

**SUMMARY COMMENTS**

**Clark State Forest, Comp 15 Tracts 16 and Comp 16 Tract 7**

**30 Day Comment Period Ending: 7/30/2024**

**Comments Received: 1**

The table below is a summary of public comments received concerning the draft Resource Management Guide(s). 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 concern with active forest management on state forests, more specifically timber removal, use of prescribed fire, carbon storage, old growth, rare, threatened, and endangered flora and fauna, invasive species, and recreation.</li> <li>• Concern that more than 97% of 160,000-acre state forest system is under a timber harvest rotation.</li> <li>• Concern with the division’s strategic direction.</li> <li>• Concern with linking management guides to timber sales.</li> <li>• Concern with water quality, specifically Deam Lake, Dry Fork, Stone Branch, Big Run, and Muddy Fork watershed.</li> </ul>	<ul style="list-style-type: none"> <li>• The Division of Forestry has actively managed its lands for more than 120 years. This management has been a multiple uses multiple benefits approach. These benefits include timber production, biodiversity, watershed protection, recreation, wildlife habitat, and research areas. Recreational benefits include over 430 miles of designated recreational trails (e.g., horse, bike, hike and interpretive), over 500 individual camping options that include family and horse camp sites, rent-a-camp cabins, and family cabins. In addition, state forests offer dispersed primitive camping along three major hiking trails covering 125 miles, a swimming beach, shooting &amp; archery range, hunting, trapping, fishing, boating, caving, picnicking, mushrooming, and many other opportunities under this management philosophy across more than 160,000 acres.</li> <li>• State Forest management is guided by science and implementation of sound silvicultural principles. They are managed under the principle that we’re stewards of this land for the future. This work is guided through legislation and comprehensive scientific national and international forest certification standards which are independently audited to help insure long-term forest health, resiliency, and</li> </ul>

sustainability. [Forest Certification](#)

- Silvicultural prescriptions proposed in draft RMGs include National Heritage Database (NHD) reviews as well as Division of Forestry staff reviews, which include a forest wildlife specialist and forest ecologist/botanist. Further information on direct and indirect impacts on species and habitats can be found in the [Indiana State Forest Environmental Assessment](#).
- 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, NHD review for threatened or endangered species (federally and state) on or near the management unit are considered. ***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 can be found in the [Indiana State Forest Environmental Assessment](#).
- Implementation of RMGs utilize guidance from the US Fish & Wildlife Service on federally listed species known to occur on state forests.
- Continuous Forest Inventory (CFI) data (2021) indicates Indiana State Forests contain approximately 61.3 million live trees, 1 billion board feet (Doyle) of sawlog volume with an estimated annual growth of 22.1 million board feet. Managed harvest levels are set at a level to insure long-term sustainability. These levels are periodically reviewed as new data is made available. See [CFI Summary of years 2017-2021](#)
- CFI data indicates 72 percent of the state forest acreage is oak-hickory.

	<ul style="list-style-type: none"><li>• CFI data indicates stand age diversity at 6 percent young forest (0-19 years of age), 11 percent (20-59 years of age), 49 percent (60-99 years of age), and 34 percent older forest (100+ year of age).</li><li>• The Indiana Division of Forestry represents approximately 30 percent of the Indiana DNR public lands portfolio, which encompasses more than 500,000 acres. The Division of Forestry is the only land holding division with an active timber management program. In addition to the 70 percent of Indiana DNR lands not subject to timber management, the Division of Forestry has over 4,000 acres set aside as no harvesting and 7,700 acres restricted to single tree selection only with longer rotations to mimic older forest conditions. These figures do not include areas removed from timber management such as campgrounds, archeological or geologically unique features, or other special areas.</li><li>• The Division of Forestry considers recreational impacts during the planning and execution of management activities. The visual enhancement area (VEA) policy requires visual consideration when managing within high-use public areas or high-use recreational facilities. During active management some sections of recreational trails may require temporary closure or rerouting for public safety. Those sections reopen following the completion of work.</li><li>• Invasive species, their presence and control, are evaluated as part of the property's normal operations. Treatments may occur prior to or following a timber harvest, or situational based on their presence within the county. Treatments range</li></ul>
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	<p>from minor to aggressive utilizing a variety of methods such as manual, mechanical, chemical, prescribed fire, or a combination. Only approved herbicides are used following forest certification standards and chemical labels.</p> <ul style="list-style-type: none"><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 sale contract on state forests. The Division of Forestry will respond to reported BMP departures. <a href="#">2022 BMP Field Guide</a></li><li>• BMPs are guidelines, not law. However, contractual stipulations require BMPs to be implemented and followed on all State Forests. State Forest staff perform regular site visits during active operations and evaluate as part of their post-harvest review. Additionally, BMP monitoring is performed on each harvest for application and effectiveness. There are 58 individual BMPs measured across 5 categories: access/haul road, log landings or yards, skid trails, stream crossings, and riparian management zones (RMZ). View results <a href="#">BMP Monitoring Results for State Forest Properties 1996-2023</a></li><li>• Assessing climate change and carbon sequestration is beyond the scope of tract level resource management guides. See <a href="#">Forest Carbon Assessment for Indiana State Forests</a></li><li>• State Forest timber sales are made available to the public on the Indiana Forestry Exchange. Each state forest timber sale listed provides detailed information about the sale including the associated resource management guide(s).</li><li>• The Division of Forestry is working under an extension of the 2015 – 2022 strategic direction while an updated version is</li></ul>
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	<p>finalized. This is a voluntary document used to guide programs over a certain period. These processes take time to maneuver when considering all aspects required.</p> <ul style="list-style-type: none"><li>• The number of timber sales sold per year, acres impacted by timber sales, trees sold, and board feet sold has decreased over the past 15 years.</li><li>• State forest timber sales support local markets throughout the state, providing jobs and materials. They provide material used statewide and abroad. The statute does not imply only local markets or how a buyer must market material. Materials removed from state forests are certified globally recognized as material coming from well managed forests.</li></ul>
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