June 28, 2019

Indiana Department of Natural Resources (IDNR) and Division of Forestry (DOF) staff,

I am submitting my individual comments regarding the 2020 Forest Action Plan. Please include me as a stakeholder in the development of this plan from the beginning of the process. I have deep concerns about the increased amount of logging that I have seen over the last 10 years in our Indiana State Forests and fear that the damage is and will continue to be irreparable, certainly in my lifetime. Please consider my comments regarding the 2020 Forest Action Plan:

- I would like to emphasize my request to **protect the trails in our State Forests**. Leave the established trails undisturbed, protect an area of 150 yards across the trails and do not log or build roads in a way that would disrupt the trails. Continuous re-routing of established trails by the DOF and using the trails as actual logging roads by covering them with huge chunks of gravel so that heavy equipment can be driven into the forest has made the trails a disaster for hikers. Also, being re-routed from an established forest trail to a county road is not an enjoyable forest hike. These re-routes make existing trail maps inaccurate. It is difficult to navigate these re-routed and poorly marked “trails” and as a result many people including myself have become lost in the forest.

- I support the High Conservation Value Forest, (HCVF) Proposal: Back Country Area of Morgan-Monroe/Yellowwood State Forest that the Indiana Forest Alliance has recommended. Old growth forests are rare in Indiana, found only in small patches of nature preserves. **Recent research underscores the values of large tracts of old growth forests, including carbon sequestration, forest resiliency, mitigation of climate change impacts, and conservation of biological diversity.** I request that additional timber harvests be avoided in the HCVF to allow the development of Type 2 Old Growth. The FSC, which certifies forests for sustainability, recommends the following in the audit section 6.3.a.1: “Where old growth of different community types that would naturally occur on the forest are underrepresented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.” The CFI indicates only 2,711 acres (1.8 %) of forest stands within Indiana state forests are 140 years or older and only 493 acres (0.3%) of state forest stands are 160 years or older. Also, DNR’s strategic plan includes old forests as a goal “Work toward a long term balance in forest stand ages and structure with 10% of forest acreage in or developing older forest conditions (e.g. nature preserves and high conservation forests) as well as 10% in early successional, young forests (0-20 years old).” In defining old growth forests, the FSC includes old secondary forests as Type 2 Old Growth. Due to historical management, portions of the BCA of Morgan-Monroe/Yellowwood State Forest are in a late seral stage and present an opportunity for the recovery of a large interior tract of Type 2 Old Growth. The proposed High Conservation Value Forest area includes approximately 2,380 acres in Morgan-Monroe/Yellowwood State Forest (a forest unit of 51,000 acres) and will provide the only large tract of interior HCVF within this state forest complex.
• If a healthy forest is what the DOF strives for **more attention should be given to the increase in invasive species as a direct result of harvesting timber.** I have visited logging sites in Jackson Washington State Forest and Yellowwood State Forest and have witnessed soil erosion, streams and lakes filled with sediment as a result of the erosion and invasive species that will soon be out of control (including multi-flora rose and Japanese stilt grass). I would request that past logging sites be inventoried by the IDNR/DOF in order to understand the impact and to improve the health of the forest at future logging sites. **Climate change has been predicted to cause an increase in invasive species in our Indiana Forests and so an earnest effort should begin to mitigate these ever present and increasing threats to our forests,**

( [https://ag.purdue.edu/indianaclimate/forest-ecosystems-report/](https://ag.purdue.edu/indianaclimate/forest-ecosystems-report/) )

My family and I have lived in southern Indiana for generations enjoying the forests for their beauty, tranquility, and bounty. We consider the forests to belong to us and have respected and preserved them. Please do not upset the delicate balance with actions that may bring our forests to the point of no return.

Best Regards,

Julia Lowe