

Data Submitted (UTC 11): 6/10/2024 4:00:00 AM

First name: Jeff

Last name: Stant

Organization: Indiana Forest Alliance

Title:

Comments: To Whom It Should Concern:

I wish to submit the following Predecision Objection on behalf of the Indiana Forest Alliance to the Houston South Vegetation Management and Restoration Project Supplement. This Objection is in addition to the statement of Predecision Objections being filed by Matthew Arnold of Eubanks and Associates, PLLC on behalf of the Indiana Forest Alliance, the Monroe County Board of Commissioners, Hoosier Environmental Council and the Friends of Lake Monroe on the Houston South Vegetation Management and Restoration Project Supplement.

This objection is being filed on behalf of Indiana Forest Alliance by:

Jeff Stant, Executive Director

Indiana Forest Alliance

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Project Name:

Houston South Vegetation Management and Restoration Project Supplement.

Responsible Official:

Christopher Thornton

District Ranger

Hoosier National Forest

Brownstown Ranger District

The following is a description of the aspects of the proposed project addressed by this objection including specific issues related to the Project as proposed and the lack of adequate analysis of those issues required under the National Environmental Policy Act as well as suggested remedies for addressing this objection. Indiana Forest Alliance raised the issue of unique recreational values of in the Houston South area that will be degraded by the Houston South Project as proposed in timely submitted comment on the Draft Supplemental Environmental Assessment for this Project in December, 2023.

Failure to Acknowledge or Protect the Significant Natural and Recreational Value of the Area.

IFA commented on the high value of the Houston South area for primitive recreation in Indiana and the failure of the DSEA to acknowledge that value or take a hard look at alternatives that would avoid desecrating that value. Yet the FSEA and Comment Response document do not acknowledge the unique recreational significance of the area or examine the project's impacts on that significance despite the fact that federal legislation has been introduced in the current 118th Congress, in the Senate, S.4402, and House of Representatives, H.R. 8535, that would set aside the entire project area either as federal wilderness (2,600 acres in northwest corner being added to the existing Charles Deam Wilderness) or as National Recreation Area (the remaining 10,900 acres becoming part of the Benjamin Harrison National Recreation Area). Under these bills which are identical in text, the NRA is to be managed explicitly to protect the drinking water supply of Monroe Reservoir, promote dispersed recreation and maintain the scenic and aesthetic quality of the land for this purpose. The bills have been introduced by republican Senator Mike Braun of Indiana and republican Representative Erin Houchin of IN's 9th Congressional district which contains all of the lands in the Houston South Project, demonstrating widespread public support for the protection of the lands in the Houston South area for their recreational value. Yet there is no effort to examine an alternative in the SEA that would protect this value.

The Houston South Project will devour the pristine natural condition, high scenic quality and wilderness recreation value of nearly one fourth of the largest expanse of wild hardwood forest on public land in the lower Midwestern US. There is no expanse of nature this size anywhere else in the states of Ohio, Indiana and Illinois. The fact that the Charles Deam Wilderness which occupies part of this expanse is one of the most heavily used wilderness areas in Region 9 according to Visitor Use Monitoring Data gathered by the Forest Service, attests to the high value of this area for recreation. The federal legislation is seeking to spread out the use of the Deam to adjacent areas including the Houston South area to relieve much of the overuse that is damaging the Deam Wilderness acknowledged in HNF Biennial Monitoring Evaluation Reports. The Houston South Project's logging, burning and road building activities will substantially erode that accomplishment by reducing the current attractiveness and useability of the area for dispersed recreation.

Indiana's longest hiking and backpacking trail, the Knobstone Trail (KT) has just been completed through the Project Area. Major portions of the KT will have to be closed to accommodate the project's logging. The KT will likely be used as a haul road for that logging. The same appears to be the case for the pristine Fork Ridge Trail in the eastern half of the project area. The SEA does not acknowledge any of this impact and should have examined an alternative that would avoid closing the KT as well as the Fork Ridge Trail.

The SEA also does not examine the economic impact to private horsecamps from multiple closures of trails they use heavily in the western portion of the project area due to project logging over the next 10-15 years. These horsecamps are the major businesses in the Project Area. No data is provided to assess the extent of use of the area for horseback recreation but anecdotally, the project area is regularly identified as providing the highest horseback riding recreation in the HNF.

I am requesting that further environmental analysis be undertaken to examine the impact of the project's proposed logging, roadbuilding, prescribed fire, and herbicide application on the highly unique, scenic and recreational values of the project area and alternatives that will protect these values which federal legislation is seeking to protect.

Respectfully Submitted,