Comment Summary



Division of Forestry Response

SUMMARY COMMENTS

Harrison-Crawford State Forest Comp 5 Tract 8, Comp 8 Tract 5, Comp 23 Tract 2, and Comp 30 Tract 1 30 Day Comment Period Ending: 10/15/2021 Comments Received: 2

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.

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 Comment opposing forest management and inquiring if the Division of Forestry were aware if bats were present and would management create erosion or impact caves. Concern with too aggressive forest management to support mixed use of public lands. Concern with the cost of maintaining management roads within the state forest and weight limits on public roads. Concern with Turkey Ridge Horse Trail. Concern with sequestering of carbon within each tract. Concern with how single tree and group selection will produce regeneration with deer browse. Concern with Hellbender salamander and Blue River. Concern with invasive species and use of chemicals. Concern with ash trees. 	 The Division of Forestry has been identifying, categorizing, and mapping caves on Harrison-Crawford State Forest. This information allows us to better understand and employ protective measures. 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 State Forest timber revenues are well above cost of operations and contribute positively to local and State economies. Like other forms of hauling, log trucks must follow all county, state and federal laws. Local market conditions are part of the timber bidding process. Pricing and market condition reports are reviewed regularly. Recreation disruption will occur during management activities. In affected areas hunting access and recreational trails may be 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 trail impacts during the planning and execution of management activities.
- Not all ash trees will be removed. As with any harvest conducted on State Forest's those that show signs of resistance, already dead, or too far gone remain for tree species diversity or wildlife habitat.
- 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.
- This tract is open to public hunting. While deer are browsers by nature, their presence within the tract and surrounding area is not expected to hinder regeneration.
- 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.
- 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.

- 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
- 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 and chemical. 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. 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 State Forest's.
 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., Blue River.)
- 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.



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