

SUMMARY COMMENTS

Owen-Putnam State Forest Comp 1 Tract 4, Comp 4 Tracts 5 & 8, and Comp 8 Tract 13

30 Day Comment Period Ending: 3/15/2022

Comments Received: 33

The table below is a summary of public comments received concerning the draft Resource Management Guide. The public comments received have been reviewed in their entirety and given due consideration summarized in the Division of Forestry response below.

Comment Summary	Division of Forestry Response
<ul style="list-style-type: none"> • Comment supporting the silvicultural prescriptions and encouragement of oak regeneration. • Comment supporting use of prescribed fire. • Concern with overstocking, supporting the need for management to improve health and resilience of forest. • Comment supporting management of mast producing trees for wildlife benefits and establishment of wildlife habitat. • Comment encouraging young forest development. • General comments opposing forest management and the harvest prescription portion of the draft RMGs citing concerns of potential impacts to aesthetics, plants, wildlife, habitat diversity, recreation, culturally sensitive areas, ecological services, climate change and carbon sequestration. • Concerns with impacts to Jordan Creek, Fall Creek, Cage Mill Lake, Cataract Lake, Rattlesnake Creek, Eel River, and White River. • Concern regarding the designation of a stream (intermittent vs perennial). • Concerns with recreation (e.g., Blue Trail, Rattlesnake Campground). • Concern for threatened and endangered species such as the Indiana bat, owls, grouse. • Concern with invasive species and use of chemicals. • Concern with use of prescribed fire. 	<ul style="list-style-type: none"> • The Division of Forestry has actively managed its lands for nearly 120 years using a multiple uses multiple benefits approach. These benefits include timber production, biodiversity, watershed protection, recreation, wildlife habitat, and research areas. Recreational benefits include over 430 miles of designated recreational trails (e.g., horse, bike, hiking and interpretive), nearly 1,000 campsites and cabins, dispersed/back country camping, swimming beaches, hunting, fishing, picnicking, mushrooming and many other opportunities under this management philosophy. • Continuous Forest Inventory (CFI) data indicates Indiana State Forests contain approximately 60 million live trees, 1 billion board feet (Doyle) of net sawtimber volume with an estimated annual growth of 22 million board feet (Doyle). Managed harvest levels are set at a level to insure long term sustainability. These levels are periodically reviewed as new CFI data is collected. See https://www.in.gov/dnr/forestry/files/fo-Continuous-Forest-Inventory-Property-Report-2015-2019.pdf • The Division of Forestry actively manages its lands for multiple use multiple benefits. A part of that management is timber production. Annually, the division plans, schedules and implements forest management activities across state forests. Activities may include forest inventories, timber harvests, timber stand improvement (TSI), tree plantings, invasive species control,

- Comment referencing Starve Hollow SRA fills up with sediment due to timber harvests on Jackson-Washington State Forest.
- A reference to Mountain Tea State Forest indicating it's beauty, bird diversity and moss-covered road.
- Forest Service reference.

and prescribed fire. These activities help sustain the diverse hardwood landscape and ensure state forests remain vigorous and healthy supporting the multiple uses multiple benefits philosophy in perpetuity.

- The prescribed management activities are consistent with silvicultural principles, promotes habitat diversity and supported by inventory data and field assessments. The concerns expressed have been considered and may be further addressed during plan implementation. See http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf.
- Forest management activities ensure forests remain healthy, vigorous, diverse, and adequately stocked. Overstocking and largely over mature conditions jeopardize forest health, resiliency and resistance making them more vulnerable to mortality and disease and insect outbreaks.
- Local market conditions are part of the timber bidding process. Pricing and market condition reports are reviewed regularly.
- State Forest management is guided by science and implementation of sound silvicultural principles. They adhere to legal mandates and voluntary compliance to a comprehensive set of forest certification standards to insure long term forest sustainability. State Forests are subject to annual 'third party' audits for compliance to these standards. <https://www.in.gov/dnr/forestry/7532.htm>
- Assessing climate change and carbon sequestration is beyond the scope of tract level RMGs. See https://www.in.gov/dnr/forestry/files/fw-carbon_assessment.pdf
- Hardwood Ecosystem Experiment (HEE) and other research continue to document forest impacts and indicate increased

	<p>biodiversity in managed forests. http://www.heeforeststudy.org/</p> <ul style="list-style-type: none">• Detailed flora and fauna inventories are beyond the scope of tract level management guides. Habitats, communities, and species are considered as part of the management planning process. Along with field observations, Natural Heritage Data is reviewed for threatened or endangered species on or near the management unit. <i>Please note, for the protection of sensitive flora and fauna NHD review results are not disclosed in draft RMGs.</i> Further information on direct and indirect impacts on species and habitats are found in the Indiana State Forest Environmental Assessment. http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf• Invasive species presence and control needs are monitored as part of the property's normal operations. Treatments may be pre- or post-harvest and situational ranging from minor to aggressive based on the presence of the species within the county. Methods may include manual, chemical or use of prescribed fire. Only approved herbicides will be used following forest certification standards.• Best management practices (BMP) will be implemented and monitored to address the soil erosion and sedimentation concerns. BMPs are required and included in each State Forest timber sale agreement. Division of Forestry will respond to reported BMP departures. BMP guidance can be found at: http://www.in.gov/dnr/forestry/files/fo-2005_Forestry_BMP_Field_Guide.pdf• BMPs are guidelines, not law. However, contractual stipulations require BMPs to be implemented and followed on all DNR State Forest land. State Forest staff perform regular site visits during
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	<p>active operations and evaluate as part of their post-harvest review. Additionally, BMP monitoring is performed on each harvest for application and effectiveness. There are 53 individual BMPs measured across 5 categories: access/haul road, log yards, skid trails, stream crossings, and riparian management zones.</p> <ul style="list-style-type: none">• Implementation of the draft RMG will utilize guidance from the US Fish & Wildlife Service and other sources to avoid take impacts to the Indiana bat and other listed species.• Recreational use for each tract was identified in the draft resource management guides (RMGs). Consideration for recreational features will be made during planning and implementation of the RMGs. As noted in the draft RMGs when active management occurs designated recreational trails will close Monday – Friday and open on weekends.• Rattlesnake Campground will not close during implementation of the RMGs.• The term “landscape” references the tract and area around the tract which may include private lands. It’s a broader assessment of what may be occurring on the landscape at the time of the inventory. For the state forest, the tracts will remain forested. But it’s possible that land use changes are occurring on private lands nearby such as subdivisions, industry development, forestland converted to agricultural uses, etc.• Prescribed fire is a management tool. Those conducted on state forests are executed based on criteria that establishes the burns complexity. Criteria considered but not limited to include fuel models, required staff and equipment, safety, present and surrounding features, wildlife, smoke management, and weather (current and predicted).
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	<ul style="list-style-type: none">• Owen-Putnam State Forest (by acres) is currently 2.5% young forest (0-19 years of age), 2.5% age 20-39, 76% age 40 – 99, and 19% age 100+. Only 17% of Owen-Putnam is considered oak-hickory. Cover types dominated by oak account for 34% of Owen-Putnam acreage. Oak dominated cover types provide many ecological services and its retention within the forested landscape is a concern throughout the region.• Identification of a stream as intermittent or perennial is based on United States Geological Survey (USGS) determinations.• Starve Hollow SRA is a 4,000+ acre watershed with sandy soils predominantly to the north, west, and south. Issues with sediment come from these more non-forested areas where sand is most likely to move.• Mountain Tea has a rich history of forest management. Since 2000, there have been five (5) documented timber harvests, two (2) timber stand improvement projects, and one (1) prescribed fire.• Archeological reviews are conducted prior to any timber harvest operation. Culturally sensitive areas identified during review are protected following guidance from the Division of Forestry Archeologist and Division of Historic Preservation & Archaeology (DHPA).• Like other forms of hauling, log trucks must follow all county, state and federal laws.• The United States Forest Service (i.e., Hoosier National Forest) and the Indiana Department of Natural Resources Division of Forestry (i.e., state forests) are two separate agencies. The Forest Service is federal, and the Indiana DNR is state.
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	<ul style="list-style-type: none">• The pine cover type in compartment 4 tract 8 is approximately 7 acres.• Compartment 4 Tract 5 is also known as 6380405.• The Indiana Natural Heritage Data Center (INHDC) is managed by the Division of Nature Preserves.• There is no designated back country area at Owen-Putnam State Forest. The only state forests with designated back country areas are Morgan-Monroe, Yellowwood, Jackson-Washington, and Clark State Forests. There has not been a timber sale in a back country area since 2017.
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