

**Jackson Washington State Forest**      **Public Comment Review: 2/10/2019**

**Compartment and Tracts: C11T11, C8T2, C9T10, C3T14, C3T24, C2T2**      **Comments Received: 4**

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"> <li>• General statements opposing the harvest prescription portions of the DRMG citing concerns of potential impacts to aesthetics, plants, animals, habitat diversity, recreation and ecological services.</li> <li>• Prefers no timber harvesting be done on State Forests. Competes with private timber.</li> <li>• Concern on how the prescribed harvest will impact recreation trails. Suggests no harvest buffers along trails. Encourages minimal disruptions, rerouting or closing of the trails.</li> <li>• Suggests areas be conserved for old forests, natural habitat and high conservation values. Compartment 9 Tract 10 of particular interest to one commenter.</li> <li>• Concern on potential introduction, spread and control costs of invasive species as a result of management activities.</li> <li>• Encourages and supports the retention of dead and dying trees for ecological benefits.</li> <li>• Concern and potential impacts to soil and water resources and the effective implementation of BMPs, specific mention of steep slopes and potential karst features.</li> <li>• Concern on potential presence of, or adverse impact to RTE species, including Indiana bat.</li> <li>• Proposes wildlife inventories be conducted to assess potential impacts.</li> <li>• Questions the ecological importance of oak-hickory forests.</li> <li>• Questions need for a forest harvest, timber market conditions, fair pricing</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Compartment and Tract boundaries can be found at: <a href="http://www.in.gov/dnr/forestry/3635.htm">http://www.in.gov/dnr/forestry/3635.htm</a> The INdianaMap.org site contains a managed lands layer indicating property boundaries, but not management units which are subject to periodic change.</li> <li>• 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. <a href="http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf">http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf</a></li> <li>• Implementation of the RMG will utilize guidance from the US Fish and Wildlife Service and other sources to avoid take</li> </ul>

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and sustainability of State Forest harvest levels.

- Would like DRMG to include more information on harvest layout, access system and cost of DRMG prescribed activities.
- 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

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. Information on State Forest protected areas and HCVFs can be found at: [www.in.gov/dnr/forestry/files/fo-HighConservationValueForests.pdf](http://www.in.gov/dnr/forestry/files/fo-HighConservationValueForests.pdf)
- 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. Harvesting along trail routes will consider trail and user impacts. Trail closures will be minimized as safety allows.
- Snags and habitat (legacy) trees are considered at the tract and compartment level. The prescribed management includes snag recruitment strategies and supports habitat and structural diversity 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](http://www.in.gov/dnr/forestry/files/fo-2005_Forestry_BMP_Field_Guide.pdf)
- 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

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	<p><a href="http://www.in.gov/dnr/forestry/files/fo-State_Forest_CFI_Report_2010_2014.pdf">http://www.in.gov/dnr/forestry/files/fo-State_Forest_CFI_Report_2010_2014.pdf</a></p> <ul style="list-style-type: none"><li>• Invasive species presence and control needs are incorporated in the management guide. The species noted are widespread in the County.</li><li>• Cost accounting and assessing climate change and carbon sequestration is beyond the scope of tract level DRMGs.</li><li>• 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.</li><li>• 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.</li></ul>
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