

**SUMMARY COMMENTS**

**Ferdinand-Pike State Forest Comp 5 Tract 1, Comp 7 Tract 2, Comp 10 Tract 4, Comp 11 Tract 1 30 Day Comment Period Ending: 5/26/2020**

**Comments Received: 42**

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 in support of forest management practices that follow science, best management practices, address invasive species and create diverse habitat beneficial to a broad range of flora and fauna.</li> <li>• General comments in support of silvicultural techniques that promote and sustain oak and hickory in the state forest landscape.</li> <li>• General comments in support of sustainable forest management to keep forests diverse, productive, and healthy.</li> <li>• General comment in support of providing early, mid, and late successional stages to increase diversity and provide environmental conditions for all forest stages of forest development and wildlife habitat.</li> <li>• General comments 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.</li> <li>• Concern with the use of chemicals containing glyphosate (e.g., Roundup) and other dangerous chemicals.</li> <li>• General comments to protect old growth forests.</li> <li>• General concerns with the potential impacts to RTE species. Recommends detailed environmental inventory of wildlife and plants be conducted/included in draft RMG.</li> </ul>	<ul style="list-style-type: none"> <li>• 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 vigorous and healthy providing the multiple use/multiple benefits philosophy for future generations.</li> <li>• Local market conditions are part of the timber bidding process. Pricing and market condition reports are reviewed regularly.</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 Indiana DNR</li> </ul>

- Concern with the potential impacts to soil and water resources and effective implementation and monitoring of BMPs. Specific concerns with the Patoka River.
- General concern on the potential spread of invasive species as a result of the proposed management activities.
- General concern the draft RMG does not address impacts on climate change and carbon sequestration.
- Concern with over logging and logging just for profit.
- Concern for large openings due to the removal of pine.
- General comments requesting the Division of Forestry to manage its land in a compatible manner with the Patoka River National Wildlife Refuge.

State Forest properties. 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. **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 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. See [https://www.in.gov/dnr/forestry/files/fw-carbon\\_assessment.pdf](https://www.in.gov/dnr/forestry/files/fw-carbon_assessment.pdf)
- 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 data is collected. See [https://www.in.gov/dnr/forestry/files/fo-Continuous\\_Forest\\_Inventory\\_Property\\_Report\\_2015-2019.pdf](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. 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](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 temporarily closed or rerouted for safety reasons during active operations. Only a small percentage of any state forest is impacted at a given time. The Division of Forestry will consider recreational trail impacts during the planning and execution of management activities.
- The Indiana DNR land portfolio covers 520,000+ acres. The 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

	<p>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.</p> <ul style="list-style-type: none"><li>• No old growth forests are found in the tracts covered by these draft RMGs.</li><li>• Implementation of the draft RMG will utilize guidance from the US Fish &amp; Wildlife Service and other sources to avoid impacts to the Indiana bat and other listed species.</li><li>• 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.</li><li>• 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.</li><li>• Hardwood Ecosystem Experiment (HEE) and other research continue to document forest impacts and indicate increased biodiversity in managed forests. <a href="http://www.heeforeststudy.org/">http://www.heeforeststudy.org/</a></li><li>• State Forest timber revenues are well above cost of operations and contribute positively to local and State economies.</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), over 940 campsites/cabins, back country camping, swimming beaches, hunting, fishing, picnicking, mushrooming and many other opportunities under this management philosophy.</li><li>• Compartment and tract designations for each state forest are</li></ul>
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	<p>available at: <a href="https://www.in.gov/dnr/forestry/3635.htm">https://www.in.gov/dnr/forestry/3635.htm</a></p> <ul style="list-style-type: none"><li>• Like other forms of hauling, log trucks must follow all county, state and federal laws.</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><li>• Any management activity implemented in Compartment 10 Tract 4 and Compartment 11 Tract 1 will incorporate a 100' buffer strip along the Patoka River, riparian management zone. It is possible that this buffer increases in sections where conditions warrant.</li><li>• Any bridge construction for access into Compartment 10 Tract 4 would be of temporary material and removed following the management activity. Further, access from other locations is more realistic at this time.</li><li>• A large section of the River Trail in Compartment 11 Tract 1 parallels the Patoka River and state forest property line. This section of trail would be within any buffer strip establish. Given the layout of this trail within the tract it is likely to remain open or only intermittently closed during week days while specific sections receive active management.</li><li>• Conversion of planted pine stands to hardwood species does not negate the work of those who planted them. The pine was planted to protect bare, exposed, eroded soils in an effort to stabilize and return to forestland. The pine has done that and now its removal will promote the return of native hardwoods while providing young forest habitat to the landscape. This silvicultural prescription will not remove the current ground level vegetation or leaf litter, which will maintain soil conditions while regeneration</li></ul>
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	<p>of hardwoods are established.</p> <ul style="list-style-type: none"><li>• Not all ash trees will be removed. As with any harvest conducted on State Forest's those that show signs of resistance, already dead, or too far gone remain for tree species diversity or wildlife habitat.</li><li>• 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.</li><li>• Tree cavities may be found in trees of all age and size classes. Each draft resource management guide identified snags observed by size classes down to 5" diameter at breast height (DBH).</li><li>• Down coarse woody debris would increase as a result of forest management activities, not reduced.</li><li>• Oak and hickory tallied during data collection indicates the hydrology within Compartment 11 Tract 1 and Compartment 10 Tract 4 will support their presence within the landscape. Because of oaks important ecological role within the forested landscape the goal is to ensure its existence is not lost. We acknowledge that not all areas within the landscape are suitable to manage for oak and hickory.</li></ul>
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