

IFA's Guide to Commenting on Proposed Timber Harvests (also known as Draft Resource Management Guides)

The Division of Forestry's proposed harvests are listed here, along with maps:
<https://secure.in.gov/dnr/forestry/3635.htm>.

Every State Forest is divided into compartments that are further sub-divided into tracts. These are not square parcels -- they follow streams and ridges, so they vary greatly in size and shape.

1. Scroll down to see maps showing compartments.
2. Scroll down within pdfs to see tracts.
3. Separate comments must be submitted for each tract.
4. We suggest typing your comments in a Word document first, then cutting and pasting your comments into the form.
5. The agency must respond to comments, so feel free to ask them questions.
6. Submit comments through an online form at <https://secure.in.gov/dnr/forestry/3646.htm>.
7. Be sure to put the Compartment and Tract in the appropriate box on the form.

Consider commenting on these points:

- Describe **your experience or interest**. State Forests are supposed to be managed for multiple uses and future generations. Do you visit this section of the forest to hike or hunt? It's ok if you don't, but if you do, say so. Explain why you care.
- **Suitability of Terrain**. By law, suitability of terrain must be considered.
 - Maps are available here: <https://secure.in.gov/dnr/forestry/3635.htm>. Scroll down, select the state forest you are interested in, then scroll down to the page with the Compartment of interest. Then look for the Tract in question.
 - How steep is the tract? What is the erosion potential? Are the soil types highly erodible? Will Best Management Practices be sufficient to prevent runoff?
 - What watershed is the proposed harvest in? Is the watershed already impaired? For which parameters? [Check the latest Indiana 303\(d\) list](#). It is a violation of the Clean Water Act to exacerbate a known impairment. If the watershed is listed as impaired for sediment or Impaired Biotic Community, there is a good argument that a timber harvest will increase pollution load.
 - Is karst topography noted? Karst represents an especially sensitive hydrology and buffers should be placed around karst features.
- **Local Market Conditions**. Does the DRMG mention whether local market conditions demonstrate a need for timber, as required by statute?
- **Forest Health**. Forest health should not be defined by economic productivity. Forest health should be defined by ecological complexity and ecosystem services, and we

should ask them to describe these. In general, timber harvests do not improve forest health. They say that they harvest dead and dying trees, but this is not designed to prevent the spread of pests or disease – it is meant to capture the value of the timber before it is lost. Dead trees can be left in place – they have great ecological value.

- Do they list **snag density** compared to optimal snag density? Density of snag trees that are important habitat for bats and other species. Is it adequate?
 - What **invasive/exotic species** are present? Timber harvest equipment and open canopies can spread invasives, and present a hazard to other timber stands nearby.
 - **Carbon Sequestration**. Does the DRMG mention anything about the forests' ability to sequester CO₂. Documenting this is a stated goal of the Division of Forestry.
 - **Wildlife**. Note whether pre-harvest wildlife inventory has been done. Often the DRMG says it is done or will be done, but the results are not in the Draft Resource Management Guide. Are you aware of any endangered species present?
 - Is there any mention of **endangered species** present, including especially Indiana bats?
- **Recreation**. State Forests are supposed to be managed for future generations by statute. The DOF strategic plan emphasizes increased recreational opportunities, but in practice recreation is often a lower priority than logging.
 - Do you recreate there? Describe your experience.
 - Will any trails be closed? Is the proposed harvest in an area that has special designation such as Back Country Area or High Conservation Value Area?