

**SUMMARY COMMENTS**

**Harrison-Crawford State Forest Comp 7 Tract 4, Comp 11 Tract 7, Comp 16 Tracts 4 & 6, and Comp 20 Tract 5**

**30 Day Comment Period Ending: 12/16/2020**

**Comments Received: 13**

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"> <li>• General comments opposing forest management, particularly Compartment 11 Tract 7, and the harvest prescription portions of the draft RMG citing concerns of potential impacts to aesthetics, plants, animals, habitat diversity, recreation, culturally sensitive areas, ecological services, climate change and carbon sequestration.</li> <li>• Concern with the potential impacts to RTE species suggesting detailed environmental inventory of wildlife and plants be conducted/included in draft RMG. Specifically mentioned was the Eastern Hellbender Salamander.</li> <li>• Concern with the potential impacts to soil and water resources and effective implementation and monitoring of BMPs. Specific concerns with the Blue River and karst features.</li> <li>• Concern with deforestation</li> <li>• Concern with diversity</li> </ul>	<ul style="list-style-type: none"> <li>• The Indiana DNR land portfolio covers 520,000+ acres. State Forests are the only DNR properties where long term forest and timber management practices occur. State Forests represents approximately 30% of the DNR portfolio. Set aside lands that are trending towards old growth conditions can be found on a variety of DNR lands, including established nature preserves on State Forests, State Parks, Fish &amp; Wildlife Areas and Nature Preserve lands. These continue to be important conservation strategies.</li> <li>• The Division of Forestry manages its lands for multiple uses/multiple benefits proving timber production, biodiversity, watershed protection, recreation, 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, back country camping, swimming beaches, hunting, fishing, picnicking, mushrooming and many other opportunities under this management philosophy.</li> <li>• The state forest system was established in 1903 to restore eroded, worn-out farmland that become abandoned early in the century and directed by Indiana Code. The Division of Forestry has actively managed its land for nearly 120 years for multiple uses multiple benefits.</li> <li>• The Division of Forestry actively manages its lands for multiple use multiple benefits. A part of that management is timber</li> </ul>

production. Annually, the division plans, schedules and implements forest management activities across all 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 present and ensure state forests remain vigorous and healthy providing the multiple use multiple benefits philosophy for future generations.

- Indiana State Forests contain approximately 986 million board feet (Doyle) of sawlog volume. 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>
- 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](http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf).
- State Forest operations adhere 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](https://www.in.gov/dnr/forestry/files/fw-carbon_assessment.pdf)

- State Forest management is guided by science and implementation of sound silvicultural principles to insure long term forest health and sustainability. State Forest management adheres to legal mandates and voluntary compliance to comprehensive forest certification standards.
- Hardwood Ecosystem Experiment (HEE) and other research continue to document forest impacts and indicate increased biodiversity in managed forests. <http://www.heeforeststudy.org/>
- 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.
- In 2020, the Division of Forestry planted more than 200 acres of old field land on State Forests as part of the Governors plant a million trees initiative. Learn more at: <https://www.in.gov/dnr/forestry/10343.htm>
- 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](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

	<p>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.</p> <ul style="list-style-type: none"><li>• The Department of Natural Resources Division of Forestry does not have a plan, nor does it intend to, log 97% of the state forest acreage over the next 20 years.</li><li>• 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 sales contract. Division of Forestry will respond to reported BMP departures. BMP guidance can be found at: <a href="http://www.in.gov/dnr/forestry/files/fo-2005_Forestry_BMP_Field_Guide.pdf">http://www.in.gov/dnr/forestry/files/fo-2005_Forestry_BMP_Field_Guide.pdf</a></li><li>• 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.</li><li>• Implementation of the draft RMG will utilize guidance from the US Fish &amp; Wildlife Service and other sources to avoid take impacts to the Indiana bat and other listed species.</li><li>• Deforestation is the permanent conversion of forest land to make land available for another use such as a home, housing addition, shopping mall, agriculture, etc. The Division of Forestry practices forest management, which retains and promotes the growth of trees. Trees are a renewable resource and through forest management we create a diverse landscape with a variety of forest age classes that benefit both game and non-game species.</li></ul>
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