



SUMMARY COMMENTS

Clark State Forest Comp 6 Tract 3 & 4, Comp 11 Tract 11 and Comp 10 Tract 11 (amendment)

30 Day Comment Period Ending: 8/6/2020

Comments Received: 6

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"> • 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, ecological services, climate change and carbon sequestration. • Concern with the use of chemicals containing glyphosate (e.g., Roundup) and other dangerous chemicals. • Concern with the potential impacts to RTE species suggesting detailed environmental inventory of wildlife and plants be conducted/included in draft RMG. Specifically mentioned were ruffed grouse, hellbender salamander, smoky shrew, Northern long-eared and Indiana bat, timber rattlesnakes, and box turtles. • Concern with the potential impacts to soil and water resources and effective implementation and monitoring of BMPs. Specific concerns with the South Fork Blue River watershed. • Concern with cultural resources. • Concern on the potential spread of invasive species as a result of the proposed management activities. • Concern with too aggressive logging or logging just for profit. • Concern with forest health. 	<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. • 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. • 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.

- 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.
- 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
- 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>

- Indiana classifies archaeological site locations as confidential as provided under IC 14-21-1-32. We maintain reports and site locations as non-disclosable information in order to protect the cultural resources. While we recognize that the majority of individuals would never consider causing damage to these finite resources, there are individuals who would use this information with malice. Every timber management project in which ground disturbance could occur, such as a timber harvest, is reviewed by a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards and/or the qualification standards in IC 14-21-1 and 312 IAC 21-3-4(b). A report of this review is compiled and provided to the property; however, this information is removed from the public version of the management guide in order to protect archaeological resources and to remain compliant to the state law.
- Local market conditions are part of the timber bidding process. Pricing and market condition reports are reviewed regularly.
- 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:
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 Indiana DNR 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
- 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
- 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.

- Implementation of the draft RMG will utilize guidance from the US Fish & Wildlife Service and other sources to avoid 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.
- Hardwood Ecosystem Experiment (HEE) and other research continue to document forest impacts and indicate increased biodiversity in managed forests. <http://www.heeforeststudy.org/>
- State Forest timber revenues are well above cost of operations and contribute positively to local and State economies.
- 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.
- 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 of hardwoods are established.
- 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.
- Forest management activities ensure forests remain healthy, vigorous, diverse, and adequately stocked. Overstocking and

	<p>largely over mature conditions jeopardize forest health, resiliency and resistance making them more vulnerable to mortality and disease and insect outbreaks.</p>
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