>Resulting Change to Plan</i>	
<i>Concern Statement No. 17.1</i>	There is a desire for more red pine to be planted than the current rate of planting.
DNR Response	The plans specify following the red pine project recommendations and using habitat classification to determine site suitability. The harvest and replanting acres projected by the model aim to balance the age-class distribution of red pine for long-term sustained yield.
Resulting Change to Plan	This is current practice and no changes were made to the plans.
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<i>Concern Statement No. 17.2</i>	<i>There is a concern that current rates of red pine harvest are not sufficient to use red pine before the larger sizes become uneconomical.</i>
DNR Response	Current management of red pine is largely driven by the lack of red pine in the younger age classes and the need to regenerate red pine for future harvest. The model does take into consideration rotation age, and where available, older age classes are projected for harvest to regenerate red pine at a level necessary to eventually produce an even distribution of red pine acres in age classes throughout the rotation.
Resulting Change to Plan	This is current practice and no changes were made to the plans.
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<i>Concern Statement No. 17.3</i>	<i>There is a concern that more jack pine should be planted instead of red pine due to better wildlife value associated with jack pine.</i>
DNR Response	This issue is considered through the compartment review process on a case-by-case basis and does take into consideration the Kotar vegetation classification system and other local factors. However, the plan does very little in terms of direction for conversion of cover types and as such, should be identified as a gap for future planning.
Resulting Change to Plan	This should be part of the discussion around the range of desired future conditions as well as the integration of wildlife habitat objectives with cover type objectives. Both these potential solutions have been identified as gaps to be addressed in the future and hence, no changes were made to the plans.

<i>Concern Statement No. 17.4</i>	<i>Consider other management purposes for jack pine - other than Kirtland's warbler.</i>
DNR Response	This issue is considered through the compartment review process on a case-by-case basis and does take into consideration the Kotar vegetation classification system and other local factors.
Resulting Change to Plan	This should be part of the discussion around the range of desired future conditions as well as the integration of wildlife habitat objectives with cover type objectives. Both these potential solutions have been identified as gaps to be addressed in the future and hence, no changes were made to the plans.

<i>Concern Statement No. 17.5</i>	<i>Questions the rationale for red pine and northern hardwood management - needs to be a more detailed harvest discussion for these species.</i>
DNR Response	The Red Pine Management Guidelines provide direction for red pine management. Northern hardwood management should be covered in a silvics guide for that species.
Resulting Change to Plan	A silvicultural guide for northern hardwoods is currently in draft form and will be used upon approval. The Red Pine Management Guidelines are currently in use. No changes were made to the plans.

<i>Concern Statement No. 18.1</i>	<i>There are many oak management concerns including support for planting more oak, managing for oak in mixed types, replacing pine types with oak for wildlife value as well as balancing the age class distribution of oak.</i>
DNR Response	There is a need for spatial analysis to determine site suitability and there needs to be more discussion on how much of each species is needed for habitat and the production of timber products. There is also a need for a comprehensive strategy to regenerate oak on the landscape. Most oak age-class distributions in the NLP are heavily skewed toward older age classes with little if any regeneration. Balancing the age classes through regeneration will be a long-term and very difficult process due to regeneration issues.
Resulting Change to Plan	Discussion of oak management issues was added in several MAs in the NLP along with management direction to maintain oak through prescriptions to be determined through the compartment review.

<i>Concern Statement No. 18.2</i>	<i>Concerns about oak management techniques including clearcutting oak and the need to maintain mast tree</i>
DNR Response	<i>In cases in the NLP where oak has reached its maximum productive age, clear-cutting is used to re-establish the oak cover type on the site. In these cases the traditional selective or partial harvest will no benefit the remaining trees, so they are all removed. The importance of mast trees is recognized and some may be left if there is some probability that they can continue to live and produce mast long enough to warrant being left.</i>
Resulting Change to Plan	Since this is a current practice, no changes were made to the plans.

<i>Concern Statement No. 19.1</i>	<i>There is support for increased harvesting in lowland types, but also questions as to whether harvested lowland conifer/ cedar will regenerate and how will regeneration be monitored.</i>
DNR Response	Lowland cover types have not been well assessed in terms of identifying manageable acres and since regeneration can be a significant challenge for some of these cover types, proposed harvest area have been very low. There has been some refinement in the harvest level since the draft plan and these are reflected in the final draft of the plans. Cedar is perhaps the exception since it is primarily intended to serve as wildlife habitat and since regeneration is a wide scale problem. Cedar harvests will be necessarily small in area.
Resulting Change to Plan	As the new inventory replaces the old, there will be a much better assessment of manageable acres for all lowland cover types and hence a better estimate of allowable harvest. The plans will be revised when new numbers are available as indicated in sections 1 and 5. The actual implementation of harvesting operations and regeneration will continue to have challenges. Regeneration in lowland harvest areas will be monitored and assessed according to current guidelines. There have been some changes to the estimates of lowland cover type harvest area since the draft plan and any further revisions will await new inventory data, a reassessment of manageable acres and a revision to the plans as indicated in sections 1 and 5.

<i>Concern Statement No. 19.2</i>	<i>There are concerns that manageable acres have not been well defined due to possible hard factor limits and special conservation area classification. Just how many acres are available for harvesting and at what level can we harvest?</i>
DNR Response	Better definition of manageable acres on the state forest system is very important in determining the allowable harvest and defining sustained yield. Some improvements have been made since the draft plans were developed and harvest numbers have been adjusted accordingly.
Resulting Change to Plan	Continued refinements to the definition of manageable acres will continue as the inventory system is switched over to the new Integrated Forest Monitoring, Assessment and Prescription system (IFMAP). Once that is complete, the plans will be revised to reflect this better definition of manageable acres and further revisions to the allowable harvest will be integrated into the revised plans. The numbers of manageable acres and the allowable harvest have been revised from the draft plans.

<i>Concern Statement No. 19.3</i>	<i>There is a desire for more selective cutting over clearcutting and more harvesting in general.</i>
DNR Response	The DNR is committed to managing the state forest using the best available science which includes silvicultural techniques. Early successional cover types will generally be managed using the clear-cut method since selection cutting is generally inappropriate. Selection harvesting systems are more suitable to mid- and late-successional cover types that will benefit from thinning or partial harvesting. The appropriate application of silvicultural techniques is determined during the compartment review process.
Resulting Change to Plan	Since the application of silvicultural techniques is determined through the compartment review process, no changes were made to the plans.

<i>Concern Statement No. 19.4</i>	<i>Need to harvest more on the Beaver Island Archipelago</i>
DNR Response	Harvest projections are based on the model with local decisions made on harvest areas made through the compartment review process.
Resulting Change to Plan	No changes were made to the plan.

<i>Concern Statement No. 19.5</i>	<i>Need to clearcut more to provide early successional habitat.</i>
DNR Response	Clearcuts are used in the appropriate cover types as a final harvest technique to restart a stand to the same cover type. This ten-year planning period will see no conversion to early successional cover types, so there will be no increase in the area of early successional habitat. Use of this technique in conjunction with reduced aspen rotations, particularly in the western Upper Peninsula will create more young early successional forest over the life of these plans.
Resulting Change to Plan	Aspen rotation ages in the western Upper Peninsula were reduced for some management areas.

<i>Concern Statement No. 19.6</i>	<i>There is a concern that not enough planning emphasis is placed on invasive species and that some species are not identified in the areas where they are found.</i>
DNR Response	<i>There is a need for a more comprehensive plan to address invasive species that includes staff training, field assessments and data tracking. Recently there has been increased attention to staff training with respect to the identification of species and symptoms and this will continue in 2014. Reporting tools have also been developed and made available to field staff to use in the course of their normal field duties.</i>
Resulting Change to Plan	No changes were made to these plans for the final draft; however, important changes will be added when available as part of other plan revisions.

<i>Concern Statement No. 19.7</i>	<i>There is a concern that continued emphasis need to be placed on salvage of timber impacted by invasive species, catastrophic events as well as the timing of salvage operations. Also, that there is no larger strategy for dealing with invasive species.</i>
DNR Response	The model outputs can be adjusted to deal with timber salvage needs and has been used for that purpose in response to large fires events and in response to mortality related to invasive forest pests like emerald ash borer. Salvage operations need to happen quickly before timber quality is lost and may well require attention outside the normal compartment review process and year-of-entry.
Resulting Change to Plan	Since the model can and is being used for these purposes, no changes were made to the plans.

<i>Concern Statement No. 19.8</i>	<i>Need to include spruce budworm in Forest Health write up for eastern Upper Peninsula.</i>
DNR Response	Spruce budworm is a serious pest for the entire Upper Peninsula and the northern Lower Peninsula. Outbreaks are widespread being 20 or more years apart. Spruce budworm is not always viewed as a major threat to forest resources. Proper management of stands of spruce and fir in between outbreaks is the key to avoiding catastrophic losses. Spruce budworm prevention and mitigation activities should be an ongoing theme in the proper management of spruce-fir cover types.
Resulting Change to Plan	Spruce budworm will be added to the write-up for the final draft of the plans.

<i>Concern Statement No. 19.9</i>	<i>There is a concern that harvest levels are too high and that clearcutting is excessive or the desire to stop clearcutting.</i>
DNR Response	One of the underlying principles of the model is sustained yield management and outputs should be in line with this goal. Outputs will continue to be reviewed in terms of new inventory data as well as the results of monitoring harvest levels and projected acres in the plan.
Resulting Change to Plan	Since this is already being addressed and the development of a monitoring plan has been identified in the plan, no changes were made.

<i>Concern Statement No. 19.10</i>	<i>There is need to identify and protect genetic diversity of native red and white pine.</i>
DNR Response	<i>There is very little genetic diversity in red pine. We already maintain what there is by tracking seed source from cones purchased at the district offices, and matching local seed source stock with the sites being planted. The Division is considering options for developing a red pine seed orchard that would capture representatives of good performing Michigan populations, but all red pine native to this area is from the same race. We'd have to go to Nova Scotia to capture scions from the only other existing race in red pine. We plant very little white pine, and chiefly rely on natural regeneration from local seed sources. Within stand retention helps to conserve locally uncommon or less represented species at the stand level in each harvest area.</i>
Resulting Change to Plan	Since the current actions appear to be sufficient to protect the genetic diversity of both red and white pine, there were no changes made to the plans.

<i>Concern Statement No. 19.11</i>	<i>Clarify whether the plan is recommending under-planting mesic conifer in high snowfall areas for deer management.</i>
DNR Response	<i>This should be addressed in wildlife plans and local decisions are made through the compartment review process. Under-planting mesic conifer trees in high snowfall areas in one of many wildlife habitat treatments that can be considered by the habitat biologists in those locations, but there is no initiative or special program to elevate this treatment option above others that may be considered; or, as a broad-scale treatment.</i>
Resulting Change to Plan	Decisions on which wildlife habitat treatments are implemented in any given context are made at the compartment review scale. As a result, no changes were made to the plans.

<i>Concern Statement No. 19.12</i>	<i>There were questions about what exactly constitutes a hard factor limit and why if cedar has no factor limits we can gauge manageable acres.</i>
DNR Response	Limit factors are discussed in terms of the model in Appendix D and are listed/described at the start of Appendix C for all three plans. The identification/application of limit factor acres is assessed at the time when the stand reaches the age of general silvicultural criteria, usually defined by the rotation age. Since most cedar has yet to reach the rotation age, very little has been assigned limit factors.
Resulting Change to Plan	The Michigan State Forest Plan (2008) states that the primary goal for cedar is to supply wildlife habitat and since most cedar acres have yet to reach the rotation age (150 years), very little has been assessed for limit factors and total harvest area is small. No changes were made to the plans.

<i>Concern Statement No. 19.13</i>	<i>How will we monitor cedar regeneration?</i>
DNR Response	All regenerating acres on state forest land are subject to well defined, periodic regeneration surveys at least until the regeneration is deemed successful. Regeneration survey information is tracked in a central database and will feed into a future monitoring plan and assessment.
Resulting Change to Plan	Regeneration surveys and tracking are currently being carried out and the need for a monitoring plan is already addressed in Section 5, so no changes were made to the plans.

<i>Concern Statement No. 19.14</i>	<i>There is a concern that forest health issues including older age classes susceptible to conversion are addressed through timber harvesting.</i>
DNR Response	The model can be adjusted to deal with older age classes that may be susceptible or vulnerable to forest health issues and scheduled for harvesting.
Resulting Change to Plan	The model is already capable of using current inventory data to deal with this potential concern, so no changes were made to the plans.

<i>Concern Statement No. 19.15</i>	<i>Support was expressed for using conifer plantations to provide late succession forest and reduce fragmentation.</i>
DNR Response	DNR will continue to use guidelines and the compartment review process to determine where plantations are best suited to be placed on the landscape. The inventory and assessment tools will be used to determine and assess their role in the landscape and compare them to desired conditions once those have been determined.
Resulting Change to Plan	No changes were made to the plan.

<i>Concern Statement No. 19.16</i>	<i>Support for chipping and biomass production for economic development.</i>
DNR Response	The production of woody biomass from harvesting operations is recognized as an important economic value for local communities and guidance is provided by the Woody Biomass Harvesting Guidelines and where ecologically acceptable it is encouraged.
Resulting Change to Plan	This is a current practice so there were no changes made to the plans.

<i>Concern Statement No. 19.17</i>	<i>Plan lacks discussion on determination of sustained yield and backing with inventory numbers. Growth and yield modeling is lacking.</i>
DNR Response	The sustained yield calculations have not been included in the plans; but, are calculated by the model based on DNR inventory data. The DNR inventory system does not include permanent sample plot measurements suitable for growth and yield modeling; however, the USFS FIA plot network can be used to supply this information.
Resulting Change to Plan	The DNR is working with the USFS to identify FIA plots on state owned land that can provide suitable cover type measurements for use in growth and yield modeling. The DNR is also working with MSU to investigate the potential to develop a future model that will also produce growth and yield estimates. This work is ongoing; but, is outside the scope of the current plans and hence no changes were made to the plans.

<i>Concern Statement No. 19.18</i>	<i>Comment suggested use of hardwoods as fuel breaks in pine stands.</i>
DNR Response	Fuel breaks are decided upon through the compartment review process and may be grass or other non-forested types.
Resulting Change to Plan	No changes were made to the plan.

<i>Concern Statement No. 19.19</i>	<i>Comment suggested limiting prescribed fire and wildfire due to the release of carbon dioxide.</i>
DNR Response	Fire is a natural part of the forested ecosystem and is important to the overall ecology of the forest. Prescribed burning is also an important tool used to manage specific forest cover types as well as some non-forest conditions. Prescribed fires under prescriptive conditions can reduce fuel levels that may lead to catastrophic wildfires. Also, carbon dioxide released under prescribed conditions is less than uncontrolled wildfires.
Resulting Change to Plan	No changes were made to the plan.

<i>Concern Statement No. 19.20</i>	<i>There are concerns about the accuracy of the model and whether the projected harvest acres are sustainable.</i>
DNR Response	The model used to project harvest acres is based on the best available inventory data and is also designed to produce sustainable yields using the area regulation approach. As with all models, there are underlying assumptions that must be met for the results to be meaningful. One of the ways to test the outputs of the model and improve model outputs is to provide continuous feedback through the results of monitoring on an annual basis.
Resulting Change to Plan	This information is already being collected and tracked through a centralized database; but, the monitoring program will be developed over the next few years. Assessment of the data will provide the feedback to the model. No changes were made to the plan; but, some may be made in the future when the plan is revised based on the approved monitoring program.

Concern Statement No. 19.21	Comments expressed a desire to see more details in the plan for understory species including herbs and shrubs.
DNR Response	Management direction for featured species provides details related to the need for understory species and fine scale habitat features (such as down and dead wood) for the benefit of wildlife. The implementation of appropriate guidelines through the compartment review process and harvest operations ensures that these conditions are conserved in harvested stands.
Resulting Change to Plan	No changes were made to the plan.

<i>Concern Statement No. 19.22</i>	<i>Concern about road damage by log trucks.</i>
DNR Response	Damage by logging trucks during a timber sale is addressed in the timber sale conditions and is enforced through audits and implementation or compliance monitoring. Damage to state forest roads and stream crossings is required to be repaired and is tracked through Resource Damage Reports.
Resulting Change to Plan	No changes were made to the plan.

<i>Concern Statement No. 19.23</i>	<i>More harvests- especially thinning for state game areas, state parks.</i>
DNR Response	These regional forest plans are specific to state forest land and do not apply to any activities on state game area or state park land. Activities on state game areas are directed towards specific wildlife habitat management projects and are directed by management plans specific to the game area. Similarly, forest management activities in state parks are usually carried out to ensure human safety or to restore or maintain specific cover type conditions as specified in individual state park management plans.
Resulting Change to Plan	No changes were made to the plan.

<i>Concern Statement No. 19.24</i>	<i>Require timber companies to replant after harvesting.</i>
DNR Response	The responsibility for ensuring regeneration on state forest land is with the DNR. However, timber sale revenues are used to fund any reforestation activities to ensure that the site is regenerated to minimum standards.
Resulting Change to Plan	No changes were made to the plan.

<i>Concern Statement No. 19.25</i>	<i>Too much slash is left after logging sales.</i>
DNR Response	The amount and distribution of slash left on a harvest site is stipulated in the timber sale contract and is enforced through compliance inspections. On-site slash plays an important role in nutrient cycling and in providing a variety of wildlife habitat conditions. Slash conditions are addressed in the compartment review process and can be modified based on the presence of other values, such as the presence of trails.
Resulting Change to Plan	No changes were made to the plan.

<i>Concern Statement No. 19.26</i>	<i>Questions about the rationale for species management such as for red pine, northern hardwood, hemlock, white pine, lowland conifer and cedar - needs to be a more detailed harvest discussion for these species.</i>
DNR Response	Silviculture guides for use by department staff exist for several of these cover types and work is underway to produce additional silvicultural guides for the other species.
Resulting Change to Plan	The silviculture guides will be available on the DNR website and made available to staff for implementation as they are finalized. No changes were made to these plans.

<i>Concern Statement No. 20.1</i>	<i>There is a desire to have more young forest as habitat for game species in particular, and its value to wildlife discussed in the plan.</i>
DNR Response	The quantity of young forest needs to be addressed as part of the discussions related to the ranges of desired future conditions and the integration of wildlife habitat and cover type objectives. These needs have been identified as shortcomings of the plans. The amount of young early successional forest will be at least partially addressed through the reduction of the aspen rotation ages in many of the western Upper Peninsula management areas and the effort to balance aspen age classes. The value of young forest to wildlife could be developed and added to the featured species discussion in Section 3.
Resulting Change to Plan	These concerns will be addressed through a future revision to the plans.

<i>Concern Statement No. 20.2</i>	<i>There is a desire to more closely integrate forest management with wildlife habitat in the plan; i.e. How does forest management improve habitat? Also a desire to use sound science in management of the forest.</i>
DNR Response	This point is well taken and it is recognized that this is a short-coming in the plan. The habitat objectives for featured species need to be developed and integrated into the management area write-ups and there needs to be a rationalization of both the cover type objectives and the wildlife habitat objectives.
Resulting Change to Plan	The recognition of this need has been identified in both Section 1 and Section 6 as a short-coming of the plan and as a trigger for a future plan revision.

<i>Concern Statement No. 20.3</i>	<i>There is a desire to maintain older age classes on the landscape to provide mature timber and wildlife habitat for species that need larger trees and structure.</i>
DNR Response	Mature forest is important to many species of wildlife and should be an integral part of the state forest system. Some featured species were selected with this in mind (American marten, Red Crossbill, Gray Jay) and the complete list is found in Table 3.9. Past harvesting practices have left most cover types with an abundance of older age classes in the manageable as well as in the factor limited area in most management areas. This situation will persist through this 10-year planning period.
Resulting Change to Plan	Since mature forest will persist on the landscape through this planning period, providing needed forest structure, no changes were made to the plans.

<i>Concern Statement No. 20.4</i>	<i>There is concern that extending the rotation age for white spruce and balsam fir by 20 years will remove it from timber production.</i>
DNR Response	Extending the rotation age of white spruce and balsam fir by 20 years is a wildlife habitat prescription intended to provide wildlife habitat on a limited portion of the landscape. The intention is not to maximize timber value on every acre as other values must be recognized and accommodated. Decisions on where and when to apply this specification area made at the compartment review.
Resulting Change to Plan	This is an ongoing practice and no changes were made to the plans.

<i>Concern Statement No. 20.5</i>	<i>There is a desire to manage Kirtland's warbler habitat in a way that is different from normal management and not let it interfere with public recreation. Some comments reflect the opinion that jack pine has little habitat value beyond Kirtland's warbler.</i>
DNR Response	There is a desire by managers and researchers to explore different methods of management for Kirtland's warbler across the landscape; however we have federal mandates that need to be met for this listed species. Jack pine has great value for many wildlife species, but this may be beyond the scope of this plan to discuss, though it is touched upon in section three. Current Kirtland's warbler plan revisions recognize the need to begin to experiment with other stocking densities, planting configurations, and species composition to better define Kirtland's warbler range of tolerance for breeding habitat in relation to economic trade-offs.
Resulting Change to Plan	The silvics of jack pine management were not discussed in the plan. However, the need for a level of acres necessary to sustain the Kirtland's warbler was addressed in the latest revision. The wildlife habitat specifications for Kirtland's warbler and jack pine in the western Upper Peninsula and eastern Upper Peninsula plans are different from the traditional open weave pattern in the northern Lower Peninsula.

<i>Concern Statement No. 20.6</i>	<i>There is support to remap deer wintering complexes and have their guidelines included in the plan.</i>
DNR Response	Deer wintering complexes in the Upper Peninsula are being remapped and management guidelines area being developed. The completed package will not be ready to incorporate into the plans and this short-coming is recognized in Sections 1 and 6.
Resulting Change to Plan	The need to incorporate the results of deer wintering complex project are recognized and this will be done as part of a future plan revision as indicated in Sections 1 and 6.

<i>Concern Statement No. 20.7</i>	<i>There is a desire to see more benefits for wildlife left post-harvest.</i>
DNR Response	Some of the featured species wildlife habitat practices require additional post-harvest features; in particular dead and down wood, snags, large green tree and mast producing species retention. Post-harvest stand structure is also addressed in the various retention guidelines that are used as standard practice.
Resulting Change to Plan	The application of specific habitat treatments and stand retention guidelines is done at the compartment review process. No changes were made to the plans.

<i>Concern Statement No. 20.8</i>	<i>Support for expansion of sharp-tailed grouse habitat.</i>
DNR Response	Expansion of opening complexes is examined through the compartment review process, and there is a general desire to consolidate openings to increase their size and functionality.
Resulting Change to Plan	Since this is already being addressed through the compartment review process, no changes were made to the plans.

<i>Concern Statement No. 20.9</i>	<i>Need to accommodate the needs of featured species through retention and inaccessible areas (factor limited acres).</i>
DNR Response	Factor limited areas do count toward the needs of some featured species, but these areas alone are inadequate across the landscape for many of the species.
Resulting Change to Plan	A change to the plans was not warranted.

<i>Concern Statement No. 20.10</i>	<i>Concern about using funding from hunters to improve habitat for anything other than game species.</i>
DNR Response	License revenue from restricted funds (deer and turkey licenses) is spent primarily for the management of those species. Other species, however, do benefit from that same management. Federal funds and state game funds have fewer restrictions and can be spent to benefit all wildlife species which fulfills our public trust mandate.
Resulting Change to Plan	No change to the plans was warranted.

<i>Concern Statement No. 20.11</i>	<i>The value of young forest to the full spectrum of wildlife species has not been discussed.</i>
DNR Response	The value of young forest to wildlife could be developed and added to the featured species discussion in Section 3.
Resulting Change to Plan	This concern will be addressed through a future revision to the plans.
<i>Concern Statement No. 20.12</i>	<i>Concern about the amount of jack pine management for Kirtland's warbler - too much and dissatisfied with the methods.</i>
DNR Response	Ninety-eight percent of the world's population of Kirtland's warbler breeds on public land in the northern Lower Peninsula. These lands are crucial to the survival of the species. Based on the species very specific habitat requirements, opportunities of habitat management are limited and beyond the present population distribution. The amount of jack pine cover type dedicated to Kirtland's warbler management is less than 30% of the total acreage on state forest land.
Resulting Change to Plan	The silvics of jack pine management were not discussed in the plan. However, the need for a level of jack pine acres necessary to sustain the Kirtland's warbler was addressed in the latest revision.
<i>Concern Statement No. 20.13</i>	<i>There is concern that the deer population is too high and having a negative impact on the regeneration of northern hardwoods.</i>
DNR Response	These plans are intended to direct wildlife habitat direction. The establishment of game population goals is outside the scope of these plans and is the purview of the Natural Resource Commission.
Resulting Change to Plan	Population goals are beyond the scope of these plans and no changes were made.
<i>Concern Statement No. 21.1</i>	<i>The rationale for choosing featured species and how they are used and assigning them to any given management area is not clear resulting in suggested additions/modifications.</i>
DNR Response	A document outlining the process and purpose of featured species would be helpful, but should be pursued outside these plans. There is some information about the featured species approach in the wildlife portion of Section 3.
Resulting Change to Plan	No changes were made to the plans.
<i>Concern Statement No. 21.2</i>	<i>Featured species write-ups should include the climate vulnerability index score and a discussion of its implications (Section 3).</i>
DNR Response	The vulnerability index for featured and other species was not available in time to include in the draft plans as reviewed by the public. Now that they are available, they will be included in the final draft in Section 3.
Resulting Change to Plan	Climate change vulnerability indices have been included for each featured species in Section 3 of the final draft of the plans.
<i>Concern Statement No. 21.3</i>	<i>Some of the featured species write-ups are missing certain habitat elements or features and long-term direction and need to be reviewed for completeness.</i>
DNR Response	This comment was rather vague and certainly more detail would have been helpful.
Resulting Change to Plan	Review and revision of the write-ups and recommendations will be considered as part of a future revision, such as for the inclusion of wildlife habitat objectives.

<i>Concern Statement No. 21.4</i>	<i>Consider re-ordering the featured species write-ups to identify the issues up front and then list the featured species and relate how these species will focus efforts on wildlife habitat issues (Section 3) with some assessment of species priority.</i>
DNR Response	This is a good suggestion and one that could not be addressed in time for the final drafts of these plans since it ties into other aspects of the plans.
Resulting Change to Plan	This suggestion will be given attention as part of a future revision such as for the inclusion of wildlife habitat objectives.

<i>Concern Statement No. 21.5</i>	<i>The featured species write-ups should be management area specific.</i>
DNR Response	Habitat requirements for species may not be different across a region or even a state regardless of changes in cover-type composition and distribution within any given management area. The habitat objectives, however, could indeed be different and do need to be developed for individual management areas.
Resulting Change to Plan	This suggestion will be given attention as part of a future revision for the inclusion of wildlife habitat objectives.

<i>Concern Statement No. 21.6</i>	<i>There is an issue associated with meeting the original goals of the marten re-introduction program - they have not been achieved.</i>
DNR Response	Including marten as a featured species is an important first step in reinvigorating the discussion about species management goals in the northern Lower Peninsula and in providing late successional habitat for a variety of species.
Resulting Change to Plan	Marten were added as a featured species to the Lake County Outwash, Lake County Moraines and Emmet Moraines management areas in the northern Lower Peninsula.

<i>Concern Statement No. 22.1</i>	<i>There is a need for policy with respect to openings as well as objectives related to the desired future area.</i>
DNR Response	These plans are not vehicles to develop department policy; however, the need for objectives related to openings is recognized.
Resulting Change to Plan	The development of objectives related to openings will be part of the revision related to the inclusion of wildlife habitat objectives.

<i>Concern Statement No. 22.2</i>	<i>How will wetlands be managed to account for the effects of drought and other climate change impacts?</i>
DNR Response	Adaptive strategies for habitat management, including wetlands, in the face of climate change will be an important consideration in the development of a broader suite of adaptive strategies related to climate change.
Resulting Change to Plan	The need to address the many potential impacts of climate change is recognized and will result in a future plan revision. As of 2013, the answers to most climate change issues are just not available.

<i>Concern Statement No. 22.3</i>	<i>Consider the use of herbicides to manage openings for wildlife.</i>
DNR Response	This is an operational consideration that is taken into account in the compartment review process.
Resulting Change to Plan	Since this is already a standard practice in the compartment review process, no changes were made to the plans.

<i>Concern Statement No. 23</i>	<i>Concern that the recreation provisions expressed in a legacy plan were not reflected in the write-up for western Upper Peninsula management area 18.</i>
DNR Response	The WUP plan is focused on the management of forest cover types and the provision of wildlife habitat conditions defined by the identified featured species for this particular management area. The plan is not a vehicle to plan recreational opportunities or facilities although the compartment review process is used to ensure that existing recreational values are minimally impacted by forest management operations.
Resulting Change to Plan	The public access and recreation sub-section of this management area write-up has been modified to include reference to the Tip of the Keweenaw draft recreation plan that has never been finalized or approved. Implementation of the plan, should it be finalized and approved, still remains an unanswered question in terms of responsibility and funding.

<i>Concern Statement No. 24.1</i>	<i>Trails moved due to Kirtland's warbler breeding areas need to maintain recreational experience.</i>
DNR Response	There is no knowledge of any trails that have been relocated because of conflicts with Kirtland's warbler breeding habitat in the past 10 years. In the event that a trail did have to be relocated, our staff would do their best to ensure that the new section maintained the quality recreational experience.
Resulting Change to Plan	Since there is no history of this being an issue, there were no changes made to the plan.

<i>Concern Statement No. 24.2</i>	<i>Leave older trees along trails and leave trail markers intact after timber sales. Concerns about logging damage to trails, trail markers. Cited High Country Pathway damage.</i>
DNR Response	Trail protection specifications can be decided upon during the compartment review and applied through the vegetative management system (VMS) in the design and administration of timber management activities. Guidance for within-stand retention may also be used along trails to minimize impacts which may include modifications to management to "protect trails." Decisions on buffers along trails are made through the compartment review process with guidelines for timber sale contract specifications guided by the vegetative management system .
Resulting Change to Plan	Since these provisions already apply and are used during the compartment review process and the design of timber sales, no changes were made to the plans.

<i>Concern Statement No. 24.3</i>	<i>Snowmobile and all-terrain vehicles trails have not received enough attention in the plans.</i>
DNR Response	The primary purpose of the RSFMPs is to address cover type and wildlife habitat. Specific detail related to snowmobile and ATV trails can be found in the Statewide Comprehensive Outdoor Recreation Plan (2013-2017) and in the Michigan Statewide Comprehensive Trail Plan (2013 - 2018).
Resulting Change to Plan	Trail planning is out-of-scope for the RSFMPs and no changes were made to the plans.

<i>Concern Statement No. 24.4</i>	<i>Comments that roads are blocked limiting access to parts of the forest system and an interest in keeping public lands open for motorized use.</i>
DNR Response	Blocked access roads are managed through specific DNR policy and procedures for road closures and are reviewed through the compartment review process. Public involvement is encouraged. Recreational access planning is part of the Statewide Comprehensive Outdoor Recreation Plan and Statewide Trail Plan planning processes and is not part of the RSFMPs.
Resulting Change to Plan	Trail planning and access are out-of-scope for the RSFMPs and are covered in the compartment review process, so no changes were made to the plans.

<i>Concern Statement No. 24.5</i>	<i>Not all areas should be open for motorized use and concerns that state forest plans will open state lands to all-terrain vehicles.</i>
DNR Response	Many state forest values preclude access to motorized vehicles and such an assessment is carried out in the compartment review process and is consistent with DNR policy and procedures. Long-term access planning for trails is accomplished through the Statewide Comprehensive Outdoor Recreation Plan and the Comprehensive Trail planning processes.
Resulting Change to Plan	Trail planning and access are out-of-scope for the RSFMPs and are covered in the compartment review process, so no changes were made to the plans.

<i>Concern Statement No. 24.6</i>	<i>Support ORV access.</i>
DNR Response	Long-term access planning for off-road vehicles is accomplished through the Statewide Comprehensive Outdoor Recreation Plan and the Statewide Trail planning processes. Short-term decisions are made using DNR policy and procedures through the compartment review process.
Resulting Change to Plan	Off-road vehicle access planning is carried out during other planning processes or through the compartment review process and hence is out-of-scope for the RSFMPs. No changes were made to the plans.

<i>Concern Statement No. 24.7</i>	<i>Enhance all types of trails, more connected motorized trails, increase the amount of trails. Would like more open areas in Mason County.</i>
DNR Response	Expanding trail types and increasing connectivity is addressed in the Comprehensive Trail Plan and the associated planning process as well as in the Statewide Comprehensive Outdoor Recreation Plan.
Resulting Change to Plan	Trail expansion and connectivity are subjects of other planning processes and are out-of-scope for the RSFMPs. No changes were made to the plans.

<i>Concern Statement No. 24.8</i>	<i>Support for maintaining recreational activities on state forests, support for more attention to recreational trails and for more trails.</i>
DNR Response	Maintaining recreational activities on state forest land is clearly a goal of the state forest system; but, planning for those activities as well as expansion of the trail system is accomplished through the Statewide Comprehensive Outdoor Recreation Plan and the Comprehensive Trail Plan.
Resulting Change to Plan	Maintaining and planning of recreational facilities and activities are subjects of other planning processes and are out-of-scope for the RSFMPs. No changes were made to the plans.

<i>Concern Statement No. 24.9</i>	<i>Stop logging within 1/2 mile of high volume recreation areas, especially trails and waterways.</i>
DNR Response	One of the objectives of forest management planning is to minimize or mitigate any potential impacts of operations on other values in the state forest. Mitigation techniques are implemented through the compartment review process and/or timber sale agreements.
Resulting Change to Plan	Compartment review and timber sale agreements will continue to address mitigation of forest operations on other values in the state forest. No changes were made to the plans.

<i>Concern Statement No. 24.10</i>	<i>Concerns about off-road vehicle damage or opposed to motorized access or motorized trails on state forest land.</i>
DNR Response	Motorized access to the state forest will continue to be an acceptable recreational activity where and when appropriate. Any resulting damage from authorized or unauthorized use of motorized vehicles is documented through the submission of a Resource Damage Report by DNR staff, tracked through a centralized system and then used to seek funding for rehabilitation.
Resulting Change to Plan	The Resource Damage Reporting system will continue to be used to deal with damage caused by motorized vehicles. No changes were made to the plans.

<i>Concern Statement No. 24.11</i>	<i>Recognize trails as visual management areas (5.1.9) or as corridors (5.1.6)</i>
DNR Response	Recognizing trails as a visual management area or as corridors would have to be done through the compartment review process and nominated areas or trail sections would have to be evaluated against the criteria for each of those categories. Public participation in the compartment review process is encouraged.
Resulting Change to Plan	Nomination and evaluation of potential special resource area categories is accomplished through the compartment review process. No changes were made to the plans.

<i>Concern Statement No. 25.1</i>	<i>Fisheries direction is very vague and is more or less 'one-size-fits-all' - there is no management area specificity.</i>
DNR Response	Fisheries direction in the draft plans is more focused on fisheries management rather than management of forest cover in both the watershed and the riparian zones, to minimize any potential impact on riverine communities. This discussion does need to be revised. Specific treatments for specific sites will continue to be addressed through the compartment review process with involvement and review by fisheries staff.
Resulting Change to Plan	The fisheries text has been revised at the management area scale and the high priority trout streams are now identified on a map that has been included for each management area. Site specific fisheries habitat values will continue to be handled through the compartment review process.

<i>Concern Statement No. 25.2</i>	<i>Fisheries direction is lacking in Section 3 and refers to obsolete regulations that have no relevance.</i>
DNR Response	The fisheries discussion in Section 3 of the draft plans is more focused on fisheries management rather than management of forest cover in both the watershed and the riparian zones, to minimize any potential impact on riverine communities. This section does need to be revised.
Resulting Change to Plan	The fisheries discussion in Section 3 has been revised to focus on mitigating any potential impacts on fisheries habitat, in the watershed as well as the riparian management zones, from cover type management. This new version will provide for metrics that can be identified and tracked through periodic measurements as part of a monitoring plan.

<i>Concern Statement No. 25.3</i>	<i>The statements about beaver management conflict with the summary of priority habitat elements and it is very unclear as to how the work will get done. The impacts on timber and wildlife habitat management are notably absent and impossible to assess.</i>
DNR Response	Resolution of priority habitat elements needs to occur as part of a landscape assessment and through the development and integration of wildlife habitat objective with cover type objectives. Development of habitat objectives will allow for the identification of key metrics that can be measured and assessed as part of a monitoring program. The work will continue to be developed and implemented through the compartment review process.
Resulting Change to Plan	The shortcomings related to the need for a landscape assessment and wildlife habitat objectives has been identified in sections 1 and 5 and once these assessments have been completed, the plans will be revised accordingly.

Concern Statement No. 26.1	There is concern about soil and water quality related to old and new stream crossings and logging roads/trails.
DNR Response	Soil and water quality are also DNR concerns. Installation of new stream crossings and roads are guided by best management practices designed to minimize and mitigate potential impacts on soil and water quality. Any problems related to old or new crossings or roads are dealt with through the Resource Damage Reports filed and maintained by DNR staff. Rehabilitation of problem sites is also a DNR priority.
Resulting Change to Plan	The Resource Damage Reporting system will continue to be used to deal with damage caused by problems with stream crossings and roads. No changes were made to the plans. Metrics related to soil and water quality will be included in the development of a monitoring program for the state forest system.

<i>Concern Statement No. 26.2</i>	<i>There is an issue related to matching the beaver no-cut policy to high quality trout streams and the one-size-fits-all approach that does not leave room for any sustainable management. It is a bit of a 'black box' approach.</i>
DNR Response	The beaver management policy implies that early successional habitat, particularly aspen, will not be encouraged adjacent (in the riparian zone as defined by the backslope) to high priority trout streams. Management of early successional cover types adjacent to non-high priority trout streams (within the riparian management zone) is an option subject to harvesting guidelines related to soil and water quality and as addressed in the best management practices guidelines. Selective harvesting in other than early successional habitat adjacent to high priority trout streams is an option and will be subject to approval through the compartment review process.
Resulting Change to Plan	Revised language detailing management of aquatic resources and providing direction for managing high priority trout streams, with a citation to beaver-trout policies, has been included in each management area write-up. It is also noted that many management decisions will be made through the compartment review. A new map has also been included with each management area write-up that shows the high priority trout streams.

<i>Concern Statement No. 26.3</i>	<i>There is concern that buffers are no-cut zones, tending to old growth conditions and hence not open to any kind of management. Management should be encouraged where appropriate.</i>
DNR Response	Depending upon the slope of the riparian management zone, this may actually be somewhat true as the steeper slopes prohibit harvesting because of the probability of soil and erosion damage related to the harvesting operation. Where slopes are low and soil conditions permit, the best management practices do allow for selective harvesting and in some cases may allow for limited clear-cutting of early successional habitat for beaver management (adjacent to non-high priority trout streams). Management of riparian zones is subject to best management practices and discussion and approval through the compartment review process.
Resulting Change to Plan	The practice of harvesting in stream riparian zones is already addressed through best management practices and the compartment review process and is not a change. No changes were made to the plans.

<i>Concern Statement No. 26.4</i>	<i>Would like to see 800 foot wide buffers.</i>
DNR Response	The width of the riparian management zone is currently described in the best management practices based on the slope of the backshore and is also suggested as a minimum width. The option remains for wider zones; but, these would have to be proposed along with the rationale for review and decision at the appropriate compartment review. The current minimums represent the best available science with respect to most circumstances that are encountered and are related to soil and water quality.
Resulting Change to Plan	The current best management practices and the compartment review process allow for the consideration of wider riparian management zones. No changes were made to the plans.

Concern Statement No. 26.5	Has Fisheries Division guidance document 02.02.011 (Riparian Vegetation Protection) been updated? It conflicted with the best management practice guidelines.
DNR Response	The <i>Sustainable Soil and Water Quality Practices on Forest Land</i> , IC4011 is dated 02/24/2009 and represents the standard that we are currently following. We do not use the older Fisheries Division guidance document.
Resulting Change to Plan	Reference to the Fisheries Division guidance document has been removed from the plans.

<i>Concern Statement No. 27</i>	<i>The plans should incorporate outreach and education strategies that help the public understand state forests, help with the management of private forest land and that can accommodate partnerships.</i>
DNR Response	Outreach, education and partnerships are important and are relevant to all forest lands in Michigan. As a consequence, they have a tendency to be addressed largely for private forest land holdings in the southern Lower Peninsula and in the Forest Action Plan (Michigan Forest Resource Assessment and Strategy).
Resulting Change to Plan	Although outreach, education and partnerships are not specifically addressed in the regional plans, they are addressed in the Forest Action Plan (Michigan Forest Resource Assessment and Strategy) and the DNR will be pursuing opportunities as they arise. With respect to partnerships, the DNR is working with the Northern Institute of Applied Climate Science on various aspects of climate change and will be developing a number of partnerships related to monitoring and ecological reference area planning and management.

<i>Concern Statement No. 28.1</i>	<i>Old growth conservation needs to be carried out at a landscape rather than compartment scale. Special resource areas and high conservation value areas should be allowed to regenerate old growth conditions, which should be increased for wildlife and future generations.</i>
DNR Response	The conservation of late successional forest conditions, old growth and the old growth characteristics needs to be carried out at a variety of scales. High value conservation areas will be managed to maintain the values, habitat or habitat conditions for which they were identified. Ecological reference areas will be used to protect bench mark reference conditions associated with the natural communities in Michigan including late successional forest and old growth forest characteristics.
Resulting Change to Plan	The plan identifies the need for a more detailed landscape assessment, ecological reference area planning and the development and implementation of a monitoring plan. All three of these efforts will contribute to identifying and managing the state forest for late successional forest and old growth forest characteristics. No changes were made to the plans.

<i>Concern Statement No. 28.2</i>	<i>There is support for biodiversity conservation on state forest land. Biodiversity is an important value that must be considered as part of land management.</i>
DNR Response	Biodiversity is recognized as one of the pillars of forest sustainability and is addressed in DNR forest related legislation, policy, procedure and guidelines. In fact almost all of the guidelines and best management practices are founded on the need to conserve biological diversity. Our implementation (compliance) and effectiveness monitoring programs are designed (at least in part) to demonstrate that biodiversity is being conserved.
Resulting Change to Plan	Section 5 of the plan documents the monitoring process in terms of implementation (compliance) and effectiveness monitoring and identifies the need to fully develop and integrate monitoring into the forest management system. No changes were made to the plans.

<i>Concern Statement No. 28.3</i>	<i>There is a lack of adequate provision for biodiversity across ecosystem types.</i>
DNR Response	Provisions for biodiversity across natural community types is a work-in-progress and will continue over the life of this plan, although the regional forest management plans are not the planning process that is used to address this concern.
Resulting Change to Plan	Various processes to address this concern have been developed and implemented. Living Legacy is an example and includes the development of a network of ecological reference areas representing the natural communities of Michigan. The development of the ecological reference area network will continue. No changes were made to the plans.

<i>Concern Statement No. 28.4</i>	<i>There is concern that there is an inadequate amount of detail with respect to outcomes related to old growth and biodiversity.</i>
DNR Response	The regional forest plans are primarily focused on cover type and wildlife habitat management and related outcomes. Although the plan must consider other values in terms of mitigating or minimizing any potential impacts, development of outcomes and discussion of details related to outcomes associated with those values (for example old growth and biodiversity) is primarily one of the functions of the planning process for those values.
Resulting Change to Plan	Outcomes and related details associated with old growth and biodiversity will be included in the continued development of the ecological reference area network. No changes were made to the plans.

<i>Concern Statement No. 28.5</i>	<i>The Living Legacy program needs to be introduced, described and discussed in terms of its implications.</i>
DNR Response	As the Living Legacies initiative has not been completely implemented and Biodiversity Stewardship Areas have not been formally designated, they are not included within the regional forest plans. While all documentation with direction for the Living Legacies initiative remains in place, the DNR's process for identifying and conserving representative sample areas is being evaluated.
Resulting Change to Plan	If for some reason (legislative or otherwise) the initiative does not move forward in its present format, the DNR will use information from the Living Legacies initiative to identify representative areas that will help to fulfill Forest Stewardship Council certification requirements. The DNR is committed to sustainable forest management, which requires forest diversity and biological diversity as an outcome. Therefore, we will continue to manage with this value in mind. Just how this is accomplished moving forward and under what label places of particular importance are identified, is still under construction. No changes were made to the plans.

<i>Concern Statement No. 28.6</i>	<i>There is concern that white and red pine genetic diversity be identified and protected.</i>
DNR Response	This is addressed through our broader efforts to conserve biodiversity on state forest lands. Biodiversity includes diversity at genetic, species and ecosystem scales. Red pine has very little genetic diversity and the planting of white pine is very limited. Within stand retention is used to help conserve locally uncommon or less representative species at the stand level in each harvest area.
Resulting Change to Plan	No changes were made to the plans.

<i>Concern Statement No. 28.7</i>	<i>There is an issue related to the apparent combining of biodiversity and old growth giving the impression that they are one-and-the-same, which they are not.</i>
DNR Response	It is true that biodiversity and old growth are not one and the same. However, conservation concerns about both of these concepts are related to representing the full spectrum of potential conditions, whether the spectrum of potential genetics, species and ecosystems or the spectrum of potential successional stages and in this way they are similar.
Resulting Change to Plan	No changes were made to the plans.

<i>Concern Statement No. 28.8</i>	<i>Although Section 5 is well done it needs to have better maps.</i>
DNR Response	The maps included in the draft plans for Section 5 (Special Resource Areas) do a poor job of describing and portraying special resource areas at the scale of the management area and this does need to be improved.
Resulting Change to Plan	Section 5 tended to do a poor job of showing the special resources areas for any given management area and has been removed from the plans (Section 5 is now the Monitoring, Reporting, Review and Revision section) and the detailed information related to special resource areas is now included in each management area write-up in Section 4. A new map has also been generated and included that shows the special resource areas for each management area. The management area maps have also been improved and show more detail.
<i>Concern Statement No. 28.9</i>	<i>The role of the Department in protecting privately owned dune systems needs to be defined in the text.</i>
DNR Response	While the Department tries to work cooperatively with private landowners and other adjacent landowners, we do not have a specific role in, nor are authorized to interfere with, how privately owned lands are managed. The exception to this would be if there are listed species on the dunes, but that situation would be addressed through the Wildlife Division, not as part of the regional forest plans.
Resulting Change to Plan	This is outside the scope of the plan and no changes were made.
<i>Concern Statement No. 28.10</i>	<i>In Section 5, dealing with Great Lakes islands, one of the stated objectives is 'the provision for intensive recreation and vegetation management activities' but there is no definition or discussion of what this means.</i>
DNR Response	Great Lakes islands are administered by Wildlife Division and will continue to be inventoried and subject to forest management for wildlife habitat objectives as opportunities occur. Any vegetation management would be aimed at improving wildlife habitat and related recreation.
Resulting Change to Plan	The objective referred to here has been removed from the plan along with the content of the Section 5 that was in the draft. The primary emphasis of any management on the islands will be for ecological values.
<i>Concern Statement No. 28.11</i>	<i>There is support for the need to address forest structure in terms of legacy trees, den trees, snags and downed woody debris.</i>
DNR Response	These are fine scale attributes that are not addressed in these plans. These attributes are addressed at the compartment review and during implementation through the use of within stand retention guidelines.
Resulting Change to Plan	No changes were made to the plan.
<i>Concern Statement No. 28.12</i>	<i>There is a concern about management of deer winter complexes in natural areas - permissible management activities need to be better articulated in special resource areas.</i>
DNR Response	Permissible management activities related to wintering complexes for deer in special resource areas is not part of the regional forest management plans since special resource area planning is part of another planning process.
Resulting Change to Plan	New management direction related to deer wintering complexes is under development by Wildlife Division and will be implemented through the compartment review process. The new direction will be included in a future revision to the regional forest management plans. The new management direction will also be included in the development of management plans for special resource areas or direction will be addressed in whatever new planning process is developed for special resource areas. No changes were made to the plans.

<i>Concern Statement No. 28.13</i>	<i>The complete suite of values related to ecological reference areas is not discussed.</i>
DNR Response	Development of a complete suite of values for ecological reference area is a component of another planning process and not part of regional forest management planning.
Resulting Change to Plan	Although not part of this planning process the development of specific management plans for ecological reference areas that will include a discussion of specific associated values will be accomplished over the next ten years. This objective is stated in these plans. No changes to these plans were made.

<i>Concern Statement No. 28.14</i>	<i>The North Country National Scenic Trail (and other non-motorized trails) needs further consideration with respect to their inclusion in concentrated recreation areas and contiguous recreational area categories as well as general large landscape planning.</i>
DNR Response	Consideration of including trails, and specifically the North Country National Scenic Trail, as contiguous recreation areas, or portions of a trail as a concentrated recreation area is a good suggestion; but, one that cannot be accomplished through the regional forest management planning process.
Resulting Change to Plan	The long-term solution is to consider this suggestion in broad terms as part of any special resource planning process that is developed. The short-term solution is to nominate trails, portions of trails or specific areas to be reviewed in terms of the specific special resource area class criteria during the appropriate compartment review process. No changes were made to the plans.

<i>Concern Statement No. 28.15</i>	<i>There was a comment in support of quiet area creation.</i>
DNR Response	Creation of special resource areas, including quiet areas, is not part of the forest management planning process.
Resulting Change to Plan	Although quiet areas are not a specific type of special resource area, it could be applied to another type such as a concentrated recreation area. Special resource areas can be nominated for review and consideration through the compartment review process. No changes were made to the plans.

<i>Concern Statement No. 28.16</i>	<i>There is a recommendation to include a discussion of the Fiborn Karst in eastern Upper Peninsula management area 26 in Section 5.</i>
DNR Response	A discussion of the values and details related to the Fiborn Karst is a good suggestion; but, this type of detailed discussion is not appropriate for the regional forest management plan.
Resulting Change to Plan	Section 5 details on special resource areas have been integrated into the Section 4 management area write-ups. Detailed description of potential special resource areas to allow consideration for use in seeking specific designation such as a natural area or ecological reference area can occur and be presented in the compartment review for a decision. Once a specific designation is determined the appropriate planning requirements can then be applied. No changes were made to the plan.

<i>Concern Statement No. 28.17</i>	<i>Two additional special conservation areas are being recommended near Little Ocqueoc River and falls in northern Lower Peninsula management area 5.</i>
DNR Response	Recommendations for special resource area classification are not accomplished through the regional forest management planning process.
Resulting Change to Plan	These two areas near the Ocqueoc River and falls in NLP MA 5 should be documented and submitted for discussion and consideration through the Atlanta Management Unit compartment review process. No changes were made to the plan.

<i>Concern Statement No. 29</i>	<i>Monitoring, reporting, evaluation, and feedback into the management system needs to be addressed in more detail and include discussion related to climate change, regeneration, featured species, and periodic review of the plan.</i>
DNR Response	This recommendation is acknowledged. The need for a monitoring plan that addresses inventory, surveillance, effectiveness and validation monitoring is acknowledged in Sections 1 and 6. Some of the probable data requirements are also shown in Section 6. Since the development of a monitoring plan will need to draw on these plans and other DNR plans, the development of a monitoring plan will be done after these plans are approved. The monitoring plan will address issues such as climate change, regeneration, featured species habitat and desired future conditions, will address monitoring questions and outline reporting requirements. The plan will also be designed to provide feedback into both planning and implementation of planning provisions.
Resulting Change to Plan	Direction related to the need for monitoring is now included in Section 1 and there is now an expanded discussion of monitoring and a listing of some of the most probable metrics in Section 6. Development of the monitoring plan will take place after these management plans are approved.

<i>Concern Statement No. 30.1</i>	<i>There is a desire for additional opportunities for metal detecting on state forest land.</i>
DNR Response	The regional state forest management plans are not the appropriate vehicle to plan for additional metal detecting opportunities. The use of metal detectors can lead to unauthorized and destructive digging on state lands. Artifacts on state land legally belong to all people in Michigan and cannot be casually removed by the finders. Use of metal detectors is allowed on state lands not legally closed or in "designated" historic or archaeological sites (those sites listed on the state or national Register of Historic Places) or indicated by Michigan as worthy of serious consideration as a state registered site.
Resulting Change to Plan	No changes were made to the plan.

<i>Concern Statement No. 30.2</i>	<i>There is a desire for additional opportunities for gold and copper prospecting on state forest land.</i>
DNR Response	The regional state forest management plans are not the appropriate vehicle to plan for additional metal detecting opportunities. That is done through a Land Use Order of the Director. There is an existing Land Use Order that permits recreational-type hobby prospecting for gold and copper, and collecting small amounts, through hand panning and sluicing on state-owned mineral and surface land (fee lands). Any disturbance to stream banks is prohibited as is panning and sluicing in designated trout streams, natural rivers or natural areas or where stream mussel beds are known to occur or are encountered.
Resulting Change to Plan	No changes were made to the plan.

<i>Concern Statement No. 30.3</i>	<i>There is a desire to be able to use sluices, high bankers and dredges on state forest land.</i>
DNR Response	The regional state forest management plans are not the appropriate vehicle to regulate prospecting for gold and copper. Only hand-operated sluices can be used on state riparian rights no greater than 52 inches long, 12 inches wide and 6.5 inches deep along all streams and rivers with the exceptions of designated trout streams, natural rivers, natural areas or in streams where mussel beds are known or encountered.
Resulting Change to Plan	No changes were made to the plan.

Concern Statement No. 30.4	<i>There is support to ensure that natural resources are protected from destructive activities of mining or gas exploration/extraction and that permitted activities are aligned to state statutes and/or policies.</i>
DNR Response	Part 5, Department of Natural Resources, Section 502, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended speaks to provisions that restrict destructive activities of mining and gas exploration/extraction with the exception of cases where values (such as those discussed in these management plans) can be sufficiently protected with special development conditions that can be included in any lease.
Resulting Change to Plan	The non-development conditions associated with leasable mineral rights where no surface disturbance will be allowed have been added to the mineral sub-section of each management area write-up.