Indiana Department of Natural Resources
Division of Forestry
State Forest Resource Management Guide Public Comment Summary

carbon sequestration. Suggests DoF put in place evaluation standards

## <u>Jackson Washington State Forest</u> <u>Compartment 10 Tract 31</u> <u>30 Day Comment Period Ending: 1/3/2014</u> <u>Comments Received: 2</u>

The table below is a summary of public comments received concerning the draft Resource Management Guide (DRMG). The public comments received have been reviewed in their entirety and given due consideration summarized in the Division of Forestry response below.

## **Division of Forestry Response Comment Summary** While the State Forest managed timber sales provide Concern on economics and impacts to recreation, wildlife habitat and important contributions to the State economy and support climate change. many Division of Forestry programs, including recreation, Proposes tract to grow for another management cycle in order to private landowner assistance, conservation education and help stabilize and replenish the depleted soils others, the resource management decisions are guided by Concern on potential for soil erosion and stream sedimentation and science and the principles of forestry and forest sustainability. the effective implementation of BMPs Best management practices will be implemented and Questions need of prescribed management to achieve desired results. monitored to address the soil erosion and sedimentation Questions value of actively managing for oak species. concerns. BMPs will be required of operator and included in Concerned about utilitarian terminology used to describe trees and timber sales contracts. DoF will respond to reported BMP forest conditions and that full range of values are not considered. departures. BMP guidance can be found at: Concern about utilitarian (tree farm) management philosophy. http://www.in.gov/dnr/forestry/files/fo-Concern of potential impact to wildlife habitats, and potentially to 2005 Forestry BMP Field Guide.pdf endangered/threatened species. Recommends comprehensive inventory of birds and wildlife be conducted before plan State Forest operations adhere to a comprehensive set of implementation. forest certification standards (FSC & SFI) to insure long Objects to harvest and utilization of Ash trees ahead of Emerald Ash term forest sustainability. Operations are subject to 'third party' audits to insure compliance to these standards. Borer infestations. Concern that removals will eliminate potentially www.in.gov/dnr/forestry/7532.htm resistant trees and not slow the spread of EAB. Opposes commercial harvesting in this tract and potential The RMG uses forest terminology which integrates many considerations including biological, human utility and backcountry area impacts. more. The scope of considerations are not always fully Concern on potential spread of invasive species as result of portrayed by the terminology. management activity. Concerned about the removal of wild grapevine Habitats, communities and wildlife species are considered as from the tract. part of the management planning process. Along with field Concern RMG does not address impacts on climate change and

observations, Natural heritage data has been reviewed to

to consider the cumulative impacts of all state and federal forest management projects across the state.

check for threatened or endangered bird and wildlife species on or near the management unit. Grapevine control measures specifically call for retention of a vine component.

Further information on direct and indirect impacts on species and habitats are found in the Indiana State Forest

http://www.in.gov/dnr/forestry/files/fo-StateForests EA.pdf

- The importance of Oak sp. is well documented. While oak and hickory species may be present in the understory and regeneration layers they will require sunlight to survive, grow and remain in the stand.
- Where applicable, resource management will follow backcountry guidelines.

Environmental Assessment.

- EAB is widespread throughout Indiana, including the counties surrounding the State Forest.
   http://www.in.gov/dnr/entomolo/5349.htm
   . Recruiting ash regeneration is an expected and desired outcome of the prescribed treatment. While the prescription will remove many infected Ash trees it will not and is unable to remove all infested Ash trees.
- Invasive species presence, management and control are incorporated in the RMG.
- Assessing climate change and carbon sequestration is beyond the scope of tract level RMGs.
- The prescribed management activities are consistent with silvicultural principles, promotes habitat diversity and supported by inventory data and field assessments. The concerns expressed have been considered and may be further addressed during plan implementation.