

SUMMARY COMMENTS

Greene-Sullivan State Forest Comp 5 Tracts 4 & 5

30 Day Comment Period Ending: 3/30/2023

Comments Received: 5

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"> • General comment citing concerns of potential impacts to wildlife, recreation, climate, and the spread of invasive species. • Concern with timber harvest levels on state forests. Concern with Division of Forestry costs associated with timber sale access. • Concern for water quality, specifically the following lakes Corky, Green Ash, Almond, Hornbeam, and Reservoir 29. • Concern managing for oak-hickory. • Concern for the lack of older forest conditions. • Concern with the use of prescribed fire. • Concern with removal of sycamore, cottonwood, sweetgum, and pine. 	<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), 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 CFI data is made available. See https://www.in.gov/dnr/forestry/files/fo-continuous-forest-inventory-property-report-2017-2021.pdf • 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

	<p>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.</p> <ul style="list-style-type: none">• 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.• 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 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
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	<p>scope of tract level resource management guides. See https://www.in.gov/dnr/forestry/files/fw-carbon_assessment.pdf</p> <ul style="list-style-type: none">• 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. <i>Please note, for the protection of sensitive flora and fauna NHD review results are not disclosed in draft RMGs.</i> 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, chemical or use of prescribed fire. 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 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• BMPs are guidelines, not law. However, contractual stipulations
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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 yards, skid trails, stream crossings, and riparian management zones.

View reports at:

<https://www.in.gov/dnr/forestry/files/fo-BMP-report1996-2021.pdf>

- 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.
- Maintained fire lanes serve multiple purposes. They serve as access for emergency rescues, engaging wildland fires, and often serve as a recreational trail. Division of Forestry improvements for timber sale access are included in the cost of operations (i.e., FM 200).
- 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.
- 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

	<p>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.</p> <ul style="list-style-type: none">• The Division of Forestry communicates and works with the Division of Reclamation regarding management of mined areas.• In tract 5 sycamore, cottonwood, sweetgum, and pine represent 78% of the trees available >11" DBH. To promote diversity within the tract these species would be selected over other hardwoods for removal, where appropriate.
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