

SUMMARY COMMENTS

Clark State Forest Comp 4 Tract 1, 2 & 3, Comp 7 Tract 1 & 2 (amendment)

30 Day Comment Period Ending: 2/5/2022

Comments Received: 7

The table below is a summary of public comments received concerning the draft Resource Management Guide. The public comments received have been reviewed in their entirety and given due consideration summarized in the Division of Forestry response below.

Comment Summary	Division of Forestry Response
<ul style="list-style-type: none"> • Comment supporting the silvicultural prescriptions and encouragement of oak regeneration. • Concern with overstocking, supporting the need for management to improve health and resilience of forest. • Comment supporting management of mast producing trees for wildlife benefits and establishment of wildlife habitat. • Comment opposing forest management on state forests due to steep slopes and concern for water quality, specifically compartment 4 tract 2 and Big and Little Ox Creek. • Concern with clearcutting and impacts on carbon sequestering, wildlife, and recreation. • Comment opposing the proposed forest management in the back country area of Clark State Forest. • Concerns with the amount of volume and trees removed during timber harvest and TSI operations. • Concern for Threatened and endangered species such as the Indiana bat, cerulean warbler, and pygmy and smoky shrew • Concern with snags during management activities. • Concern with invasive species. • Concern with use of prescribed fire. • Why carry out management in a tract if only a portion of the tract is prescribed management activities, specifically compartment 4 tract 3. 	<ul style="list-style-type: none"> • The Division of Forestry has actively managed its lands for nearly 120 years using a multiple uses multiple benefits approach. These benefits include timber production, biodiversity, watershed protection, recreation, wildlife habitat, and research areas. Recreational benefits include over 430 miles of designated recreational trails (e.g., horse, bike, hiking and interpretive), nearly 1,000 campsites and cabins, dispersed/back country camping, swimming beaches, hunting, fishing, picnicking, mushrooming and many other opportunities under this management philosophy. • Recent CFI data indicates Indiana State Forests contain approximately 60 million live trees, 1.4 billion board feet (Doyle) of sawlog volume with an estimated annual growth of 22 million board feet. Managed harvest levels are set at a level to insure long term sustainability. These levels are periodically reviewed as new Continuous Forest Inventory (CFI) data is collected. See https://www.in.gov/dnr/forestry/files/fo-Continuous-Forest-Inventory-Property-Report-2015-2019.pdf • The Division of Forestry actively manages its lands for multiple use multiple benefits. A part of that management is timber production. Annually, the division plans, schedules and implements forest management activities across state forests. Activities may include forest inventories, timber harvests, timber stand improvement (TSI), tree plantings, invasive species control,

	<p>and prescribed fire. These activities help sustain the diverse hardwood landscape and ensure state forests remain vigorous and healthy supporting the multiple uses multiple benefits philosophy for future generations.</p> <ul style="list-style-type: none">• There are no recreational trails within compartment 4 tracts 1, 2, and 3. Hunting is the main public use of this area. Recreation disruption will occur during management activities. In affected areas access may be limited, temporarily closed, or rerouted for safety reasons during active operations. Only a small percentage of any state forest is impacted at a given time. The Division of Forestry does consider recreational impacts during the planning and execution of management activities.• Forest management activities ensure forests remain healthy, vigorous, diverse, and adequately stocked. Overstocking and largely over mature conditions jeopardize forest health, resiliency and resistance making them more vulnerable to mortality and disease and insect outbreaks.• Compartment 4 Tracts 1, 2, and 3 and Compartment 7 Tracts 1 & 2 are not located within the designated Back Country area of Clark State Forest.• Local market conditions are part of the timber bidding process. Pricing and market condition reports are reviewed regularly.• The prescribed management activities are consistent with silvicultural principles, promotes habitat diversity and supported by inventory data and field assessments. The concerns expressed have been considered and may be further addressed during plan implementation. See http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf.• State Forest management is guided by science and implementation of sound silvicultural principles. They adhere to
--	---

legal mandates and voluntary compliance to a comprehensive set of forest certification standards to insure long term forest sustainability. State Forests are subject to annual 'third party' audits for compliance to these standards.

<https://www.in.gov/dnr/forestry/7532.htm>

- Assessing climate change and carbon sequestration is beyond the scope of tract level RMGs. See https://www.in.gov/dnr/forestry/files/fw-carbon_assessment.pdf
- The Hardwood Ecosystem Experiment (HEE) and other research continue to document forest impacts and indicate increased biodiversity in managed forests. <http://www.heeforeststudy.org/>
- Detailed flora and fauna inventories are beyond the scope of tract level management guides. Habitats, communities, and species are considered as part of the management planning process. Along with field observations, Natural Heritage Data is reviewed for threatened or endangered species on or near the management unit. ***Please note, for the protection of sensitive flora and fauna NHD review results are not disclosed in draft RMGs.*** Further information on direct and indirect impacts on species and habitats are found in the Indiana State Forest Environmental Assessment. http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf
- Invasive species presence and control needs are monitored as part of the property's normal operations. Treatments may be pre- or post-harvest and situational ranging from minor to aggressive based on the presence of the species within the county. Methods may include manual, chemical or use of prescribed fire. Only approved herbicides will be used following forest certification standards.
- Best management practices (BMP) will be implemented and

monitored to address the soil erosion and sedimentation concerns. BMPs are required and included in each timber sale contract on state forests. Division of Forestry will respond to reported BMP departures. BMP guidance can be found at:

http://www.in.gov/dnr/forestry/files/fo-2005_Forestry_BMP_Field_Guide.pdf

- BMPs are guidelines, not law. However, contractual stipulations require BMPs to be implemented and followed on all DNR State Forest land. State Forest staff perform regular site visits during active operations and evaluate as part of their post-harvest review. Additionally, BMP monitoring is performed on each harvest for application and effectiveness. There are 53 individual BMPs measured across 5 categories: access/haul road, log yards, skid trails, stream crossings, and riparian management zones (i.e., Big and Little Ox Creek)
- Implementation of the draft RMG will utilize guidance from the US Fish & Wildlife Service and other sources to avoid take impacts to the Indiana bat and other listed species.
- Prescribed fire conducted on state forests are executed based on criteria that establishes the burns complexity. Criteria considered but not limited to include fuel models, required staff and equipment, safety, present and surrounding features, smoke management, and weather (current and predicted). If a prescribed fire were executed in Compartment 7 Tracts 1 & 2, the safety of I-65 motorists would be priority and the burn would only be executed under optimal conditions that provide for the safety of motorists.
- Compartment 4 tract 3 had three cover types identified covering 138 acres. Of the cover types 92% of the acreage was considered

	<p>oak-hickory. This cover type provides many ecological services and its retention within the forested landscape is a concern. While management throughout the entire tract is not necessary, many areas would benefit from management to improve crown spacing and retention and recruitment of oak and hickory.</p> <ul style="list-style-type: none">• The prescribed management activities are consistent with silvicultural principles, promotes habitat diversity and supported by inventory data and field assessments. The concerns expressed have been considered and may be further addressed during plan implementation. See http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf.
--	---