

**SUMMARY COMMENTS**

**Clark State Forest    Compartment 10 Tract 11    30 Day Comment Period Ending: 9/10/2016    Comments Received: 4**

The table below is a summary of public comments received concerning the draft Resource Management Guide (DRMG). 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>• Opposes harvest of timber for following reasons:               <ul style="list-style-type: none"> <li>○ Potential impacts to forest ecology, biodiversity and habitat.</li> <li>○ Potential impacts to global environment, climate change and carbon sequestration</li> <li>○ Potential impacts to wildlife and RTE species (e.g. Indiana Bat, Cerulean Warbler, etal).</li> <li>○ Potential impacts on soils and water quality</li> <li>○ Potential impacts on aesthetics and recreation (hunting, hiking)</li> </ul> </li> <li>• Concerns about stainability of harvest practices and State Forest timber harvest levels.</li> <li>• Concerned on impacts to recreation trails and suggests no harvesting along trail corridors.</li> <li>• Recommends following US Fish &amp; Wildlife Service Management Guidelines to prevent take of the Indiana bat, but also suggests a hands-off strategies.</li> <li>• Concerned about potential nest predation and suggests DoF should focus management on interior forest habitats.</li> <li>• Recommends detailed flora and fauna inventory be conducted/included in RMG.</li> <li>• Suggests evaluation of habitat composition on the surrounding landscape and consider possible set aside of</li> </ul>	<ul style="list-style-type: none"> <li>• As standard practice, the Division of Forestry consults with and utilizes guidance from the US Fish and Wildlife Service and other sources to conserve habitat and avoid take impacts to the Indiana and Long-eared bat.</li> <li>• Habitats, communities and wildlife species are considered as part of the management planning process. Along with field observations, Natural heritage data has been reviewed to check for threatened or endangered bird and wildlife species on or near the management unit. No HCVF or old growth were noted on this tract.</li> <li>• Detailed flora, fauna and landscape level habitat inventories are beyond the scope of tract level management guides.</li> <li>• Further information on direct and indirect impacts on species and habitats are found in the Indiana State Forest Environmental Assessment. <a href="http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf">http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf</a></li> <li>• Wildlife research indicates that soft edge, edge created by harvesting is much different than hard edge which is more permanent. As such does not support the assertion that certain parasitizing bird species increase disproportionately to the species positively impacted by the soft edge.</li> <li>• Best management practices will be implemented and monitored to address the soil erosion and sedimentation concerns. BMPs will be required of operator and included in timber sales contracts. DoF will respond to reported BMP departures. BMP guidance can be found at: <a href="http://www.in.gov/dnr/forestry/files/fo-">http://www.in.gov/dnr/forestry/files/fo-</a></li> </ul>

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tract for long rotation management (100+ years) values, and/or HCVF.

- Concern on potential spread and introduction of invasive species as result of management activity. Supports non-herbicide control methods.
- Concern the removal of Ash trees suggesting removals may reduce ash genetic diversity important to long term survival of the species.
- Concern on potential for soil erosion and sedimentation and the effective implementation of BMPs. Recommends avoiding or buffering sensitive areas.
- Suggests DoF evaluate impacts on climate change and carbon sequestration. Or, put in place evaluation standards to consider the cumulative impacts of all state and federal forest management projects across the state on carbon sequestration and climate change.
- Suggests public comment period longer than 30 days

[2005 Forestry BMP Field Guide.pdf](#)

- Invasive species presence and control needs are incorporated in the management guide. The species noted are widespread in the County. A variety of management measures are considered in an overall integrated pest control strategy.
- Assessing climate change and carbon sequestration is beyond the scope of tract level RMGs.
- Hunting access and trails will be temporarily closed or rerouted for safety reasons during operations. Trail considerations will be incorporated into the implementation of the RMG.
- EAB is widespread throughout Indiana, including the counties surrounding the Ferdinand State Forest. <http://www.in.gov/dnr/entomolo/5349.htm> . Recruiting ash regeneration is an expected and desired outcome of the prescribed treatment. While the prescription will remove many infected Ash trees it will not and is not able to remove all infested Ash trees.
- Indiana State Forests contain approximately 1.15 billion board feet of timber. Managed harvest levels on State Forests are set at a level to insure long term sustainability. These levels are periodically reviewed as new inventory data is collected. See [http://www.in.gov/dnr/forestry/files/fo-State\\_Forest\\_CFI\\_Report\\_2010\\_2014.pdf](http://www.in.gov/dnr/forestry/files/fo-State_Forest_CFI_Report_2010_2014.pdf)
- The 30 day public comment period will remain as standard procedure. However, if individuals have information that is pertinent and specific to the area and the proposed action they can present that information at any time.
- The prescribed management activities are supported by inventory data and field assessments. The concerns expressed have been considered and may be further addressed during plan implementation.