

**Restoring Native Hardwoods Initiative – Mohican-Memorial State Forest**  
**Summary of the Consultation Process, List of Concerns and DOF Response**  
**January 31, 2018**

<b>1. Support</b>	
Description:	Conservation groups, interest groups, science community, and individuals have written expressions of need for this initiative (biologically/ ecologically). Some have provided helpful reviews of literature, benefits to the forest, or benefits to specific forest features / functions (wildlife habitat).
Response:	These comments provide third-party validation to the initiative.

<b>2. Philosophically-driven concerns.</b>	
Description:	Philosophical concerns that any and all management, regardless of the reason, would be detrimental to the forest. A let-nature-take-its-course philosophy. The positions expressed to DOF represented a spectrum of views ranging from advocating a return to the 1990's Ad Hoc plan to a complete prohibition of any management whatsoever and making the state forest a state park.
Response:	Many state lands were identified by ODNR to be managed passively and set aside in the state park and state nature preserve system. ODNR manages 533,000 acres. 63% of these lands are set aside as passively managed and 37% are state forests. The Division of Forestry's mission assumes that some level of active management is beneficial to the state forest system. Furthermore, approximately 10% of state forest acres are set aside as High Conservation Value Forests.

<b>3. Extend the comment period.</b>	
Description:	Concerns that the initial comment period was too short and that the period for public comments be extended. The suggested extension ranged from 30 days to 6 months.
Response:	The DOF endeavored to make groups aware of this initiative in the weeks prior to the public open house. An open house was held on August 21, 2017 where this initiative was presented to the public. DOF asked for public comments to be turned in by October 1, or approximately 40 days. Based on the number of comments asking for an extension, DOF extended the comment period until November 6. The total period from open house until November 6 was 77 days.

<b>4. Negative Impacts to Tourism.</b>	
Description:	Concerns that this initiative would have negative impacts to local tourism, i.e. tourist visitation and local economic benefit.
Response:	DOF has received this comment and has taken the following steps: <ul style="list-style-type: none"> <li>• Outreach to local community with tourism interests: Local trail user groups, volunteer groups, sportsmen's groups, and local tourists were consulted. DOF received support from these groups and did not receive this concern from these user groups and tourists.</li> <li>• Data analysis from Hocking State Forest that shows that harvesting and visitation at Hocking are not strongly correlated.</li> <li>• Review of literature: literature suggests that some aesthetic considerations (modifying boundaries and reducing the size of harvests) has positive impact on visitor's perception.</li> <li>• Aesthetic considerations will be made at the individual activity (silvicultural unit) level consistent with the guidelines of the Land Management Manual, and as recommended by the DOF Aesthetic Team.</li> <li>• Responding this concern, DOF will limit silviculture practices to the recreation "off-season" in order to minimize disruption to forest visitors, unless activities are warranted during other times of the year due to catastrophic weather, natural disasters, or to address a public safety situation.</li> </ul>

<b>5. DOF should recognize the importance or value of white pine in this area.</b>	
Description:	Concerns that DOF has an eradication strategy for white pine at Mohican SF. That Mohican SF contains outstanding examples of naturally occurring white pine that is not recognized. That some white pine plantations should be left as a legacy of the CCC efforts from the 1930's to 1950's.
Response:	DOF does indeed recognize the historical significance of the CCC efforts. The intent of this initiative is to promote native biodiversity through promoting the regeneration of natural hardwood forests. This can be accomplished by managing artificial pine plantations. The forest composition of Mohican suggests that a high percentage of the area is chronic artificial plantation and therefore potentially at risk. DOF recognizes that since a high percentage of this forest is in plantation, diseases that threaten pine plantations (such as pine bark adelgid, white pine blister rust, and southern pine beetle) pose a relative high risk situation for the health of the entire forest. By promoting the regeneration of hardwood tree species in managed pine plantations, the risk is reduced. It is not the intent of DOF to eradicate all of the white pine from Mohican SF. No naturally occurring white pine

	stands will be managed in this plan. Pine plantations within any buffer or protected areas (such as 1A) should remain on the landscape and will not be actively managed.
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**6. Hardwood Regeneration will not occur**

Description:	Concerns that natural regeneration of hardwood forest species will not occur post-harvest. Rather, that timber harvesting will only promote invasive species that will dominate the site.
Response:	<p>Mohican SF has a long history of pine plantation management and can demonstrate the efficacy of these treatments. Natural hardwood forests have regenerated and provide inherently greater biodiversity. DOF conducted a literature review and the literature supports this practices.</p> <ul style="list-style-type: none"> <li>• Responding to this concern, DOF will design a research proposal to evaluate the history of pine plantation management and silvicultural practices and their impact on hardwood regeneration. This research may be led by The Ohio State University and / or the USFS Delaware Research Station in collaboration with DOF. The published results will help guide future management and provide evidence to stakeholders.</li> <li>• Responding to this concern, DOF will establish prescriptive monitoring with delineated time intervals of silvicultural practices consistent with the monitoring procedures outlined in the Land Management Manual.</li> </ul>

**7. Invasive Species**

Description:	Concerns that forest management promotes invasive species.
Response:	DOF believes that promoting naturally regenerating hardwood forests would have an overall net benefit for biodiversity. A monoculture pine plantation is at a higher risk of being impacted by disease. The changes allow for a more proactive approach to invasive species mgmt. over the Ad Hoc plan. DOF has invasive species mitigation practices built-in to our procedures: prompt rehabilitation of landings and skid trails, BMP's for erosion control, contract requirements, etc. DOF will not conduct silvicultural practices at Mohican SF until proactive management of invasive species has been completed.

**8. Buffer around the 36-acre Clear Fork Nature Preserve**

Description:	Concerns that activities could occur in the future that would be adjacent to the Clear Fork Nature Preserve. Asks that DOF consider a no-management buffer adjacent to the preserve.
Response:	About half of the perimeter of the Clear Fork Nature Preserve is either state park or HCVF. Based on this concern, the zone boundaries on state forest land have been adjusted so that the complete perimeter of the Clear Fork Nature Preserve has an aesthetic buffer.

**9. Adjust / Expand / Reclassify the zone 3A around Pine Run.**

Description:	Concerns that activities could occur adjacent or within Pine Run, that would be detrimental to the health of stream and/or streamside forest.
Response:	The DOF zone 3A-Resource Protection is specifically designed for streams and riparian areas. Potential impact considerations are inherent and are accounted for in how zone 3A areas are managed. Single-tree selection is the preferred silvicultural system in zone 3A, however most of these areas are not managed at all due to topography and sensitive soils. DOF did not find enough evidence that Pine Run has the significant ecological values that would warrant HCVF classification. Further, several primitive campsites exist in this drainage consistent with 3A zone. Based on this concern, DOF has adjusted the boundaries of the 3A area around Pine Run to include the side drainages to further minimize any possible impact to this riparian area.

**10. Financial benefit for DOF is motivating this initiative. DOF should consider cutting and leaving white pine logs in the forest and not selling commercially.**

Description:	Concerns that selling logs gives DOF too much of a financial incentive to harvest. Concerns that disturbance from removing logs is a net detriment to the forest. Therefore, it has been suggested to cut and leave the logs lay in the woods.
Response:	As per Ohio Revised Code, DOF keeps 35% of the net timber revenue from commercial harvests and the remaining 65% is distributed to the local community. DOF has a stewardship obligation to capture the value of harvested forest products whenever possible. DOF is obligated to the FSC and SFI certification programs that both mandate proper utilization of harvested products. DOF has as a core value to support the \$22 billion dollar forest economy in Ohio. DOF believes and has evidence that the forest products economy and the tourism economy had co-existed and can mutually benefit each other.

**11. Confusion and/or misunderstanding of jargon and terms.**

Description:	Several comments received showed that certain jargon terms within the plan are not well understood.
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Response:	<p>Based on this concern, DOF has clarified and defined jargon and terms in the revised plan in order to provide better understanding for stakeholders.</p> <p>DOF had also publicly stated that the annual level of activity will be between 20-40 acres of thinning per year. Silvicultural practices with acreages are listed each year in the annual work plan. DOF will commit to between 20 and 40 acres of silvicultural practices per year, unless adjustments are warranted due to catastrophic weather, natural disaster, or public safety issues that may arise.</p>
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