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First name: Liz

Last name: Jackson

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.

Your reports have documented a current level of only 3% of project acreage less than 30 years of age and a paltry 0.1% less than 10 years of age, so the current condition of the forest would suggest a nearly complete absence of wildlife dependent on young forest habitat and a lack of sunlight-preferring species like oak and forbs.

The 2006 Hoosier National Forest Land and Resource Management Plan (Forest Plan) has established an acreage goal for 4- 12% of young forest habitat. WE appreciate that this project will move the Forest toward that important goal, but it is too little acreage over too much time so we object to the amount of acreage impacted and the timing of the activities.

As was noted in our March 2023 and December 2022 comments, more than 42% of disturbance dependent forest birds in Indiana have experienced significant population declines over past several decades, with several species experiencing exponential declines due to loss of early successional habitat including Eastern Towhee, Golden Winged Warbler, and Field Sparrow. Without increasing the size and rate of these proposed actions we could anticipate further loss of these and many other species, thus our objection to this project.

Your reports note that there is a lack of oak regeneration in the project area, and the Forest Plan recognizes the need for prescribed fire and silviculture treatments to ensure continued success of the oak/hickory system, which is currently 59% of the acreage in this region. This forest is evolving to a maple/beech dominated system with less biodiversity and food for wildlife. In fact, the proposed action falls far short of what is needed. We think many more acres should be treated in the project area in order to ensure continued oak ecosystem dominance for the long term, which we also noted was a concern in our previous comments.

While this project certainly addresses the lack of young forest and need for oak forest restoration and we applaud you for that, we believe that increasing the acreage in treatments and implementing over a shorter time frame 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