

SUMMARY COMMENTS

Clark State Forest Comp 6 Tract 1 and Comp 9 Tract 10

30 Day Comment Period Ending: 5/16/2023

Comments Received: 7

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"> • Concerns with the use of prescribed fire and its impact on wildlife and the climate. • Concern with rare, threatened, and endangered species, specifically, the Eastern box turtle. • Concern that we are managing too much for oak and hickory. • Concern with logging on state forests. 	<ul style="list-style-type: none"> • 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), over 500 individual camping options (e.g., family & horse camp sites, rent-a-camp cabins, family cabins), dispersed primitive camping along three major hiking trails, a swimming beach, hunting, fishing, picnicking, mushrooming and many other opportunities under this management philosophy on over 160,000 acres. • 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 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, indicate Native Americans used fire routinely, followed by

	<p>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">• Prescribed fire administered on State Forests are considered low to moderate intensity fires conducted during the dormant season. These types of fires conducted during dormant season have little direct impact on fauna.• Smoke management is a part of the prescribed fire planning process. Every prescribed fire is carefully planned to take into consideration factors such as fuel models, smoke, hazards, number of staff needed, fire breaks, current and predicted weather, etc. Smoke management includes consideration of surrounding residential areas, cities, interstates, etc. Weather is sometimes unpredictable, and the smallest change can impact the best plans regarding smoke management.• 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
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	<p>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.</p> <ul style="list-style-type: none">• 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. In addition, a review by a staff wildlife biologist and forest
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ecologist/botanist is conducted. ***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 restricting harvest prescriptions to single tree selection and longer rotations to mimics older forest conditions.
- 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’s acres are considered oak-hickory cover type. White oak cover type represents 21%, while cover types dominated by oak species account for 61%. Oak dominated cover types provide many ecological services and their retention within the forested landscape is a concern throughout the region.
- 51% of the state forest acres are dominated by oak cover types. This figure increases when considering other cover 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

	<p>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</p>
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