

September 1, 2017

These comments are submitted on behalf of Heartwood and the Sierra Club Hoosier Chapter (SCHC) in response to the Draft Resource Management Guide (DRMG) for Yellowwood State Forest Compartment 13, Tract 3.

Heartwood is a grassroots forest protection network that represents individual members and member groups across 17 states in the central and eastern hardwood region of the United States. Heartwood works to protect and restore native hardwood ecosystems in the central and eastern U.S. through advocacy, education, and community empowerment. SCHC has more than 10,000 members across Indiana and works to protect the wild places of the Earth and to protect and restore the quality of the natural and human environment.

Heartwood and SCHC strongly oppose the commercial timber harvest proposed for this tract. In this DRMG, the Division of Forestry (DOF) failed to adequately assess this tract's ecological characteristics, including even a cursory inventory of flora and fauna present. Nowhere does the DRMG list the current basal area or how many trees per acre there are in this tract, nor does it mention what these numbers would be following the proposed harvest. The same is true for the number of Legacy trees and standing snags present in the tract. Further, the DOF provided no details about the potential size and scope of the proposed timber sale, neglecting to include even a proposed volume of the harvest or a species-specific breakdown of how much of each species they intend to remove. This information has been made available in past DRMGs; without it, the public is unable to understand details of the proposal that are necessary in making informed public comment. By failing to provide any of these essential details, the DOF is allowing itself such a large range of actions that is much too broad for the public to possibly comment on all of the possible options. With such critical information missing from the DRMG, we can only assume that the DOF did not do an adequate enough inventory of this tract to justify its proposed course of action.

Without a thorough inventory of flora and fauna, it is impossible to predict the full impacts of the proposed commercial timber sale. Listing which plants and animals are characteristic to certain forest types is not a proper substitute for thoroughly inventorying species actually present in the tract. Such surveys are necessary in order to identify the rare, threatened, and endangered species whose populations would be disproportionately impacted by habitat disruption and destruction. The Natural Heritage Database is updated far too infrequently to be reliable. This tract is unique in that it is remote, relatively undisturbed, and mostly surrounded by dense forests. Large blocks of intact closed canopy forests with minimal disturbance are uncommon in Indiana, especially on state forestland, due to an unprecedented rate of logging that has occurred since 2005. Therefore, this tract provides excellent habitat for species that rely on closed canopy, interior forests for habitat and successful reproduction, including

many rare, threatened, and endangered species. The proposed timber sale would attract more generalist and predatory species to the tract, further reducing areas where interior specialist species can survive. It is important for the DOF to maintain large, intact blocks of closed canopy forests throughout its properties to serve as biological reserves. The designated nature preserves in state forests are too small to provide sufficient space and interior forest characteristics to suffice for this purpose.

The DRMG addresses neither the impacts of climate change on this tract, nor this forest's potential for carbon sequestration and climate mitigation. Researchers have determined that not only do mature forests serve as carbon sinks, but they also sequester carbon from the atmosphere at a faster rate than young forests. Research conducted as part of the Indiana Carbon Cycle project in nearby Morgan-Monroe State Forest found the same conclusion. The US Forest Service is required to consider the cumulative impacts of each of their projects on climate change, and the DOF should do the same.

The silvicultural prescription for this tract recommends salvaging wind thrown oaks as well as ash trees affected by the emerald ash borer, stating that the ash trees must be "utilized" before they die and decay. Dead, dying, and down trees are already "utilized" by several species of insects, birds, fungi, mammals, and other wildlife where they are in the forest. In fact, this DRMG says as much earlier in the document: "Downed woody debris provides habitat for many species and contributes to healthy soils." The wind thrown oaks create the sort of openings conducive to oak and hickory regeneration that the DOF tries to replicate in its timber sales, but without the negative side effects of inevitable erosion and soil runoff, introduction and spread of nonnative invasive species, soil compaction, and aesthetical degradation. This tract could serve as an important control unit in which the DOF can observe oak and hickory regeneration rates through natural forest succession, of which disease and wind damage are an integral part, and compare the results to the more heavily managed tracts that make up the majority of the state forest system.

This tract is designated as part of the Morgan-Monroe/Yellowwood Back Country Area (BCA). In the July 1981 press release announcing the designation, users were urged to "exercise a great deal of caution to not disturb the natural habitat," of the area, which was created to provide a "primitive-type experience" for visitors. While timber management is not prohibited, the release states unequivocally, "The management of timber resources in the Back Country will be compatible with all other uses permitted." Although the DRMG for this tract is remarkably vague, as we have noted, past timber sales in this and other BCAs have been incompatible with this directive.

This tract is also part of the survey area for the Ecoblitz, a multi-year project led by the Indiana Forest Alliance (IFA) that seeks to compile an exhaustive inventory of flora and fauna in a 900-acre section of this BCA. (IFA is a

Heartwood member group.) Scientists from universities across the state and the private sector have teamed up to identify thousands of species across many taxa, including some that have never before been documented in Indiana. As these scientists have noted, many of these species require the sort of closed canopy, undisturbed interior forest that characterizes this tract for habitat and successful reproduction. (<https://indianaforestalliance.org/ecoblitz/>) The DOF has issued permits for the Ecoblitz project and has received annual reports of its findings. The DRMG for this tract was drafted before the Ecoblitz project began in 2014. Before any timber management activities or any other management that would alter the habitat in this tract be implemented, the DOF should revise this DRMG to include the publicly available data collected during the Ecoblitz. To ignore that data and move forward with the proposed commercial timber sale would demonstrate a blatant and irresponsible disregard for any science that does not support the DOF's commercial logging policy.

What makes this tract and the adjacent tracts exceptional are their maturity, wildness, and the exceptional closed canopy, interior forest habitat they provide. In this DRMG, the DOF completely fails to justify its plans to destroy what makes this tract so ecologically significant. If the DOF were to move forward with the silvicultural prescription described in the DRMG, it would be due to its economical and political agenda and not any ecological rationale.

Sincerely,

Myke Luurtsema
Heartwood Council Chair

Bowden Quinn
Director, Sierra Club Hoosier Chapter