

SUMMARY COMMENTS

**Owen-Putnam State Forest Comp 2 Tract 2, Comp 8 Tract 3, Comp 8 Tract 10, Comp 9 Tract 7 30 Day Comment Period Ending:
1/28/2020 Comments Received: 62**

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"> • According to a recent study from Purdue University, states 50% of the frog population is killed outright with every logging operation. • Continue sustainable harvesting practices for healthy diverse forests for future generations • Proper and responsible logging and forest management should continue on state forests • Forests, both public and private, need professional foresters to assess and implement practices that allow multiple uses which benefit all of us • Forest management is needed to create young forest habitat to benefit the wildlife that depend on it while providing a diverse landscape • Forest management should be more aggressive to avoid looking like a park or golf course. • General statements opposing forest management and the harvest prescription portions of the draft RMG citing concerns of potential impacts to aesthetics, plants, animals, habitat diversity, recreation, cultural sensitive areas, and ecological services • General comments encouraging tracts be set aside as old growth or mature into old growth forests. • General comments opposing logging in Compartment 9 Tract 7 due to proximity to campground. 	<ul style="list-style-type: none"> • A review of literature and research did not yield supporting language or evidence regarding a recent frog study by Purdue University. However, the following technical guide does provide good information regarding forest management for reptiles and amphibians: https://www.extension.purdue.edu/extmedia/FNR/FNR-480-W.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 all state forests. Activities may include: forest inventories, timber harvests, timber stand improvement, tree plantings, invasive species control, and prescribed fire. These activities help sustain the diverse hardwood landscape present and ensure state forests remain healthy providing the multiple use/multiple benefits philosophy for future generations. • Archeological reviews are conducted before any harvest operation is permitted. Any area identified as sensitive is protected following guidance from the Division of Forestry Archeologist and Division of Historic Preservation & Archaeology (DHPA).

- General comments to increase recreation within Owen-Putnam State Forest
- Concern with the potential impacts to box turtles and other RTE species. Recommends detailed environmental inventory of wildlife and plants be conducted/included in draft RMG.
- Concern with the potential impacts to soil and water resources and effective implementation and monitoring of BMPs. Specific concerns with Jordan Creek, King Creek, Fish Creek, Eel River, and Cataract Lake
- DNR officials have indicated BMP's are guidelines and not required
- Concern on the potential spread of invasive species as a result of the proposed management activity.
- Concern on how the prescribed harvest will impact recreation and trails. Suggests no harvest or buffers along sections of trails to avoid disruptions from rerouting or closure of trails.
- Concern draft RMG does not address impacts on climate change and carbon sequestration.
- Division of Forestry does not promote multiple use management.
- Concern with over logging and logging just for profit
- Too much burning of forests worldwide caused by human activity and exploitation
- Reference to Greene Sullivan State Forest logging operations

- Local market conditions are part of the timber bidding process. Pricing and market condition reports are reviewed regularly.
- Best management practices (BMP) will be implemented and monitored to address the soil erosion and sedimentation concerns. BMPs are required and included in each timber sales contract. 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 State Forest's. State Forest staff perform regular site visits during active operations and evaluate as part of their post-harvest review.
- These draft RMGs do not suggest prescribed fire as a management option at this time.
- Greene-Sullivan State Forest is unique with its manmade stripper hills and valleys, which were created during mining operations. In cooperation with the Division of Reclamation these areas are restored to a safe and more inviting environment through what is referenced as High Wall Projects. https://www.in.gov/dnr/forestry/files/fo-GS_newsletter.pdf
- 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. No HCVF or old growth forests were noted on this tract. Further information on direct and indirect impacts on species and

	<p>habitats are found in the Indiana State Forest Environmental Assessment. http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf</p> <ul style="list-style-type: none">• RMGs will vary with respect to the amount of estimated board feet present in saw timber volume. Figures are generated from data collected during systematic horizontal point sampling based on variable radius plots.• Several logistical factors can impact the implementation of a RMG. These factors can delay implementation by several years. For example, a draft RMG with the recommendation to perform a timber harvest that was posted last month may not actually be marked and timber sold for several years.• 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 and chemical. Only approved herbicides will be used following forest certification standards.• Assessing climate change and carbon sequestration is beyond the scope of tract level RMGs.• Indiana State Forests contain approximately 985 million board feet of timber. Managed harvest levels are set at a level to insure long term sustainability. These levels are periodically reviewed as new continuous forest inventory data is collected. See https://www.in.gov/dnr/forestry/files/fo-Continuous_Forest_Inventory_Property_Report_2014-2018.pdf• The prescribed management activities are consistent with silvicultural principles, promotes habitat diversity and supported by inventory data and field assessments. The concerns expressed
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	<p>have been considered and may be further addressed during plan implementation. See http://www.in.gov/dnr/forestry/files/fo-StateForests_EA.pdf.</p> <ul style="list-style-type: none">• State Forest operations adhere to a comprehensive set of forest certification standards to insure long term forest sustainability. Operations are subject to annual ‘third party’ audits to insure compliance to these standards. https://www.in.gov/dnr/forestry/7532.htm• Habitats, communities and wildlife species are considered as part of the management planning process. 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.• We recognize that aesthetic impacts are inherent of many forest management activities. This may include visual impacts along roadways and trail segments. Potential impacts will be considered during activity planning and execution.• Recreation disruption will occur during management activities. In affected areas hunting access and trails will be temporarily closed or rerouted for safety reasons during operations. The Division of Forestry will consider recreational trail impacts during the planning and execution of management activities. There are no designated recreational trails in these tracts.• The Indiana DNR land portfolio covers 520,000+ acres. State Forests are the only DNR properties where long term forest and timber management practices occur. State Forests represents approximately 30% of the DNR portfolio. Set aside lands that are trending towards old growth conditions can be found on a variety of DNR lands, including established nature preserves on State Forests, State Parks, Fish & Wildlife Areas and Nature Preserve lands. These continue to be important conservation strategies.
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	<ul style="list-style-type: none">• No old growth forests are found in the tracts covered by the draft RMGs. However, there are over 110 acres of forest land at Owen-Putnam State Forest set aside as long term preserves and development as old growth areas. Jordan Creek Seep Spring and Pleasant Grove Valley Nature Preserves.• 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.• State Forest management is guided by science and implementation of sound silvicultural principles to insure long term forest health and sustainability. State Forest management adheres to legal mandates and voluntary compliance to comprehensive forest certification standards.• The state forest system was established in 1903 to restore eroded, worn-out farm land that become abandoned early in the century and directed by Indiana Code. The Division of Forestry has actively managed its land for nearly 120 years for multiple uses/multiple benefits.• Hardwood Ecosystem Experiment (HEE) and other research continue to document forest impacts and indicate increased biodiversity in managed forests. http://www.heeforeststudy.org/• State Forest timber revenues are well above cost of operations and contribute positively to local and State economies.• The Division of Forestry manages its lands for multiple uses/multiple benefits proving timber production, biodiversity, watershed protection, recreation, and research areas. Recreational benefits include over 430 miles of designated recreational trails (e.g., horse, bike, hiking and interpretive), camping, back country camping, swimming beaches, hunting, fishing, picnicking, mushrooming and many other opportunities under this management philosophy.
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	<ul style="list-style-type: none">• The areas outlined within these draft RMGs are open to field trips and will continue to be.• Compartment and tract designations for each state forest are available at: https://www.in.gov/dnr/forestry/3635.htm• Like other forms of hauling, log trucks must follow all county, state and federal laws.
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