Objection: Houston South Vegetation Management and Restoration Project
Responsible Official: Michelle Paduani, District Ranger, Brownstone Ranger District,
Hoosier National Forest
Via: objections-eastern-region@usda.gov

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The Sierra Club Hoosier Chapter objects to the draft Decision of Notice and Finding of No
Significant Impact for the Houston South Vegetation Management and Restoration Project
(project) on the grounds that the Forest Service (FS) has not adequately assessed or addressed the
potential detrimental impacts of the project on future global warming and the resulting
catastrophes associated with climate change, as noted in my 30-day notice comments numbers
60, 60-2, and 60-3. Instead, we offer an alternative scenario allowing the Hoosier National Forest
(HNF) to serve as a continuous carbon sink, source of increasing biodiversity, and a public
health amenity contributing to both human physical and emotional well-being, as suggested by
my comments 60-4 and 60-5.

The FS contends that the HNF would become “carbon neutral and perhaps even a carbon source
if no management occurs” (response to my comment 60-4). As justification it references the
report Forest Carbon Assessment for the Hoosier National Forest in the Eastern Region.
However, this report doesn’t make that claim. The closest it comes is this statement at the top of
page 16: “If the Forest continues on this aging trajectory, more stands will reach a slower growth
stage in the coming years and decades . . . , potentially causing the rate carbon accumulation (sic)
to decline and the Forest may eventually transition to a steady state or to a carbon source in the
future.” Note the tentativeness of this statement, which is a theme throughout the report, as stated
in the summary on page 18: “The effects of future climate conditions are complex and remain
uncertain. . . . [I]t is difficult to judge how these factors and their interactions will affect future
carbon dynamics on the Hoosier NF.” Here the FS so much as admits that it has no real
knowledge of how forest conditions may change over the next 20 years, yet it offers a
management project based on decades-old theories of what is best for the forest.

The point of my comments 60, 60-2, and 60-3 was the critical need to focus on carbon impacts
over the next decade in view of the extreme urgency stressed by the 2018
IPCC Special Report (report.ipcc.ch/pdf/sr15_spm.final.pdf), which was not referenced in either
the Forest Carbon Assessment or the other specialist report on carbon, Project Scale Carbon
Effects, although both reports are date July 31, 2019, nine months after the IPCC Special Report was released. Basically, the FS’s argument is that, over time, forest regrowth will compensate or exceed the carbon storage lost by the removal of mature trees during the project. However, the regrowth of new trees sufficient to compensate for the loss of mature trees will take decades. The IPCC report warns that we don’t have decades to address the dire threat of climate change. Instead, we may have little more than a decade left to greatly reduce the amount of carbon that human activities are releasing to the atmosphere. If we fail to do so, the resulting cataclysm may well be irreversible.

The Project Scale Carbon Effects report also points out that the additional carbon released to the atmosphere as a result of the proposed project is miniscule compared with total global carbon emissions. This is a simplistic argument. The vast majority of world carbon sources individually contribute only a tiny portion of total carbon emissions. If they all were to argue that they don’t need to eliminate their emissions because they are inconsequential when looking at the big picture, we would fail to avert the catastrophe that awaits us if we don’t take drastic action. Should every coal-burning power plant be allowed to continue operation simply because they each emit a relatively small amount of carbon to the atmosphere?

Furthermore, the basis of my objection isn’t solely to address the impact of the proposed project but to point out the failure of the FS to acknowledge the critical juncture we are at in our need to change course and save our civilization. As noted above, neither of the reports that the project relies on to address carbon impacts reference the 2018 IPCC report. Instead, the project relies on a 13-year-old forest management plan that is based on forest management theories dating to the last century. The time has come for the FS to recognize that we are in a new era when it comes to deciding how to manage our forests and to change its policies to reflect this new reality.

The Sierra Club has long opposed commercial logging on federal forests because of our commitment to protecting wilderness and promoting the biodiversity and unique recreational benefits that wilderness provides. Now, we bolster that position by emphasizing the critical role of forest preservation in meeting the carbon challenge, as detailed in our Forest & Climate website: content.sierraclub.org/ourwildamerica/forests-climate.

The website lists a dozen references supporting this argument (/ourwildamerica/resources-0). The most recent is “Intact Forests in United States: Proforestation Mitigates Climate Change and Serves the Greatest Good,” (Moomaw WR, Masino SA and Faison EK), published June 11, 2019. The authors argue that “growing existing forests intact to their ecological potential—termed proforestation—is a more effective, immediate, and low-cost approach that could be mobilized across suitable forests of all types. Proforestation serves the greatest public good by maximizing co-benefits such as nature-based biological carbon sequestration and unparalleled ecosystem services such as biodiversity enhancement, water and air quality, flood
and erosion control, public health benefits, low impact recreation, and scenic beauty.” (Attributes referenced by my comments 60-4 and 60-5).

While the report focuses mostly on northeastern U.S. forests, in its section on proforestation and ecosystem services (p. 6) it references an analysis done in 1999 of more than 1,000 public comments regarding management of the Hoosier National Forest. “Responses with the highest frequency reflected an interest in preservation and protection of forests and wildlife, a recognition of the benefits to human physical and mental health, a sense of ethical responsibility, opposition to damage and destruction, monetary concerns, and a preponderance of sadness, fear and distress over forest loss.”

Moomaw, et al, also note the failure of the FS to change its priorities in light of current concerns, as I mentioned above. Citing Gifford Pinchot’s belief that that national forests should be managed “from the standpoint of the greatest good of the greatest number in the long run,” the authors go on to say:

“This ethos continues to define the management approach of the U.S. Forest Service from its inception to the present day. Remarkably, however, even in 2018 the five major priorities of the Forest Service do not mention biodiversity, carbon storage, or climate change as major aspects of its work” (p. 6).

In conclusion, the Sierra Club Hoosier Chapter objects to the draft Decision of Notice and Finding of No Significant Impact for their failure to acknowledge today’s changed circumstances in regards to the urgency of the climate crisis and the critical need for the Forest Service to change its forest management policies to focus on maximizing short term carbon storage and sequestration rather than outdated theories of promoting forest health by logging.