



**Jackson-Washington State Forest Comp 3 Tracts 19 & 21, Comp 11 Tracts 1 & 2, Comp 12 Tracts 13, & 15, 16, 17**

**30 Day Comment Period Ending: 11/30/2023**

**Comments Received: 1**

The table below is a summary of public comments received concerning the draft Resource Management Guide(s). 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>• General concern with forest management on state forest, more specifically the use of prescribed fire, carbon storage, old growth conditions, wildlife, invasive species, and recreational trails.</li> <li>• Concern that more than 97% of 158,000-acre state forest system is under a timber harvest rotation.</li> <li>• Concern Indiana’s forest management plan is outdated.</li> <li>• Concern with linking management guides to timber sales.</li> <li>• Concern with managing for oak and hickory.</li> <li>• Concern with water quality, specifically Starve Hollow Lake, White River, Delaney Creek, and Muscatatuck River.</li> <li>• Concern with costs associated with state forest timber sales.</li> </ul>	<ul style="list-style-type: none"> <li>• The Division of Forestry has actively managed its lands for over 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), over 500 individual camping options (e.g., family &amp; horse camp sites, rent-a-camp cabins, family cabins), dispersed primitive camping along three major hiking trails covering 125 miles, a swimming beach, gun &amp; archery range, hunting, trapping, fishing, picnicking, mushrooming, and many other opportunities under this management philosophy on over 160,000 acres.</li> <li>• Continuous forest inventory (CFI) data 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 ensure long term sustainability. These levels are periodically reviewed and updated as new CFI data is available. <a href="#">CFI Summary of years 2017-2021</a></li> <li>• Fire has been present on the forested landscape for thousands of years in the central hardwood region, both naturally (i.e., lightning) and human caused. Research, including dendrochronological data,</li> </ul>

	<p>indicate Native Americans used fire routinely, 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 has helped shape the forests we have today.</p> <ul style="list-style-type: none"><li>• The state forest system encompasses 160,251 acres. Each state forest is divided into compartments and tracts. Within those compartment and tract acres there are water features, nature preserves, campgrounds, shelters and picnic areas, administration areas, and other sensitive areas removed from active forest management.</li><li>• The Division of Forestry is engaged with various professional organizations, universities, and other government agencies regarding the science and studies of forest management. The division maintains trained professional staff to plan and execute prescribed management.</li><li>• Assessing climate change and carbon sequestration is beyond the scope of tract level resource management guides. <a href="#">Forest Carbon Assessment for Indiana State Forest Properties</a></li><li>• 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 restricting harvest prescriptions to single tree selection and longer rotations to mimics older forest conditions.</li><li>• State Forest timber sales on the Forestry Exchange provide a direct</li></ul>
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	<p>link to the resource management guides associated with the timber harvest. This is a new feature implemented in October 2023.</p> <ul style="list-style-type: none"><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 review for threatened or endangered species (federally and state) on or near the management unit are considered. <b><i>Please note, for the protection of sensitive flora and fauna NHD review results are not disclosed in draft RMGs.</i></b> Further information on direct and indirect impacts on species and habitats are found in the Indiana State Forest Environmental Assessment. <a href="#">Indiana State Forest Environmental Assessment</a></li><li>• Over 50% of the state forest acres are dominated by oak. This figure increases when considering other forest types where oak and hickory are a component. Continuous forest inventory (CFI) data suggests oak is being replaced in the understory by shade tolerant species such as American beech and maple. The ecological role oaks and hickories play in the forested landscape make efforts to sustain them in the forested landscape all that more important.</li><li>• Silvicultural prescriptions proposed in draft RMGs include NHD reviews as well as Division of Forestry staff reviews, which include forest wildlife specialist and forest ecologist/botanist. Further information on direct and indirect impacts on species and habitats are found in the Indiana State Forest Environmental Assessment. <a href="#">Indiana State Forest Environmental Assessment</a></li></ul>
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- 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: [2022 BMP Field Guide](#)
- 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 58 individual BMPs measured across 5 categories: access/haul road, log landings or yards, skid trails, stream crossings, and riparian management zones (RMZ). View report
- [BMP Monitoring Results for State Forest Properties 1996-2021](#)
- The Division of Forestry does consider recreational impacts during the planning and execution of management activities. The visual enhancement area (VEA) policy requires visual consideration when managing within 100 feet of high-use public roads or high-use recreational facilities (i.e., picnic area, campground, etc.). This distance may be increased if deemed necessary by the marking forester or property manager. State forest webpage advisories are available to the public and address trail closures.
- 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

	<p>may include manual, chemical or use of prescribed fire. Only approved herbicides will be used following forest certification standards.</p> <ul style="list-style-type: none"><li>• Maintained fire lanes serve multiple purposes. They serve as access for emergency rescues, engaging wildland fires, management of trails, access for timber harvests, and often serve as a recreational trail. Improvements for timber sale access, along with other sale associated expenses are included in the cost of operations (i.e., FM 200).</li></ul>
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