

Data Submitted (UTC 11): 6/4/2024 4:00:00 AM

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Organization: Indiana Forestry & Woodland Owners Association

Title:

Comments: Indiana Forestry and Woodland Owners Association would like to object to the referenced project on the Hoosier National Forest (HNF), supervised by district ranger Christopher Thornton.

Previous HNF Houston South environmental assessments have documented the almost zero percent of young forest habitat (0-20 years old). One of your primary requirements is to address threatened and endangered species and improve habitat per the Endangered Species Act (ESA). Species of concern include Ruffed grouse and American woodcock, several migratory songbirds, and many at-risk species of bats, all of which have shown in research to be positively impacted by timber harvest. Since the original Environmental Assessment, the US Fish & Wildlife Service has uplisted the Northern Long-Eared bat to endangered status, thus creating a more critical situation to address. We do not feel that this project as proposed will adequately meet the requirements of the ESA for these species.

This project calls for fire and silvicultural treatments on only 6.5% of the project area at a rate of 0.16% annually. We object to that low rate of forest management which is not large enough to "move the needle" on the tremendous need these wildlife species have. Furthermore, the 2006 Hoosier National Forest Land and Resource Management Plan establishes a desired amount of early successional forest habitat of 4-12% for the area, which will not be met with this project.

In our comments of August 8, 2019, we encouraged you to address "specifically lack of young forest (0-9 year age class), insufficient oak regeneration, and habitat loss for sensitive species dependent on the young forest environment." In our comments of October 18, 2022, we stated "The Houston South project area is seeing declines in forest health and increasing mortality due to high tree density. There is also low diversity in tree age classes and a lack of oak regeneration, leading to poorer wildlife and songbird habitat, whose populations are already declining."

While this project certainly addresses those issues and we applaud you for that, we believe that even more acreage in treatments over a shorter time frame, large enough to meet your Forest Plan goal of 4-12% early successional habitat, are necessary to meet your Forest Plan and the Endangered Species Act and to ensure a healthy and resilient forest.

Thank you for your time and your work on behalf of our national forests.

Sincerely,

Liz Jackson
Executive Director

Indiana Forestry & Woodland Owners Association