Organization	Comment	Plan Section	DNR Repsonse
Aamazon Natural Resoruce Consulting	Of particular interest to me are the sections dealing with endangered and threatened species, since that is a major part of my own professional practice. I was pleased to see recognition of the importance of cooperation with MNFI and keeping them updated on new occurrences. I am also pleased to see recognition of invasive species management as a critical factor.	4.1.4	Support acknowledged
Michigan Association of Timbermen	There is a sense that the future desired condition of Michigan's forest is the circa 1800 forest conditions. It seems the plan is trying to manage for the needs of a past society and not for the needs of our future generations.	4	Circa 1800 conditions are one of several data (others include current conditions, Kotar Habitat Type/or soils, and social and economic uses) that are considered in assessing trends and determining management direction. There is no intent to manage the State Forest using circa 1800 conditions as a template.
Michigan Association of Timbermen	The time allotted to this process is not long enough to provide a well developed plan that has a shared vision from all stakeholders. This section states "the Department has a vision of the desired future conditions of DNR-managed forestlands" we feel this should be a shared vision by all stakeholders otherwise it would seem the DNR is implementing their own agenda. We question the timing planning process of this important document. We feel the department is still rushing to get a final document.	4.1	In response to public comment the DNR extended the public comment period until March 14, 2008 and delayed a Director's decision by one month to April 10, 2008.

Michigan Forest Products Council	In the Statewide Management Direction section, there are some excellent management objectives, including retention of aspen stands on sites on which they are well-suited, balancing the age class distribution of red pine, and the recognition that northern hardwood forests would be better managed on a continuous basis rather than the 10-year compartment review cycle. These objectives benefit wildlife, forest health, and the forest products industry which in turn contributes to strong local economies.	4	Support for aspen and red pine management is acknowledged. With respect to northern hardwoods, the text is qualified as: "...potentially...one possible ...management by conducting inventory, preparing sales, and monitoring much of the forest on a continual basis... The DNR does not have the resources that would enable a shift to a continual management cycle in the near-term, nor would it be necessarily desirable to do so, but...such a shift may be possible in the future."
Michigan Forest Products Council	The Department is asking for approval of the plan one month after the final draft was released. A plan of this magnitude would benefit from a Natural Resource Commission review which ensures due process. I strongly urge the Commission to refer this plan to the appropriate subcommittee for a full critical review and analysis of management objectives. This is far too important and far-reaching of a document to approve after just one month of review, with limited opportunity for review of additional comments.		In response to public comment the DNR extended the public comment period until March 14, 2008 and delayed a Director's decision by one month to April 10, 2008. Review of the plan has been scheduled with the NRC Policy Committee on Land Management at the March 6, 2008 NRC meeting.
Ruffed Grouse Society	In general, the Ruffed Grouse Society supports the Plan that will guide sustainable management of the State Forest System.		Support acknowledged

Ruffed Grouse Society	We are also concerned that few measurable management objectives are provided in this expansive document. The Plan includes no harvest volumes, acreages to be treated, wildlife population objectives, or other targets to reach. It will be difficult for such a Plan to be monitored effectively if few targets are provided. It will also be difficult for outside publics (industry, hunters, hikers, auditors, etc.) to ever determine if the Plan is succeeding if there is nothing to base judgments on.	4	While the SFMP is an operational plan, it provides broad strategic direction for forest types which can be monitored, but it is intentionally less specific than the Regional State Forest Management Plans (RSFMPs) will be that are under development in 2008. Specificity in the RSFMPs will be based upon detailed analysis at the local level, and will provide a focused regional picture of managment direction for cover types and other uses. Annual production capacity for timber harvests in the State Forest are specified in Section 3.1.3 of the plan. Objectives for other uses are also contained in other DNR plans (e.g. Deer Management Unit objectives, etc.)
Ruffed Grouse Society	We continue to question the reliance on circa 1800 data as a basis to compare current forest composition. The amount of references to that time period is staggering and probably over emphasized in this document. This inclusion in the Plan infers that what may or may not have existed in circa 1800 forests in the Michigan landscape were "natural" forests and a target to strive for. While historical data can provide valuable insight into what a given locale supported at a point in time, climate variability, human (ie. Native American) population changes and data biases such as General Land Office notes all must be taken into account. However, this data should not be used to chart the course of future management. Why not also bring in speculative information from 1600, 200 or even 10,000 years ago? From several accounts, the 1800 period, near the end of a		Circa 1800 conditions are one of several data (others include current conditions, Kotar Habitat Type/or soils, and social and economic uses) that are considered in assessing trends and determining management direction. There is no intent to manage the State Forest using circa 1800 conditions as a template.
Ottawa Natl Forest	I commend you for the plan's focus on ecosystem management and sustainable practices in furthering the state's goals and ensuring the long term productivity, conservation, and efficient use of forest resources. In addition, I support your intent to manage adaptively, recognizing a level of uncertainty in managing natural systems and allowig yourself the flexibility to adjust your management practices based on changing conditions and new information.		Support acknowledged

Great Lakes Council, Federation of Fly Fishers	We have the following comments and concerns regarding Section 4.1.61, and Metallic and Nonmetallic Mineral Development, pages 137-139. We applaud the desired future condition and goal number 1, with the emphasis on resource protection. How well this is accomplished is as always, dependant upon actual management standards.	4.1.6.1	Support acknowledged
Great Lakes Council, Federation of Fly Fishers and Anglers of the AuSable	Throughout this Plan documents are referenced as standards with no descriptions or hot links to the referenced documents. We find this unacceptable because it is difficult for the public to find and use these documents.	4 and 5	The DNR will strive to provide live links to documents in the on-version of the final plan.
Mackinaw Forest Council	More importantly how can sustainability be assured in a forest system largely maintained in an unnaturally disturbed state? How can the current structurally and compositionally compromised state of the forest be sustainable? After habitat loss, habitat alteration is the leading cause of the death of birth, the loss of native biodiversity. Yet here is a SFMP that calls for massive habitat alteration on a statewide scale. A SFMP that nonsensically claims it is sustainable, yet offers no analysis contrasting this plan with native habitat.The tradeoffs must be stated clearly, what do we the people of this state lose by stopping the restoration of our forest? Just saying that there will be tradeoffs is very unhelpful. What are the tradeoffs? What is the cost? What pieces of the web of life will we lose? How can you alter the habitat in novel ways and still claim to know your new system is sustainable in the long term? Do you even have a complete list of the components, of how they interact? If not, how do you show sustainability in a system you don't understand?		The DNR is just beginning to implement the concepts of ecosystem management and sustainability into forest operations. The SFMP and Regional State Forest Management Plans provide a framework for moving in this direction. The plans provide for areas where natural processes and restoration of natural communities will be the focus of management (e.g. Natural Areas, Biodiversity Stewardship Areas and Ecological Reference Areas). The plan also provides areas where other uses and values (such as fiber production and recreation) will be the primary focus of management. These plans are intended to be living documents that will be updated when monitoring and management review protocols indicate the necessity of new management direction.

Mackinaw Forest Council	In the DNR response to our comments on monitoring, and allowing the public to be involved in critiquing the DNR monitoring, we are told that that is outside the scope of the SFMP and is address in Work Instructions 1.2. As has been previously commented the Work Instructions were never vetted in public, and had no public involvement. We are dismayed at the continued systematic exclusion of the public from any real input into planning at early stages, when real change and real exchange of ideas would be possible. This exclusion is continuing with the Cervid team and the BCPP, both of which have been meeting and planning for years with the complete exclusion of public input. This systematic exclusion of real public input must stop.		The Biodiversity Conservation Planning Process has been and will continue to be a public process. Forest Certification Work Instructions are internal DNR documents that provide guidance to staff on operational processes, for which public review is inappropriate. The DNR has a goal to improve public involvement processes in many programs. In relation to planning the Ecoregional Resource Plans will be developed using a collaborative public process, which will begin in 2008.