

**SUMMARY COMMENTS**

**Clark State Forest    Comp 15 Tract 3, Comp 11 Tract 5, Comp 11 Tract 6, Comp 10 Tract 4    30 Day Comment Period Ending: 12/13/2019**

**Comments Received: 46**

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"> <li>• Continue sustainable harvesting practices for healthy forests for future generations</li> <li>• Proper logging and forest management should continue on state forests</li> <li>• Proactive forest management is needed</li> <li>• Multiple use management allows all factors to be addressed and sustained in perpetuity</li> <li>• General statements opposing forest management and the harvest prescription portions of the DRMG citing concerns of potential impacts to aesthetics, plants, animals, habitat diversity, recreation and ecological services</li> <li>• General statements about not enough information provided in the DRMG on timber volume to be removed and acreage of each cutting method described.</li> <li>• General comments encouraging tracts be set aside to become mature old growth forests.</li> <li>• General comments encouraging old growth forest areas be protected.</li> <li>• General comments opposing logging in areas that will impact the Knobstone Trail and other trails within Clark SF. Specifically Compartment 15 Tract 3.</li> <li>• Concern of potential impact to hellbender, Indiana bat, and other RTE species. Recommends detailed environmental inventory of wildlife and plants be conducted/included in</li> </ul>	<ul style="list-style-type: none"> <li>• Best management practices (BMP) will be implemented and monitored to address the soil erosion and sedimentation concerns. BMPs will be required of operator and included in timber sales contracts. Division of Forestry will respond to reported BMP departures. BMP guidance can be found at: <a href="http://www.in.gov/dnr/forestry/files/fo-2005_Forestry_BMP_Field_Guide.pdf">http://www.in.gov/dnr/forestry/files/fo-2005_Forestry_BMP_Field_Guide.pdf</a></li> <li>• 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 has been reviewed to check for threatened or endangered species on or near the management unit. No HCVF or old growth forests were noted on this tract. Further information on direct and indirect impacts on species and habitats are found in the Indiana State Forest Environmental Assessment. <a href="http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf">http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf</a></li> <li>• Invasive species presence and control needs will be monitored as part of the property’s normal operations. Treatments will be situational ranging from minor to aggressive based on the presence of the species within the county. Methods may include</li> </ul>

DRMG.

- Concern on potential impacts to soil and water resources and effective implementation and monitoring of BMPs. Specific concerns with Poplar Branch Creek, Whiskey Run Creek, Honey Run Creek, South Fork Blue River, and Deam Lake
- Concern on the potential spread of invasive species as a result of the proposed management activity.
- Concern on how the prescribed harvest will impact recreation and trails. Suggests no harvest or buffers along sections of trails to avoid disruptions from rerouting or closure of trails.
- Concern DRMG does not address impacts on climate change and carbon sequestration. Suggests DoF put in place evaluation standards to consider the cumulative impacts of all state and federal forest management projects across the state on climate change.
- Concern on impacts to species diversity, forest resiliency and genetic diversity.
- Division of Forestry does not promote multiple use management.
- Concern with over logging and logging just for profit

manual and chemical. Only approved herbicides will be used following FSC standards.

- Assessing climate change and carbon sequestration is beyond the scope of tract level RMGs.
- Indiana State Forests contain approximately 985 million board feet of timber. Managed harvest levels are set at a level to insure long term sustainability. These levels are periodically reviewed as new continuous forest inventory data is collected. See [https://www.in.gov/dnr/forestry/files/fo-Continuous Forest Inventory Property Report 2014-2018.pdf](https://www.in.gov/dnr/forestry/files/fo-ContinuousForestInventoryPropertyReport2014-2018.pdf)
- 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](http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf).
- State Forest operations adhere to a comprehensive set of forest certification standards (FSC and SFI) to insure long term forest sustainability. Operations are subject to annual 'third party' audits to insure compliance to these standards.
- Habitats, communities and wildlife species are considered as part of the management planning process. 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](http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf).
- We recognize that aesthetic impacts are inherent of many forest management activities. This may include visual impacts along roadways and trail segment. Potential impacts will be considered during activity planning and execution.
- Recreation disruption will occur during management activities. In

	<p>affected areas hunting access and trails will be temporarily closed or rerouted for safety reasons during operations. The Division of Forestry will consider recreational trail impacts during the planning and execution of management activities.</p> <ul style="list-style-type: none"><li>• The Indiana DNR land portfolio covers 500,000+ acres. State Forests are the only DNR properties where long term forest and timber manager practices occur. State Forests represents approximately 30% of the DNR portfolio. Set aside lands that are trending towards old growth conditions can be found on a variety of DNR lands, including established nature preserves on State Forests, State Parks, Fish &amp; Wildlife Areas and Nature Preserve lands. These continue to be important conservation strategies, and include the recently established 500+ acre Outbrook Ravine Nature Preserve at Clark State Forest.</li><li>• No old growth forests are found in the tracts covered by the DRMG. However, there are currently over 827 acres of forest land at Clark State Forest set aside as long term preserves and development as old growth areas.</li><li>• Implementation of the DRMG will utilize guidance from the US Fish &amp; Wildlife Service and other sources to avoid take impacts to the Indiana bat, hellbender and other listed species.</li><li>• State Forest management is guided by science and implementation of sound silvicultural principles to insure long term forest health and sustainability. State Forest management adheres to legal mandates and voluntary compliance to comprehensive forest certification standards.</li><li>• The state forest system was established in 1903 (Clark State Forest) to restore eroded, worn-out farm land that become abandoned early in the century and directed by Indiana Code. The Division of Forestry has actively managed its land for over 100 years for multiple uses/multiple benefits.</li><li>• Hardwood Ecosystem Experiment (HEE) and other research</li></ul>
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	<p>continue to document forest impacts and indicate increased biodiversity in managed forests. <a href="http://www.heeforeststudy.org/">http://www.heeforeststudy.org/</a></p> <ul style="list-style-type: none"><li>• State Forest timber revenues are well above cost of operations and contribute positively to local and State economies.</li><li>• The Division of Forestry manages its lands for multiple uses/multiple benefits proving timber production, biodiversity, watershed protection, recreation, and research areas. Recreational benefits include over 450 miles of designated recreational trails (e.g., horse, bike, hiking and interpretive), camping, back country camping, swimming beaches, hunting, fishing, picnicking, mushrooming and many other opportunities under this management philosophy</li></ul>
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