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First name: Perry

Last name: Seitzinger

Organization:

Title:

Comments: Christopher Thornton:

I am writing you today to object to the Houston South Management and Restoration Project SEA.. Though, I support the proposed actions of the Houston South project and recognize that they are a step in the right direction, I don't believe they go far enough to adequately address the resource concerns/threats identified within the supplement. Furthermore, I adamantly oppose the "No Action" option.

The supplement thoroughly and extensively addresses the actions that will be implemented to protect the water quality of the Lake Monroe watershed. The BMP's that will be implemented in the Houston South project to protect water quality as described in the Supplement are far and above the standards here in Indiana and far and above the "2022 Indiana Logging and Forestry Best Management Practices, Field Guide" as well as EPA standards as described in the Clean Water Act. The EPA recognizes that logging and forestry practices that abide by and implement BMP's are minimal contributors to runoff, sedimentation, and have very little adverse effects on water quality. The 2022 "Lake Monroe Watershed Management Plan" published by Friends of Lake Monroe also recognizes that logging and forest management practices that utilize BMP's are minor contributors to runoff, sedimentation, and nutrient loading to the Lake Monroe watershed. The same document identifies row crop/livestock agriculture, septic systems, construction, and lake/stream bank erosion as the primary sources of the degradation of water quality in Lake Monroe. The "No Action" alternative will lead to increased degradation of the water quality of Lake Monroe because actions proposed in the Supplement specifically aimed to improve water quality, such as replacing undersized culverts and improving forest roads, will not be implemented.

The actions proposed in the supplement go to great lengths address forest and natural resource concerns/threats that are long overdue. Young forests, 0-9 years old, are nonexistent in the project area and age class diversity (60% of the stands are 80 years old+) is severely lacking within the project area which is beyond inexcusable. The 2006 Land and Resource Management Plan mandates that the Hoosier must maintain 4-12% young forests 0-9 years old. Many species of wildlife are dependent on young forests and the structure that is attributed to forests as a result of age class diversity. One glaring example, is the State Endangered ruffed grouse which is a bellwether forest health and forest diversity. The precipitous decline in many songbird populations is largely attributed to the lack of forest diversity and young forests. The Supplement proposes actions such as clearcuts, shelterwoods, prescribed fires, non-native pine removal, and selective harvesting which will increase the amount of young forests in the project area and improve forest structure and age class diversity but not at the levels mandated by The 2006 Land and Resource Management Plan. These same actions are being implemented in this project to aid in the recovery/restoration of our oak-hickory ecosystem which is threatened by mesophication and the lack of forest disturbance. The utilization of logging, prescribed fire, and other forest management practices are not only acceptable but the only way we can guarantee the perpetuation of young forests and the oak-hickory ecosystem which is critically important to most forest wildlife which have evolved to depend upon them. The actions proposed in the supplement are not intense nor immediate enough to create enough disturbance to insure the oak hickory ecosystem perpetuate/persist in the future. I suggest that more intensive and immediate management actions be taken than what are proposed in the SEA in order to adequately promote young forests and the oak hickory ecosystem within the project area and across the entire HNF.

Perry M. Seitzinger, ACF

Consulting Forester

Seitzinger Forestry, LLC