

SUMMARY COMMENTS

Clark State Forest Prescribed Fire Comp 12 Tracts 1, 2, & 5

30 Day Comment Period Ending: 3/21/2023 Comments Received: 4

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 |
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| General comments citing concerns of potential impacts to wildlife, recreation, and climate. Concern with overharvesting and use of fire. Concern that we are managing too much for oak and hickory. | The Division of Forestry has actively managed its lands for 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, hike and interpretive), nearly 1,000 campsites, rent-a-camp cabins, family cabins, dispersed camping, swimming beaches, hunting, fishing, picnicking, mushrooming and many other opportunities under this management philosophy. Recent continuous forest inventory (CFI) data (2021) indicates Indiana State Forests contain approximately 61.3 million live trees, 1 billion board feet (Doyle) of sawlog volume with an estimated annual growth of 22.1 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-2017-2021.pdf Fire has been used for thousands of years in the central hardwood region. Native Americans used fire routinely as part of their management, followed by European settlers, and today many forest managers use prescribed fire as a tool to achieve management objectives. Use of fire within the central hardwood |



- region is nothing new to the landscape and it has helped create the forests we have today.
- 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,
 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 in perpetuity.
- The prescribed management activities are consistent with silvicultural principles, promote 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.
- 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.
- 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/forest-certification/state-forests/

- Assessing climate change and carbon sequestration is beyond the scope of tract level resource management guides. See https://www.in.gov/dnr/forestry/files/fw-carbon assessment.pdf
- 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
- The State Forest system is dominated by older forest conditions.
 Only 5% of the State Forest acreage is considered young forest (0-19 years old). In contrast to 34% older forest (100+ years old).
 Most of the system acreage is between 40-99 years of age. Over 4,000 acres is set aside to mimic older forest conditions with no harvesting with an additional 7,700 acres with harvest guidelines that mimics older forest conditions.
- 51% of the state forest acres are dominated by oak. This figure increases when considering other forest types where oak is a



| | component. CFI Data indicates oak is being replaced in the understory by shade tolerant species such as beech and maple. The ecological role oaks play in the forested landscape make efforts to sustain it all that more important. • 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: https://www.in.gov/dnr/forestry/files/BMP.pdf |
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