**DNR Response to Public Comments on Section 2 of the Draft Michigan State Forest Management Plan**

December 27, 2007

The Michigan Department of Natural Resources (DNR) received ten comments that were directed to Section 2 (Forest History) of the Draft Michigan State Forest Management Plan. Most comments focused on use of data from the Michigan Natural Features Inventory interpretation of circa 1800 General Land Office surveys. A response to these comments follows.

The DNR set forth a Biodiversity Conservation Planning Process in April of 2005. The genesis of this process was rooted in the recommendation of a Public Advisory Team to conserve and restore some portion of the native biodiversity of Michigan by conserving and restoring "functional" representative native ecosystems. The process specifies the conservation of biodiversity on a landscape scale through the identification of the general distribution and quantity of each of the 76 Michigan Natural Features Inventory natural community types which exist now and in the past. The only means of assessing the distribution and quantity of natural communities in the past is through analysis and use of circa 1800 vegetation maps.

A circa 1800 map of the entire state was developed by the Michigan Natural Features Inventory in 1998. The maps is based upon an interpretation of the original General Land Office survey notes of the state from the early to mid-1800s, as well as current landform and soils data. It is the most comprehensive landscape-scale map that exists of the original natural communities of the Michigan that were in existence in the early to mid-1800s.

Circa 1800 maps are not a baseline for the wholesale restoration of the State Forest to pre-European settlement conditions, or for use in guiding the management of the forest. There is an apparent conflict that stems from comparing current natural resource conditions to historic conditions and the perception or expectation that natural resource management should, could or will restore the forest to those conditions. The State Forest Management plan specifically states at the beginning of Section 3 that "With the exception of some rare community types, the state's present population levels, ownership patterns, and social and cultural values preclude the restoration of our remaining forests to circa 1800 conditions." This would also similarly apply to any other historical period such as the turn of the 20$^{th}$ century post logging era, the 1930s or 1950s. Any such attempts at restoration would necessitate dramatic changes in timber production, wildlife management and many forms of recreation. Principles of ecosystem management recognize that ecosystems are complex with interconnected elements, dynamic, and cannot be maintained in a particular

configuration.  Ecosystem management principles also acknowledge that humans and human activities are components of ecosystems.

The use of Circa 1800 maps is appropriate and helpful for assessing broad post-settlement trends for different cover types, the type and scale of pre-settlement disturbance regimes, and for identification of the locations of historic and presently rare communities when it is appropriate for the restoration of such communities for biodiversity purposes.