

Submitted via the DOF electronic mail portal at www.in.gov/dnr/forestry/8122.htm

From: Indiana Forest Alliance
2123 North Meridian St.
Indianapolis, IN 46202

To: Indiana Division of Forestry
402 W. Washington Street, Room W-296
Indianapolis, IN 46204

RE: Yellowwood DRMG Compartment 4 Tract 7 posted February 5, 2018

Dear Division of Forestry (DOF) staff,

Please accept the following comments on behalf of the Indiana Forest Alliance (IFA) regarding the proposed Draft Resource Management Guide (DRMG): Yellowwood DRMG Compartment 4 Tract 7 posted on February 5, 2018. We would appreciate a written response to our comments.

It would be helpful if the DOF would provide the exact deadline for comments instead of making the public calculate and guess. It would also be helpful if DOF would make available shapefiles showing compartments and tracts via indianamap.org so that the public could look at the proposed harvest in relation to other important contextual features such as watershed and township boundaries.

The Indiana Forest Alliance urges the DOF not to harvest this tract. By statute, State Forests are supposed to be protected and conserved for equal enjoyment and use by future generations. The DRMG does not demonstrate the need for logging to restore or maintain forest health. The DOF has been harvesting our State Forests too aggressively to support mixed uses of these public lands. Further, the DRMG makes no evaluation of whether local market conditions need the timber, as required by Indiana statute. Below are other questions and concerns.

Suitability of Terrain, Erosion & Water Quality

- This tract contains steep slopes that are not suitable for logging. By law, suitability of terrain must be considered. The DRMG recognizes that portions of this tract are very steep, but there is no indication that logging activities will avoid these areas. There is great potential for erosion on these sites due to both steepness and soil types.
- Please describe how steep slopes will be protected to prevent erosion and water quality impacts. Best Management Practices (BMPs) are likely to be inadequate to protect soils and water quality in these areas. Despite training conducted by the DOF on BMPs we have observed and recorded gross violations of BMPs on state forest land, including unmitigated skid trails running directly into intermittent streams after a harvest, drainages that are filled with tree tops and other debris, and trees marked for harvest within just a few feet of karst features and waters of the U.S.
- The DRMG indicates that this tract is in the Middle Fork Salt Creek watershed. Please provide hydrologic unit codes. What is the existing background water quality in the

watershed? Has the DOF determined whether this watershed has existing impairments for sediment or other parameters? How will the DOF demonstrate that soil erosion is not going to impact this stream?

Forest Health

- How does the DOF define forest health? Please explain how the proposed timber harvest is going to protect or improve forest health.
- We appreciate the table showing relative number of trees per acre. Please provide more information about exactly where group selections, improvement cuts and thinning are to take place.
- Please explain how group selection will result in regeneration of desirable hardwoods in the presence of heavy browsing by deer and other wildlife.
- This area has not been harvested previously due to difficult access. How is building access roads going to improve forest health?
- Forest health should be defined by ecological complexity and indicators such floristic quality. Please describe ecological complexity and floristic quality of this tract before and after the proposed harvest.
- Is the proposed timber harvest going to prevent the spread of pests such as Emerald Ash Borer? How are resilient ash trees going to be identified if all dead and dying ash trees are removed?
- The DRMG states that no invasive species were noted. Introducing logging equipment and opening the canopy is likely to introduce invasive species and/or favor expansion of small pockets of invasive species that may exist. Please explain how this protects forest health.
- Please indicate which areas will be managed for old growth.

Wildlife

- We appreciate that the DRMG lists some of the species expected to be present, but the proposed DRMG does not contain a pre-harvest wildlife inventory. The DRMG states that a Natural Heritage Database Review has been conducted. The results should be listed in the DRMG. Rare, threatened or endangered species should be described in the DRMG in the same way that exotic and invasive species are listed.
- We appreciate that the DRMG recognizes the importance of snags and provides details about what snag density is present in each diameter class. We would like to see that in all DRMGs. We would also like more detail about how many snags of large diameter will be created and/or left standing after the proposed harvest.
- If the DOF really wants to improve forest health, dead and dying trees should be left in place where they can serve as food and habitat for the insects and small mammals that form the foundation of the forest food chain. Dead trees are not “wasted” but are an important part of the forest ecosystem.

Ecosystem Services

- The DRMG makes no mention of anything about the forests' ability to sequester CO₂. Documenting this is a stated goal of the Division of Forestry. Please describe how much CO₂ will be sequestered by this tract with and without the proposed timber harvest.

Local Conditions

- Has the DOF done any analysis of local market conditions? Where is the evidence, required by statute, to indicate that local markets need more timber?
- The DRMG states that road improvements will be needed. Will the costs be listed on the SF200 as required by law? What about impacts to roads outside the State Forest? Please indicate the expected weight of equipment and logging trucks, both empty and loaded. What is the anticipated impact on county roads and bridges? Will logging equipment and trucks be expected to adhere to road weight limits?

Recreation

- By statute, State Forests are supposed to be protected and conserved for equal enjoyment and use by future generations. The DOF strategic plan emphasizes increased recreational opportunities, but the proposed harvest will have a negative impact on recreational users. The area will likely need to be closed both before and after the timber harvest. The area will likely become so unappealing that few will want to recreate there.