

Statewide Forest Assessment & Strategy

Draft Strategy Review

Indiana Forest Stakeholders submitted input, suggestions and comments on the 2010 Draft Statewide Forest Strategy during a two week public comment period that ended on June 11, 2010. This input was taken into consideration by the Statewide Forest Assessment and Strategy Steering Committee and resulted in additions to the document and changes to the Strategies and Action Steps. A revised and updated version of the Statewide Forest Strategy is available at:

<http://www.in.gov/dnr/forestry/5436.htm>

The draft strategy review was a part of a two year, stakeholder driven process to derive a Statewide Forest Assessment that highlights the status of Indiana's forestlands across all ownerships: public, private and urban as well as a Strategy that prioritizes action to address threats to resource sustainability. Indiana's Statewide Forest Strategy offers long term direction and details prioritized actions deemed to be most important and achievable by Indiana's forest stakeholders, natural resource professionals, conservationists and land stewards. Stakeholder coordination can be reviewed in the following documents:

- Issues Survey (1,294 responses)
<http://www.in.gov/dnr/forestry/files/fo-SurveySummary.pdf>
<http://www.in.gov/dnr/forestry/files/fo-DetailedSurveyResults.pdf>
- Indiana Forest Stakeholder Summit
Wabash, Bloomington, Indianapolis & Huntingburg, Indiana - 6/24/09 through 7/2/09
<http://www.in.gov/dnr/forestry/5439.htm>
<http://www.in.gov/dnr/forestry/files/fo-SummitInputAndResponseWorksheet.xls>
- Statewide Forest Assessment Draft Review
<http://www.in.gov/dnr/forestry/files/fo-AssessmentReviewReturns.pdf>
- Strategy Survey (611 responses)
http://www.in.gov/dnr/forestry/files/fo-Strat_surv_summary.pdf
http://www.in.gov/dnr/forestry/files/fo-Strategy_Comments.pdf
- Forest Conservation & Stewardship Strategy Forum
Indianapolis, Indiana - 4/30/10 through 5/1/10
<http://www.in.gov/dnr/forestry/5954.htm>
<http://www.in.gov/dnr/forestry/files/fo-Issue-wrkgrp-output.pdf>
- Statewide Forest Strategy Draft Review

Comments and Input for the Draft Statewide Forest Strategy Document
Submitted 5/28/10 – 6/11/10

Note: These comments are presented in reverse order that they were received and have not been edited for content but formatting may have been changed to present responses in similar font, color, size, etc. Contact information for reviewers has been removed for privacy purposes.

In the case where an identical comment was received multiple times, the comment appears once with the names of all associated senders listed below. There was no attempt to ascertain the authenticity of non-recognized stakeholders.

Please find all of the 76 stakeholder comments below.

*******Comment 76**

Comment on Indiana Statewide Forest Strategy

This comment is submitted on behalf of the Southern Indiana Weed Management Area (SICWMA) in support of the Indiana Statewide Forest Strategy drafted by the Indiana Department of Natural Resources, Division of Forestry (DoF).

Overall Support

SICWMA wishes to express strong and unequivocal support for the Statewide Forest Strategy. We believe it is critical to develop and implement an overall forest strategy for Indiana – which covers all public and private lands – and strives to engage and encourage the wide range of constituencies that have an interest in Indiana forestland. We are especially pleased with the focus on invasive species within the strategy. We believe it appropriately reflects the threat that invasive species create in our forestlands. A high priority on actions that prevent or control invasive species will play a major role in protecting the environmental and economic benefits derived from Indiana forests.

General Comments

We believe the five strategies outlined are entirely appropriate and represent the key goals that Indiana government and all key constituencies should be working toward. The ten key components of the strategies also seem to be good ways to organize the objectives of this strategic plan. The action steps outlined are an excellent starting point for implementation of this plan. Of course, it will be important to prioritize, assign responsibility and determine time frames and measurement criteria for these action steps in order to effectively implement the strategy. Likewise, action steps will need to be added, deleted and clarified over time as progress is made.

Here are some general comments on the strategies, components and action steps:

The key to effectively implementing this plan will be to positively effect:

Acquisition and reforestation of public lands

Management practices on public land

Ownership structure and development rights (parcel size, amount protected by easement, zoning restrictions, etc.) of private land

Management practices on private land

To significantly affect any of these areas will require resources – especially funding for:

Ownership and management incentives

Education – Creating awareness, explaining benefits, providing training, etc.

Expertise – the people and systems necessary to guide, coordinate, train, etc.

Key Priority: Funding

Action steps that obtain funding resources should be prioritized, since the amount and quality of resources available will directly impact the success of this strategy. These include:

The Timber “Check Off” program – It seems likely that funding from this or a similar program will be critical for funding many of the strategy’s action items. We would suggest that such a program include an allocation for education and training programs as well as management incentives, research and product promotion.

A Mitigation program to recognize the societal cost of forestland disturbance or destruction and provide incentives for retaining, protecting, or regenerating forestland habitat in key locations.

Facilitating programs that provide financial rewards for ecosystem services such as carbon sequestration, water quality improvement, flood control, etc.

Increase State funding of DoF and other agencies and organizations that will contribute to the successful implementation of this strategy.

Secure greater funding for the Indiana Heritage Trust to acquire targeted land for protection or rehabilitation.

Attempting to augment and simplify the process of private landowners obtaining resources and assistance from existing programs (CREP, WHIP, EQIP, etc) – for management practices that support the strategy.

We think an additional key action item should be to actively pursue and apply for grants from Federal agencies and from Federal, community, and private foundations that can provide funding for implementation of this strategy.

Key Priority: Public Policy

Another key area for prioritization should be action items that affect public policy:

Developing, rationalizing, and communicating the priority locations (Target Forest Patches) for forestland protection, restoration, and management should be a key priority. The rationale and importance of this “targeting” process needs to be well-communicated to local communities and landowners.

Attempting to influence county planning and zoning to include specific county targets for forest cover. This might also include encouraging the development of Green Infrastructure Plans or Green Building codes.

Examining and modifying Indiana law and regulation that effects soil and water quality (and perhaps flood control?) – as appropriate to encourage forest riparian areas.

Determining what forestland tax assessment changes or property tax incentives would be most useful to implement this strategic plan. This should include whether changes to the Classified Forest and Wildlands program might accomplish some of the necessary changes.

Regulation or discouragement of practices that damage or destroy forest habitat. Expansion of logging and forestry Best Management Practices is critical. We agree that BMPs must be expanded to address broader goals than simply water quality. Other goals that logging and forestry BMPs should work toward are reducing the introduction of invasive species, oak/hickory regeneration, and sensitive

habitat protection. In addition, we think the strategy should address other industries (not just loggers) that can have big negative impacts on the health of our forestland. For example, some other industries that may facilitate the destructive introduction of invasive species to our forestland include the nursery trade, landscapers and mowing contractors, and highway construction and maintenance departments.

Key Priority: Education

We agree, as outlined in Strategy 4, that education and communication will be key to effectively implementing the overall strategy. Key action items will include:

Coordinating with key partners. In addition to the key constituents mentioned in Action 4.1, we would suggest adding federal and local government agencies, educational institutions, nature-based recreation organizations (including hunting, fishing, camping, etc), and non-profit conservation organizations such as Cooperative Weed Management Areas (CWMAs).

Creating and maintaining good databases of targeted constituencies (especially forest landowners) to allow effective direct communication of forestland issues and strategies.

Enhancing and expanding education and training for private landowners. Web resources, as well as easy-to-understand written resources should be available for a broad range of topics including timber management, passing forestland to the next generation, “call before you cut”, and invasive species prevention and management. We think an important and overlooked topic for education is the overall rationale for forest protection and management – i.e. the short and long term economic benefits of healthy and diverse Indiana forests.

Key Priority: Invasive Species Prevention and Control

We agree with the emphasis on invasive species reflected in the strategy. Key priorities should be:

Develop and maintain the “infrastructure” necessary to control invasive species – especially invasive plants that overwhelm and destroy forest habitats. As mentioned in the strategy, this infrastructure should include:

Coordination with the State’s Invasive Species Council to establish organizational roles and responsibilities for various aspects of Invasive Species Management. This coordination should also include prioritization of invasive species threats, recognizing that priorities may differ based on location and habitat.

An invasive species infestation or “range” database and mapping “protocol” that allows many constituencies to add and retrieve data about invasive species in Indiana.

A “clearinghouse” or “forum” that allows experts to easily share and retrieve information about invasive species in Indiana – including range information, watch lists, and (especially) experience on effective prevention and control techniques.

An invasive species education program with components that target both experts (like technical staff and consulting foresters) and landowners. This program should include and emphasize the economic rationale for controlling invasive species in Indiana.

Include Invasive Species prevention and control practices in BMPs for loggers and foresters. BMPs should also be developed, communicated, and encouraged for nurseries, landscapers, mowing contractors, road construction contractors, highway departments and other industries that can introduce or spread invasive species.

Encourage the conservation and planting of native species by public and private landowners.

Develop a statewide Early Detection and Rapid Response program for forestland invasive species. Such a program should include:

Awareness and education about priority threats. In addition to general communication to the general public, this information should be targeted to the “boots on the ground” including district foresters and wildlife biologists, Purdue extension, SWCD and NRCS staff, highway departments, Parks staff, Master Gardeners and others who will most likely recognize new invaders.

A quick and easy reporting process – by phone or web.

A “triage” process to evaluate reports and prioritize responses.

A range of response options from information-only to eradication resources.

A “disaster plan” to quickly mobilize resources and react quickly to a major new threat (e.g. Asian Longhorned Beetle)

A follow-up database to allow measurement of results and follow-up practices.

Specific Comments

In addition to the general comments above, we have a few specific comments, questions, and suggestions:

In the strategy’s introduction, it lists the key benefits of Indiana forests including clean air, carbon sequestration, etc. We would suggest including outdoor recreation as a key benefit. All forest and nature-related recreation, hobbies and tourism are a very important part of the economy and society of Indiana.

In Action Step 1.4, we wonder if the total acreage of woodland under management might be a better measure of success – as opposed to the number of woodland parcels. As parcelization increases, the number of woodland parcels under management could increase without increasing the total acreage of forestland under management.

Regarding Action Step 1.7: Could expanding the eligibility requirements for Classified Forest and Wildlands potentially achieve this goal?

Regarding Action Step 1.10: We think that education and training programs should be allocated a percentage of the receipts of this program.

Regarding Action Step 1.15: We agree and wonder if targeted financial incentives could be used to encourage even-age management practices in priority areas.

Regarding Action Step 1.19: We agree that invasive species management and control will need to be prioritized. We think, however, that we need to be careful about limiting invasive species prevention or management practices to high conservation value forests. Especially for newly invading species, it is more cost effective to eradicate a new infestation in a low-value location (and therefore eliminate the risk of spread to high-value locations) than to treat a well-established infestation in a high value location. Bottom line: Prioritization of invasive species control resources will be tricky and might be based on a combination of the species involved, the likelihood of eradicating the infestation and the sensitivity/value of the location.

Regarding Strategy 2: We wonder whether flood control might be another important benefit of riparian forest restoration in some places. If so, this may suggest additional action items to educate and encourage reforestation for this reason.

Regarding Strategy 3: In addition to including invasive species prevention and control practices in logger BMPs, should the Classified Forest and Wildlands Program include requirements for invasive species management? For example, should the required management plan be required to address invasive species? Should survey and reinspection visits be required to include a simple inventory or coverage estimate of invasive species?

Regarding Action Step 4.4: Should this action step be broadened to include other Farm Bill programs? For example, can WHIP and EQIP be enhanced to include more forestry practices like control of a broader list of invasive species? Can anything be done to simplify the enrollment process for landowners?

We agree with the importance of maintaining and expanding markets for Indiana hardwoods (Strategy 5). We think, however, that this strategy could be broadened to include promotion of all products and services generated by Indiana forestland – including non-wood forest products, forest recreation, and nature-based tourism.

Respectfully submitted:
Tom Tremain, President
Southern IN CWMA

*******Comment 76*******

Good morning,

I would like to comment on the planning strategy document regarding continuing a sustainable forest preserve in the state of Indiana, which I generally favor. It is critically important, for a multitude of reasons all beneficial to the health of our citizens, our economy, and to the quality of life in our state, including maintaining an appreciation of our created world.

I support the proposal of the plan where it is conserving and expanding protected forest areas, so Indiana's forested corridors continue. I support the improvement of best management practices for forestry. It is also critical to attempt to control invasive species in our state, when our native plant life is forced out by these invasive species.

However, I am not in favor of CLEAR cutting in either private or public lands. This process deprives so much of our native life, and there is not easily accessible route to preserve what is lost with clear cutting. Please eliminate that prospect.

Thank you for allowing my input into the process.

Mary McDonald
Indianapolis, In

*******Comment 75**

Comments from Indiana Forest Alliance

This document does not represent the “result of consensus opinion from natural resource professionals, landowners, conservationists, land stewards and forest stakeholders.” It is a synthesis created by the Division of Forestry according to its understandings and definitions of the issues.

Purporting that there is “nearly unanimous understanding” assumes a uniformity of mind and culture that does not exist in this state. There are many diverse opinions about the role of forests throughout the state. While the Division of Forestry and the timber industry are very much in support of managing forests for timber, the vast majority of the citizens of this state have repeatedly been shown to oppose commercial management.

Strategy 1:

p. 4—Forests do not have to be managed for them to perpetuate themselves.

The priority areas seem to support existing Division of Forestry projects and areas.

1.4—increase the number of woodland parcels under management—owners should have complete control over the level of management and the intention and aim of the management (conservation, no extraction, etc.)

1.10—should read to reflect matching local supply with local need. Not to export materials for others.

1.15—IFA does not recognize the need for increasing the amount of forest area on public (or private) lands of areas that are under 19 years of age. With the increase in forest coverage throughout the state, there will be plenty of trees in that age class without active management.

Commercial activity on private stands, tree mortality on public forests and other processes create opportunities for those younger trees. Managing for this age class is not necessary. Additionally, this document does not reflect a need for larger portions of trees over the age of 100 years in the forest—particularly the forest interior.

Invasive species—establish a body of information (perhaps including new studies) that identifies why “invasive” species have been successful in Indiana’s forests.

Strategy 2—connecting and restoring forests

Coordinating at the county and state level to identify and set goals for each county should be effective.

Consider working to increase the acreage of forests not just in riparian areas, but in forested wetland—increasing the ecological benefits to the state—including the creation of new soil and more biodiversity.

Strategy 4—education and training

4.1—left out a good number of forest stakeholder groups—particularly conservation and environmental groups.

4.8—Education programs should thoroughly and clearly instruct participants about the ecological processes (soil generation, forest soil life, water purification, microclimate modification, impact on local weather, etc...)

4.9— Include permaculture perspectives on invasives and the use of those plants as long as they are present in the systems.

Strategy 5: Local and sustainable markets

5.3—Biomass markets—this is not the recommended action from the working group. The working group recommended a thorough study being done to know the safe parameters for using Indiana forests as sources of biomass. The study was not necessarily to promote the use of biomass as an energy source either in the state or for export. To jump forward to establishing BMP's is irresponsible and a betrayal of the process that this assessment process has been built upon. Further, the implementation of a biomass program on the forests of Indiana would completely violate the intention and goals of the USDA program to which this document is responding. Woody biomass energy production is a dangerous and misguided concept that would have a devastating effect on the forests.

5.5—Oak Regeneration is a questionable project and has not been prioritized by this assessment process to date. Inserting it in the final draft as a way to promote DoF priorities is neither honest nor appropriate.

*******Comment 74**

Please stop ALL logging on state forests, which, as an Indiana resident, I am against. I will vote accordingly.

Do not cut forests or harvest trees for biomass. Sell the carbon offsets instead and keep the trees in the 'bank' so they can 'grow' more carbon, which can later be sold. Whether or not you believe in global warming, it is still a good business proposition. Re-use the resource of our trees instead of cutting them. Leave your 'principal', our trees, in the bank and sell the 'interest' of the carbon offsets, over and over again. No overhead.

There is value in old-growth forests. Their habitat is different from that of younger forests. That's how I feel, what I believe, and it's why I will vote, against this state administration every time. Cut those trees and I will be sure to vote elsewhere. Daniels wants the popular vote. He is there because of the voters, that's me, us. If he wants support, he needs to listen to the voters, who are overwhelmingly against logging in state forests.

Thank you for your time.

Melanie Hunt
Unionville IN

*******Comment 73**

To the Statewide Forest Assessment Team:

Protecting and expanding Indiana's forests are high priority conservation and economic goals for Indiana. We appreciate the research and outreach efforts that have gone into preparation of the draft strategy document, as well as the preceding Indiana statewide forest assessment.

Overall, the 5 consensus strategies capture many of the most important forest protection needs. We have the following comments and recommendations for the components and action steps of each strategy.

Strategy 1

Action step 1.3

“Increase economic incentives..” We recommend including action steps for exploring and/or obtaining funding for these incentives, such as state appropriations, fees, taxes, or other mechanisms.

“develop demand for lower quality hardwoods..”

We are concerned about this recommendation. It has the potential to conflict with and create competition with other actions intended to maintain and expand Indiana’s high quality hardwoods industry. Encouraging demand for low quality forest products may encourage more management for less desirable, short harvest rotation species that provide fewer non-timber benefits than the forest practices that are desirable for a high quality hardwood industry.

Action step 1.15

We do not support the recommendation for increasing even aged management on large land holdings. It is too broad and may encourage casual and unjustified use of clearcutting, instead of the harvest method that is best suited for a particular forest stand.

We recommend more consideration and analysis of a variety of strategies to provide young forest habitats. The plan should not, even indirectly, encourage conversion of forest habitats to grassland or shrubland habitats. The need to establish and maintain these non-forest habitats should be part of a separate initiative to protect and restore grasslands and shrub habitats.

This component should include an action step to conduct research to examine and quantify the benefits of old forests.

Strategy 2

Action step 2.4 We recommend inserting “native” before “tree species”.

Action step 2.6 Use full conservation program names instead of acronyms.

Action step 2.8 Many cost share programs already exist. Is the principal need to create more programs, or should existing programs be expanded, improved, or combined? In proposing cost share programs, the strategy should be conscious of program efficiencies and ease of access by forest owners. Also, as with Action step 1.3, how will these programs be funded?

Strategy 3

We recommend adding action steps to discourage or reform bad actors in the forestry industry, given the recent instances in Brown County with loggers now facing prosecution.

Strategy 4

Action step 4.3

We recommend elaborating here to encourage routine interaction with/collaboration with local government units.

We recommend action step(s) for identifying and resolving conflicts between forest protection goals in this strategy and state and local actions that potentially threaten forests, such as highway projects, other infrastructure projects, and land use/development plans.

We recommend including all ages, interests, and decision makers among those who should be exposed to and have access to quality forest information.

We recommend expanding component # 4 to include action steps for integrating Indiana forest information with federal, state, local, college and university information portals – websites, GIS, social media, Google Earth, or other information technology.

Strategy 5

As discussed in our comments on Action step 1.3, steps 5.1 and 5.3 create potential conflicts between categories of forest products. The DNR's Woody Biomass report suggests that the only significant available quantity of excess forest biomass in Indiana is in standing forests. Encouraging the collection and removal of biomass from standing forests for energy fuels or other biomass uses is likely to result in unsustainable forestry practices that harm long term forest health, future production of sawtimber and veneer products, and soil and water conservation. How practical or effective will BMPs for biomass removal be?

Action step 5.2

We recommend adding after "Develop incentives" the words "and otherwise promote"; and at the end of the paragraph, add, "and the value-added benefits from secondary wood product manufacturing."

Target Forest Patch maps

We generally agree with the target forest patches, but would like to see added a systematic approach for adding new target patches and corridors.

On page 17, what is the basis for using the size category of 1,225 acres?

On page 21, the Gibson/Pike/Warren forest patch – should it read "Warrick"?

Thank you for the opportunity to comment.

Tim Maloney
Senior Policy Director
Hoosier Environmental Council
Indianapolis, IN

*****Comment 72

Please do not allow clear cutting as part of forest management. Please do not allow biomass harvesting as part of forest management. The many industries and businesses already dependent on wood by products should not have their prior claims on wood waste jeopardized. Biomass burning is a waste of resource. Clear cutting is a crime against public forests.

Pat Berna
Underwood, In

*******Comment 71**

Hello,

I have a particular interest in invasive species as we have a constant struggle with them here at the arboretum. The native plants here are losing ground to the many invasives which grow stronger, faster and bigger than their native counterparts. I thought the bullet point "Expand Best Management Practices with special attention to invasive plant species" was the shortest section in the draft. It concerns me that something so crucial to conservation wasn't covered a bit more thoroughly. Perhaps the details aren't available yet but there's no use conserving our forests and native plants if invasives creep in at every minor soil disturbance and choke everything out. We certainly have found we can't even think about restoring an area to natives until the competition of invasives is removed. They're changing the soil and changing our forests. My hope is that more attention is given to this matter. Thank you.

Patricia Stimmel
Senior Horticulturist
Taltree Arboretum & Gardens
Valparaiso, In

*******Comment 70**

11 June 2010

Please accept the following comments on the draft statewide forest strategy:

**It may seem obvious, but it has to be repeated: forests are for more than just human use. Myriad other creatures depend on the forests; our climate also is dependent on the forests. Consideration of global climate change must be a part of every forest management plan.

**Biomass use should be strongly discouraged. There is no good way to sustainably manage a forest for diverse use when biomass production is encouraged. There are clearly more sustainable ways to produce energy.

**Clear cuts of any size should not be allowed. In Indiana forests, clear areas are naturally created by storm blowdowns.

**Timber value-added products should be manufactured in the state. Raw timber should not be sold overseas to produce value added products. Timber industry jobs should be kept in Indiana.

**Since forests are such an important part of the State's resources, major development projects that result in the loss and/or fragmentation of large forest tracts should be discouraged. The I-69 extension is one example of a project that will have major direct and indirect negative impacts on large forest tracts. This project should be strongly discouraged as having unacceptable forest impacts.

**Old growth forests are not biologically diminished. This type of forest should be encouraged for its wildlife and recreational, including spiritual, value.

**There are more than enough deer in Indiana. Public lands should not be managed to increase the deer population.

**More efforts should be made to explain to the public the multiple values of forests. What we do not understand, we more easily destroy.

**Mitigation plans for forests loss can be misunderstood and misused. Mitigating forest loss by simple agreeing not to cut other existing forests is not acceptable. The result is still a net loss of forests. Planting trees on fallow farm ground does not make up for the loss of mature forests. It may take 100 years to reach mature forest stature. Too often, forest mitigation plans are forgotten over time and the forests are not sustained.

**Thank you for all the work that went into this document. Our forests are of great and lasting value. They must be protected and expanded.

Comments by Thomas Tokarski, landowner, Monroe County

*******Comment 69**

I support the plan's proposal to improve best management practices for forestry and control of invasive species, and clear cutting on public or private lands. We have the best foresters in the world right here in Indiana so let them do their jobs.

Darin Hollingsworth
Hollingsworth Lumber

*******Comment 68**

Dear Madam or Sir:

Please accept these comments on the Draft Statewide Forest Strategy. The strategy appears to give the green light to clearcutting and promoting biomass harvesting for incineration, and I oppose these practices as part of the statewide forest strategy.

David Stewart

*******Comment 67**

Comments on Draft Statewide Forest Strategy
General Comments:

Very good! I commend you for the inclusive nature of the process and the extensive analysis.

I support strongly the commitment to protecting Indiana's forests and to make strategic improvements to the inventory to maximize the various benefits that are derived from this important resource.

I recommend strongly that DNR reconsider elements of the strategy that read as statewide (top-down) land-use regulation or planning. These efforts are not likely to be successful. Time and resources can be better spent on the other action steps.

Specific Comments:

Action Step 1.2 Mitigation Banking

Creating a forest mitigation bank is an interesting idea. Setting statewide mitigation requirements, in my opinion, is not realistic relative to the political climate in Indiana and citizen preferences for limited regulation. While Indiana citizens may indicate that they value forests, they also value local control. This is (or at least sounds like) top-down land use regulation. Time and resources would be better spent on other strategies. At the very least, I would soften the language about mitigation requirements.

Action Step 1.6 Green Infrastructure Plans

You probably need to define what “green infrastructure plans” means in this context. The term “green infrastructure” is used to mean a variety of things.

I would suggest that you work with local governments to include natural resource issues in comprehensive plans and other plans they already do rather than suggesting a new separate set of plans. It also would be preferable if this section makes it clear that DNR and its partners are working to include forestry considerations in local planning instead of planning being imposed from above.

Action Step 1.12

Very few, if any, Indiana communities have the administrative capacity to manage a system of TDRs. It is a very complex tool to manage.

Strategy 4: Strategic partnerships

I would really like the plan to recognize that DNR and other partners need to participate in ongoing broader policy discussions that affect forestry. It comes across a bit like once the plan is done, then all the stakeholders just go out and do it. To be successful, DNR and the partners must participate in ongoing policy discussions that include forestry but are broader in scope. The plan and the action steps won't be successful if considered or pursued in a vacuum.

Action Step 4.9

What is a “resource pool?” I'm not sure that's even standard forestry jargon. I can't tell what is meant by that one

*******Comment 66**

Date: Wednesday, June 09, 2010

I have looked over the proposed DRAFT of the “Indiana Statewide Forest Strategy – 2010” and have received several requests for comments.

Overall, I am pleased with the strategies they have developed and their proposed actions to accomplish those tasks. I especially support Actions “1.3 to 1.5” that strives to reduce the current rate of parcelization into smaller ownerships and encourages forest management and Actions 1.14 to 1.16 that increases the proportion of younger forest classes <19 years. I believe Actions 5.1 to 5.4 that strive to

expand markets and wood utilization will ultimately benefit the retention of forest lands as sound investments and indirectly help enhance early successional or young forest tracts.

I do have a problem with Action 5.5 that is actually two statements. The first part of the sentence to enhance oak species regeneration is fine but I feel the second half about advocating changes to reduce deer herd size is out of place, undefined and not specified in details, and implies or infers that deer are the primary force influencing oak regeneration and understory suppression. The latter statement is more of an extension of Action 4.10 and should probably be deleted.

Furthermore, based on my personal experience dealing with forest regeneration and high deer densities, I feel that there are a number of forces adversely impacting successful forest regeneration besides deer herbivory. A major one is getting enough overhead canopy removed across large enough areas in a short period of time and implemented a more rigorous prescribed burning program. Not only does this encourage oaks over other tree species, encourage a greater diversity of understory plant species, it also reduces the impact of deer since their browsing is no longer concentrated or focused on relatively small size cuts that are, for the most part, sparsely distributed across the forested landscape.

Steven E. Backs
Wildlife Research Biologist
Mitchell, IN

*******Comment 65*******

June 11, 2010

Dear Mr. Seifert,

The Nature Conservancy in Indiana has been actively involved in the Indiana Statewide Forest Assessment and Strategy Process. As a science based organization that promotes conservation action planning and the development of site conservation plans we have been very pleased with the planning process and science based analysis of the forest landscape in Indiana.

In reviewing the Indiana Statewide Forest Strategy (June 2010) The Nature Conservancy is supportive of the five long-term strategies that have been identified to conserve public, private and urban forestland across Indiana and pleased to see a detailed list of action steps to conserve large forest patches across the state. Many of the action steps listed will create opportunities for The Nature Conservancy and other conservation groups to partner with the Division of Forestry.

With the development of a Strategic Forestland Conservation Program there appears to be action steps aimed at establishing and achieving forest cover goals within each Target Forest Patch. The Nature Conservancy is concerned about this approach in the Newton Forest Patch. The ecological classification of this Target Forest Patch is primarily savanna and prairie. Succession, human alteration and the lack of a natural fire regime have created forest patches not characteristic of this natural region. The conservation of the Newton Forest Patch should be a priority, but increasing the amount of forestland in this area should not be a goal for the Division of Forestry and is not a goal on the 7,800 acres that TNC owns in this area. Action steps for the Newton Forest Patch should aim to create a desired future condition that is primarily savanna and prairie instead of closed canopy forest.

Besides the concern over the Newton Forest Patch, The Nature Conservancy is pleased to see the Division of Forestry advancing a Statewide Forest Strategy and looking forward to participating in the continued conservation of forestland across the state.

Sincerely,
Daniel J. Shaver

Brown County Hills Project Director
The Nature Conservancy

*******Comment 64*******

Dear Sir or Madam:

I am writing to comment on the Draft Statewide Forest Strategy 2010.

I would first like to establish that, although I reside in Virginia, I am a user of Indiana's State Forests. I visit Indiana at least once a year. I have visited Yellowwood State Forest and Morgan-Monroe State Forest. I am familiar with the proposals to log in these and other Indiana forests and in "back country areas" which are intended to be more remote and to have more "wilderness" characteristics. This strategy would allow, facilitate and encourage more of this bad management.

My experience has been that most people are not even aware that logging occurs on Indiana's state forests. They see the purposes of these forests as being for recreation, wildlife habitat, clean air, and clean water. The public does not want the trees from Indiana's forests to be bought and cut by private companies.

Timber production is not appropriate for Indiana's forests due to the unique opportunities for other vital uses: recreation, emotional sustenance and inspiration, scenic value, conservation education and watershed protection. Logging operations diminish these values, create artificial habitat for expanding and harmful populations of deer and create vectors for invasive plant species to expand their range into interior forest habitats. Not only is there is no need to create more "early successional habitat" when such habitat is already plentiful in a heavily degraded landscape, these activities actually do more harm than good to Indiana's forests.

Especially flawed are sections 5.3 and 5.4. The use of State Forests for Biomass production is a dangerous and harmful action. The huge amounts of carbon dioxide and particulates that accompany biomass incineration are reasons alone to not promote the use of forests as fuel stock. The transportation of large amounts of wood takes large amounts of energy and the accompanying pollution it causes. Woody biomass benefits the forest by creating ground forest habitat and by decomposing into healthy forest soils. It is my understanding that promoting biomass was not an action recommended by the working group involved in creating the Draft Statewide Forest Strategy 2010. Sacrificing forests for energy is a bad tradeoff at every conceivable level.

Section 5.4 actually promotes the logging of Indiana State Forests. It is a conflict of interests for Indiana to promote logging and protect state forests in the same breath. Private and industry lands will continue to provide timber for Indiana markets. They have no such conflicts of interests and can more effectively promote their products than having the State adopt a strategy that destroys other higher uses of Indiana's resources.

For these reasons I encourage you to delete sections 5.3 and 5.4 from the Draft Statewide Forest Strategy and follow the lead and the will of the majority of the residents of Indiana and protect the State Forests for your children's children's children.

Please keep me informed of any action or revisions to the proposed Draft Statewide Forest Strategy 2010.

Sincerely,

Ernie Reed
Charlottesville, VA

*******Comment 63**

To whom it may concern:

As a deeply concerned citizen and land owner in the state of Indiana, I make the request that the cutting, burning, clear-cutting of Indiana Forests be stopped!!! There are alternatives to biomass, and sacrificing dwindling forests is an extremely poor choice. Must we pollute our air, and then create more disruption and catastrophe by cutting forest? Will we be selfish and senseless...leaving nothing for our children? I was born and raised in Indiana, and would like to feel proud of my native state. A state that takes the protection of its forests very seriously. I beg you, cutting forests would be a huge cost for a temporary, and therefore meaningless, solution. Please, please, protect our forests.

Leah Robling

*******Comment 62**

Ladies and Gentlemen:

I am writing to express my extreme opposition to clear cutting Indiana forests.

I am also strongly opposed to woody biomass plants because they are even more polluting than coal and voraciously consume fuel, which will inevitably cause forest land to be clear cut to feed the incinerator.

Sincerely,

Steven Chase Spurgeon
Indianapolis, Indiana

*******Comment 61**

Mr. Seifert:

Thank you for the invitation to comment on the Indiana Statewide Forest Strategy. I represent the Hoosier Chapter of the Sierra Club. The Sierra Club supports some of the goals of the Statewide Forest Strategy. For example, we agree that large tracts of forests should be conserved and expanded and that forest fragments should be consolidated or connected with corridors. We agree that invasive species

should be controlled and eliminated where possible. Private forests should be harvested sustainably, and every effort should be made to maintain and expand forests on private land.

However, the ultimate goal of the Sierra Club is to halt logging on public lands, both state and federal. Private forests already supply almost all of the timber harvested in Indiana, so a public supply is not necessary. The fact that the plan includes the need for market development is a tacit admission that the demand for forest products is not enough to justify harvesting public forests.

Moreover, allowing logging on public lands undercuts the overall goals of the Forest Strategy. Virtually all of the large forest blocks in Indiana are publicly owned. Logging activities tend to fragment those blocks by building roads and introducing clear-cut patches. Removing even single trees opens the canopy and allows invasive species to thrive.

While small private woodlots might be treated as gardens that need to be thinned or managed, large public forests are self-sustaining ecosystems. Logging disrupts the processes that sustain them, for example by causing erosion. And logging is not a substitute for natural disturbances like fire, wind, insects, disease, etc., because it removes wood from the forest rather than letting it fall to protect and build the soil.

The plan calls for increasing “the percent of forest in the age class of <19 and >100 years old” but includes no actions to produce old forests. Stopping logging on Indiana’s public lands will allow them to develop into old-growth forests that are almost absent from the state at present. Early successional forests are abundant and will always be so on private land. Public forests are our best chance to add a mature component to the total forest mix, increasing overall biodiversity and storing more carbon, thereby slowing global warming. The benefits of an uncut forest greatly outweigh any benefits of logging.

Because the forests on Indiana’s public lands are the best chance to reap the benefits of old growth forests in the state, we ask that you include the following action in the Statewide Forest Strategy: End all logging in the public forests of Indiana.

Richard Miller
Chair, Conservation Committee
Hoosier Chapter, Sierra Club

*******Comment 60**

I favor disallowing all clear-cuts. they are too disruptive, e.g., soil erosion is highest then. select cuts are nearly as productive and leave the forest as a forest; much preferable.

nathan pate
paoli, in

*******Comment 59**

Clear cutting is one of many really stupid ideas of politicians, lobbyists and other greedy, uninformed nuts. It assures that we have no healthy old growth forests with hard wood trees - only trash trees on ruttled destroyed land. Clear cutting to burn the trees is even more stupid. Stop this nonsense of

increasing green house gasses and work to free us of dependence on fossil fuels!! Unless, of course, you are one of the many working to destroy - not just this country, but the entire Planet!

Melva Hackney

*******Comment 58**

Dear Madam or Sir:

Please accept these comments on the Draft Statewide Forest Strategy.

I oppose clearcutting and promoting biomass harvesting for incineration. Ninety percent (90%) of Indiana's harvestable timber is on private land. Indiana's forest strategy should be favorable to reforestation, not deforestation. We need to adopt policies favorable to biodiversity and a return of extirpated species to the State. We are short on old growth. We can not cut and achieve old growth. We do not need more early successional habitat.

I oppose the promotion of logging for biomass incineration. Biomass is an energy strategy that needs to be discarded. Promoting biomass was not recommended by the working group.

Sincerely,

Samuel E Flenner III
Indianapolis, IN

*******Comment 57**

Hello,

Please accept my comments on the Draft Statewide Forest Strategy. The strategy appears to give the green light to clearcutting and promoting biomass harvesting for electricity generation – I oppose these unsustainable practices as part of the statewide forest strategy.

The strategy document emphasizes active management, such as heavy logging and clearcutting, of existing forests to increase “even-aged” stands of trees less than 19 years of age. Instead of clearcutting public forests, however, Indiana can create opportunities for younger trees by increasing the percentage of land going back to forest. There is no need to create more "early successional habitat" when such habitat is already plentiful in a heavily degraded landscape. Commercial activity on private lands and tree mortality on public lands already create opportunities for younger trees.

The strategy document likewise identifies a shortage of trees more than 99 years old, yet there is no mention of any plan for creating more old forest or allowing younger forests to age past 99 years. Instead, the focus is on a heavy logging regime to create more young forest. This strategy is inverted and misguided. Also many older trees have a value greater than their board-feet in lumber as Carbon Sinks and should be valued appropriately.

In order to promote a healthy forest ecosystem the forest understory should be protected during any harvesting of timber. Forest floors should not be “swept clean” as sources of woody biomass as some

promoters of woody biomass to energy projects have been quoted as saying... Residues left over from timber harvesting should be left on the forest floor to recycle nutrients back into the forest.

In addition the wholesale harvesting of “Woody Biomass Feedstock for the Bioenergy and Bioproducts Industries” as proposed by the IDNR, including “Standing Dead Woody Biomass,” is both unsustainable and destructive of valuable and necessary habitat for several rare and/or endangered species found in Indiana. In addition Indiana forest areas set aside or designated for “wild,” “wilderness” and/or “old-growth” habitat and recreation should not be cut or actively managed from the perspective of timber improvement and harvesting but rather should be managed with the goals of achieving healthy “wild,” “wilderness” and/or “old-growth” habitat and recreational experiences.

I also object to the strategy in the document’s promotion of logging for biomass to energy projects utilizing inappropriate and highly polluting technologies such as the currently proposed direct burning of biomass in fluidized bed combustors. I oppose cutting and burning Indiana’s state forests as a source of energy. In addition, promoting biomass was not an action recommended by the working group involved in creating the document. The working group recommended a thorough study to know the safe parameters for using Indiana forests as sources of biomass. The study was not necessarily to promote the use of biomass as an energy source either in the state or for export.

If biomass to energy is a desired goal of INDR then it must be done only utilizing long-term sustainable practices which use advanced and appropriate technologies that produce clean sources of biogas, biofuels, and residues from biomass waste sources only from sustainable and appropriately scaled value-added processing of selectively harvested trees on private lands.

For example, local hardwood users producing value-added products such as artwork, furniture, cabinets, millwork, flooring, etc. can and do create jobs and markets which depend upon a long-term sustainable supply of high quality lumber. This is and will only continue to be the case if Indiana forests are increased in size and quality of habitat and a truly sustainable rate of selective harvesting is achieved. This rate of selective harvesting must take into account the adverse impacts of climate change on Indiana’s forests which the current proposed forest strategy does not consider or plan for...

The appropriate small scale local use of biomass waste which does not promote unsustainable and destructive harvesting of Indiana forests utilizing waste from existing value-added producers is possible if done with appropriate advanced technology to ensure the production of clean sources of biogas, biofuels, and residues. This would involve biological and/or enzymatic digestion in closed-looped systems to produce sources of clean fuels and organic residues which can subsequently be used as fertilizers or other value-added byproducts.

The gross industrial scaled burning of woody biomass in direct combustors is not only unsustainable but also produce: large amounts of air pollution, including Hazardous or toxic air pollutants; large scale fresh water withdrawals; large discharges of wastewaters containing thermal and/or other pollutants of concern; and toxic residues which must be disposed of and further contribute to the degradation of land, groundwater, and surface water quantity and quality that the forest ecosystem and many Indiana residents depend upon for sources of clean fresh air, water, and food.

In short the INDR should start over in the development of a Statewide Forest Strategy and use an enlightened goal of achieving a truly sustainable plan that considers the health of Indiana’s forests and residents first over timber improvement and harvest. Such a plan would: recognize the challenges of

climate change and its impacts upon Indiana's forests; the value and importance of mature trees and their healthy ecology as Carbon Sinks; the value of achieving the goals of healthy "wild," "wilderness" and/or "old-growth" habitats and recreational experiences in Indiana forests, the value of land, groundwater, and surface water quantity and quality that the forest ecosystem and many Indiana residents who depend upon it for their health; and finally the value of local hardwood users producing value-added products such as artwork, furniture, cabinets, millwork, flooring, etc.

Whereas there is little likelihood that the current energy resource provided by forest biomass can be increased sustainably and given that there are far better sources and technologies already available to produce electricity, it should be recognized that the current woody forest biomass to energy proposals are neither sustainable nor clean and their adverse impacts on Indiana forests and residents are unacceptable. We can and must do better!

Sincerely,

Larry Davis
Hebron, Indiana

*******Comment 56*******

Dear strategy group:

Please accept these comments on the Draft Statewide Forest Strategy:

In today's Herald Times (Bloomington) newspaper, there appeared an article about a study just completed on biomass harvesting for incineration:

Study: Wood worse polluter than coal

Associated Press

June 11, 2010

BOSTON — A new study has found that wood-burning power plants using trees and other "biomass" from New England forests releases more greenhouse gases into the atmosphere than coal over time.

This current research highlights the shortsightedness and "pseudo-science" of much of the Draft Statewide Forest Strategy. The strategy makes many underlying assumptions that are erroneous, unproven, or impossible to implement in the current and foreseeable state economic climate.

The strategy promotes biomass harvesting for incineration, and I oppose this emphasis given the new questions raised about this issue, as referenced above. Indiana certainly doesn't need any more dirty fuels polluting our environment! Please do not use this strategy to set Hoosiers on a path that destroys forestland and further pollutes our environment.

Although the strategic plan promotes heavy logging and clearcutting of existing forests to increase "even-aged" stands of trees less than 19 years of age, there is absolutely no documentation of the success of such practices in creating healthy forests over the last twenty years. Indeed, clearcuts within Yellowwood State Forest, for instance, performed ca. twenty years ago, have yielded only terrible erosion and an impenetrable thicket of invasive shrubs and trees. Deer and turkey disturbance has

prevented the regeneration of oaks and hickories. Only intensive, sapling-by-sapling management can overcome this reality, and given the condition of State Forest funding, this is unlikely to be provided.

The strategy document identifies a shortage of trees more than 99 years old, yet there is no mention of any plan for creating more old forest or allowing younger forests to age past 99 years. Instead, the focus is on a heavy logging regime to create more young forest.

Some statistics are cited in the draft strategy: for instance, section 1.2, quoting from a Purdue study: 79% of Hoosiers disapprove of “cutting Indiana trees to make room for new homes.” Yet a statistic that is even more meaningful is not cited: what percentage of Hoosiers object to cutting Indiana trees in Indiana’s State Forests? The statistics that I have seen place this number as high as 80%.

Sincerely,
Linda Baden
Nashville, In.

*******Comment 55**

Dear Public Official,

My name is Ian McSpadden. I was born and raised in Southern Indiana (Crawford and Orange Counties) and now reside in Greenfield township of Orange County. Where I grew up and here where my daughter will grow up is adjacent to Hoosier National Forest. I value these forests and give a lot of credit to who I am as a person because of these forests. There is nothing like walking through big timbered forest. The diversity they offer is very special and should be protected. With the world crumbling down around us we should treasure these fine forests and appreciate what they have to offer besides the timber value and energy value.

Let it be know and recorded that I as well as my family oppose the timbering of Hoosier National Forest as well as the plans for Biomass incineration plants in Southern Indiana.

Thank you,
Ian McSpadden
Paoli, IN

*******Comment 53**

To Whom This May Concern,

I want to share my disagreement with the possibility of more clear cutting and burning of our wooded lands. These actions, pose immanent multiple dangers, and will destroy pristine and ecologically necessary forests,

Yet more than this, the burning of the land will create carbon toxic wastelands, which all of the wildlife and humanity will most definitely suffer the most dire consequences.

Sincerely,
Denny Miller, Indiana

*******Comment 53**

Just look around you at all the Environmental Ideas gone wrong. Give it a break. I witness man managing the National Forest every day. Managing It to Death. Gone are all the BIG TREES in the National Forest, making it your Duty to Protect what you still manage at the State Level, for the Future Generations Lets not get on w/AIR QUALITY & Indianas Ratings. Please take at look, all the way to the OHIO Valley area. KIDS should be !st on your minds as this proceeds.
Gotta go, Thanks Jeff Piper

*******Comment 52**

Dear staff:

I am TOTALLY opposed to clearcutting public forests and to cutting trees down for biomass incineration. No commercial logging in the backcountry! No commercial logging in any public forest

Sincerely,

Linda Greene
Unionville, IN

*******Comment 51**

Dear people,
I oppose clearcutting, and use of Indiana forests for biomass.
Judy Klein

*******Comment 50**

Dear Madam or Sir:

If the governor cuts your budget, then you should live within your means and not go out cutting more trees. That's contrary to what our governor, your boss, wants. We all want less money spent by government. You are just trying a back-door, sneaky way to keep your spending levels higher than we, the people, want.

Here are some comments on the Draft Statewide Forest Strategy. The strategy appears to give the green light to clearcutting and promoting biomass harvesting for incineration, and I oppose these practices as part of the statewide forest strategy.

The strategy document emphasizes active management, such as heavy logging and clearcutting, of existing forests to increase "even-aged" stands of trees less than 19 years of age. Instead of clearcutting public forests, however, Indiana can create opportunities for younger trees by increasing the percentage of land going back to forest. There is no need to create more "early successional habitat" when such habitat is already plentiful in a heavily degraded landscape. Commercial activity on private lands and tree mortality on public lands already create opportunities for younger trees.

The strategy document likewise identifies a shortage of trees more than 99 years old, yet there is no mention of any plan for creating more old forest or allowing younger forests to age past 99 years. Instead, the focus is on a heavy logging regime to create more young forest. This strategy is inverted and misguided.

I also object to the strategy document's promotion of logging for biomass incineration. I oppose cutting and burning Indiana's state forests as a source of energy. In a time when we should be working to reduce greenhouse gas, a recent study by the state of Massachusetts shows that burning trees for energy actually INCREASES the level of greenhouse gas by 3 percent. In addition, promoting biomass was not an action recommended by the working group involved in creating the document. The working group recommended a thorough study to know the safe parameters for using Indiana forests as sources of biomass. The study was not necessarily to promote the use of biomass as an energy source either in the state or for export.

How can you possibly promote burning trees, or anything, to REDUCE the atmosphere's temperature?

Sincerely,
Paul

*******Comment 49*******

Dear Folks:

I realize Indiana is a republican state, but it also has its share of hunters, who would like for you to leave the woods as you found them. Do not replant, do not clearcut to use the trees as 'biomass' fuel. Your jaded and willful contempt for all things green is an insult to the people who pay you. Those woods belong to us--not you. You are just there to keep them intact to pass on to the next steward.

Magie Read
Battle Ground, IN

*******Comment 48*******

To: John Seifert
State Forester

The Indiana Association of Consulting Foresters IACF agrees with and supports the five long-term strategies that have been presented in the draft Indiana Statewide Forest Assessment. Our organization and its membership can and are interested playing a vital role in further developing and implementing the components and action steps associated with each of the strategies identified.

Many of our members are already intimately involved with other groups, organizations, and individual forest landowners, in promoting the strategies identified in the Draft Forest Assessment. We believe involving and empowering the private business sector, trade associations, non profit organizations, other conservation groups, and local government is paramount to achieving the results desired. Many of the actions presented in the draft assessment do just that.

Of particular concern to IACF is Action step 1.8 which calls for increasing State Division of Forestry funding and cites camping fees, user fees, forester property visits, and charging for educational events as options to provide funds. Charging for forester property visits, which we assume to be government foresters, only empowers more government, and a need for more dollars. IACF believes that the Indiana Division of Forestry must identify its core functions and be funded by the state at a level such that it can perform those core functions. When user fees are tied to core government functions such as regulatory action, roads, police and fire services, it is entirely appropriate to institute them. It is inappropriate in

areas where the same services are offered for a fee in the private sector. Actions that negatively impact small businesses, which includes consulting foresters, hurt Indiana's economy. Charging fees for services available in the private sector distorts the free market system by obscuring the true cost of the services and disrupts the free market system that private enterprises operate in.

We want to emphasize our support for the strategies outlined in the Draft Forest Assessment. We also offer our collective expertise, knowledge, and involvement as the individual components and action steps are more clearly refined and implemented.

Sincerely

Mike Warner
President
Indiana Association of Consulting Foresters

*******Comment 47*******

dear state,

the state allowed private cutting a couple of decades ago that was adjacent to our property. since then the various openings these cuts produced have not been managed so what we generally are left with is a tangle of poplars and grape vines. it's disgusting. of course, if that is what you are after, cut away.

also, please do not burden our area with a biomass plant. we and the environment do not need this!

Jim Wootton
Paoli, IN

*******Comment 46*******

DNR Forestry,

After reviewing the strategy, I agree with most all of the ideas laid out. The items of importance to me I believe are represented in the work that is being done. My one concern mainly consists as to how feasible some of them are in this state. All of the ideas/strategies that require a change in a law extra funding will in my opinion have a hard time coming to pass. We as a country, state, and individuals have limited funds to complete the things we need to do and want to do.

Also after reading all of the comments, all I can say is wow and good luck! I'm glad I don't have to deal with all of the public everyday and can pick and choose who I work for.

Also so far as helping with the strategies I am thinking I can do the most with step 4 Education. I attempt to educate people in my local area when the opportunity presents itself. I am also interested in items that are in the Dearborn, Decatur, Franklin County forest patch as this is where I live.

Thanks for your efforts,
Matthew Raver

*******Comment 45*******

Dear State Assessors,

I believe that using Indiana's forest for biomass incineration is a serious mistake that will impact the State's future for generations.

Bruce Liles
Jasper, IN

*******Comment 44*******

Dear Madam or Sir:

Please accept these comments on the Draft Statewide Forest Strategy. The strategy appears to give the green light to clearcutting and promoting biomass harvesting for incineration, and I oppose these practices as part of the statewide forest strategy.

The strategy document emphasizes active management, such as heavy logging and clearcutting, of existing forests to increase "even-aged" stands of trees less than 19 years of age. Instead of clearcutting public forests, however, Indiana can create opportunities for younger trees by increasing the percentage of land going back to forest. There is no need to create more "early successional habitat" when such habitat is already plentiful in a heavily degraded landscape. Commercial activity on private lands and tree mortality on public lands already create opportunities for younger trees.

The strategy document likewise identifies a shortage of trees more than 99 years old, yet there is no mention of any plan for creating more old forest or allowing younger forests to age past 99 years. Instead, the focus is on a heavy logging regime to create more young forest. This strategy is inverted and misguided.

I also object to the strategy document's promotion of logging for biomass incineration. I oppose cutting and burning Indiana's state forests as a source of energy. In addition, promoting biomass was not an action recommended by the working group involved in creating the document. The working group recommended a thorough study to know the safe parameters for using Indiana forests as sources of biomass. The study was not necessarily to promote the use of biomass as an energy source either in the state or for export.

Sincerely,

Amanda Moore
Murfreesboro, TN

Charlene Marsh
Nashville, Indiana

Mary Rice
Bloomington, IN

Carey Lea
Spencer, WV

Winnie Edgerton

Charles Phillips
Boonville, MO

Lorraine Crecelius
Marengo, In

Alex Harrington

Kevin Strunk, LPG

Sarah Ryterband
Bloomington, IN

Kevin Ryan
Bloomington, IN

Doug Cornett
Marquette, MI

Miriam Ash
Ferdinand, IN

mike mcroy
eldorado, IL

Rich & Marsha Scherubel
Gladstone, MO

Rob Archangel
Harrisonburg, VA

Danyele Cottrell
Bloomington, IN

Jo Ann Vogt
Bloomington, IN

Josh Schlossberg
Montpelier, VT

Stone Joseph
Bloomington, IN

Thisis AJoKe
WallaWalla, WA

Terri Greene
Bloomington, IN

Paul Schneller
Bloomington, IN

Christine Linnemeier
Bloomington, IN

David Nickell
Ledbetter, KY

Steve Woods
Evansville, In

Amy Benningfield
Leopold,IN

Lucille Bertuccio
Bloomington IN

Jennifer Weiss
Bloomington, IN

Mark M Giese
Racine, WI

Marian Cooley
Muncie, IN

Katherine B. Hicks
Bloomington, IN

Alec Kalla
French Lick, IN

Emily Jackson
Bloomington, IN

Mark Burwinkel
Cincinnati, Oh

Tony Jones
Carbondale, IL

Douglas Paprocki
Lafayette, IN

randall haile
bloomington, IN

Mary Hood
Plain City, OH

dinda evans
san diego, ca

Jeanne Melchior
Jasper, IN

Lauryn Slotnick
Douglaston, NY

*******Comment 43**

My earliest family memories involve hiking and picnicking with family and friends in our local forest settings. I believe that some of my early outdoor experiences have helped me respect nature, as well as my neighbors. I understand that in a slow economic climate there is an urge to find a quick fix. I believe logging and clear cutting our public forests will truly come back to bite us all. Please, in our rush to increase Indiana revenue, let's not "jump out of the pot and into the fire." Right now, tourists slow down to visit awhile in our rolling, forest-covered hills. They don't rush through on their way to somewhere else. It has been my experience that "rushing through to somewhere else" already happens in some states. It would be sad and disappointing if Indiana became one of them.

Kris Lasher

*******Comment 42**

I am writing to commend you on the forest plan's proposals to conserve and expand protected forest areas and to improve best management practices for forestry. However, I implore you to vote against any measures supporting clear cutting on public or private lands.

Sincerely,
Lori Thomas
Lebanon, IN

*******Comment 41**

Hello,

A few comments and a question or two on the Statewide Forest Strategy and Assessment.

To what degree will management across "forest patches" be coordinated between public agencies?
Does the Strategy provide for sub-patch, cross-jurisdictional management?

For example in the Monroe Lake vicinity, part of the Shawnee/Brown County Hills Patch, public land is managed by the United States Forest Service, Indiana Department of Natural Resources Division of Parks, IDNR Division of Forestry and United States Army Corps of Engineers. Heavy timber harvesting by multiple agencies, while justifiable on a specific project basis, may result in exponential increases in edge habitat and acres of forest lost to logging roads when considered across a sub-patch level. In addition to the revenue raised by the harvest, the logging roads are considered an added benefit by our Governor and are unlikely to be rehabilitated post-harvest.

Getting back on point, well intentioned management by individual agencies may produce results contrary to the Strategy's objectives unless sub-patch, multi-jurisdictional planning takes place.

Steve Hrenchir
Indianapolis, In

*******Comment 40**

Indiana Statewide Forest Strategy
Citizens Action Coalition of Indiana
June 9, 2010

The Citizens Action Coalition of Indiana recognizes the unanimous understanding that we need to protect the sustainability of our state forests at a time when our resources are becoming increasingly threatened.

We fully support the following strategic goals that the Indiana Department of Natural Resources purports to accomplish through the statewide plan.

- 1.) Conserve, manage and protect existing forests, especially large forest patches
- 2.) Restore and connect forests, especially in riparian areas
- 3.) Expand Best Management Practices with special attention to invasive species
- 4.) Coordinate education, training, and technical assistance, especially develop strategic partnerships with land use decision makers

We understand the importance and are cautiously supportive of economic development through the sustainable use of state resources, but question the methodology, intent, and sustainability of the following strategic goal:

- 5.) Maintain and expand markets for Indiana hardwoods, especially sustainably certified and local use
- 5.3 Promote the development of a sustainable market for biomass from the State by establishing Biomass Harvesting Best Management Practices specific to the needs of Indiana's forests and incorporating third party sustainable certification

The logistic, resource, and economic sustainability of fuel sourcing for a woody biomass to energy facility is an extraordinarily complex endeavor. The goal (and requirement) for biomass to energy facilities is to source low-to-no cost fuels, throughout the entire lifecycle of the facility's operation, in order to offset the low BTU value of wood relative to traditional fossil fuel feedstocks. According to case

by case considerations of existing biomass facilities in the U.S., to remain economically defensible the operator must source feedstocks from within a 50-100 mile radius of the plant's physical location. The type and content of feedstocks however is critical in determining a cost effective distance from which it can be transported. More hazardous resources – such as C&D debris, RDF, TDF, MSW - with higher tipping fees can be transported from longer distances while primary, less hazardous woody biomass resources with lower tipping fees reduce the maximum distance from which they can be sourced. This methodology of sourcing, by using tipping fees to net out cost of transportation, is extremely volatile and must be managed with constant oversight.

Due to the economic constraints in woody biomass sourcing, it is imperative that woody biomass facilities be spaced according to resource availability. Currently there are 4-5 woody biomass facilities proposed for the southern half of Indiana; three of which are further along in permitting and development: LGR-Scott County, LGR-Crawford County, BioEnergy – Clay County.

Proposed Woody Biomass Facilities: 100 mile supply radius

The 2010 Woody Biomass Feedstock report published by the Indiana DNR separates the location of biomass resources by four distinct regions in Indiana (Northern, Lower Wabash, Knobs, and Upland Flats). The intersection, or shared supply space, of all 3 supply radii (shown in the above figure) represents the entire Knobs region, and small percentages of the Lower Wabash, Northern and Upland Flats regions. The shared intersection of all three facilities also happens to represent the area of the state with the highest density of primary mills. It is clear that the 3 proposed facilities will be competing for the same resources within this intersection. This competition – for the majority of the viable resource – brings into question the regional sustainability of supporting such facilities.

Also according to the 2010 DNR report, Indiana has aggregate woody biomass availability (from primary mills) of approximately 1.3 million tons. The Energy Information Administration however states the following based on a study conducted by Anteres that: [...urban wood waste and mill residues would be considered to be available only if they are not currently being used for other productive purposes. In other words, it was assumed that if urban wood waste and mill residues are currently being used for any purpose, it would not be economically attractive to divert them to electricity generation at any price.] (<http://www.eia.doe.gov/oiaf/analysispaper/biomass/>) This is critically important when considering the distribution of residues generated by primary wood using mills in Indiana. With the fiber product industry, current use for industrial and domestic fuel, and other miscellaneous uses, only 1% of the 1.3 million tons is currently unused in Indiana (~13,000 tons). According to the permits of all 3 proposed facilities, mill residue represents an important feedstock to maintain operational viability. It would be our recommendation to conduct a study to determine availability of mill residues to be used for the purpose of electricity generation – not just an aggregate amount that exists.

Even more questions arise when considering other available resources as reported by IDNR. According to the 2010 DNR report the following is an estimate of available feedstocks: 1.3 million tons of harvest residue, 474.4 million tons of above ground live biomass, 10.4 million tons of standing dead biomass, 160 thousand tons of construction and demolition debris, and an unknown amount of secondary wood manufacturing resources. For harvest residue, live standing, and dead standing resources, what percentage of this resource is logistically and economically possible to extract for electricity generation purposes? What percentage of each of those is currently used in any capacity? Is it economically attractive to divert these resources for electricity generation? Is burning woodwaste the most equitable and attractive use of these resources?

Supporting the massive expansion of the woody biomass to energy industry should not be taken lightly. Before we have an intimate understanding of regional sustainability and vet all other alternatives, woody biomass plants should be queued. Other studies that need to be considered before massive

development and deployment of the woody biomass to energy industry need to focus on: Availability of urban wood waste (tree trimmings), harvest residue availability, ecological impacts of removing biomass from wildlife habitats (i.e. erosion, nutrient depletion), the regional sustainability with multiple biomass-to-energy operations, economic impacts on the current wood-waste-using industry, and economic impacts of future users of wood waste (i.e. cellulosic ethanol).

Sincerely,
Zac Elliot
Citizens Action Coalition of Indiana

*******Comment 39**

To Whom It May Concern:

With Indiana's current environmental statistics, I was very pleased to see the DNR's efforts to conserve and expand protected forest areas, to increase forested riparian corridors, and to improve best management practices for forestry and control of invasive species. However, the quantity of forestry density matters too! I strongly oppose the authorization of clear cutting on both public or private lands.

Indiana is #3 in toxic air emissions; Indianapolis has the 2nd largest carbon footprint out of all US cities; not to mention the very depressing asthma and lung disease rates in our state. If anything, we should be promoting the planting of forests to protect our physical and mental health. I recently visited Sharonville, OH, which is an official TREE CITY. It's a beautiful example of human progress harmonizing with nature. Perhaps, you could lead the promotion in making our very own Hoosier cities into official TREE CITIES (<http://www.arborday.org/programs/treecityusa/>). We need something though.....Hoosiers are begging for fierce environmental protection.

I am also greatly concerned with the plans to go ahead on the I-69 extension. It seems like continuing that project would be hypocritical in light of the plan to preserve forestry. Maybe, the DNR could be a voice of reason for the governor.

Thanks so much for your consideration, and good luck in your decision-making!

Sincerely,
Jennifer Washburn

*******Comment 38**

I have read through the proposed statewide-forest strategy document. While I applaud some aspects of the plan (efforts to control invasive species, for example), I strongly object to one portion of the plan - the practice of clear-cutting.

Clear cutting is a dangerous practice. Decimating our forests does not provide any benefits (except for loggers). It damages wildlife and their habitat and it increases erosion. This erosion problem is especially severe in the southern portion of the state where the situation is exacerbated by the many hills and the impact on our water supply.

Thank you for your time and attention -

Julie L. Thomas
Monroe County Council
Owner, Cartridge World Bloomington
Bloomington, IN

*******Comment 37**

Thank you for the opportunity to contribute.

The emphasis on large forest patches is sensible, but it should be noted that these patches exist and are still in place due to economic/physiographic constraints that will most likely continue to operate.

Programs to re-establish forests on land that is best-suited to forest cover and in areas that will provide connectivity of forest patches – even relatively small ones – should yield high rewards per dollar spent.

This approach would re-emphasize the importance of many wooded areas in Northern Indiana that seem to be of lower priority in the current plan, and spread important forest stewardship efforts more evenly across the state.

Adding exotic species management as an important aspect of management is crucial to future forest health and productivity. This is a total society problem that will require enormous investments to manage, starting with education of citizens to avoid the use of potentially invasive plants. Perhaps if the citizens of Indiana know that their landscaping is threatening the native forest lands, pressure will be applied to slow or stop the sale of invasives that continues to this day. Some states have banned the sale of some forest-invading plants – something to consider. Efforts to control invasive expansion in large forest patches, as well as smaller but highly productive forests in Northern Indiana, are both important objectives.

Even-aged silviculture will be an important tool to retain a diverse forest habitat if applied properly. There are established techniques using the shelterwood system – see publications from Jeff Stringer <http://www.utextension.utk.edu/publications/spfiles/SP676.pdf> – that require more management effort, but are effective at regenerating oaks on higher site index locations with a current oak component. Large group openings and well-planned clearcuts should provide early successional habitat. Uneven-aged management will continue to be a valuable tool in areas where aesthetics, and late-successional forest habitat are management objectives.

The effective management of the deer herd is of great importance relative to diverse forest tree regeneration, diverse forest floor vegetation, and control of invasive species invasion. Information from deer exclosure studies, and comparison of forest dynamics in areas with heavy hunting pressure versus minimal hunting should be used in setting deer population management targets and as a public education tool. Deer management should be based on biological principals and long-term ecosystem health.

Many of these issues are addressed in an abstract publication

<http://www.ces.purdue.edu/extmedia/FNR/FNR-258.pdf>

I and other members of Purdue FNR have been and will continue to cooperate with the Division of Forestry to provide research-based information and education/extension/engagement.

Lenny Farlee, Extension Forester
Hardwood Tree Improvement and Regeneration Center
Purdue University Department of Forestry and Natural Resources
West Lafayette, IN

*******Comment 36*******

The Division of Nature Preserves would like to provide a few comments:

Regarding the focus area in Newton County, we would like to clarify that the area will be a complex of open prairie, black oak sand savanna, and wetlands, as opposed to a closed forest. That is the goal for both The Nature Conservancy's Kankakee Sands Project, and the Department of Natural Resources Properties in the area (Conrad Savanna, Beaver Lake, and Willow Slough;

Regarding the Invasive Species Assessment, the map (p 32) shows portions of Porter, LaPorte, and Noble Counties as being medium to low risk. Based on our work on battling invasives in natural areas in those portions of those counties, we recommend the map show those entire counties as high risk. Dunes State Park, for example, has major infestations of numerous invasive species.

Thanks.

John A. Bacone
Division of Nature Preserves
Indiana Department of Natural Resources
Indianapolis, IN

*******Comment 35*******

The state of Indiana has been a leader in forest management for nearly 100 years. With the creation of the Classified Forest Act, incentives were created to prevent the conversion of forest land to other uses. We need to keep the Hoosier forest as a “working” forest with multiple uses including harvesting. The forest products industry produce nearly 60,000 jobs and over \$7 billion in revenue, jobs and revenue the state can hardly afford to lose.

I am in favor of timber harvests on state and federal forest lands. Timber harvesting improves the long term health and ecological diversity of the forest. Young tree use up more carbon dioxide and give off more oxygen than over mature and dying trees. Forest are vibrant, every changing ecosystems. Preservation is impossible. The current model of Conservation is possible. Sound forest management, sustainable harvesting, and good government policy that “works with Hoosier foresters” is the key to the long term future, and health, of the Hoosier forest.

I am hopeful that the Department of Forestry will continue to look at the science and progress make with sound forest management and avoids the short-sighted, “sound bite” politics that dominate most policy decisions.

Thank you,

Richard Solano
Akron Indiana

*******Comment 34*******

I am submitting these comments on behalf of myself and the Indiana Wildlife Federation. Thanks!

1. Indiana Wildlife Federation is very glad to see a statewide comprehensive approach to forest management, and is supportive of the Division's efforts and progress.
2. Myself and IWF, as an organization, share many, if not all, of the same concerns and priority issues addressed in the Strategy, with a special emphasis on our forests' ecological importance and impact on our State's wildlife resources and plant communities. A very large proportion of our membership and affiliates are especially supportive of increasing early-successional forest habitat (specifically action steps 1.14 - 1.16) and the sustainable regeneration of oaks through increased active management.
3. It is important to continually recognize forests as vital habitat for wildlife in the Strategy and to acknowledge that many species are dependent on active management.
4. I am very optimistic about the future management of our forests with this strategy, and am more than willing to continue to be part of the collaborative efforts with DoF; whether it be through professional input, stakeholder involvement, educational program support, or all the above.

Travis Stoelting
Habitat Programs Director
Indiana Wildlife Federation

*******Comment 33*******

Hello,

Please accept this support for this initiative and opposition to those that oppose.

Kent Burget, CHST
Indianapolis, Indiana

*******Comment 32*******

I support the plan to conserve and expand protected forest areas but am not in favor of clear cutting. I've watched this kind of destruction in a nearby neighborhood where I live and find it very disturbing. Deer and other creatures have nowhere to live. There is so little forest land - let's protect what we have.

Thank you,

Bonnie Hand
Indianapolis, IN

*******Comment 31*******

To whom it may concern,

I sincerely hope that when you are making the decisions on the state forests for the next forest plan, you consider science in the equation. These forests belong to all Hoosiers, and should be managed for all uses. This includes periodic cutting of mature trees. We have managed our forests for over a hundred years for not only recreation, but for timber harvest. The State of Indiana has a Sustainability Statement

along with a Legal Logging Statement, please see the attachments. I am very proud of the forests in this state, and don't believe that decisions on the issue should be based on the number of responses that are received, but more on science. We have educated people for a reason. Let's use them and keep our forests managed for all purposes.

Sincerely,

Dave Bramlage
Monticello, IN

*******Comment 30*******

I totally support the IDNR's Division of Forestry in their assessment and strategic plan.

Jack C. Corpuz
Indianapolis, IN

*******Comment 29*******

Mr. Davis,

I understand that the Department of Natural Resources is working on a statewide forestry plan. I applaud the plan's proposals to expand protected areas, control invasive species and improve best practices of forest management. I would like to express my strong opposition, however, to the clear-cutting of our public lands. I am particularly distressed by the planned logging in the so-called Back Country Area of Morgan-Monroe State Forest and Yellowwood State Forest. These areas hold fond memories for our family. We have taken our kids there to hike and camp. Their experiences there have helped shape their excitement and love of our state's natural beauty and heritage. They help form the foundation of our teaching them to preserve and protect nature. I am distressed at the possibility that I would have to explain how the very part of our representative government that is charged with the forests' protection was the one responsible for that destruction.

Please do not log our state forests. Please create a rule to protect the Back Country Area and the deep spiritual beauty it represents.

Thank you,

Bob Flynn
Bloomington, IN

*******Comment 28*******

To whom it concerns...

I support the plan's proposals to conserve and expand protected forest areas to increase forested riparian corridors and to improve best management practices for forestry and control of invasive species; however, I AM NOT in favor of clear cutting on public or private lands.

We need these lands and everything on it for the future benefit of the future generations!

Thank you!

Jacquie Green
Indianapolis, IN

*******Comment 27**

While I support and applaud the plans and proposals to conserve and expand protected forest areas, I definitely am NOT in favor of clear cutting on public or private plans. Let's put an end to the practice of clear cutting once and for all. (I'm surprised people still actually want to do this type of thing. I thought this type of obvious environmental bad idea was passé by now.) Thanks!

Kim Ball
Indianapolis, IN

*******Comment 26**

While I support the second stage of the DNR strategy development plan's proposals to conserve and expand protected forest areas to increase forested riparian corridors and to improve best management practices for forestry and control of invasive species, I am NOT in favor of clear cutting on public or private lands.

Thanks you,
Amanda Zachow-Stover

*******Comment 25**

No clear cutting.

Jerry and Ann Kaplan

*******Comment 24**

I support the Indiana Statewide Forest Strategy proposal to conserve and expand protected forest areas, to increase forested riparian corridors, and to improve best management practices for forestry and control of invasive species. However, I am NOT in favor of clearcutting on public or private lands.

Thank you,
Amanda Budhi
South Bend, IN

*******Comment 23**

Greetings.

I'd like to express my thoughts on the second stage of the DNR strategy document for forestland. By and large, I think it's a good piece of work. My one concern with it has to do with the proposed increase in clear cutting on public and private land. I've yet to see any instance in which clear cutting is a good strategy for managing a forest, whether in Indiana or anywhere else. Please see that that part of the document is revised.

Thank you for your attention.

Gregory L. Green
Covington, IN

*******Comment 22**

Thank you for your efforts in creating the Draft Statewide Forest Strategy. There are many positive and important action steps in this strategy. Among the many positive features included in this strategy are the proposals to conserve and expand protected forest areas, to increase forested riparian corridors, and to improve best management practices for forestry and control of invasive species. BMPs really need to be mandatory for all logging activities and not voluntary. Enforcement will be problematic but a few bad logging jobs besmirch the entire industry. Every job would not have to be checked, just periodic spot checks.

The features of the plan that I disagree with are the recommendations to increase the use of even-aged management on large public and private landholdings and to promote the use of forest biomass as an energy source. Even aged management does not mimic any natural process and would greatly encourage invasive species. Woody biomass is just such a bad idea on too many levels to begin to address.

Thank you again for this opportunity and for the great amount of effort to put this strategy together.

Jess A. Gwinn
Solsberry, IN

*******Comment 21**

Please make sure that the statewide forest strategy for Indiana emphasizes the following:

1. Restoring and connecting forest corridors along rivers and streams
2. Increase or expand assistance to private landowners so that they can manage their forest on a landscape scale in conjunction with other owners.
3. Significantly increase the amount of young forest (5 to 15 years) through creation of large clearcuts (5 - 10 acres plus) in areas of stagnant forest (dominated by mature maples).

The state has seen a drastic change in the forest age structure over the last 75 years and much of the young forest has disappeared along with those species that are dependent on young or early successional forest. These areas of oak and hickory have become virtual deserts with full canopies of maple and no food or habitat for other species. The fact that the State has allowed this decline to continue when the loss of species diversity has been well documented is outrageous. The State can no longer manage the forest to the whims of the anti-loggers when it is clear that the anti-logging movement has actually harmed the forest ecosystem.

I have to commend the State for the great strides made in increasing the amount of young forest but we are still several orders of magnitude from where we need to be.

Thank you,
Jon Eggen
Conservationist, Naturalist, Birdwatcher, Biologist and Outdoorsman
Brownsburg, Indiana

*******Comment 20**

While I support the plan's proposals to conserve and expand protected forest areas, to increase forested riparian corridors, and to improve best management practices for forestry and control of invasive species, I am NOT in favor of clearcutting on public or private lands.

I also question the recommendations to increase use of even-aged management (clearcutting) on large public and private landholdings, and to promote use of forest biomass. What is the reasoning behind even-aged management and why??

Any form of clearcutting damages the fragile environment for years if not decades and can cause irreversible damage to the eco system.

We should be increasing the forest areas 10 fold and protecting them as well as planting the right species of trees for the area and eco system.

This would be my goal if I am successful in getting 40 acres with a house. 2/3 of the land would be returned back to woodland and the natural eco system.

Yours sincerely,
Miles Stepney

*******Comment 19**

As a citizen of Indiana, I am not in favor of clear cutting in our forests unless it is for an invasive species. Otherwise, these forests should continue to grow as so much has already disappeared over the past years. We need these areas to be protected for the future and for our well being now.

Millie Brady

*******Comment 18**

Dear Sirs,

I do not support clear cutting of Indiana's forestland. I do support the plan's proposals to conserve and expand protected forest areas. We need to improve management practices for forestry and control of invasive species. Clear cutting, you are NOT in favor of clear cutting on public or private lands. Let's be smart, let's stop destroying our natural resources, let's plan for the future.

Deborah Capps
Greenwood, IN

*******Comment 17**

Hello,

While I support the DNR's Strategy plan's proposals to conserve and expand protected forest areas to increase forested riparian corridors and to improve best management practices for forestry and control of invasive species, I am NOT in favor of clear cutting on public or private lands.

Sincerely,
Amy Cheek

*******Comment 16*******

While I support the DNR strategy plan's proposals to conserve and expand protected forest areas, please stop clear cutting on public or private lands. Our forests have been decimated enough. Are we going to cut all the trees down until they're gone? Humans do not exist apart from their environment, but I'm afraid the state government, and most Americans, haven't quite figured that out yet. Let's stop committing mass suicide.

Doug Hanvey

*******Comment 15*******

Dear DNR -- In general you have a good draft strategy -- but NOT when you open the door again to CLEAR-CUTTING. -- Thank you,

Prof. Paul Salstrom
St. Mary-of-the-Woods College
St. Mary of the Woods, IN

*******Comment 14*******

I am writing concerning the second stage draft of the DNR strategy document. I agree with most of the strategy, but I DO NOT AGREE WITH CLEAR CUTTING OF FORESTS.

Please remove the clear-cutting portions of the strategy before it is approved.

Jain Young
Fort Wayne, IN

*******Comment 13*******

While most of the forests in Indiana are outside of urbanized settings, most of the people in Indiana live in cities and towns. Forest tracts -- large and small -- wherever they exist are very important, but the urban forest is the place where most Hoosiers come into contact with trees. It would be great to have a 6th primary strategy that addresses the urban forest specifically; this is the forest that most immediately affects most people in Indiana, the forest which can most positively affect sustainable lifestyle issues for

most people. Soil and water issues which can be mitigated by trees are most critical in urban areas. Energy-use reduction through trees is most effective in urban areas. Pollution amelioration through trees is most effective in urban areas. A comprehensive strategy for Indiana forests is correct to recognize the exceptional value of rural and wilderness forests; the unique and complicated nature of urban forests deserves equal recognition.

Thanks,

Aaron Sawatsky Kingsley
Forester, City of Goshen

*******Comment 12**

I heard that Indiana's statewide Forest planning effort is now seeking public comment and wanted to voice my opinion.

I support the plan's proposals to conserve and expand protected forest areas, to increase forested riparian corridors, and to improve best management practices for forestry and control of invasive species, but am NOT in favor of clearcutting on public or private lands.

Katie Harrington
Indianapolis, IN

*******Comment 11**

Dear Sir or Madam:

When I made my earlier comments, I had not yet been able to review your final version of this plan.

In now reviewing the final version of your Indiana Statewide Forest Strategy, it does indeed appear that this plan will place overwhelming priority on the securing of large, southern, rural, relatively development-safe lands that you call "forest patches". That is really nothing new. Because of their size alone, your "forest patches" have always appeared to be the Division of Forestry's top priority. But what is disturbing, is the paucity in this plan of priority or interest toward saving smaller, but important forested lands in the north.

Although the forests of the Northwest Moraine Forest Legacy Area are clearly shown on Figure 2 to be high priority areas on this "Composite Forest Priority Areas" map--doubtless due in part to their high biodiversity. It does seem that your definition of "forest patches" has been written so as to exclude these areas from this definition. Indeed, your Figure 1 "Strategic Target Forest Patches" (in contradiction to Figure 2) creates the false impression that only the only forested areas of importance in this FLA are those presently existing as preserves, here.

Your strategy speaks of concern for neo-tropical migrant songbirds, Yet, it appears that this final version has practically written-off the forests of the Northwest Moraine FLA which provide such important habitat for them, during their migrations. This belt of forestland extends over the widths of two counties. Yet, it is not even shown as a "possible corridor" on Figure 4.--even though it is indeed an ACTUALLY EXISTING forest corridor!

Where is the Division of Forestry's initiative for preserving and protecting the important biodiverse forestland near urban-suburban areas in the north??? I see no real evidence for any such initiative in this plan. Is it non-existent? Are you basically just going to write these forests off? (Perhaps due to political pressure?)

If so, then perhaps then you should re-name your plan the "Southern Indiana Semi-Statewide Forest Strategy". Because it seems from this final version of the plan that your interest in the small, but important woodlands north of the National Road is meager, at best.

--Robert J. Boklund

*******Comment 10*******

Dear Assessment Director,

I have reviewed the draft IDNR Division of Forestry Statewide forest assessment and strategy as a case example for how it addresses the status of sustainability for Indiana's forests. The nature and dimensions of sustainable forests has been the primary focus and object of my research for more than 20 years and my results have been presented in books published by the Forest History Society and Pinchot Institute for Conservation, the Forest Service where I am sponsored as a volunteer researcher, and papers in the SAF Journal of Forestry, its National Conference Proceedings of 2003 and 2008 and for its draft Forest Encyclopedia. The Indiana assessment understanding reflects the nature of sustainability of forests as expressed in the first paragraph of the Executive Summary and the first paragraph of the Goals and Objectives Section on page 1 of the Assessment. It also recognizes that Indiana's forests have been and presently are being sustained along with the landowner and societal stakeholder and citizen interests in the forests but dynamically (first Para. Executive summary).

My research defines the pursuit of sustainability for forests as a dynamic, holistic societal goal and process across the broad landscape of multiple ownerships and the diverse stakeholder, landowner and citizen interests for Indiana's forests (and for the USA, the Nation's forests). The most basic weakness in American Forestry today is that it has not defined what constitutes the enforceable bounds and limits of sustainable forests. My research does so. Sustainability for forests is a blend of natural beauty and peoples' needs on the forest land. In concrete categorical terms it is a blend of nature's natural beauty, ecosystem diversity and multiple utilities as well as peoples' amenity needs, environmental services and material goods and products. However, there is more than one particular blend that can be sustained over the long-term. For that reason sustainable forests need to be defined in terms of limits and bounds. This raises the question of how does society define these limits and bounds. It enacts legislation and defines regulations that set enforceable long-term policy bounds and limits for the use and management of natural resources including forests. While the legislation does not refer to them as policy bounds and limits for sustainability, they, nevertheless, implicitly constitute the society's definition of sustainability for natural resources and forests.

Sustainability in this perspective is not scientifically defined by science but a practical goal for societal survival, quality of life and a supporting natural resource and forest environment. But science can define measurable indicators of the status of those limits and bounds such as the Criteria and Indicators defined by the Montreal Protocol. However, the Montreal C & I are not enforceable. But you will discover that the USA national and state policy bounds closely parallel the Montreal Criteria and with

the explicit approval of the Montreal Technical Committee, they can substitute for the Montreal C & I. American forests have been and are sustainable because its practice responds to and obeys the law and observes the policy bounds and limits they define. Note: that forestry cannot independently define what constitutes sustainability for society because there are other demands that society places on the natural resources and the forests as population and the economy grows and shifts. The policy bounds and limits are dynamic and increasingly restrictive in response to the societal growth and development as evidenced by the recent emergence of the so-called environmental laws. Note also that the Indiana emphasis on the best management practices reflect the enforceable policy bounds and limits guidelines. Some may be optional or voluntary guidelines for what to sustain within those bounds as discussed in the next paragraph.

Because sustainability is defined as a range there remains a second decision and process for determining what to sustain across the forest landscape of multiple ownerships. My research labels this process as landscape planning and coordination or landscape forestry. Actual forest practice, incidentally, has always been a step-by-step process implicitly and pragmatically shaping the landscape somewhat randomly as guided by the preferences of the individual landowners and public jurisdictions and its own multiple use principle. Today, the aggregations of public interest confrontations, demonstrations, adjudications of recent decades can and should be viewed as the democratic voice of the public interest calling for a voice and vote in the determination and guidance of the long-term landscape outcome for forest use and management. This has been difficult to perceive on the ground in traditional forest use and site-specific management practice because preferences of landowners and stakeholder and citizen interests have been implemented simultaneously with the policy bounds and limits for sustainability. The confrontations were primarily due to the lack of public policy and governance, a democratic communal process, for reconciling differences in landscape development preferences. Presently forestry practice in beginning to acknowledge the landscape planning and coordination need and the need for participative and collaborative communal forest use and management decision making. But it is largely ad hoc and ownership specific and not coordinated across the statewide landscape. The State of Minnesota, however, has recognized this separate need and provides the governance for a systematic public participative societal approach as a separate decision process in the pursuit of sustainable forest resources. This is described in depth in the Pinchot Institute Book that I am forwarding by Express Mail.

These challenges call for a stronger role in leadership for the future of forestry in the USA. The Federal role will remain but needs to be expanded to encourage states and State Foresters to respond more explicitly to the cultural change as defined by the Pathway understanding and model and the Minnesota empirical approach on the land. Indiana is at the same point of Assessment completion and development of a strategy for the goal and process for sustainable forest resources as Minnesota was in 1995. The Indiana process is poised on that Pathway. It may be too late to reshape the assessment results drastically. I encourage Indiana to make the definition of what constitutes sustainability as a goal and process and the differentiation of the landscape forest resource management process across the landscape of multiple ownerships as the primary issue and strategic objective for the next five years. The present assessment should be defined as a baseline for assessing the explicit status of sustainability for statewide forest landscape. The current long term strategies should be issues that need to be assessed and remediated in pursuit of the goal and process of sustainability for the longer term future. As you acknowledge in the Executive summary opening Indiana has been and is on the Pathway for sustainable future forests.

I thank you for the opportunity to review your draft progress. I am forwarding by overnight Express Mail several of the published results of my long-term study and research on the goal and process of

sustainability for forests. I would appreciate your response and any questions. You are on the verge of an innovative change in the culture of forestry and I encourage Indiana foresters to move as boldly forward in your poised position as time and other constraints permit. Forestry needs dynamic leadership and it can only come from the States and their State Foresters.

John Fedkiw

*******Comment 9*******

Comments on review copy of the draft State Forest Assessment

Strategy 1: Conserve, manage and protect existing forests, especially large forest patches

Component: Develop a Strategic Forestland Conservation Program and increase incentives to keep forests as forests.

In this component I see little mention of cooperating with conservation organizations to ensure a forested Indiana. The state should cooperate with groups like the Nature Conservancy and various land trusts not limited to the Central Indiana and Sycamore Land Trusts to help with conservation of forests. Although this action is addressed under Strategy 4, it should also be mentioned here, in Strategy 1.

Action step 1.6 should also have a component that encourages smart growth throughout the state, not just in targeted forest. As a tool for smart growth, trees can be conserved using covenants that require maintaining as much forested cover as possible as well as requiring replacement of trees removed due to disease, mechanical damage or potential hazard.

Component: Increase the percent of forest in the age class of <19 and >100 years old

Action steps here appear to encourage reforestation and conversion which should adequately reinstate <19 year old age classes.

However, this component fails to adequately encourage development of >100 year old forest. An action step needs to be developed to encourage the maintenance of mature and over mature forests such as "Action Step 1.xx Dedicate areas in forests throughout the state of 100 acres or more which are not included in cutting rotations for development of older age stands that mimic presettlement condition with trees several feet in diameter." State Park forests are inadequate to meet the needs of the portion of the recreating public that requires a broad expanse of older forest in which to ramble about, backpack, and camp overnight in solitude. As stewards of the state's resources, we should provide all kinds of forest, including over mature forest, for the benefit of our descendents.

Remember that the forest means many things to many people and should not be treated as simply an economic resource. Just as we respect the hunters who value the forests for their preferred activity, respect should be given to people who value the forest's intrinsic qualities as expressed in older growth areas. No-cut corridors near trails will not fool those of us who value the kind of forest that is dominated by >100 year old trees. Keep significant chunks of forest free from harvest even when it is not the best economic use of that timber.

Component: Develop statewide Early Detection Rapid Response Program (EDRR) for forest invasive plants

These actions are not proactive enough. Invasive species must be treated as aggressively to prevent invasion and as they begin to invade areas. For, example:

Action step 1.XY Require all forest users, recreationists as well commercial operations to adequately clean all equipment and supplies of plant material prior to entering the forest.

Action Step 1.XZ Require all livestock feed be certified weed free for animals that will spend time within a forested area.

Action Step 1.YX Develop a seed bank of native species of plants that can be used to revegetate areas treated for invasive species.

Strategy 2: Restore and connect forests, especially in riparian areas

Component: Develop corridors to connect isolated forest patches and enhance dispersal and genetic integrity – create and restore forest where it does not exist.

Action step 2.4 should read During restoration utilize native tree species that will foster a broad range of ecologic benefits and are found naturally in the area.

For example, Locust trees are not generally touted as mast trees, but they perform several ecological functions. They are nitrogen-fixers and prepare the soil for further forest succession. I have observed that they are a significant draw for hummingbirds while they are in flower, and they could be a significant seasonal food source for other animals as well. During the last locust hatch, I observed locusts concentrating around these trees, so it is possible that they are a significant contributor to this phenomenal natural wonder and should be available to the locusts next time they emerge. There are many other examples of tree species that are important ecologically although not particularly important to a hunter during hunting season.

Component: Increase forest cover in riparian areas.

There should be consideration of including drains and ditches in the areas to be forested. Trees would provide enhanced water quality. The advantages and disadvantages of cutting all woody vegetation out of drains and ditches should be formally evaluated and recommendations should be made to county surveyors.

Strategy 3: Expand Best Management Practices with special attention to Invasive Species.

There needs to be more incentive for private forest owners to use BMPs. More landowners should become “willing” and more willing landowners should be presented with financial incentives and other forms of recognition when BMPs are practiced.

As stated above, preventative BMPs should be developed to prevent introduction of invasive species. Requiring power washing of all equipment and supplies is one practice. Requiring certified weed free feed for livestock is another

Strategy 4: Coordinate education, training, and technical assistance, especially develop strategic partnerships

These all look strong. Take it to the schools and teach the kids when they are still able to adapt to a new day.

Strategy 5: Maintain and expand markets for Indiana hardwoods, especially sustainably certified and local use

Action step 5.3: Biomass harvesting is a tricky subject. BMPs must be narrow enough to allow activities without encouraging depletion of forest nutrients and disturbing habitat. Cover needs to be maintained. Quantities of biomass must remain in the forest to decompose and return some nutrients to the soils. Simply sweeping the forest of all biomass is not an acceptable sustainable practice. Before supporting a particular biomass project, require an analysis of all energy inputs and outputs to assure a net gain.

Oak regeneration should proceed carefully, realizing that it is a trial and error prone experiment. As such, it should never sacrifice areas known to be especially valued by the fact that they have received formal recognition as backcountry areas. Action step 5.1 names walnut, maple and cherry as other valuable hardwoods; therefore it is not necessary to focus solely on oaks. Maple will grow under established oaks and cherry will grow easily in early succession habitat. As a forest stakeholder, I know that this land tends to replace oaks with maples (and beeches). Indiana has options if oak regeneration proves as difficult as it first appears.

There should be an action step addressing artisan uses of wood products. There should be incentives to local artisans to use Indiana based wood products for a variety of value added products. If Indiana based businesses sell consumer-ready products, our state will reap a more appropriate portion of the profits to be made on our timber. Furniture making, toy making, tool and utensil trades as well as many other workers could use Indiana wood products including that found in regenerating forests.

Respectfully submitted,
Tom Hougham
Trafalgar, IN

*******Comment 8*******

Dear Indiana DNR,

"Few are altogether deaf to the preaching of pine trees. Their sermons on the mountains go to our hearts; and if people in general could be got into the woods, even for once, to hear the trees speak for themselves, all difficulties in the way of forest preservation would vanish.

- John Muir, "The National Parks and Forest Reservations," Sierra Club Bulletin, v. 1, no. 7, January 1896, pp 271-284, at 282-83.

Please don't be deaf to the 'preaching of the trees.' Please don't let John Muir look down upon you with disgust and shame!

While I support the Statewide Forest Strategy proposals to conserve and expand protected forest areas, to increase forested riparian corridors, and to improve best management practices for forestry and control of invasive species, I am NOT [nor is the spirit that remains of John Muir] in favor of clearcutting on public or private lands. Let this be known!

Phillip Brown
Lafayette, IN

*******Comment 7**

I am a novice owner of 85 acres of classified forest in Orange Township, Orange County; logged by the previous owner in about 1995.

The program, to me, is very ambitious - good! Funding problems and cooperation are obvious problems. Education also. I especially liked the proposed funding suggestions relating to increased fees; especially Heritage Trust.

Education, yes. This novice needs help on invasive species. More than photos, hands on experience would help me.

The land I have suffers from erosion, possibly from the poor homesteader in 1846. About 30 acres.

It still suffers somewhat from the logger in 1995 who left deep skidder tracks, many of which I have repaired. The top soil in the two log yards was not returned. (Reminds me of the coal strip mining decades ago in southern Indiana.) All of this suggests that loggers need strict state supervision/inspection.

This from a novice part time forest manager.

William M. Mattingly

*******Comment 6**

Dear State Forester

In your "Strategic Forestland Conservation Program" document, I-69 destroying classified forests is not addressed. This new proposed highway will cut through my 70 acres of classified forest in Greene County. It will be difficult to conserve, manage, and protect a forest with an interstate cutting through it. Perhaps in the protection and management of Hoosier forests, this issue needs to be addressed.

Sincerely,
Ruth Engs

*******Comment 5**

My husband and I own natural forest land and other acres in the CRP program in DeKalb. Also, property around Dunton Lake, one of the largest natural lakes in DeKalb. We are interested in good management of the land and the lake to continue it as it is meant to be. Your strategy plan sounds like a positive step and we hope we might be able to participate in some way. Two of our concerns are the ash bore and also, protecting our lake from run-off pollution from nearby fields and golf course. (herbicides) We feel the flow of water at the outlet of our lake needs to be addressed.

Thanks,
Linda (Mrs. James) Beaman
Auburn, IN

*******Comment 4*******

To whom it may concern,

I was one of the participants in the polling that occurred for this plan. Please consider my input while interpreting the results of the data collected.

The forest Products industry is the largest employer of Hoosiers in rural areas, their continued existence is important to carrying out many of the initiatives pointed to in the survey. It needs to be brought out that industry is the solution to many of the points even the ones that precede it in ranked importance.

My hope is that the importance of industry will not be lost in the translation of the data collected.

Below are most of the points and my opinion of how they relate to industry

Fragmentation and/or conversion of forests to another land use.

This concern is in harmony with the forest industry 189 507

Conservation and maintenance of soil and water resources.

This is important to the forest industry as well 199 425

The spread and control of invasive species

This is important to the forest industry as well 127 421

Conservation of biodiversity

This is important to the forest industry, and they can help to create more diversity. 150 364

Counterproductive government forest conservation related policies

This is a concern for the forest industry as well 75 249

Availability of land for public recreation

The forest industry helps to create recreational opportunities with the trails and roads they put in place 142 234

High cost of forest ownership and low incentives to retain.

The forest industry is the best solution to this issue 49 226

Conservation of forests that protect drinking water supplies.

This is important to the forest industry as well 51 206

Overpopulation of white-tailed deer

this is important to the forest industry 47 194

Inadequate public education about forests.

This is important to the forest industry and education should help to promote forest management

Sustaining Indiana's forest product industry 49 160

Lack of active management on forests

Most forest management is accomplished by the industry 38 146

Sustainable regeneration of oak woodlands

Again this is an area where industry can help if it is still around and they will also benefit from the gained diversity. 29 138

Inadequate youth education about forests

This can only benefit the industry, and they will/do participate in the education process. 18 94

The control of forest fires

Industry can help with this and it is to their benefit.36 73

The loss of fire dependent plant communities and habitats

Industry can help to create management techniques that can reverse this trend.13 67

Other 24 61

Forests not managed for carbon storage

given the proper credit for long term storage industry extends the forests ability to store Carbons.6 45

Jim Steen

Executive Vice President

Pike Lumber Company, Inc.

Akron, IN

*******Comment 3**

- 1.) Conserve, manage and protect existing forests, especially large forest patches.
- 2.) Restore and connect forests, especially in riparian areas
- 3.) Expand Best Management Practices with special attention to Invasive Species
- 4.) Coordinate education, training, and technical assistance, especially develop strategic partnerships with land use decision makers
- 5.) Maintain and expand markets for Indiana hardwoods, especially sustainably certified and local use.

100% support any conservation efforts in this plan to keep our existing forest intact and to expand and reconnect areas of forest where possible. INDIANA's forest are so fragmented with roads, farms, and developments that will take much more than this to ensure the future conservation and, if possible, expanse.

Please continue with programs that offer incentives for private land owners to keep their land wooded. A plan should also be developed for a program that will allow the state to buy back wooded land for public ownership. Shut down factories, old mines/quarries, and failed development should be reclaimed. Current public land should be considered to expand National and State forest. 100% agree with de-fragmentation and expanse to help the health of the forest, environment and wildlife.

I don't disagree with development, but the small percentage of large areas of forest Indiana still has should be conserved before it's too late. Keep Indiana beautiful.....not a big run down parking lot full of old factories and deteriorating roads and bridges.

Jeremy Stahley

*******Comment 2**

I appreciate seeing the plan. It is relatively conservative and feasible. Continuity and preservation are the two issues that I consider to be most important, particularly in 'non-high-priority' areas of the state, such as the not Morgan-Monroe Forest areas of Morgan and Monroe counties.

Karl Koehler

*******Comment 1**

I applaud the effort in putting the document together. I support it. I would add that I believe there still needs to be a greater consideration given to wildlife and species that are suffering due to the past lack of early successional management that took place over many years. I understand the plan as well as the forestry's emphasis is on trees but I believe that public values the land for wildlife as well as recreation more, especially public land. I think the Division of Forestry might consider those points more in this plan.

Doug Allman