

**PRC Concept of Management
2007 Update
Comments Received by Mail**

ID#	Category	Summary of Comment
66	Advisory Council	It would be helpful if the discussion of the makeup of the Advisory Council included mention of the groups, government units, and organizations currently represented, and the intent that at-large members represent a cross-section of other interested organizations.
67	Advisory Council	The Advisory Council appreciates the opportunity to present the foregoing comments, and looks forward to the successful implementation of the updated Concept of Management.
13	AR	Page 19, the sentence introducing the Principles has a typo: change with to within the PRC
14	AR	Principal 7: Motors other than electric should be unlawful not discouraged. Principal 8: Construction of new dams, or repair to existing dams in lieu of complete removal shall be denied to the extent allowed by law.
18	AR	Page 20 item 7 replace - use of a vessel powered by any motor other than an electric motor on waters in the PRC will be discouraged with shall be prohibited.
46	AR	Add reference to Rainbow Trout in the first paragraph, and note that brook trout are char.
47	AR	References to regulations and management goals and guidelines should be generic rather than referenced to specific orders, publications, or regulations currently in effect. Over time, those specific regulations could be modified or repealed, and might diverge from special management objectives that have been adopted for the PRC. An example would be stating that streams might be considered for reclassification to a higher gear classification standard, rather than referencing a particular current Fisheries order.
48	AR	The reference to treatment of motorized watercraft in principle 7 in this section conflicts with the treatment of the same subject in the Recreation and Law Enforcement Section. The Advisory Council recommends adoption of the standard and language used in the Recreation Law Enforcement Section—motorized watercraft should be prohibited except as noted. The term "discouraged" is vague and ambiguous
49	AR	Under principle 8, the language should be tightened to make clear that new dams should be prohibited, and removal of existing dams (except at Cornwall) pursued.
50	AR	Consider adding a discussion of beaver control and management and elimination of impoundments that warm cold water streams.
78	AR	Page 19 will type 5,6,or 7 be meaningful 30 years from now?
79	AR	Re: higher size limits Brook Trout with an average life span of two years may not get much above current size limit, is higher size limit justified?
80	AR	Prohibit motors on trout streams.
69	Boundary	All of the numbers in parentheses with a question mark have to do with the final boundary that is decided upon. The total acreage of the PRC, the number and acres of private inholdings and the percentage of state land are affected by the boundary. The numbers in the 5/23/07 draft do not reflect the boundary described in that draft and need to be corrected even if that draft becomes final.
2	FCWHM	More openings should be created including perhaps navy beans, corn & other farm crops to hold more elk on PRSF.
3	FCWHM	Reduce Red Pine in PRC especially where soil is better and moist to allow Aspen, Maple, Oaks, etc. to return to the forest. Also, while harvesting Aspen, enlarge such stands by at least 75' around perimeter to allow Aspen to reproduce enlarged area. The harvesting of the "second growth" Aspen should begin soon where markets allow.
7	FCWHM	Maintain current Elk populations. Maintain 7%-8% of property in the 0-9 age class. Continue to harvest mature red pine. Agree with the added harvest of "long-lived species" rather than allow for potential fire build-ups and wasting of natural resources.
17	FCWHM	Page 14 : Under objectives for age class distribution replace recommended to shall be. Page 15: Under openings and upland brush - <u>shall</u> is mandatory <u>should be</u> is a discretionary action. Replace should be increased to shall be increased; replace maintenance of this percentage should be done with a variety of practices to shall be done; and in the last paragraph where it reads openings and upland brush should be evaluated - replace with shall be.
30	FCWHM	Would like to see an area of the forest reserved for quiet, sacred pursuits. An area off limits for the purposes of hunting and certain unnatural "management" techniques.... People of quiet pursuits are also citizens, and deserve to be represented on public land.
43	FCWHM	The Advisory Council believes that the discussion of wildlife and wildlife values should be expanded. This discussion should include the full range of herptofauna in the forest, not just game animals, and should include appropriate reference to management guidelines as to these wildlife assets.

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44	FCWHM	The discussion of forest management should be expanded to address northern hardwood and lowland conifer species. The Advisory Council endorses the proposed discussion of the northern hardwood complex that Arch Reeves previously submitted to Glenn Matthews, a copy of which is attached to this letter. A similar discussion of lowland conifer species and management would be appropriate.
45	FCWHM	Other topics deserving consideration are mention of river bottom and lowland evergreen and shrub species, maintaining shade canopy along streams, leaving standing dead stubs in the forest, and avoiding or eliminating introduction of exotic species.
68	FCWHM	The Northern Hardwood Complex (see scanned document)
70	FCWHM	Page 16 under Mast production - What about beech mast?
77	FCWHM	Page 14 under Age Class Distribution add "cedar" after spruce-fir
35	FIH	The current total acreage of the PRC should be noted.
36	FIH	Reference to the PRC before 1973 should be to the Pigeon River State Forest. We understand that the Pigeon River "Country" State Forest title was adopted in 1973
37	FIH	In the boundary description on page 4, abbreviated references to sections should be made plural or singular ("Sec" or "Secs") as appropriate.
38	FIH	On page 7, drop the reference to the removal of the "worst" of the debris in streams, which qualitatively implies that woody debris has a negative effect on stream habitat, though the opposite is generally true.
39	FIH	Under More Recent Developments on page 9, refer to the creation of the "Kammer" Land Trust Fund in 1976 (now known as the Michigan Natural Resources Trust Fund).
40	FIH	On page 10, note in the third paragraph that "[T]he Advisory Council also has successfully challenged repeated efforts to establish a designated snowmobile trail through the Pigeon River Country."
41	FIH	In the sixth paragraph, refer to the Michigan Civilian Conservation Corps before using the CCC acronym.
42	FIH	Under Preparing for the Future on page 10, include reference to the Trust Fund along with other key groups mentioned.
25	General	Approve of the portions of the plan that have been reviewed. "Keep it Wild".
26	General	Pleased the update team has gotten us to this point. "Special Interest " groups are now destroying the character of the Pigeon River Country. Hope that this update to the Concept of Management will address new uses not in existence when the original 1973 version was drafted, while reaffirming the belief that sound resource management can prevail, but policy MUST be followed with a conservative point in mind.
32	General	Suggest that a Table of Contents be prepared with page references to the various sections
33	General	Updated maps of the PRC, probably fold-out versions, would be helpful. One should depict the boundaries and key natural and recreation features of the forest, highlighting original and annexed areas, with a reference to when annexed areas were added. A second would be an oil and gas map showing Consent Order boundaries, annexed areas, wells, pipelines, and facilities. A third map would depict vehicle access.
34	General	References in the Concept to current orders, standards, procedures, or guidelines should be generic rather than specific, as such orders, etc. could be modified or repealed in the future.
84	General	Are all references to MDNR documents in this Concept to be included in an appendix? If not, will they be listed with instructions about how to access?
86	General	Request to confirm the original Concept of Management
15	History	On pages 6 and 7 of the draft, many references are made to the Pigeon River Country State Forest. In reviewing maps, literature, etc. the word country does not exist. It was the Pigeon River State Forest. In 1973 when the area was dedicated the word "country" was added. I believe this to be a significant error which should be corrected.
16	History	On page 11 the last sentence refers to a forested condition. This may or may not be of value to wildlife. It might better read: maintain their land in an undeveloped condition suitable for wildlife.
28	History	Addressing comments made in the last paragraph of page 9 regarding Golden Lotus, Inc. These comments are both misleading and grossly incorrect.... In the interest of truth and fairness, I suggest you obtain a copy of the court's ruling and make the appropriate corrections to your document. (See scanned version for complete details)

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75	History	Page 11 first paragraph after organizations add "such as the 18 year and ongoing work of the upper Black River watershed Restoration Committee to improve the Brook Trout fishery".
73	Introduction	Page 5 first paragraph add low ground evergreen and ? between dense and swamps. Last paragraph refer to Brook Trout as Char.
76	Objectives	Add elk to number 4
64	Oil & Gas	The Concept should clarify by map and other reference what the annexed areas are.
65	Oil & Gas	The Advisory Council recommends that the Concept provide for notification of the Council if state owned lands or minerals adjacent to the PRC are considered for lease.
71	Oil & Gas	Delete "SF" because PRCSF refers to the area defined by the Consent Order and excludes the annexed area while PRC refers to the entire area addressed by this document, including the annexed area
72	Oil & Gas	Page 31 last bullet point consider the following changes: No surface locations for wells (OR ASSOCIATED INFRASTRUCTURE - DELETE) will be allowed on State-owned minerals within the PRC boundary. ADD THE FOLLOWING: No surface disturbance will be allowed for associated infrastructure unless significant environmental damage would be avoided and unless there would be little impact to the PRC.
86	Oil & Gas	Page 30 bullet two after removed add "except if the pipelines contain naturally occurring radio active materials".
11	Other	Suggest that plan incorporate additional means of generating monies that will allow future land purchases and maintenance of the currently extensive land holdings. It is irrational to believe that added funding will be provided by the State and without a plan for funding and control of the local resources, lawmakers will ultimately abandon environmental interest and instead find a means to raid the Pigeon's resources for use by the General Fund. Drilling by environmentally friendly interests and the harvesting of timber under the strictest environmental standards would benefit funding requirements.
6	Overall	Support of the draft and implementation to guide management decisions for the PRC. These efforts will ensure future generations will have an opportunity to enjoy this unique area and is consistent with the mission of the Huron Pines to conserve the forests, lakes and streams in Northeast Michigan.
31	Private Land Ownership	Suggest, like the Memorandum of Understanding with the Road Commission and other entities, I propose the beginning of dialogue with us towards development of such an understanding with our retreat.
4	RLE	MTRA organization (equestrian users) concerned with camp closures at Walsh Road, Johnson Creek, and Stoney Creek. (If they remain closed they will not be able to plan north south organized ride, one planned for next year, however, keeping camps open is necessary for the trail system to stay active.) MTRA has 3000 members. Permanent closures will have a negative impact on the economy.
5	RLE	Concerned with snowmobile use in forest. The only current restriction on snowmobile travel is the Green Timbers tract and several hiking trails. Believes organized trail systems would take away from the experience and the lack of groomed trails helps to keep speeds at a slower pace. Would like regulations to remain status quo.
8	RLE	Recreation and Law Enforcement recommendations appear well reasoned and responsive.
12	RLE	All of the "should not" need to be changed to wording that is more prohibitive. The term 'should not' allows too much opportunity for persons to violate the intention of permitted activities. There is no teeth in 'should not'.
19	RLE	Page 21 regarding enforcement and regular patrols change wording from should be to shall be; under the heading Recreational Use Criteria the eight lines all contain the word should - change wording to shall; under the heading of Camping the 4th line reads should be - change to read shall be; under the heading of Pathways change the wording from should be to shall be.
20	RLE	Page 22 under the heading Horseback Riding the statement "Horseback use is primarily by those who camp in the PRC. Currently....group campsite system." These opening statements are untrue. Horses have been and are one of the largest problems confronting the PRC yet. This entire section refuses to acknowledge this. Horses should be prohibited from the PRC.
21	RLE	Page 23 Under the heading Commercial Use and Events replace the wording should be with shall be.
27	RLE	The plan appears to single out a number of user groups for study without defining any type of ascertainable criteria for (1) why these groups are singled out for study (2) the criteria for the study (3) the scientific method for determining a need to study these groups or (4) the scientific method that will be used to study the user group.... Science, without prejudice of user groups is the only way to an answer that will speak without ulterior motives. The Michigan Mountain Biking Association is confident that science will show that biking is a use that should not be subject to suspect classification, but is instead a use to be encouraged due to the minimal impact on environmental resources...

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29	RLE	Before banning snowmobiles from parts of the forest please read the following written by our daughter... Under the draft management plan, snowmobiles would be limited to only those roads on which motorized vehicles are allowed. This would greatly reduce the roads on which snowmobiles could operate.....concerned that emotions are making the decisions, rather than sound science. Just how great or how little is the noise associated with the snowmobiles in the forest?....Snowmobiles should not be allowed on footpaths or hiking trails in the Pigeon River State Forest. Snowmobiles should continue to be allowed on all public road; two tracks, both opened or closed to wheeled vehicles; and trails not specifically set aside as footpaths. We respectfully request that the language included in the draft management plan in regard to snowmobiles be removed.
51	RLE	The horseback use discussion should be reviewed for accuracy. The section does not refer to trail riders and day use, which are common in the PRC.
52	RLE	The last sentence in the third paragraph, referencing the criteria, should be moved under the heading that follows.
53	RLE	The Advisory Council recommends that snowmobiles should be prohibited in the PRC, and in any event limited to using county roads within the PRC, with the stated reason for such use being county jurisdiction over the roads, not that the Department favors the use of snowmobiles in the PRC.
54	RLE	The discussion of the specific DNR Procedure applicable to Commercial Use and Events in that section should be made generic, rather than strictly tied to the current revision of the Procedure, which could be modified or repealed in the future.
55	RLE	The Information and Education discussion should be expanded to point out that the Forest Headquarters provides an opportunity for education as well as interface with the public, tied to maintaining the "Big Wild" character of the forest. The Advisory Council recommends inclusion of the original subcommittee paragraph on this topic, which was not picked up in the current draft.
56	RLE	The Advisory Council also recommends that pertinent information should be made available on a DNR website and other electronic access.
57	RLE	The Advisory Council recommends that the Concept should state as a management goal that baiting in the PRC should be prohibited.
58	RLE	Finally, the Advisory Council recommends that the Council be notified of significant management activities on adjacent state land that may affect the goals and objectives of the Concept.
81	RLE	Are ORVs state licensed?
82	RLE	Page 21 under Snowmobiles add the word "county" before roads.
83	RLE	Page 22 Will unrestricted numbers of mushroom picker interfere with bird and animal reproduction and nurturing?
10	Utilities	Strongly encourage the elimination of abandoned hardware and services. Recognizing limited funds, cooperative efforts between DNR and local sporting and hunting chapters for the clean-up is recommended.
1	VS	Forest Manager should make decisions regarding all roads within PRC. Respective County Road Commissions should be contracted to do work as usual. Tin Bridge should be removed and the road SW to Grass Lake gated off to enable a larger elk management area north to Webb Road.
9	VS	Vehicular System recommendations appear well reasoned and responsive.
22	VS	Page 25 under the heading County Roads on the first line - routine maintenance should be reviewed, etc. Change wording to shall be.
23	VS	Page 26 addresses snowmobile use. We concur with the limited use within the PRC.
24	VS	We believe that a Director's Order is needed to effectively enforce rules regarding snowmobile use.
59	VS	As noted above, the Advisory Council recommends that snowmobiles should be prohibited in the PRC, and in any event limited to county roads.
60	VS	Further, the Advisory Council recommends a clear statement that the vehicle access plan needs updating now, and that the Advisory Council should be assigned the task of recommending revisions, with a specific timeline for completion of the project.
61	VS	Under the County Roads section, the reference in the final sentence should be to the Concept rather than this "Plan."
62	VS	Under the Management Roads discussion, the final phrase "has occurred" can be deleted.
63	VS	Consider making more generic reference to the DNR Procedure mentioned under the Utilities discussion, rather than only a specific procedure that could be amended or repealed.
85	VS	Page 25 second paragraph - consider mentioning the 700+ acre hunting compound on the Black River.