

From: Indiana Forest Alliance
615 N. Alabama St Suite A
Indianapolis, IN 46204

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

CC: Governor Holcomb

Date: July 11, 2024

Subject: DRMG Logging Plans for Clark State Forest

Posted July 1, 2024

Clark State Forest:
Compartment 15 Tract 16; (237.58 acres)
Compartment 16 Tract 7; (112 acres)

Dear Division of Forestry,

We appreciate this opportunity to comment on these proposed timber harvests in the Clark State Forest. The Indiana Forest Alliance does not oppose all timber harvests in state forests, but we object to the overall volume of timber authorized for harvest from our state forests and the lack of transparency and accountability for such activities. To begin with, these proposed harvest plans do not indicate whether they have been authorized by the DOF's 2020-2025 Strategic Direction Management Plan for Indiana's state forests. We have attempted to find this Plan on the DOF website to reference in our public comments but could not locate this document. Further, there was too little opportunity for public comment on this Strategic Direction Management Plan. If the goal of harvesting 14 million board feet per year is still the target, it is too high to be considered sustainable.

The Indiana State Forest system consists of approximately 160,000 acres of forest land. Presently and under the previous Strategic Management Plan, these lands are being managed almost entirely (more than 97%) under a timber harvest rotation that subjects nearly all state forest acres to commercial timber harvests. Rather than such harvests, our public forests should be managed primarily to "protect and conserve the timber, water resources, wildlife, and topsoil ... for the equal enjoyment and guaranteed use of future generations," as stated in the enabling statute for Indiana's state forests, IC 14-23-4-1. Therefore, timber harvests on public lands should be undertaken only when and if it can be demonstrated that local market needs cannot be met by harvesting from private lands and the harvest is needed to improve forest health. Thus far the only working definition of forest health IFA has been able to locate is a reference made on the DOF website which reads, "The term "forest health" describes forest conditions relative to human values, needs, expectations and functions." While we appreciate this candid and transparent explanation of forest health, such an anthropocentric viewpoint displays a lack of appreciation for the myriad floral and faunal relationships that maintain forest resilience through time. Forests are dynamic, self-organizing ecosystems that depend upon an incredibly diverse set of relationships that go well beyond just the values, needs and expectations of humans. In the face of climate change and a significant loss to biodiversity, our state forests have far more value in sequestering and storing carbon and providing a home for all native forest dependent, rare, threatened and/or endangered species than they do as sources of timber.

Over the past two decades, the DOF has repeatedly represented to the Forest Stewardship Council (FSC) that 10% of our state forests are to be managed for late seral conditions. Yet, the DOF has never indicated which areas of the state forests have been designated for older forest condition, or which areas are targeted for the development of early succession habitat, and/or regeneration of oak hickory forests, nor why any of these areas were selected.

We continue to support the establishment of management plans for each state forest, and the establishment of specific Wild Areas within each state forest to be managed without timber harvests for late seral conditions and the restoration of secondary old growth forest as recommended in the guidelines for sustainable forestry by the Forest Stewardship Council. Large blocks of interior forest still exist in our state forests, and these should be protected to provide future generations of Hoosiers with secondary old growth forests. In fact, the logging plans for Compartment 16, Tract 7 are located within a portion of the deep forest habitat that IFA has proposed to set aside as one of Indiana's 13 designated State Wild Areas – the Knobstone State Wild Area. Any logging in this tract or others like it will significantly disrupt the ecological attributes of high conservation value it has developed over time. In addition, there are many vital ecosystem services that designated wild areas provide that are paramount to forests with secondary old growth characteristics. For example, these wild areas serve as climate reserves for carbon sequestration, core scientific reference areas, habitat for species that need older forests, and a wilderness experience for recreational users. Prioritizing the conservation of these areas would demonstrate the DOF's commitment to restoring a fully functioning hardwood forest ecosystem within our state forests.

Current state forest timber management does not comply with the enabling statute (Indiana Code 14-23-4-1) because it fails to protect the wildlife and wildlife habitat, topsoil, water resources, recreational uses, and ecosystem services of these forests for future generations. The agency's current approach of managing our state's public forests for oak and hickory timber production is a one-size-fits-all approach that reduces the natural diversity of the mixed mesophytic hardwood forest ecosystem of our region and does not serve the people of Indiana.

The Indiana Forest Alliance would not oppose timber harvests on these tracts, provided the DOF demonstrates that:

- Comprehensive flora and fauna wildlife inventories are conducted on each Compartment and Tract to identify a baseline of rare, threatened, and endangered species that may be present before a logging decision is made. A review of the Natural Heritage Database alone is not sufficient; the Division of Nature Preserves has concurred that a review of the Natural Heritage database is not adequate to determine whether rare, threatened, or endangered species are present on a specific tract. Only onsite surveys by professional forest ecologists or biologists can accomplish this objective.
- Set aside some compartments and tracts (at least 10% of state forest acres as indicated to the FSC), particularly those in previously designated Old Forests, Back Country Areas (BCAs), High Conservation Value Forests (HCVFs), and IFA's proposed State Wild Areas from harvest altogether.
- Logging on steep slopes (exceeding 30 deg.) will be avoided and water quality will be protected by avoiding timber harvests within riparian strips (of at least 100 feet in width, 50 feet on both sides of ephemeral and intermittent streams). Simply referencing Best Management Practices (BMPs) is not enough to ensure that the waters of the state will be protected. The Resource Management Guides (RMGs) do not provide enough

information to know exactly where the harvesting will take place or what measures will be taken to prevent soil erosion and protect water quality.

- The ecosystem services are considered, especially the potential of standing forests to mitigate climate change. Indiana ranks among the top 10 states for carbon emissions per capita and has a responsibility to offset those emissions as much as possible. The Draft Resource Management Guides (DRMGs) should demonstrate the carbon sequestration consequences of the proposed logging activities providing an accounting of forest carbon stocks in the pre-harvest and post-harvest conditions and managing forests on slower rotations.
- Recreational uses are not subverted to the interests of timber buyers. A 200 ft. (100 ft. from the center line in each direction) visual corridor without timbering should be maintained along all major trails.
- Public participation is enhanced by cross-referencing the DRMGs with timber sale documents. Currently it is almost impossible to determine if a harvest was done in accordance with the published RMGs or BMPs.
- Evidence that shows the logging, prescribed burning, and use of herbicides to control invasive plant species in our forests are not in fact accelerating their establishment or creating the conditions which make them thrive. The failure to show past successes in these approaches on state forest land does not support their continued use. It is crucial to start showing documentation which evaluates the efficacy of these management practices over time and then use this data to determine whether these practices should continue especially if they have not shown themselves to be effective at obtaining the desired results.

Suitability of Terrain. These tracts collectively have very steep slopes [69.4 acres with 25 – 75% grades] and moderate to very steep slopes [102.3 acres with 20 – 60% grades] which will pose significant erosion hazards if logged. The Indiana State Forest Procedure Manual (Section G: Timber Sales, p. 37) recommends avoiding logging on slopes greater than 30 degrees, or 58% grade. This sale notice does not confirm that logging will be prohibited on the portions of these tracts which have a steeper than 58% grade. BMPs are highly unlikely to prevent significant erosion and sediment runoff will likely occur in the intermittent streams which flow into Deam Lake and the Muddy Fork watershed. The entire western edge of the proposed Knobstone State Wild Area (Compartment 16, Tract 7) is susceptible to erosion from logging on steep terrain that has several drainages which terminate in the intermittent stream of Dry Fork. The DOF must not allow logging on slopes at or greater than 30 degrees here or anywhere else in our State Forests.

Water Quality. Using heavy equipment and removing tree cover on steep slopes with low organic matter is a formula for creating soil erosion and polluted runoff into nearby waterways. Both tracts are within the Muddy Fork watershed. Compartment 15 Tract 16 drains to Stone Branch and additional intermittent streams that flow to Deam Lake, then on to Big Run, and eventually to the Muddy Fork. Does the Deam Lake and both branches of the Muddy Fork meet water quality standards for sediment and dissolved oxygen? Logging in these tracts is likely to increase sediment and reduce dissolved oxygen. The DOF should monitor water quality downstream of the Stone Branch and at Deam Lake before, during and immediately after the harvests to ensure that sediment, nutrient, and turbidity levels do not exceed baseline levels prior to logging. And the DOF should enforce corrective actions at these tracts if baseline levels are exceeded.

Local Market Conditions. Please explain how the removal of this timber will “provide local markets with a further source of building material” as required by statute.

Forest Health. Forest health should not be defined by economic productivity, but by ecological complexity and ecosystem services. Please describe the ecological complexity and ecosystem services provided by standing forests in these tracts, especially the carbon sequestration potential. Understanding carbon sequestration is stated as one of the goals of the State Forest Strategic Direction Management Plan. What are the carbon stocks (in metric tons per acre) presently in these tracts and what is the carbon sequestration potential of these tracts in the logged versus unlogged conditions? These should be delineated and estimated to inform decisions in these harvest plans. Diseases and pests should be specifically identified within these tracts that pose a significant threat to forest health and the DOF should explain how those pests and diseases will not abate (e.g. from natural thinning or mortality from old trees) without activities proposed in the harvest plan.

Prescription. The harvest prescriptions describe a range of options e.g. single tree selection, oak shelterwood, regeneration opening, small group selection, or Timber Stand Improvement (TSI), but do not actually inform the public about what treatments will be used where. The Division should provide a more precise map showing where different management practices will be applied. The DOF should also provide estimates of how many trees will be removed before or after the timber harvest during the “oak shelterwood” and “regeneration opening” phases of the harvest management project.

The DOF’s forest inventory of these tracts has identified a total of 2,276 sawtimber quality species of native Virginia Pine, amounting to over 307,000 board feet. Virginia Pine is the only pine native to Indiana, and only grows naturally in the Clark State Forest. The DOF must adhere to its own Silvicultural Guidelines and manage the Virginia Pine at Clark State Forest to “maintain its presence and sustainability.” Virginia Pine on the steep knobby hills of these tracts must not be logged due to the sensitive soils and slopes. Special care must be taken to ensure the longevity of our only native Virginia Pine stands.

Invasive species are one of the biggest threats to forest health. But the description of how non-native invasive species will be managed is very general and takes the form of a suggestion rather than a prescription. Please prioritize eradication of invasive species before any timber harvest is undertaken. Provide details about how and when invasive species will be controlled. Logging and prescribed burning often introduce invasive species and exacerbate their spread, as evidenced by the introduction and rapid spread of Japanese stilt grass. According to research, deciduous forests that undergo repeated fire treatments are more vulnerable to the takeover of non-native invasive species due to less leaf litter, less fine woody debris, and from increased fire intensity. The harvest plans should explain how the DOF will prevent these problems. The plans should also explain how runoff and herbicide drift that are potentially harmful to biota and human health will be avoided. The DOF should tell the public what “will” be done instead of what “could” or “should” be done to control non-native invasive species.

Wildlife. No pre-harvest wildlife inventory has been done on these tracts. How will the Division of Forestry be able to protect rare, threatened, or endangered species if no wildlife inventory has been done? Endangered or proposed endangered mammals including Indiana Northern Long-Eared and Tri-colored bats are likely to be present, and utilizing features that will be targeted for removal by the harvest operation such as snags or older, declining trees with cavities, exfoliating bark, and/or additional deadwood. How will the Division of Forestry protect these species and other endangered species that may be present? A review of the Natural Heritage Database is not sufficient. While the Natural Heritage database is a wonderful tool, it is not a substitute for a site-specific taxonomic inventory and does not present an understanding of

the functional groups of endemic flora and fauna that are prevalent in the harvest areas. It is indicated that these Compartments and Tracts feature roost trees and snags that meet or exceed the recommended maintenance levels and are great for wildlife habitat. The harvest plans should explain how the proposed logging activities will ensure the legacy and standing dead trees will be maintained.

Recreational Use: According to these harvest plans, both Tracts contain horseback riding trails (Deam Lake Loop, Lane Loop, and Dry Fork Loop) as the main form of recreation in addition to hiking, foraging, fishing and hunting. While Indiana has great natural beauty, the amount that is available to the public for outdoor recreation is very limited. Due to the DOF's overly aggressive management of our state forests, many of the forests that recreational users encounter has been recently logged, while many other areas are off limits due to ongoing logging. To truly provide meaningful recreation opportunities for Hoosiers, the DOF must not log or actively manage areas of high recreational value. Wild nature is not something we can construct or build; it is something we must protect to enjoy and enhance our quality of life. These harvest plans contain no mention of the recreational value of these forests or how this value will be maintained. The harvest plans need to address public safety and the true recreational value these forests mean to the Hoosiers that use them, not ignore the immense value that the natural beauty of the area in its unlogged condition provides to the public.

If early successional habitat is desired, it should be created on areas that are adjacent to state forests, thereby expanding the state forest base. This would enable the DOF to allow for late successional habitat and secondary old growth forests in our existing state forest base for future generations.

Given the high value of the interior forest habitat in these tracts for rare, threatened and endangered bats, small mammals, forest songbirds, reptiles, amphibians, and other species, the DOF should also outline measures that will be taken to avoid the illegal take (killing) of federal and state endangered species and any harm to rare species resulting from logging, Timber Stand Improvement (TSI), prescribed fire, and additional management activities in these harvest plans.

The DOF should ensure that each state forest property will have some old growth forests for future generations to enjoy by creating Wild Areas or High Conservation Value Forest Areas that will be permanently managed for old growth conditions without human disturbance.

Addressing these concerns would help demonstrate compliance with the DOF's enabling statute.

Thank you for this opportunity to comment on the amended Draft Resource Management Guides for Compartment 15 Tract 16, and Compartment 16 Tract 7 of the Clark State Forest.

Respectfully,

Dex Conaway

State Forest Director

Indiana Forest Alliance

From: Indiana Forest Alliance
615 N. Alabama St Suite A
Indianapolis, IN 46204

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

CC: Governor Holcomb

Date: July 17, 2024

Subject: DRMG Logging Plans for Pike State Forest

Posted July 1, 2024

Pike State Forest:
Compartment 12 Tract 7; Central Portion of Tract (65 acres)

Dear Division of Forestry,

We appreciate this opportunity to comment on these proposed timber harvests in the Pike State Forest. The Indiana Forest Alliance (IFA) does not oppose all timber harvests in state forests, but we object to the overall volume of timber authorized for harvest from our state forests and the lack of transparency and accountability for such activities. However, IFA strongly disagrees with the plan to extensively log in one of the best and last riparian bottomland hardwood forests in the entire state forest system of Indiana. The rich quality of the land, water and the sustained life of numerous state and/or federally endangered bats, birds, reptiles and amphibians that rely on bottomland hardwood forests are at grave risk of being depleted or eradicated entirely if the DOF is permitted to follow through with their substantial commercial timber harvest plans for this area. Further, this proposed harvest plan does not indicate whether it has been authorized by the DOF's 2020-2025 Strategic Direction Management Plan for Indiana's state forests. We have attempted to find this Plan on the DOF website to reference in our public comments but could not locate this document. Finally, there was too little opportunity for public comment on this Strategic Direction Management Plan. If the goal of harvesting 14 million board feet per year is still the target, it is too high to be considered sustainable.

The Indiana State Forest system consists of approximately 160,000 acres of forest land. Presently and under the previous Strategic Management Plan, these lands are being managed almost entirely (more than 97%) under a timber harvest rotation that subjects nearly all state forest acres to commercial timber harvests. Rather than such harvests, our public forests should be managed primarily to "protect and conserve the timber, water resources, wildlife, and topsoil ... for the equal enjoyment and guaranteed use of future generations," as stated in the enabling statute for Indiana's state forests, IC 14-23-4-1. Therefore, timber harvests on public lands should be undertaken only when and if it can be demonstrated that local market needs cannot be met by harvesting from private lands and the harvest is needed to improve forest health. Thus far the only working definition of forest health IFA has been able to locate is a reference made on the DOF website which reads, "The term "forest health" describes forest conditions relative to human values, needs, expectations and functions." While we appreciate this candid and transparent explanation of forest health, such an anthropocentric viewpoint displays a lack of appreciation for the myriad floral and faunal relationships that maintain forest resilience through time. Forests are dynamic, self-organizing ecosystems that depend upon an incredibly diverse set of relationships that go well beyond just the values, needs and expectations of

humans. In the face of climate change and a significant loss to biodiversity, our state forests have far more value in sequestering and storing carbon and providing a home for all native forest dependent, rare, threatened and/or endangered species than they do as sources of timber.

Over the past two decades, the DOF has repeatedly represented to the Forest Stewardship Council (FSC) that 10% of our state forests are to be managed for late seral conditions. Yet, the DOF has never indicated which areas of the state forests have been designated for older forest condition, or which areas are targeted for the development of early succession habitat, and/or regeneration of oak hickory forests, nor why any of these areas were selected.

We continue to support the establishment of management plans for each state forest, and the establishment of specific Wild Areas within each state forest to be managed without timber harvests for late seral conditions and the restoration of secondary old growth forest as recommended in the guidelines for sustainable forestry by the Forest Stewardship Council. Large blocks of interior forest still exist in our state forests, and these should be protected to provide future generations of Hoosiers with secondary old growth forests. These areas would serve as climate reserves for carbon sequestration, and would also provide core scientific reference areas, habitat for species that need older forest, and a wilderness experience for recreational users. Prioritizing the conservation of these areas would demonstrate the DOF's commitment to restoring a fully functioning hardwood forest ecosystem within our state forests.

Current state forest timber management does not comply with the enabling statute (Indiana Code 14-23-4-1) because it fails to protect the wildlife and wildlife habitat, topsoil, water resources, recreational uses, and ecosystem services of these forests for future generations. The agency's current approach of managing our state's public forests for oak and hickory timber production is a one-size-fits-all approach that reduces the natural diversity of the mixed mesophytic hardwood forest ecosystem of our region and does not serve the people of Indiana.

The Indiana Forest Alliance would not oppose timber harvests on these tracts, provided the DOF demonstrates that:

- Comprehensive flora and fauna wildlife inventories are conducted on each Compartment and Tract to identify a baseline of rare, threatened, and endangered species that may be present before a logging decision is made. A review of the Natural Heritage Database alone is not sufficient; the Division of Nature Preserves has concurred that a review of the Natural Heritage database is not adequate to determine whether rare, threatened, or endangered species are present on a specific tract. Only onsite surveys by professional forest ecologists or biologists can accomplish this objective.
- Set aside some compartments and tracts (at least 10% of state forest acres as indicated to the FSC), particularly those in previously designated Old Forests, Back Country Areas (BCAs), High Conservation Value Forests (HCVFs), and IFA's proposed State Wild Areas from harvest altogether.
- Logging on steep slopes (exceeding 30 deg.) will be avoided and water quality will be protected by avoiding timber harvests within riparian strips (of at least 100 feet in width, 50 feet on both sides of ephemeral and intermittent streams). Simply referencing Best Management Practices (BMPs) is not enough to ensure that the waters of the state will be protected. The Resource Management Guides (RMGs) do not provide enough information to know exactly where the harvesting will take place or what measures will be taken to prevent soil erosion and protect water quality.

- The ecosystem services are considered, especially the potential of standing forests to mitigate climate change. Indiana ranks among the top 10 states for carbon emissions per capita and has a responsibility to offset those emissions as much as possible. The Draft Resource Management Guides (DRMGs) should demonstrate the carbon sequestration consequences of the proposed logging activities providing an accounting of forest carbon stocks in the pre-harvest and post-harvest conditions and managing forests on slower rotations.
- Recreational uses are not subverted to the interests of timber buyers. A 200 ft. (100 ft. from the center line in each direction) visual corridor without timbering should be maintained along all major trails.
- Public participation is enhanced by cross-referencing the DRMGs with timber sale documents. Currently it is almost impossible to determine if a harvest was done in accordance with the published RMGs or BMPs.
- Evidence that shows the logging, prescribed burning, and use of herbicides to control invasive plant species in our forests are not in fact accelerating their establishment or creating the conditions which make them thrive. The failure to show past successes in these approaches on state forest land does not support their continued use. It is crucial to start showing documentation which evaluates the efficacy of these management practices over time and then use this data to determine whether these practices should continue especially if they have not shown themselves to be effective at obtaining the desired results.

Suitability of Terrain. A majority of this 130-acre tract (Compartment 12, Tract 7) is flat bottomland with “deep, poorly drained” silty alluvial soils with very limited accessibility. The DOF does not currently have Best Management Practices (BMPs) or procedures in place that can mitigate the destruction of saturated soil or prevent severe rutting caused by the heavy timber equipment during harvest events. The dense native shrub and herbaceous plant layers dominating this tract cannot withstand such a disturbance caused by logging. It would take decades to recover from such activity leaving the highly disturbed areas susceptible to invasive plant species.

Water Quality. Runoff water from this tract drains to the Patoka River and flows to the river during heavy rain. Logging in the northern and eastern end of this tract will cause excessive amounts of sediment to pollute the Patoka River. The DoF must monitor water quality on the Patoka River upstream and downstream of the logging operations before, during and after the harvests to ensure that sediment, nutrient, and turbidity levels do not exceed baseline levels prior to logging.

Local Market Conditions. Please explain how the removal of this timber will “provide local markets with a further source of building material” as required by statute.

Forest Health. Forest health should not be defined by economic productivity, but by ecological complexity and ecosystem services. Please describe the ecological complexity and ecosystem services provided by standing forests in this Tract, especially the carbon sequestration potential. Understanding carbon sequestration is stated as one of the goals of the State Forest Strategic Direction Management Plan. What are the carbon stocks (in metric tons per acre) presently in these tracts and what is the carbon sequestration potential of this Tract in the logged versus unlogged conditions? These should be delineated and estimated to inform decisions in the harvest plans. Diseases and pests should be specifically identified within this Tract that pose a significant threat to forest health and the DOF should explain how those pests and diseases will

not abate (e.g. from natural thinning or mortality from old trees) without activities proposed in the harvest plan.

Prescription. The harvest prescriptions describe a range of options e.g. single tree selection, regeneration opening, small group selection, or Timber Stand Improvement (TSI), but do not actually inform the public about what treatments will be used where. The Division should provide a more precise map showing where different management practices will be applied. The DOF should also provide estimates of how many trees will be removed before or after the timber harvest during the “small group selection” and “timber stand improvement” phases of the harvest management project.

Invasive species are one of the biggest threats to forest health. But the description of how non-native invasive species such as Japanese stiltgrass, Phragmites, winter creeper, multi-flora rose, and many others will be managed is very general and takes the form of a suggestion rather than a prescription. Please prioritize eradication of invasive species before any timber harvest is undertaken. Provide details about how and when invasive species will be controlled. Logging often introduces invasive species and exacerbate their spread, as evidenced by the introduction and rapid spread of Japanese stilt grass in the area. The harvest plan should explain how the DOF will prevent these problems. The plans should also explain how runoff and herbicide drift that are potentially harmful to biota and human health will be avoided. The DOF should tell the public what “will” be done instead of what “could” or “should” be done to control non-native invasive species.

Wildlife. The rare condition and remote location of this floodplain forest nestled deeply in the Patoka River watershed would best serve the public and native wildlife as a State Nature Preserve or High Conservation Value Forest (HCVF) due to its unique landscape level characteristics not seen anywhere else in our state.

In the summer of 2023, Indiana Forest Alliance and Orbis Environmental Consulting worked together to conduct acoustic and mist-net surveys in the same bottomland forest immediately north of this tract to determine the presence of threatened and endangered bat species. Numerous Indiana bats, northern long-eared bats, tricolored bats, little brown bats and at least one federally endangered gray bat were recorded. A total of 37 bats were captured in mist nets, two of which were immature tricolored bats which the US Dept. of Fish and Wildlife has proposed to join the endangered species list and two were state endangered evening bats. The presence of immature tricolored bats indicates their maternity roost is not far from where they were caught. To follow federal endangered bat guidelines for states like Indiana which lack a habitat conservation plan, no logging must occur during the maternity roosting season (between April 15 to October 15) when endangered bats have been captured in the area. Special attention must be taken to identify bat roosting trees in this tract and prevent them from being logged to maintain these maternity roosts on which the populations of these bat species depend. There is no indication in the harvest plan that the DOF intends to follow these guidelines.

In addition to these bat species, other rare, threatened and endangered species also occupy this type of riparian forest habitat including the state endangered Yellow & Black Crowned Night Herons, American Bittern, Prothonotary Warbler and the federally endangered Copper Belly Water Snake. The DOF must definitively determine whether any of these wetland-dependent species are present in this tract before authorizing logging anywhere in the bottomland forest.

If early successional habitat is desired, it should be created on areas that are adjacent to state forests, thereby expanding the state forest base. This would enable the DOF to create late successional habitat and old growth forests for future generations.

The DOF should outline measures that will be taken to avoid the illegal take (killing) of federal and state endangered species and any harm to rare species resulting from logging, Timber Stand Improvement (TSI), and additional activities in the harvest plan.

The DOF should ensure that each state forest property will have some old growth forests for future generations to enjoy by creating Wild Areas or High Conservation Value Forest Areas that will be permanently managed for old growth conditions without human disturbance.

Addressing these concerns would help demonstrate compliance with the DOF's enabling statute.

Thank you for this opportunity to comment on the Draft Resource Management Guide for Compartment 12 Tract 7 in the Pike State Forest.

Respectfully,

Dex Conaway

State Forest Director

Indiana Forest Alliance