Comment Summary

## Indiana Department of Natural Resources

Division of Forestry Response

## **SUMMARY COMMENTS**

Martin State Forest Comp 3 Tract 7, Comp 6 Tracts 5 & 6, and Comp 7 Tract 12

30 Day Comment Period Ending: 5/9/2024 Comments Received: 3

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> <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 with managing oak and hickory.</li> <li>Concern with the division's strategic direction.</li> <li>Concern with linking management guides to timber sales.</li> <li>Concern with water quality, specifically East Fork White River and Beaver Creek.</li> <li>Supportive of active forest management to benefit wildlife values, oak-hickory, and forest health and resilience.</li> </ul>	<ul> <li>The Division of Forestry has actively managed its lands for over 120 years. This management has been 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, caving, picnicking, mushrooming, and many other opportunities under this management philosophy on over 160,000 acres.</li> <li>State Forest management is guided by science and implementation of sound silvicultural principles. They adhere to legal mandates and voluntary compliance with a comprehensive set of forest certification standards for long term forest sustainability. State Forests are subject to annual 'third party' audits for compliance with these standards. Forest Certification</li> <li>Silvicultural prescriptions proposed in draft RMGs include NHD</li> </ul>



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">Indiana State Forest</a> Environmental Assessment

- 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. 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. Indiana State Forest Environmental Assessment
- 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 available. See CFI Summary of years 2017-2021
- 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 are used following forest certification standards.
- Assessing climate change and carbon sequestration is beyond the scope of tract level resource management guides. See Forest Carbon Assessment for Indiana State Forest Properties
- The Division of Forestry considers recreational impacts during the planning and execution of management activities. The visual enhancement area (VEA) policy requires visual consideration when managing within high-use public areas or high-use recreational facilities. Sections of recreational trails may require closure or temporary rerouting for public safety during active management. Those sections reopen once work is complete.
- 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. The 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

- State forest timber sales are made available to the public on the Indiana Forestry Exchange. Each state forest timber sale listed provides detailed information about the sale including the associated resource management guide(s).
- Continuous forest inventory (CFI) data indicates 72 percent of the state forest system is oak-hickory.
- Continuous forest inventory (CFI) data indicates 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.
- Continuous forest inventory (CFI) data indicates stand age diversity at 6 percent young forest (0-19 years of age), 11 percent (20-59 years of age), 49 percent (60-99 years of age), and 34 percent older forest (100+ year of age).
- The Division of Forestry is working under an extension of the 2015 – 2022 strategic direction while an updated version is finalized. This is a voluntary document used to guide programs over a certain period. These processes take time to maneuver when considering all aspects required.
- The Division of Forestry represents approximately 30 percent of the DNR public lands portfolio. It is the only land holding division with an active timber management program. In addition to the 70 percent of DNR lands not under a timber management program, the Division of Forestry has over 4,000



acres set aside with no harvesting, 7,700 acres restricting harvest prescriptions to single tree selection and longer rotations to mimic older forest conditions. This does not include areas removed from timber management such as campgrounds, archeological or geologically unique features, or other special areas.