

Jackson Washington State Forest **Public Comment Review: 11/12/2018**

Compartment 10 Tracts 8, 9, 38, 39 **25 Comments Received; 16 respondents**

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.

Comment Summary	Division of Forestry Response
<ul style="list-style-type: none"> • General statements opposing the harvest prescription within the DRMG citing concerns of potential impacts to aesthetics, plants, animals, habitat diversity, recreation and ecological services. • General statement supporting the DRMG, including the outlined harvest recommendations. • Comments supporting prescribed management to provide habitat diversity, including needed early to mid-seral habitat for wildlife and RTE species requiring this habitat. • Concern about harvests in general that may occur in the backcountry areas of tract 8 & 9. Suggests the proposed logging be reduced in scope or avoided to conserve the primitive, older forest qualities. • Concern on how the prescribed harvest in tracts 8 & 9 will impact the Knobstone Trail in terms of aesthetics, soil stability, way finding. Encourages minimal disruptions, rerouting or closing of the trail. • General statement of concern about old growth forests and encourages retention of those structural elements as well as allowing some areas of the state forest to become old growth. • Priority should be given to recreation use, forest diversity, long term sustainability and protection of landscapes. • Concern on potential introduction and spread of invasive species as a result of management activities. 	<ul style="list-style-type: none"> • Comment period clarification: The public comment period for web posted Resource Management Guides begins the day of posting and runs for the following 30 days. • Compartment and Tract boundaries can be found at: http://www.in.gov/dnr/forestry/3635.htm The INdianaMap.org site contains a managed lands layer indicating property boundaries, but not management units which are subject to periodic change. • Habitats, communities and species are considered as part of the management planning process. Along with field observations, Natural heritage data has been reviewed to check for threatened or endangered bird and wildlife species on or near the management unit. Detailed flora, fauna and landscape level habitat inventories are beyond the scope of tract level management guides. Further information on direct and indirect impacts on species and habitats are found in the Indiana State Forest Environmental Assessment. http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf • Implementation of the RMG will utilize guidance from the US Fish and Wildlife Service and other sources to avoid take impacts to the Indiana bat and other listed species. • No old growth forests are found in the tracts covered by the DRMG. However, there are currently approximately 3,500 acres of state forest land set aside as long term preserves and development as old growth forest. • The prescribed management within tracts 8 & 9 is consistent with long

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

- Concern on Ash resiliency and spread of EAB. Recommends retaining healthy ash that has survived EAB.
- Encourages and supports the retention of dead and dying trees for ecological benefits. Would like more information exhibited on snag density projections before and after proposed management activities.
- Concern and potential impacts to soil and water resources and the effective implementation of BMPs, specific mention of steep slopes. Suggests more information be provided about BMPs, soil types and grades.
- Would like more detail about areas to be treated with group selection versus single tree selection. And, impact of deer browse on hardwood regeneration success.
- Concern on potential presence of, or adverse impact to RTE species, including Indiana bat.
- Proposes comprehensive plant and wildlife inventories be conducted to assess potential impacts to RTE species. Would like more information on species and potential impacts.
- Questions need for a forest harvest and timber market conditions, and sustainability of State Forest harvest levels.
- Would like RMG to include more information on harvest layout, access system and cost.
- Concern on potential impacts to public road systems and load limits.
- Concern on air quality, climate change and carbon sequestration and how the proposed management affects rate of carbon sequestration.
- Suggests DOF provide the exact deadline for public comments.
- Suggests compartment and tract shapefiles be available via INdianaMap.org

- established backcountry area guidelines. Harvest levels will be scaled back from what they would be in similar non-backcountry areas. Harvests will be limited to single tree selection and retain a greater component of large diameter trees.
- Recreational use of much of the area is primarily hunting and foraging. Those uses will continue, however access may be limited during management activity periods for safety.
 - The Knobstone trail transects or skirts tracts 8 & 9. Some trail sections utilize the well-established forest management access system which predates the trail on Jackson Washington State Forest. These access routes will see increased traffic during management operations, but may remain open. Harvesting along trail routes will be restricted to light thinning. Trail closures will be minimized as safety allows.
 - Snags and habitat (legacy) trees are considered at the tract and compartment level. The prescribed management supports habitat and structural diversity and the associated abundance targets across the landscape.
 - Best management practices, including slope and trail considerations, will be implemented and monitored to address the soil erosion, sedimentation and water quality concerns. BMPs will be required of operator and included in timber sales contracts. DoF will respond to reported BMP departures. BMP guidance can be found at: http://www.in.gov/dnr/forestry/files/fo-2005_Forestry_BMP_Field_Guide.pdf
 - Assessment of public road conditions are outside the scope of tract level management guides. Road weight limits are enforced by State and local authorities.
 - Indiana State Forests contain approximately 1.15 billion board feet of timber. Managed harvest levels on State Forests are set at a level to insure long term sustainability. These levels are periodically reviewed as new inventory data is collected. Growth on this tract are expected to meet or exceed harvest levels over time. Timber markets remain positive at time of this review. See

	<p>http://www.in.gov/dnr/forestry/files/fo-State_Forest_CFI_Report_2010_2014.pdf</p> <ul style="list-style-type: none">• Invasive species presence and control needs are incorporated in the management guide. The species noted are widespread in the County.• EAB is now found throughout Indiana and widespread across Indiana's forests. While the prescription will remove some affected Ash trees it will not slow the spread of EAB, nor is it able to remove all affected Ash. Recruiting Ash regeneration is an expected and desired outcome of group selection silviculture in specified tracts. Conservation of healthy ash found after the EAB killing wave will be incorporated into the plan implementation.• Group selection silviculture is limited to tracts 38 & 39 and is expected on less than 10% of those management units. Regeneration is expected to include a broad mix of native hardwood species. Deer herbivory does impact forest regeneration to some degree. However, with the active hunting and rapid, dense regrowth response found on State Forest lands regeneration of mixed hardwoods is expected to exceed target levels of 1,000 seedlings per acre.• Assessing climate change and carbon sequestration is beyond the scope of tract level RMGs.• An overview of tract soil types can be found in the DRMG, including steepness rating. Further information is available at https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx• State Forest management is guided by science and implementation of sound silvicultural principles to insure long term forest health and sustainability. State Forest management adheres to legal mandates and voluntary compliance to comprehensive forest certification standards.• 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.
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