

SUMMARY COMMENTS

Clark State Forest Compartment 7 Tract 3, Compartment 18 Tract 3, and Compartment 18 Tract 5 30 Day Comment Period Ending: 3/5/2020

Comments Received: 30

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"> • Return non-native and declining pine stands to young native forest habitat. • Support forest management efforts to improve oak regeneration. • Support forest management efforts to improve forest health and productivity. • Support control of invasive species before harvest operation. • General statements opposing forest management and the harvest prescription portions of the draft RMG citing concerns of potential impacts to aesthetics, plants, animals, habitat diversity, recreation, cultural sensitive areas, and ecological services • General concern with Knobstone Trail closure and rerouting • Concern with use of chemicals • Concern with compartment and tract availability to the public • General comments encouraging old growth forests • Concern with the potential impacts to RTE species. Recommends detailed environmental inventory of wildlife and plants be conducted/included in draft RMG • Deam Lake will not be the same if it is deforested • Concern with the potential impacts to soil and water resources and effective implementation and monitoring of BMPs. Specific concerns with Silver Creek, Big Run-Muddy Fork, Muddy Fork River, Miller Fork, Schlamm and Deam Lake 	<ul style="list-style-type: none"> • 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 all state forests. Activities may include: forest inventories, timber harvests, timber stand improvement, tree plantings, invasive species control, and prescribed fire. These activities help sustain the diverse hardwood landscape present and ensure state forests remain healthy providing the multiple use/multiple benefits philosophy for future generations. • Archeological reviews are conducted before any harvest operation is permitted. Any area identified as sensitive is protected following guidance from the Division of Forestry Archeologist and Division of Historic Preservation & Archaeology (DHPA). • Local market conditions are part of the timber bidding process. Pricing and market condition reports are reviewed regularly. • 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

- General concern on the potential spread of invasive species as a result of the proposed management activity.
- General concern the draft RMG does not address impacts on climate change and carbon sequestration.
- Concern with over logging and logging just for profit

management we create a diverse landscape with a variety of forest age classes that benefit both game and non-game species.

- 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. Division of Forestry will respond to reported BMP departures. BMP guidance can be found at: http://www.in.gov/dnr/forestry/files/fo-2005_Forestry_BMP_Field_Guide.pdf
- 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.
- 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. 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 and chemical. Only approved herbicides will be used following forest certification standards.

- Assessing climate change and carbon sequestration is beyond the scope of tract level RMGs.
- Indiana State Forests contain approximately 985 million board feet of timber. Managed harvest levels are set at a level to insure long term sustainability. These levels are periodically reviewed as new continuous forest inventory data is collected. See https://www.in.gov/dnr/forestry/files/fo-Continuous_Forest_Inventory_Property_Report_2014-2018.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.
- State Forest operations adhere to a comprehensive set of forest certification standards to insure long term forest sustainability. Operations are subject to annual 'third party' audits to insure compliance to these standards. <https://www.in.gov/dnr/forestry/7532.htm>
- Habitats, communities and wildlife species are considered as part of the management planning process. 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.
- We recognize that aesthetic impacts are inherent of many forest management activities. This may include visual impacts along roadways and trail segments. Potential impacts will be considered during activity planning and execution.
- Recreation disruption will occur during management activities. In affected areas hunting access and recreational trails will be

	<p>temporarily closed or rerouted for safety reasons during operations. The Division of Forestry will consider recreational trail impacts during the planning and execution of management activities.</p> <ul style="list-style-type: none">• 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 & Wildlife Areas and Nature Preserve lands. These continue to be important conservation strategies.• No old growth forests are found in the tracts covered by the draft RMGs. However, there are approximately 827 acres of forest land at Clark State Forest set aside as long term preserves and development as old growth areas. Outbrook Ravine Nature Preserve, Alum Cave Hollow Nature Preserve, Virginia Pine-Chestnut Oak Nature Preserve, and White Oak Nature Preserve.• 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.• 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.• The state forest system was established in 1903 to restore eroded, worn-out farm land 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.• Hardwood Ecosystem Experiment (HEE) and other research
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	<p>continue to document forest impacts and indicate increased biodiversity in managed forests. http://www.heeforeststudy.org/</p> <ul style="list-style-type: none">• State Forest timber revenues are well above cost of operations and contribute positively to local and State economies.• 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), camping, back country camping, swimming beaches, hunting, fishing, picnicking, mushrooming and many other opportunities under this management philosophy.• Compartment and tract designations for each state forest are available at: https://www.in.gov/dnr/forestry/3635.htm• Like other forms of hauling, log trucks must follow all county, state and federal laws.
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