

INDIANA FOREST ALLIANCE

Comments on Harrison Crawford State Forest logging plans (Draft Resource Management Guides/DRMGs): Compartment 12, Tracts 1, 2, 3 & 4

8/4/18

Key point: Impacts to Wildlife From Proposed Logging Have Not Been Credibly Analyzed these plans.

- 1) The discussion about impacts to wildlife is the same boiler plate language in all 4 of these DMRGs. There has been no wildlife inventory done on any of these four tracts. The DMRGs merely state the following:

A Natural Heritage Database Review is part of the management planning process. If Rare, Threatened or Endangered species were identified for in the area, the activities prescribed in this guide will be conducted in a manner that will not threaten the viability of those species.

Staff of the DNR's Division of Nature Preserves which maintains the Natural Heritage Database caution that this database is merely a collection of locations where Rare, Threatened or Endangered (RTE) species have been identified and should not be presumed to indicate the presence or absence of RTE species in a tract of forest.

Nevertheless, while the DMRGs state that general habitat features and food sources found commonly in Indiana forests are found in these forests, and describe typical wildlife species that are commonly found in them, they provide no statement about any wildlife species that actually have been identified in these forest tracts. In their final comments on wildlife, all four DMRG's ignore the documented harmful effects of logging on neotropical migrant songbirds, reptiles, amphibians, small mammals and other rare forest dependent animals in the state and assert instead that the logging will produce positive results, increasing wildlife diversity by generating more oak and hickory and creating more edge and early successional habitat.

The status of the state endangered hellbender, the largest salamander in North America, whose young will suffocate if the clear gravel bottom in the Blue River becomes covered with too much sediment, is discussed nowhere in any of these DMRGs. This despite the facts that the Blue River flows through or is adjacent to all of these tracts, the DMRGs concede that soils on steep slopes in all of these tracts, such as the Gilpin Silt Loam, Corydon Stony Silt Loam and Hagerstown Silt Loam are run-off and erosion prone, and the Blue is the only river left in Indiana where this salamander survives. According to Purdue wildlife biologist Nick Burgmeier, the South Fork-Blue River is very silted and it is hard enough for any existing hellbenders to reproduce there. Also, without data correlating runoff to timber harvests, no one has any idea how logging impacts water quality seeping into the Blue River. The precautionary principle tells us that more study is needed.

In reality, the DOF apparently has no idea what wildlife species exist in these tracts, and these DMRGs indicate that it does not intend to find out. The DMRGs must commit to surveying animals and plants in these tracts and identifying any RTE species as well as county records of plants or invertebrates found in these surveys. The DMRGs must commit to developing plans to ensure the continued survival of such species identified in the surveys of these tracts and monitoring their survival.

Furthermore, given the extreme scarcity of old growth forests within our state forests and the guideline in the DOF's sustainable forestry certification to restore more of this severely under represented condition in the state forests, it should be noted in these DMRGs that the DOF had designated all four of these tracts as "Old Forests" prior to 2005, which designations prohibited logging or road building in them to allow old growth conditions to return. Accordingly, the DOF should reduce the scope and impact of the logging that it is proposing in these four tracts and instead lay out specific plans that will be taken to ensure that the habitat values and structural features of old forests, e.g., uneven ages, abundant snags, large trees, live cavity trees, large downed logs, abundant woody debris, diverse herbaceous communities, etc., will be maintained.

Finally, they must ensure that no logging occurs on any slopes that drain directly to the Blue River and commit to a comprehensive water quality monitoring plan to ensure that sediment from the logging does not become Total Suspended Solids covering the Blue River's gravel bottom and suffocating the Hellbender's young. This monitoring regime must have threshold concentrations of TSS the exceedance of which will trigger emergency corrective actions quickly. These actions must include the immediate shut down of logging operations to avert sediment runoff into the Blue River or any of the drainages into it from these tracts if necessary.

Absent these steps being taken, this logging should not occur in any of these tracts.

The following text is lifted directly from the DMRGs for each of these tracts. Note the identical discussion of wildlife and wildlife impacts - all beneficial - from tract to tract.

Tract 1

102 acres - 300,000 to 400,000 board feet to be logged from 810,000 board feet of trees in the forest through single tree selection and regeneration openings (clearcutting).

(page 7):

Wildlife

This tract represents typical oak hickory and mixed mesic habitat, in addition to a component of old field successional habitat, with cedar and smaller hardwoods. Consequently, it likely receives use from a typical assemblage of common game and nongame wildlife species such as white-tailed deer, wild turkey, squirrels, songbirds, snakes, box turtles, and others. Hard mast food sources are provided by the abundant oaks and hickories in the tract.

The Division of Forestry has developed compartment level guidelines for two important wildlife structural habitat features: Forest Snag Density, Preferred Live Roost Trees. Snags and preferred live roost trees were tallied in this inventory and summarized in the following tables.

Table - Guidelines for preferred live roost trees (trees/acre) *(**We have left out the data in these tables which is very similar from DMRG to DMRG and usually indicates the logging plans will reduce the live roost trees by nearly half the number per acre.)*

The above table shows that live tree densities both pre and post-harvest on this tract will be above the maintenance guidelines.

Table - Guidelines for snag tree levels (trees/acre) *(**We have left out the data in these tables. Please go to the DMRGs at the links provided if you would like to see this data.)*

This data shows that all snag densities are above the recommended maintenance levels in all diameter classes on this tract. It is likely that additional snags will be created by harvest operations and post-harvest TSI. Management activities will not intentionally remove snags, with a few exceptions, including when a snag poses a physical hazard to field personnel.

Rare, Threatened, and Endangered Species (Public Use)

A Natural Heritage Database Review is part of the management planning process. If Rare, Threatened or Endangered species were identified for in the area, the activities prescribed in this guide will be conducted in a manner that will not threaten the viability of those species.

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Effect of Prescription on Tract Properties:

(pages 13 & 14)

Wildlife: Wildlife in this tract should not be adversely affected. Snags and coarse woody debris should remain at viable levels in the stratum and should continue to provide habitat for the Indiana bat and other species. The main effect on wildlife will be the reduction of the coniferous component (Cedar) of the stratum. This currently provides a limited amount of thermal cover in the winter for deer and small mammals. This type of cover will be permanently reduced from the tract. Managing to recruit newly established or released oaks and hickories will help to ensure that this important food source is available into the foreseeable future. Regeneration openings, such as prescribed have been shown to be of less an issue from nest predators and generalist species as compared to hard edges such as public roadways, utility corridors and crop field edges. Placement of regeneration openings away from hard edges can minimize these potential impacts. The prescribed activity will promote wildlife diversity and enhance habitat structural components.

Wildlife Discussion from Ecological Resource Review: Additionally, management activities involving a timber sale should not affect this habitat long-term from the perspective of any wildlife utilizing it due to the maintenance of a forested habitat on the tract. Creation of regeneration openings will improve habitat diversity and create early successional habitat that will be beneficial to certain groups of wildlife dependent upon this habitat. Likely, early successional habitat created with such management will also

benefit a wider segment of wildlife species that preferentially utilize such habitat for feeding and cover more so than later successional stage habitat.

Tract 2

212 acres (183 in West Section & 29 in East Section) – 550,000 to 625,000 board feet to be logged from 1,459,000 board feet of trees in the forest through single tree selection and regeneration openings (clearcutting).

(page 22):

Wildlife (West Section)

This tract represents typical oak hickory and mixed mesic habitat, in addition to a component of old field successional habitat, with cedar and smaller hardwoods. Consequently, it likely receives use from a typical assemblage of common game and nongame wildlife species such as white-tailed deer, wild turkey, squirrels, songbirds, snakes, box turtles, and others. Hard mast food sources are provided by the abundant oaks and hickories in the tract.

In concert with various agencies and organizations, the Division of Forestry has developed compartment level guidelines for two important wildlife structural habitat features: Forest Snag Density, Preferred Live Roost Trees. Snags and preferred live roost trees were tallied in this inventory and summarized in the following tables.

Table - Guidelines for preferred live roost trees (trees/acre) (West Section)

The above table shows that live tree densities both pre and post-harvest on this tract will be within the maintenance guidelines.

Table - Guidelines for snag tree levels (trees/acre) (West Section)

This data shows that all snag densities are above the maintenance level guidelines on this tract. It is likely that additional snags will be created by harvest operations and post-harvest TSI. Management activities will not intentionally remove snags, with a few exceptions, including when a snag poses a physical hazard to field personnel.

Rare, Threatened, and Endangered Species

A Natural Heritage Database Review is part of the overall management planning process. If Rare, Threatened or Endangered species were identified for in the area, the activities prescribed in this guide will be conducted in a manner that will not threaten the viability of those species.

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(page 29)

Effect of Prescription on Tract Properties:

Wildlife: Wildlife in this tract should not be adversely affected. No rare threatened or endangered species will be adversely affected during the planning period. Snags and coarse woody debris should

remain at viable levels in the stratum and should continue to provide habitat for the Indiana bat. The main effect on wildlife will be the reduction of the coniferous component of the stratum. This currently provides a limited amount of thermal cover in the winter for deer and small mammals. This type of cover will be permanently reduced from the tract. Managing to recruit newly established or released oaks and hickories will help to ensure that this important food source is available into the foreseeable future. Regeneration openings, such as prescribed have been shown to be of less an issue from nest predators and generalist species as compared to hard edges such as public roadways, utility corridors and crop field edges. Placement of regeneration openings away from hard edges can minimize these potential impacts. The prescribed activity will promote wildlife diversity and enhance habitat structural components.

Wildlife Discussion from Ecological Resource Review: Additionally, management activities involving a timber sale should not affect this habitat long-term from the perspective of any wildlife utilizing it due to the maintenance of a forested habitat on the tract. Creation of regeneration openings will create early successional habitat that will be beneficial to certain groups of wildlife dependent upon this habitat. Likely, early successional habitat created with such management will also benefit a wider segment of wildlife species that preferentially utilize such habitat for feeding and cover more so than later successional stage habitat.

Tract 2 East Section (this 29 acre portion of Tract 2 is across the Blue River from the west portion. Note that the same habitats, features, references to wildlife and impacts are asserted even though the DMRG proposes no logging in this portion of Tract 2. (page 34 & 35):

Wildlife (East Section)

This section represents typical oak hickory and mixed mesic habitat, in addition to a component of old field successional habitat, with cedar and smaller hardwoods. Consequently, it likely receives use from a typical assemblage of common game and nongame wildlife species such as white-tailed deer, wild turkey, squirrels, songbirds, snakes, box turtles, and others. Hard mast food sources are provided by the

In concert with various agencies and organizations, the Division of Forestry has developed compartment level guidelines for two important wildlife structural habitat features: Forest Snag Density, Preferred Live Roost Trees. Snags and preferred live roost trees were tallied in this inventory and summarized in the following tables.

Table - Guidelines for preferred live roost trees (trees/acre) (East Section)

The above table shows that live tree densities on this area of the tract are within the maintenance guidelines.

Table - Guidelines for snag tree levels (trees/acre) (East Section)

Snag levels are above recommended maintenance levels in all except the 20" + DBH class. It is likely that additional snags will be created by through the recommended management operations. Management activities will not intentionally remove snags, with a few exceptions, including when a snag poses a physical hazard to field personnel.

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(page 37)

Effect of Prescription on Tract Properties:

Wildlife: Wildlife in this tract should not be adversely affected. Snags and coarse woody debris should remain at viable levels in the stratum and should continue to provide habitat for the Indiana bat. The prescribed activity will promote wildlife diversity and enhance habitat structural components.

Tract 3

110 acres – 300,000 to 350,000 board feet to be logged from 820,000 board feet of trees in the forest through single tree selection and regeneration openings (clearcutting).

(pages 45 & 46):

Wildlife

This tract represents typical oak hickory and mixed mesic habitat, in addition to a component of old field successional habitat, with cedar and smaller hardwoods. Consequently, it likely receives use from a typical assemblage of common game and nongame wildlife species such as white-tailed deer, wild turkey, squirrels, songbirds, snakes, box turtles, and others. Hard mast food sources are provided by the abundant oaks and hickories in the tract.

The Division of Forestry has developed compartment level guidelines for two important wildlife structural habitat features: Forest Snag Density, Preferred Live Roost Trees. Snags and preferred live roost trees were tallied in this inventory and summarized in the following tables.

Table - Guidelines for preferred live roost trees (trees/acre)

The above table shows that live tree densities both pre and post-harvest on this tract will be above the maintenance guidelines.

Table - Guidelines for snag tree levels (trees/acre)

This data shows that all snag densities are above the recommended maintenance levels in all diameter classes on this tract. It is likely that additional snags will be created by harvest operations and post-harvest TSI. Management activities will not intentionally remove snags, with a few exceptions, including when a snag poses a physical hazard to field personnel.

Rare, Threatened, and Endangered Species

A Natural Heritage Database Review is part of the management planning process. If Rare, Threatened or Endangered species were identified for in the area, the activities prescribed in this guide will be conducted in a manner that will not threaten the viability of those species.

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Effect of Prescription on Tract Properties:

Wildlife: Wildlife in this tract should not be adversely affected. Snags and coarse woody debris should remain at viable levels in the stratum and should continue to provide habitat for the Indiana bat and other species. The main effect on wildlife will be the reduction of the coniferous component (Cedar) of the stratum. This currently provides a limited amount of thermal cover in the winter for deer and small mammals. This type of cover will be permanently reduced from the tract. Managing to recruit newly established or released oaks and hickories will help to ensure that this important food source is available into the foreseeable future. Regeneration openings, such as prescribed have been shown to be of less an issue from nest predators and generalist species as compared to hard edges such as public roadways, utility corridors and crop field edges. Placement of regeneration openings away from hard edges can minimize these potential impacts. The prescribed activity will promote wildlife diversity and enhance habitat structural components.

Wildlife Discussion from Ecological Resource Review: Additionally, management activities involving a timber sale should not affect this habitat long-term from the perspective of any wildlife utilizing it due to the maintenance of a forested habitat on the tract. Creation of regeneration openings will improve habitat diversity and create early successional habitat that will be beneficial to certain groups of wildlife dependent upon this habitat. Likely, early successional habitat created with such management will also benefit a wider segment of wildlife species that preferentially utilize such habitat for feeding and cover more so than later successional stage habitat.

Tract 4

155 acres – 325,000 to 400,000 board feet to be logged from 981,000 board feet of trees in the forest through single tree selection and regeneration openings (clearcutting).

(page 61 & 62):

Wildlife

This tract represents typical oak hickory and mixed mesic habitat, in addition to a component of old field successional habitat, with cedar and smaller hardwoods. Consequently, it likely receives use from a typical assemblage of common game and nongame wildlife species such as white-tailed deer, wild turkey, squirrels, songbirds, snakes, box turtles, and others. Hard mast food sources are provided by the abundant oaks and hickories in the tract.

The Division of Forestry has developed compartment level guidelines for two important wildlife structural habitat features: Forest Snag Density, Preferred Live Roost Trees. Snags and preferred live roost trees were tallied in this inventory and summarized in the following tables.

Table - Guidelines for preferred live roost trees (trees/acre)

The above table shows that live tree densities both pre and post-harvest on this tract will be within the maintenance guidelines.

Table - Guidelines for snag tree levels (trees/acre)

This data shows that all snag densities are above the recommended maintenance levels in all diameter classes on this tract. It is likely that additional snags will be created by harvest operations and post-harvest TSI. Management activities will not intentionally remove snags, with a few exceptions, including when a snag poses a physical hazard to field personnel.

Rare, Threatened, and Endangered Species

A Natural Heritage Database Review is part of the management planning process. If Rare, Threatened or Endangered species were identified for in the area, the activities prescribed in this guide will be conducted in a manner that will not threaten the viability of those species.

(page 69)

Effect of Prescription on Tract Properties:

Wildlife: Wildlife in this tract should not be adversely affected by the scale of operations. Snags and coarse woody debris should remain at viable levels in the stratum and should continue to provide habitat for the Indiana bat. The main effect on wildlife will be the reduction of the coniferous component of the tract as cedar areas transition to native hardwoods. This currently provides a limited amount of thermal cover in the winter for deer and small mammals. While not eliminated, this type of cover will be reduced in the tract. Managing to recruit newly established or released oaks and hickories will help to ensure that this important food source is available into the foreseeable future. Regeneration openings, such as prescribed have been shown to be of less an issue from nest predators and generalist species as compared to hard edges such as public roadways, utility corridors and crop field edges. Placement of regeneration openings away from hard edges can minimize these potential impacts. The prescribed activity will promote wildlife diversity and enhance habitat structural components.

Wildlife Discussion from Ecological Resource Review: Additionally, management activities involving a timber sale should not affect this habitat long-term from the perspective of any wildlife utilizing it due to the maintenance of a forested habitat on the tract. Creation of regeneration openings will improve habitat diversity and create early successional habitat that will be beneficial to certain groups of wildlife dependent upon this habitat. Likely, early successional habitat created with such management will also benefit a wider segment of wildlife species that preferentially utilize such habitat for feeding and cover more so than later successional stage habitat.