

**SUMMARY COMMENTS**

**Clark State Forest Comp 6 Tract 2, Comp 9 Tract 8, and Comp 14 Tracts 1, 2, 3**

**30 Day Comment Period Ending: 8/16/2022**

**Comments Received: 1**

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>• Comment regarding deadline date</li> <li>• Comment regarding how compartment and tract information is made available to the public</li> <li>• General comment opposing forest management on all tracts citing concerns of potential impacts to slopes, wildlife, forest health, natural succession, recreation, and carbon sequestration.</li> <li>• Concerns with recreation, specifically the Knobstone Trail</li> <li>• Concern for threatened and endangered species such as the Indiana and Northern Long Eared bats</li> <li>• Concern with invasive species spread and control</li> </ul>	<ul style="list-style-type: none"> <li>• 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 camping, swimming beaches, hunting, fishing, picnicking, mushrooming and many other opportunities under this management philosophy.</li> <li>• Continuous Forest Inventory (CFI) data indicates Indiana State Forests contain approximately 61 million live trees, 1 billion board feet (Doyle) of net sawtimber volume with an estimated annual growth of 22 million board feet (Doyle). Managed harvest levels are set at a level to insure long term sustainability. These levels are periodically reviewed as new CFI data is collected. See <a href="https://www.in.gov/dnr/forestry/forestry-publications-and-presentations/">https://www.in.gov/dnr/forestry/forestry-publications-and-presentations/</a></li> <li>• 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,</li> </ul>

and prescribed fire. These forest management activities help sustain the diverse hardwood landscape and ensure state forests remain vigorous and healthy supporting the multiple uses multiple benefits philosophy in perpetuity.

- 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).
- 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](http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf)
- 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.
- Local market conditions are part of the timber bidding process. Pricing and market condition reports are reviewed regularly.
- 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

	<p>of forest certification standards to insure long term forest sustainability. State Forests are subject to annual ‘third party’ audits for compliance to these standards.</p> <p><a href="https://www.in.gov/dnr/forestry/7532.htm">https://www.in.gov/dnr/forestry/7532.htm</a></p> <ul style="list-style-type: none"><li>• Assessing climate change and carbon sequestration is beyond the scope of tract level RMGs. See <a href="https://www.in.gov/dnr/forestry/files/fw-carbon_assessment.pdf">https://www.in.gov/dnr/forestry/files/fw-carbon_assessment.pdf</a></li><li>• Hardwood Ecosystem Experiment (HEE) and other research continue to document forest impacts and indicate increased biodiversity in managed forests. <a href="http://www.heeforeststudy.org/">http://www.heeforeststudy.org/</a></li><li>• 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.</li><li>• Best management practices (BMP) will be implemented and monitored to address the soil erosion and sedimentation concerns. BMPs are required and included in each State Forest timber sale agreement. 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>• 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</li></ul>
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	<p>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.</p> <ul style="list-style-type: none"><li>• Implementation of the draft RMG will utilize guidance from the US Fish &amp; Wildlife Service and other sources to avoid take impacts to the Indiana bat and other listed species.</li><li>• Recreational use for each tract was identified in the draft resource management guides (RMGs). Consideration for recreational features will be made during planning and implementation of the RMGs. As noted in the draft RMGs when active management occurs designated recreational trails will close or rerouted.</li><li>• Clark State Forest (by acres) is currently 3% young forest (0-19 years of age), 1% age 20-39, 47% age 40 – 99, and 49% age 100+. Only 10% of Clark State Forest is considered oak-hickory. Cover types dominated by oak account for 61% of Clark’s acreage. Oak dominated cover types provide many ecological services and its retention within the forested landscape is a concern throughout the region.</li><li>• Like other forms of hauling, log trucks must follow all county, state and federal laws.</li></ul>
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