

INDIANA FOREST ALLIANCE

Comments on Jackson-Washington State Forest logging plans (Draft Resource Management Guides/DRMGs): [Compartment 10, Tracts 8, 9, 38 & 39](#)

8/3/18

- 1) Two of these DMRGs, Tracts 8 & 9 of Compartment 10, comprise 114 acres in the eastern portion of the 2,500 acre Jackson Washington **Back Country Area** established in 1978 by Governor Otis Bowen. The proposed logging will cut down 256,090 board feet of trees, 23% of the forest stand in these tracts. In addition, an unrevealed number of less merchantable “cull trees” such as American Beeches and Red Maples will be logged to encourage the growth of oaks and hickories. The thinnings, improvement cuttings, removal of “mature and overmature” trees, removal of “culls”, two rounds of timber stand improvement and removal of all ash proposed in these cuttings floutingly dismiss the publicly-stated requirement by DNR in the 1980s for state forest Back Country Area designations to maintain the primitive, natural quality of these forests as close as possible to their conditions when the first European settlers found them. The proposed logging needs to be reduced significantly in scope and impact or otherwise avoided altogether to conserve the rare, primitive, natural quality of this forest, which the Back Country Area designation was made to protect.
- 2) The Back Country Area designation made wilderness recreation the primary use for the Jackson-Washington Back Country Area, not logging. Yet Indiana’s premier **long-distance backpacking trail, the Knobstone Trail will be closed** for this logging and rerouted from both of these tracts for up to several year periods. Thus backpacking and wilderness recreation is being made subservient to logging when just the opposite was publicly stated as the policy for the Back Country designation, i.e., light, single-tree selection is to be allowed only so long as it does not degrade the primitive character or recreational enjoyment of this area. Accordingly, any logging proposed in these tracts needs to keep the Knobstone Trail open. Otherwise, it should not occur.
- 3) For the past 4 years, the DNR’s annual Certification from the national Forest Stewardship Council (FSC) for practicing sustainable forestry has committed the Division of Forestry to manage the three Back Country Areas in our State Forests as “old forests” to **return to the “old growth condition” that is severely underrepresented** in the state forests. Yet, a major purpose of these harvest plans is to “remove mature and over-mature trees”. These DMRGs need to acknowledge the designation of these tracts in this BCA as old forest area. As such, they need to specifically acknowledge the need to retain “mature and over-mature trees”, identify old forest features and conditions and include plans to allow these features and conditions to remain and progress into old growth conditions. That was and still is the purpose of the old forest designation for these tracts in the Certification. Without these measures, no logging should occur in these tracts.
- 4) In addition, two other DMRGs for Tracts 38 & 39 that comprise 112 acres adjacent to the southeast corner of the **Back Country Area**, are proposing to harvest 90,110 board feet of trees.

That is 15% of the forests in these acres. The state purchased these tracts in 1996 after they had been logged in 1990-95 so the forests are young and “understocked.” The DOF claims that it will be maintaining these forests in the “fully stocked” range, when actually it is proposing logging that will reduce the stocking in Tract 38 from 67% to 60% and reduce the stocking in Tract 39 from 73% to 66%. Notwithstanding the concerns about the impacts on forest habitat and ecology, this raises a question of whether these tracts are ready to be logged commercially.

- 5) The discussion about **impacts to wildlife is the exact same boiler plate language** in all of 4 these DMRGs. A sole exception is a few sentences about early successional habitat in small failed tree planting areas in Tracts 38 and 39, although that language is identical between those two 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 was completed for this tract. If Rare, Threatened or Endangered species (RTE's) were identified or encountered for this 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 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 some food sources found commonly in Indiana forests are found in these forests, they provide no statement about any wildlife species that actually have been identified in these forest tracts. In their final section, three of the DMRG's state, *“The proposed management activity should have little to no impact on wildlife communities, including the Indiana bat, within or near the tract.”* 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 wildlife and plants in these tracts and identifying any RTE species as well as county records of plants or invertebrates found in these surveys. They must lay out specific plans that will be taken to ensure and monitor the continued survival of such species in these tracts.

- 6) **The potential for major soil erosion from this logging is serious.** The logging will be occurring on ground that is often steep to very steep yet the DMRGS never identify the degrees of slope involved. They do identify as many as six soil types found in these four tracts, and acknowledge that three of them are subject to major erosion hazards or equipment limitations. These include the Gilpin silt loam, found in strongly sloping ground, the Wellston silt loam, found in nearly level to steep uplands, and the Berks-Weikert complex, a soil series found on steep to very steep ground. The discussion in the DMRGs about logging on the Berks-Weikert complex which is found in all four of the tracts is telling:

The erosion hazard, the equipment limitations, seedling mortality, windthrow hazard, and plant competition are concerns in managing the

woods. Locating logging roads, skid trails, and landings on gentle grades and removing water with water bars, culverts, and drop structures help to control erosion. Because of the windthrow hazard, harvest methods should not isolate the remaining trees or leave them widely spaced.

Discussion of logging on the Gilpin and Wellson soils includes most of these words and adds, *“During wet periods, roads tend to be slippery and ruts form easily.”* In addition to not indicating whether some slopes will be avoided altogether, there are no soil maps in the DMRGs indicating where these soils are. These harvest plans need to provide soils maps, and at least identify the range of degrees of slope in these tracts, identify those slopes too steep to log, and commit to Best Management Practices (BMPs) to minimize soil erosion rather than just suggesting them.