

Karen S. Smith

(b) (6)

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Attn: Houston South Vegetation Management and Restoration Project Supplement
811 Constitution Avenue
Bedford, IN 47421

Pre-decision objection to Houston South Vegetation Management and Restoration Project Supplement: Final Supplemental Environmental Assessment (SEA), Draft Decision Notice (DN) and Finding of No Significant Impacts (FONSI)

Thank you for this opportunity to submit comments regarding the U.S. Forest Service's (Forest Service) Houston South Vegetation Management and Restoration Project Supplement and the above-mentioned documents.

The Forest Service's response to public comments regarding the draft Supplemental Environmental Assessment (SEA) for the Houston South Vegetation Management and Restoration Project Supplement was inadequate:

Unlike its response to public comments received at earlier stages of project review, which addressed each commenter's points individually, the Forest Service chose to lump together all comments concerning the draft SEA under "general resource area or topic" in its "Consideration of Comments" document (<https://www.fs.usda.gov/project/?project=64831>). This means that some very specific and detailed arguments were not acknowledged at all—for example, my discussion of the article "Rate of tree carbon accumulation increases continuously with tree size," describing research that "directly estimated mass growth rates from repeated measurements of 673,046 trees belonging to 403 tropical, subtropical and temperate tree species, spanning every forested continent" (Stephenson et al., 2014, p. 1, ¶13, PDF attached). As I pointed out, its major findings that "for most species mass growth rate increases continuously with tree size" and that "large, old trees do not act simply as senescent carbon reservoirs but actively fix large amounts of carbon compared to smaller trees" (Stephenson et al., 2014, p. 1, ¶11) challenge the draft SEA's statement on page 35 that "any initial carbon emissions from the proposed actions would be balanced and possibly eliminated because the remaining trees and newly established trees typically have higher rates of growth and carbon storage" (Draft SEA_Karen Smith comments_11-20-2023, p. 4, ¶11, PDF attached). Why did the Forest Service not address my point?

I also challenged the draft SEA's summarization of the Hoover and Smith 2023 study "Aboveground live tree carbon stock and change in forests of conterminous United States: influence of stand age" (PDF attached), with its statement: "Recent research has shown that in the absence of management, forest stands in the central states region will continue to age and, due to tree senescence outpacing growth, become net carbon emitters" (Draft SEA, p. 49). Having read the article myself, I quoted the following, which demonstrates that the study's findings are hardly so conclusive (Draft SEA_Karen Smith comments_11-20-2023, p. 4, ¶12):

One area of ongoing discussion is the role of older versus younger forests . . . While many studies of forested ecosystems find that the rate of carbon accumulation decreases with age [5-8], others have reported that old-growth forests continue to accumulate carbon [9, 10]. These differing results drive an ongoing discussion of the "best" strategies for managing the forest carbon sink (Hoover and Smith, p. 2, ¶11).

Regarding these authors' findings for the Central States region, I noted:

In their Conclusion, the authors' report that "carbon stock (per hectare) increased with age in all regions, although in some instances the oldest age class showed a slight decline." However, for the Central States region, carbon density *increased* even in the oldest age class, from a mean C density (tC/ha) of 14.1 in the 0-20 age class to 76.7 in the 121+ age class. While Hoover and Smith find that carbon "accumulation rates are highest in the younger age classes and decline with age" (p. 2), they are looking at stand level productivity, versus Stephenson et al., who measure productivity at the scale of the individual tree, reporting that "although growth efficiency often declines with increasing tree size, increases in a tree's total leaf area are sufficient to overcome this decline and cause whole-tree carbon accumulation rate to increase" (Stephenson et al., 2014, p. 3) (Draft SEA_Karen Smith comments_11-20-2023, p. 4, ¶13).

Again, the Forest Service did not acknowledge my observations from Hoover and Smith 2023 that counter their own summarization, including the study's finding that for our Central States region, carbon density **increased** even in the oldest (121+) age class of trees. How does the Forest Service defend its own one-sentence assessment of the study, the only one cited in support of its assertion? And what definitive science underpins the Forest Service's claim in the Draft Decision Notice that the Proposed Action (including removal of mature trees) will increase "the forest's ability to continue to sequester carbon in the face of our changing climate" (DN, p. 2, ¶11)?

Not one of the other articles referenced in my comments regarding the draft SEA was specifically addressed in the Forest Service's response. If the Forest Service indeed considers that a commenter took an article out of context or misconstrued its content, then they should state that directly, referencing individual commenters rather than generalizing.

Did the Forest Service possibly exclude from consideration any comments pertaining to documents “incorporated by reference”? I only became aware of this possibility when I noticed that the cover letter for the final SEA is more detailed regarding requirements for objections than cover letters for the Houston South draft SEA dated October 20, 2023 and the draft Supplemental Information Report (SIR) dated October 6, 2022, citing regulations 36 CFR 218.2, 218.5, and 218.8, which are **not** mentioned in the other two letters. Consequently, it would not be fair for comments regarding the draft SEA to be ignored if someone cited a document but did not attach it to their objection. Also, it would be helpful for the public if web links were provided for these regulations.

Planning/implementing the Houston South project without a revised Forest Plan is unacceptable:

In my comments regarding the draft SEA I noted the necessity of revising the outdated 2006 Forest Plan for Hoosier National Forest (HNF). I also attached a November 12, 2023 letter I sent to Dr. Homer Wilkes, Under Secretary for Natural Resources and Environment, USDA, asking him to follow up on his commitments to over 250 attendees of the public meeting in Paoli, Indiana on April 3, 2023 regarding the proposed Buffalo Springs Restoration Project in HNF: 1) that the Forest Service would begin work revising the Forest Plan and 2) that the public would have opportunity to provide input (Draft SEA_Karen Smith comments_11-20-2023, p. 1, ¶2). I also sent a copy of my letter to the following: Senator Mike Braun (who was present at the meeting); Randy Moore, Forest Service Chief, U.S. Forest Service; Gina Owens, Regional Forester, Region 9, U.S. Forest Service; Christopher Thornton, Head Ranger, Hoosier National Forest; and Michael Chaveas, Forest Supervisor, Shawnee and Hoosier National Forests. Regrettably, **not a single HNF staff person attended this important meeting**, which had been characterized as a public listening session.

Senator Braun also sent a letter to Dr. Wilkes on November 16, 2023 (Braun to Wilkes on HNF Forest Plan update_11-16-2023, PDF attached) to inquire about progress on the above-mentioned commitments. In the first paragraph of his letter, he comments: “I have appreciated the opportunities you have taken to discuss with me the importance of updating the HNF Land and Resource Management Plan in order to ensure that the most effective and up-to-date management practices are in place for the HNF.” In paragraph 3, he urges Dr. Wilkes “to swiftly begin updating the HNF Land and Resource Management Plan in collaboration with a wide array of user groups, local residents of the HNF, wildlife experts, and forest ecologists, among other representatives.” In the final paragraph, he notes: “This has been one of my top priorities, which I have communicated clearly to you since your confirmation process in early 2022.” He then asks what specific steps HNF has taken to update the Forest Plan and how his constituents can contact the Forest Service and be involved in the process.

I find that Dr. Wilkes’ publicly stated commitment to initiate work on HNF Forest Plan revision and Senator Braun’s prioritization of the same are at odds with Forest Service responses to comments on the draft SEA regarding this topic. In its “Consideration of Comments,” under Planning/Land Management (p. 5), the Forest Service states that “the order of revisions of

Forest Plans is a national process. Revision of the Hoosier NF's Plan will occur eventually but is still likely several years into the future." Under the same heading (p. 6), the Forest Service references H.R. 2617, Division G, Title IV, Sec. 407 (117th Congress (2021-2022)), Department of the Interior, Environment, and Related Agencies Appropriations Bill 2023, stating that "Congress, through its appropriations authority, has recognized that forest plan activities are supported even where the forest plan is more than fifteen years old, provided that the Secretary is working in good faith to complete the plan revision." This quote, however, leaves out an important part of the text, the proviso that I quoted in my comments on the draft SEA (Draft SEA_Karen Smith comments_11-20-2023, p. 1, ¶13): "That if the Secretary is not acting **expeditiously** and in good faith, within the funding available, to revise a plan for a unit of the National Forest System, this section shall be void with respect to such plan and **a court of proper jurisdiction may order completion of the plan on an accelerated basis** (*emphases mine*)."

There is certainly nothing expeditious about the Forest Service's process for revising Forest Plans. Looking at USDA's "Land Management Planning, Assessment, and Monitoring: Current List of Forest Management Plans and Comprehensive River Management Plans Requiring Revision or Completion, along with a Proposed Course of Action and Timeline for Compliance with the Underlying Statute" (January 2023), I see that many haven't been revised since the 1980s (<https://www.fs.usda.gov/sites/default/files/fy22-land-management-plan-assess-monitoring-enclosure.pdf>, pp. 1-3). A regulation that requires updating forest plans at least every fifteen years means nothing when it's regularly ignored. And if funding is the issue, why does the Forest Service not hesitate to allocate resources for the planning and implementation of large-scale, multi-year logging/prescribed burn/road building projects like Houston South and Buffalo Springs when it hasn't done the **groundwork** of revising the outdated plan on which its management proposals are based? The final SEA states that "the Houston South Vegetation Management and Restoration project would move the Forest toward its desired future condition as identified in the 2006 Hoosier National Forest Land and Resource Management Plan" (SEA, p. 3). Desired by whom? Certainly not by myself and many other local citizens who are deeply concerned that proposed management activities have potential to harm native animals and plants, including at-risk species; forest microbiomes; soil structure; air and water quality; carbon sequestration capacity, etc. It's past time for the Forest Service to **interrogate the Forest Plan's conclusions and objectives** in light of current science and climate projections and update it accordingly.

The 2012 Planning Rule would seem to be a large improvement over the 1982 Rule on which most forest plans, including HNF's, are currently based. "A Citizen's Guide to National Forest Planning" (https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd520671.pdf) notes the following:

- The 2012 Planning Rule is the first significant update to Forest Service planning procedures in 30 years (procedures were first established by the 1982 Planning Rule), reflecting decades of experience and lessons learned. **There have been many advances in ecological science, social and economic science, and planning since 1982, including**

advances in adaptive management that will allow the Forest Service to track and respond to changing conditions, assumptions, and new information (*emphasis mine*) (p. 11, ¶1).

- The 2012 Planning Rule focuses on engaging with and listening to the public at all phases of the planning process. **Ensuring that the public is involved in the development (and not just the review) of plans is one of the ways forest planning has changed** (*emphasis mine*) (p. 12, ¶2).
- . . . one of the fundamentals to effective use of scientific information is transparency in how it is used. **The 2012 Planning Rule requires the Forest Service to document and summarize how the universe of best available scientific information was identified and how it informed the planning process** (*emphasis mine*) (p. 15, ¶4).
- Compared to the 1982 planning rule, **the 2012 rule is expected to result in forest plans that are updated or amended regularly** to reflect new information, changed circumstances, and information gathered during monitoring and the adaptive management process (*emphasis mine*) (p. 23, ¶11).
- **The public should view the plan amendment process as a critical part of the adaptive management process: If the Forest Service and the public are regularly monitoring and learning from activities on the national forests, then forest plans should also be regularly updated to reflect that knowledge** (*emphasis mine*) (p. 23, ¶13).

The Forest Service's lack of focus on adhering to its own regulations means that citizens were denied the opportunity guaranteed under the 2012 Planning Rule to weigh in on revision of the HNF 2006 Forest Plan **before** HNF began its push to implement the massive Houston South and Buffalo Springs projects based on the outdated plan.

The above-mentioned "Land Management Planning, Assessment, and Monitoring" states:

The Forest Service (Agency) has studied and is aware of the many challenges ensuring land management plans are revised timely and efficiently. Beginning in fiscal year 2022, the Forest Service began standing (sic?) up the Planning Service Organization, a new staffing model for land management plan revision to address the backlog of out-of-date land management plans. This new organization will provide dedicated staff and resources toward expediting plan revision timeframes and increasing the number of concurrent land management plan revision efforts (p. 4, ¶1).

Additionally, it notes that "of the list of plans that need revision, there are 12 plans currently being revised . . . The current land management plan revision schedule includes starting five new revisions in fiscal year 2023 and an additional 33 new revisions starting through fiscal year 2028" (p. 4, ¶2). Given Under Secretary Wilkes' assurance that work would commence on updating the HNF Forest Plan, it should certainly be among those prioritized. Until revision is completed, with public input, and the Houston South project has been reevaluated as a vital part of the adaptive management process, **HNF should halt project implementation** except for

unquestionably necessary work, such as repair of degraded roads and eroded areas and improvement of stream flow for aquatic organism passages.

Since the Paoli meeting in April 2023, has Dr. Wilkes been in contact with HNF staff regarding a timeline for Forest Plan revision? Also, since Gina Owens, as Regional Forester for Region 9, and Michael Chaveas, as HNF Forest Supervisor, would be designated as responsible officials with various decision-making responsibilities for plan revision, would either or both of them have a role in requesting initiation of the process and appropriate funding?

In addition to the need for Forest Plan revision, I note that four of five programmatic documents tied to the analysis in the FONSI are between **15-19 years old**, including documents that address “issues with protection of Federally threatened and endangered species and their associated habitat” (FONSI, p. 9, ¶13). The FONSI states in the same paragraph that “the decision to implement the Proposed Action is consistent with” these documents, which I do not find reassuring considering how out-of-date they are.

My comments on the draft SEA re: conservation of mature and old growth forest were not fully addressed:

I devoted three pages of comments to **new** information regarding USDA responses to President Biden’s April 22, 2022 *Executive Order on Strengthening the Nation’s Forests, Communities, and Local Economies*: 1) Agriculture Secretary Vilsack’s June 23, 2022 directive that the Forest Service “inventory and protect mature and old-growth forests to aid in climate resilience and carbon stewardship” and 2) an April 20, 2023 announcement by the USDA and Department of the Interior (DOI) of “actions to foster forest conservation, enhance forest resilience to climate change, and inform policymaking on ensuring healthy forest on federally managed lands administered by the USDA Forest Service and the Bureau of Land Management (BLM)” (Draft SEA, pp. 16-17). While I noticed that additional information concerning definition of old-growth characteristics was added to the final SEA, the stated conclusion was the same as before, that “no stands proposed for treatment in the Project Area meet the old growth characteristics as defined” (SEA, p. 18).

Again, the Forest Service apparently missed my point and did not answer these questions: **“Is the Forest Service suggesting that mature forest on its way to attaining older growth characteristics does not merit consideration in terms of conservation? Secretary Vilsack’s directive calls for protection of *both* mature and old-growth forest, so why does the SEA seemingly dismiss (or leave unstated) any implications for Houston South?”** (Draft SEA_Karen Smith comments_11-20-2023, p. 2, ¶13).

No large contiguous areas of old-growth forest will ever develop in HNF if the Forest Service continues to break up mature forest that’s been left undisturbed for decades. And this is a great shame. As noted in the first sentence of “Old Growth Forests” (Indiana Department of Natural Resources): “Of Indiana’s original 20 million acres of forest, fewer than 2,000 acres of old-growth forest remain intact” (<https://www.in.gov/dnr/nature-preserves/old-growth->

[forests/#:~:text=Of%20Indiana's%20original%2020%20million,selected%20as%20National%20Natural%20Landmarks.">forests/#:~:text=Of%20Indiana's%20original%2020%20million,selected%20as%20National%20Natural%20Landmarks.](#)). Also, Hoosier National Forest and the state forests are the **only** public lands in Indiana where old-growth forest can develop at significant scale.

Concluding remarks and suggestions:

On April 22, 2024, I attended the “Community Forum on Forest Management” at Monroe County Public Library, during which three presenters articulated their views on management of Hoosier National Forest and, in particular, the Houston South project. These presenters were Michael Chaveas, Forest Supervisor, Hoosier and Shawnee National Forests; Dr. Sherry Mitchell-Bruker, President, Friends of Lake Monroe; and Jeff Stant, Executive Director, Indiana Forest Alliance. In Mr. Chaveas conclusion, he stated the following:

This is your national forest. National forests come with rights. Right? You’re land owners. You’re all public landowners here. You have the right to use and enjoy the land. You have the right to express your interests. You have the right to provide comment. You have the right to provide input on any kind of management that we propose . . .

(<https://www.youtube.com/watch?v=Q0hPUM22Mik>, 29:18).

This is all quite true, as was his statement about the responsibilities of public land ownership (or stewardship, as I would say), such as taking care of the land. On many occasions over the past several years, I have exercised my right to comment and question HNF management decisions, as our views regarding how best to support the forest and its plant and animal communities differ on several points. What I’ve noticed, though, when I’ve shared my thoughts and suggestions, is that the Forest Service continually falls back on the outdated HNF Forest Plan, invoking its goals and “desired conditions” as a final authority and apparently feeling no great urgency to revise it. This means that management decisions are based on a plan developed **without** public input, unlike a plan revised according to the 2012 Planning Rule. Such revision needs to happen soon.

I compared the draft and final SEAs page by page, noting minor alterations of text but no substantive changes or additions that alter my previously expressed concerns regarding the Houston South project. I object to the decision to implement the project as proposed and instead urge the Forest Service to do the following:

- Push for an expedited 2006 HNF Forest Plan revision involving public input.
- **Halt implementation** of the Houston South project until this happens and the project has been reviewed and reconsidered based on the best available ecological, climate, social, and economic science.
- Do proceed with repair of existing roads “to reduce erosion, correct drainage problems, and reduce illegal access from all-terrain vehicles” (SEA, p. 15, ¶12).

- Do “replace two undersized culverts and one undersized concrete structure with appropriately sized structures that would better allow for aquatic organism passage (AOP) and allow natural material transfer that is currently stored unnaturally upstream” (SEA, p. 15, ¶13).

As before, I also ask the Forest Service to:

- Conserve mature forest, the old-growth forest of the future, in line with national directives regarding conservation/promotion of **both** mature and old-growth forest
- Promote/support creation of early successional habitat on private land within the HNF purchase area
- Minimize use of prescribed fire as a management tool

Thank you for considering my pre-decision objection regarding the Houston South Vegetation Management and Restoration Project Supplement.

Respectfully,

(b) (6)

Karen S. Smith