

October 26, 2024

**via email**

objections-eastern-region@usda.gov

Attn: Administrative Review Staff

Re: Buffalo Springs Restoration Project, Hoosier National Forest, Region 9

Responsible Official: Christopher Thornton, District Ranger

Submitted by Andy Mahler on behalf of Protect Our Woods and others listed below

(b) (6) [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**CC (via email):**

Chris Thornton, Brownstown District Ranger Hoosier National Forest  
Brownstown Ranger District

(b) (6) [REDACTED]

[REDACTED]

Kevin Amick

(b) (6) [REDACTED]

[REDACTED]

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dear friends

# WE OBJECT

and

## We Will Be Heard

Pursuant to 36 C.F.R. § 218.8, We hereby submit formal objections to the Buffalo Springs Restoration Project (“BS Project”).

We wish to state at the outset that our preference continues to be to work with the Forest Service to find a mutually agreeable path forward that fulfills the agency's stated mission of "Caring for the Land and Serving People;" one that fully engages the public, that brings the management of the Hoosier National Forest in line with the growing scientific consensus regarding the importance of forest protection in mitigating the extremes associated with a warming planet, and that provides for the many public values this precious public land represents in a population dense and public lands poor state like Indiana. We will address what this path might look like in our concluding statements.

We wish to state clearly that we are not your enemy.  
We are your partners, your neighbors, and your employers.

We sympathize with Forest Service managers and decision-makers who must wrestle with a mixed mandate; unpredictable and conflicting guidance from periodic reversals in Congressional and Administration priorities and budgeting; and of course, mountains of paperwork and a maze of Federal Regulations.

We bear no inherent ill will towards the Forest Service or its employees; quite the opposite. Two of the finest people I have ever known were Hoosier National Forest Supervisors A. Claude Ferguson and Frank Voytas. A current Hoosier National Forest employee is one of my closest personal friends

We prefer to be defined by what we are FOR rather than what we are against.  
What is most needed and most important, both at the federal level and here in the State of Indiana is a new vision and a new approach to managing publicly owned forests. This is especially true in the hardwood forest region with high population densities and smaller, more fragmented national forests.

Having said all that, we must make it equally clear that we object in the strongest possible terms to how the public has been treated in this process to date, especially by line officers currently in decision-making positions.

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## Objections

- We object to the United States Department of Agriculture's failure to follow through on the commitment made to the people of Orange County, Indiana, and beyond, by USDA Undersecretary for Natural Resources and the Environment, Dr. Homer Wilkes, in front of an audience of more than 250 people, April 3, 2023, including Senator Mike Braun and other elected officials, and representatives from area newspapers, radio and television stations. On the record, Undersecretary Wilkes promised the assembled company that the Forest Service would begin the process of preparing a new Land and Resource Management Plan for the Hoosier National Forest.
- We object to the absurd claim that the largest project in the history of the Hoosier National Forest covering approximately 30,000 acres of land - approximately one third of which is privately owned, including land owned by numerous signatories

listed below - and to be carried out over twenty five years, will have *no significant impact*. If there will be no significant impact, **WHY DO IT?**

- We object to the failure of the Forest Service to fulfill their legal requirements under NEPA to prepare an environmental impact statement for an unprecedented project of this magnitude whose cumulative impacts, even if currently unknown or inadequately considered are certain to be significant and consequential. That is why an EIS must be prepared
- We object to the proposed 'salvage' operation within the Paoli Experimental Forest. The Paoli Experimental Forest is explicitly included in the Buffalo Springs proposal, raising concerns about the Forest Service deliberately circumventing the ongoing NEPA process before a full analysis of the potential environmental impacts, including cumulative effects, can be evaluated in a comprehensive Environmental Impact Statement (EIS).
- We object to the Forest Service's failure, again under the provisions of NEPA, to consider a range of alternatives, including a true no action alternative, and the entirely reasonable and feasible alternative submitted by the public, which as demonstrated by the public response, is supported by *far more people* than support the Forest Service's own preferred alternative.
- We object to the Forest Service abject failure to even consider, let alone evaluate or provide responses to numerous highly relevant questions submitted by members of the public, including the undersigned, regarding economics, timber targets, incentives and the true cost/benefit analysis of the proposed project.

These objections are submitted on behalf of myself, my family, my neighbors and all who share these concerns, many of whose names are listed below; on behalf of the larger Buffalo Springs community in Orange, Crawford and surrounding Counties that has come together to oppose this project; and on behalf of Protect Our Woods, an organization active on forest protection issues in Indiana since 1985.

Among the many groups and organizations on record opposing this project are

Board of Commissioners, Orange County, Indiana

Paoli Town Council, Paoli, Indiana

Board of Commissioners, Crawford County, Indiana

Board of Directors, Orange County Farm Bureau, Orange County, Indiana

Board of Directors, Orange County Economic Development Partnership, Orange County

Board of Directors, Crawford County Economic Development Corporation, Crawford County

Board of Directors, Paoli Chamber of Commerce, Paoli, Indiana

Board of Directors, Saving Historic Orange County, Orange County, Indiana

Board of Directors, Orange County Recycling Cooperative, Orange County, Indiana

In addition, the following groups and individuals (*in italics*, below) signed on to our original Buffalo Springs comments which I include herewith:

The undersigned groups and individuals, on behalf of the American people, who employ the Forest Service to protect the Hoosier National Forest for future generations, as well as for the myriad species who depend on the forest for their survival, support the **Citizen's Preferred Alternative** to the Buffalo Springs Restoration Project.

We also support the formal designation of the **Buffalo Springs Natural Heritage Trail, Historic District, Scenic Recreation Area National Monument**, or any other formal designation which will provide permanent, comprehensive protection for this special area. We also support the creation of a regional, multi-state network of protected **Biodiversity and Climate Preserves**.

We insist that the Forest Service fulfill its legal responsibilities to

- Provide sufficient time for the public to review and respond to the hundreds of pages of accompanying documentation for the Buffalo Springs project, the largest project in the history of the Hoosier National Forest, by re-issuing the Draft Environmental Assessment with a new 30 day comment period, after the first of the year
- Evaluate a full range of alternatives for the Buffalo Springs project, including the Citizen's Preferred Alternative and a range of other alternatives that do not require logging and repeatedly burning the forest, but instead recognize its critical role in promoting and protecting water quality, historic features, recreational opportunities, forest biodiversity, and climate moderation
- Take the time to fully assess the proper role of these public lands in a time of accelerating climate change and loss of biodiversity, in an environmental impact statement or as part of the process of developing a new Forest Plan to replace the woefully inadequate and out-of-date 2006 Land and Resource Management Plan for the Hoosier National Forest.

Use funds allocated for "restoration" not as a pretext for logging the Hoosier National Forest, but instead to acquire additional land for inclusion in the Hoosier National Forest or to assist private woodland owners to improve forest management, forest protection and forest health on private forest land.

Sincerely,

*David Nickell*

*Council Chair*

*Heartwood*

*Kentucky*

*Paul Edwards*

*President of the Board*

*Alliance for the Wild Rockies*

*Montana*

*Sheryl Campbell*

*Co-Founder*

*Tennessee Heartwood*

*Tennessee*

*Gwen Marshall*

*Network Coordinator*

*Protect Biodiversity in Public Forests*

*Ohio*

*Sam Stearns*  
*Founder and Spokesperson*  
*Friends of Bell Smith Springs*  
*Illinois*

*Michael Kellett*  
*Executive Director*  
*RESTORE: The North Woods*  
*Massachusetts*

*Michael Garrity*  
*Executive Director*  
*Alliance for the Wild Rockies*  
*Montana*

*Heather Cantino*  
*Steering Committee Chair*  
*Athens County's Future Action Network*  
*Ohio*

*Lora Kemp*  
*Chairperson*  
*Owen-Putnam Friends of the Forest*  
*Indiana*

*Karen Arnold*  
*Co-founder*  
*Tree of Life Alliance*  
*Indiana*

*Denise Boggs*  
*Director*  
*Conservation Congress*  
*Montana*

*Joseph Scalia III*  
*President*  
*Gallatin Yellowstone Wilderness Alliance*  
*Montana*

*Shannon Anderson*  
*Director of Advocacy*  
*Earth Charter Indiana*  
*Indiana*

*Bob Lucas*  
*Music Director/Composer*  
*Mad River Theater Works*  
*Ohio*

*Cheryl Munson*  
*Member At Large*  
*Monroe County Council*  
*Indiana*

*Phil Knight*  
*Montanans for Gallatin Wilderness*  
*Montana*

*Vernon Haltom*  
*Executive Director*  
*Coal River Mountain Watch*  
*West Virginia*

*Sally Stewart*  
*Co-founder*  
*Save Hoosier National Forest*  
*Indiana*

*David Haberman*  
*Professor Emeritus*  
*Department of Religious Studies Indiana University*  
*Indiana*

*Josh Schlossberg*  
*Co-founder*  
*Eco-Integrity Alliance*  
*Colorado*

*Mark Nowotarski*  
*Leadership Committee*  
*Coalition Against the Mid-States Corridor*  
*Indiana*

*Amy Benningfield*  
*Mighty Kindness*  
*Indiana*

*Gerald D. Ramsey, Ph.D.*  
*President*  
*Crawford County RLF*  
*Professor Emeritus of Business Administration IU Southeast*  
*Indiana*

*Catherine Ramsey, Ed.D.*  
*Director Emerita*  
*Crawford County Libraries*  
*Indiana*

*Frankie Stewart*  
*Co-founder*  
*Save Hoosier National Forest*  
*Indiana*

*Amanda Shepherd*  
*Chapter Director*  
*Sierra Club Hoosier Chapter*  
*Indiana*

*Steven Stewart*  
*Founder*  
*Save Hoosier National Forest*  
*Indiana*

*Rock Emmert*  
*Coordinator*  
*Healthy Dubois County*  
*Indiana*

*Kris Lasher*  
*Co-Director*  
*Project ACORN*  
*Indiana*

*Dr. Sara Johnson*  
*Director*  
*Native Ecosystems Council*  
*Montana*

*Mary Hess*  
*Chairperson*  
*Southwestern Indiana Citizens for Quality of Life*

*Indiana*

*John Blair*

*President*

*Valley Watch, Inc.*

*Indiana*

*Marcia Veldman*

*State Co-Coordinator*

*Citizens' Climate Lobby*

*Indiana*

*Phil & Mary Mininger*

*Retired Pastors*

*Paoli Mennonite Fellowship*

*Indiana*

*Judy Rodd*

*Director*

*Friends of Blackwater, Inc.*

*West Virginia*

*Kerwin Olson*

*Executive Director*

*Citizens Action Coalition*

*Indiana*

*Aimee Erickson*

*Executive Director*

*Citizens Coal Council*

*Pennsylvania*

*Adrienne Highhouse*

*Co-Founder*

*Friends of the Ferdinand State Forest*

*Indiana*

*Jamie Campbell Petty*

*Executive Director*

*MIDWEST HEMP COUNCIL*

*Indiana*

*Cade Bursell*

*Professor Emeritus*

*Illinois*

*Richard Owens*  
*Owner and Founder*  
*Hoosier Pawpaw*  
*Indiana*

*Irene Tarr*  
*John Maier*  
*Delilah McAdams*  
*Mica Beauregard*  
*Larry Gillen*  
*Board of Directors*  
*Orange County Recycling Co-op*  
*Indiana*

*Mary Beth Gibbons*  
*Co-Founder*  
*PROTECT OUR WOODS*  
*Indiana*

*Keith Gibbons*  
*Indiana*

*Sarah Grain*  
*Indiana*

*Katie Deveau*  
*Indiana*

*David B. Taggart*  
*Indiana*

*Janet Kennedy, RN*  
*Indiana*

*Nathan Pate*  
*Indiana*

*Carol Polsgrove*  
*North Carolina*

*Cathie Bird*  
*Tennessee*

*Phyllis Haworth*

*Indiana*

*Mary Kay Rothert*

*Indiana*

*Trudy Dunaway Brown*

*Indiana*

*Syndee Earheart*

*Indiana*

*Lori Essling Byers*

*Indiana*

*Michelle Stewart Henry*

*Indiana*

*Mary Swanson*

*Illinois*

*Caitlin Swanson*

*Illinois*

*Linda Oakley Parks*

*Indiana*

*John Henry*

*Indiana*

*Eliza Hope Kenyon*

*United Kingdom*

*Charlotte Dillard*

*Indiana*

*Matthew Leland*

*Indiana*

*Dana Nixon*

*Washington State*

*Mr. Carter Hays*

*Indiana*

*Corina Lang*

*Illinois*

*Dave and Linda Stewart*

*Indiana*

*Tom Zeller*

*Indiana*

*Scott Vannoy*

*Indiana*

*Robin Gayle Everitt*

*Ohio*

*Lila Cates*

*Indiana*

*Daniel Atlas*

*Indiana*

*Tony Moore*

*Indiana*

*Melinda Grimes Sketo*

*Indiana*

*Mary Lynn Stoll*

*Indiana*

*Ginger Russell*

*Michigan*

*Kelly Russell*

*Michigan*

*Patrick Callanan*

*Indiana*

*Paul David Grieser*

*Indiana*

*M Chipko*

*Indiana*

*Frances Atkins*

*New Mexico*

*Peg McIntosh*

*Indiana*

*Carol Fischer*

*Indiana*

*Kirk Bratton*

*Indiana*

*Dawn Bratton*

*Indiana*

*Anne Ryan Miller*

*Indiana*

*Steven V. Miller*

*Indiana*

*Benjamin Tree*

*United Kingdom*

*Barbara Mahler*

*North Carolina*

*Bob Fener*

*Virginia*

*Steven Krichbaum*

*Virginia*

*Brandi Ward Stewart*

*Kentucky*

*David Coyte*

*Indiana*

*Marco Bartholomew*

*Indiana*

*Nicole Rosenbaum*

*Indiana*

*Brandon Query*

*Indiana*

*Karyn Moskowitz*

*New Jersey*

*Brian Blankenship*

*Indiana*

*Wyatt Blankenship*

*Indiana*

*Richard Hockett*

*Indiana*

*Annie Jane Cotton*

*Kentucky*

*Jennifer Christie*

*Indiana*

*Amanda Moore*

*Tennessee*

*Sandra Krichbaum*

*Virginia*

*Eric Mannweiler*

*Indiana*

*Angelo J. Dattilo*

*Indiana*

*Georgia De La Garza*

*Illinois*

*Felicia Fields*

*Indiana*

*Elizabeth Winship-Ettinger*

*New York*

*Andy Mahler and Linda Lee, Paoli, Indiana*

These comments include, by reference comments submitted by any of the above, especially those submitted on behalf of Indiana Forest Alliance and Heartwood, since Protect Our Woods is a member of both organizations. Also included by reference are comments submitted by members of Protect Our Woods submitting comments individually, including Rick Hockett, Robbie Heinrich, Shane Murphy, Steven Stewart, Larry Gillen and others.

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### **USDA Forest Service Bad Faith**

Comment 1.2 and elsewhere, throughout

The FS response was arbitrary capricious and at odds with applicable law. The clear and explicit standard for the exemption from NFMA's fifteen year mandate for Forest Plans is "working in good faith" to complete the plan revision.

In response to the substantial and widespread opposition to the BS project (cited above), USDA Undersecretary for Natural Resources and the Environment Homer Wilkes visited Orange County on two separate occasions at the invitation of Senator Mike Braun, and in both instances, in front of numerous witnesses (the second being at a large public meeting with approximately 250 attendees, including Senator Braun and other elected officials, news media and a highly diverse representation of concerned citizens almost all of whom expressed opposition to the project and insisted that there be a new Forest Plan for the HNF) that **the FS would initiate the process to develop a new plan:**

Not in six years, not in some indefinite future when the HNF wins the national Forest Planning lottery, but in this planning cycle. Forest Service employees were present when these assurances were made. But to so publicly promise a new plan and then to have the FS so blithely offer such arbitrary and capricious excuses for their failure to fulfill such a clear and obvious mandate is the opposite of "good faith." It is deceitful, dishonest and frankly reprehensible.

### **Violation of the Mandate for Full Public participation under NEPA**

We object to this whole whack-a-mole charade of NEPA compliance characterized by circular logic and circular responses, endlessly recycled, used to justify a predetermined outcome and to provide a fig leaf of public participation for a project whose outcome was never in doubt, and whose true purpose seems to be to meet timber targets and performance review standards while maintaining and enhancing the Forest Service budget.

Cobbled together for your edification are two mash-ups of the endlessly recycled and re-purposed Forest Service responses to substantive questions submitted by members of the public:

"The (Purpose and Need) for this project (the stated goal of which dictates the range of reasonable alternatives), whose Environmental effects have been analyzed and disclosed in the EA (the use of which does not mean that there will be no impacts caused by the Federal action), has not changed since 2006, since it is consistent with

and implements the Hoosier National Forest Land and Resource Management Plan (Forest Plan), which except for project consistency with the current forest plan, the 2012 rule does not apply to project level analysis, per 36 CFR 219.2(c).”

and

“The finding of no significant impact does not mean that there will be no impacts caused by the Federal action because If an effect is found to be significant, an EIS would be prepared because NEPA requires agencies to consider alternatives to the proposed action that are reasonable and feasible. The stated goal of a project (Purpose and Need) dictates the range of reasonable alternatives and, of course Alternatives must meet the purpose and need ((36 CFR 220.7 (b)(2)).”

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### **Economics, Budget, Timber Targets and Incentives**

We have been seeking answers to questions regarding Economics, Budget, Timber Targets and Incentives since at least March 28, 2022, and what few responses have been provided by the Forest Service are inadequate, incomplete, and essentially non-responsive. None of the following legitimate questions and concerns were acknowledged or addressed in the Forest Service responses to (15) Questions or (17) Economics, Tourism and the Economy

The following letter contains the original request (*in italics*):

March 28 2022

Chris Thornton, District Ranger  
Hoosier National Forest

Brownstown and Tell City Districts

(b) (6)

[REDACTED]

Dear Chris:

We write on behalf of the members of PROTECT OUR WOODS to express our opposition to the logging, road-building, repeated burning, and herbicide-spraying the Forest Service has proposed under the auspices of the woefully out-of-date 2006 Hoosier National Forest Plan for the approximately 18,000 acres in public ownership in the 30,000 acre Buffalo Springs area of southern Orange County, Indiana. While we oppose these activities on the publicly owned lands, we believe an alternative should be developed that assesses current conditions across the landscape of the area (as mandated by the 2012 Planning Rule) to determine whether some of the stated objectives of the proposal are already being met on private lands, or could be achieved by working with and providing appropriate incentives to the many private landowners within the project area. We are therefore requesting additional information about the project funding and budget to help in the preparation of that alternative.

PROTECT OUR WOODS was founded in 1985 to oppose logging, road-building and off-road vehicle trails proposed for the Hoosier National Forest. We remain steadfast in our opposition to those activities and determined to resist this most recent proposal. In this opposition we have the support of the overwhelming majority of the public that owns these public lands, both in southern Indiana and all

across the country (see polls [here](#) and attached). We remain open however to the possibility of working with the Forest Service to find common cause and achieve shared goals in a cooperative, mutually supportive and respectful relationship. There is no doubt that such a relationship would be much more likely to produce widely supported outcomes that benefit the forest and the people who love it, and to address the many threats we face from a dramatically warming planet.

That is why we have been developing the Citizens' Preferred Restoration Alternative (Citizens' Preferred Alternative) for you to consider in your assessment of management options for the Buffalo Springs area. The Citizens' Preferred Alternative focuses on applying your team's skills, knowledge and training to improving forest management and other activities on the abundant private forestland within the purchase area of the Hoosier National Forest, while allowing natural processes to create old growth forest on public ownership in the absence of logging, new road-construction or other forest disturbing activities.

The purchase area of the Hoosier National Forest is 644,000 acres, with public ownership of only 204,000 acres. The 440,000 acres in private woodlands and other ownerships might benefit from the types of activities you are proposing for the Buffalo Springs area, while the publicly owned, mature forest you are proposing to log could instead fulfill the more important role of protecting biodiversity, moderating climate change and sequestering carbon.

We acknowledge the competence and professionalism of the team that produced [the Buffalo Springs Area Newsletter](#) (Area Newsletter), which highlighted the extraordinary *Heritage Resources, Cave and Karst Resources, Fisheries Resources, Botany Resources, Geologic, Hydrologic and Soil Resources, Wildlife Resources, and Recreation Opportunities* of the area you now call Buffalo Springs. It is indeed a lovely place to work, play, live, or visit; an area worthy of a high degree of protection; and one whose special features should be publicized and promoted to encourage the vital tourism and recreation-based component of the local economy.

So imagine for a moment our surprise (shock, dismay, grief and sadness) when we first encountered the [Buffalo Springs Scoping Letter](#) (Scoping Letter) which instead featured plans for extensive logging, road-building, herbicide-spraying, and repeated burning around our homes and all across southern Orange County.

Barely mentioned in the Scoping Letter were the area's extraordinary features that had been described in such detail in the Area Newsletter (except for the mitigation measures that would be required to protect those special features from the proposed logging, burning and road-building). Not only do the logging, road building, and burning threaten the area's special and unique features and the economic activity they support in the local community, but they also without exception exacerbate climate change which appeared only in a brief one paragraph afterthought on the last page of the original Area Newsletter which notably failed to mention the role mature and old-growth forests play in mitigating climate change.

*Which leads to the question "Why?" -- why focus almost the entire project on cutting trees, repeatedly burning the forest, building roads, and spraying herbicide in a time of growing concern over climate change?*

*The answer to that question ("Why?") might be found in the one topic conspicuously absent from any discussion in either the Area Newsletter or the Scoping Letter, and that is the subject of budgeting and its influence on those activities proposed in the Buffalo Springs area. Neither the Area Newsletter nor the Scoping Letter include any discussion of timber sales nor the disposition of revenues generated by the selling of the trees in the course of silvicultural treatments over thousands of acres in the Buffalo Springs area.*

*The 2006 Land & Resource Management Plan for the Hoosier National Forest says on p. 1-5, "Targets for outputs are dependent upon budgets and may or may not reflect Forest Plan emphasis areas."*

*Page 1-9, under the heading, Budgets, says the following:*

*"The final determining factor in carrying out the intent of the Forest Plan is the level of funding, which dictates the rate of implementation of the Plan."*

*Both strongly suggest that funding and budgetary considerations are driving this process.*

*We therefore need your help in understanding the nature and extent of budgetary incentives as we develop the Citizens' Preferred Alternative in such a way that it helps the Forest Service to fulfill its mission, but without cutting down the trees the public expects the Forest Service to protect and which protect us from the harms associated with a warming planet.*

*We are interested in both recent data and any projections you may have for future revenues, including those for recreation and other non-extractive uses, especially those related to the Buffalo Springs proposal. We are also interested in any valuation of forest ecosystem services such as carbon sequestration and endangered species habitat, that you may have developed using the contingent valuation method (or any other method) to value the structure, health and extent of forest ecosystems. Please provide information about methods used and the valuations you have derived for the Hoosier National Forest and for the Buffalo Springs area in particular.*

*Regarding revenues and expenses, we seek information about two broad categories:*

- *Annual Congressional appropriations, and*
- *Revenues from operations Congress permits the Forest Service to retain*

*With respect to "Annual Congressional appropriations," please provide information regarding appropriations and expenditures for preparing timber sales or conducting prescribed burns on the Hoosier National Forest for the five most recent years for which you have data, and any budget revenue and expense projections related to the Buffalo Springs Proposal over the duration of the project.*

*Please provide specific dollar amounts received and any targets (quotas, goals, managerial expectations or other directives) related to prescribed fire and timber cutting (whether for silvicultural or forestry goals and objectives, ecosystem management, natural resource management, restoration, or any other category that involves selling, cutting and/or removing trees, the sale of which generates revenues). These include specific direction (targets) provided by:*

- *Congressional appropriations*
- *Washington or Regional Forest Service Offices*
- *2006 Forest Plan for the Hoosier National Forest*

*We also request the following monitoring reports:*

*Monitoring reports related to targets set for the HNF submitted to either the District Ranger or the HNF Supervisor by Forest Service employees*

*Monitoring reports submitted by the HNF Supervisor (or others) to the Regional or Washington Forest Service Offices regarding progress in meeting any targets established for the Hoosier National Forest*

*And with respect to the relationship between targets and performance reviews, please answer the following questions:*

*Do performance reviews for the District Ranger and Supervisor include an assessment of success or failure in meeting targets or other performance goals related to prescribed fire and the sale and removal of timber and the generation of revenue?*

*If so, how is success in fulfilling such targets for District Rangers and/or the Forest Supervisor measured and graded?*

*With respect to fire, in addition to past budgetary data and any projections you may have for the Buffalo Springs proposal, please explain how funds related to fire are budgeted and allocated. Is it on acres proposed, acres completed, or some other basis?*

*Regarding "Revenues from operations Congress permits the Forest Service to retain," please provide revenue data for the past five years for recreation and other non-timber sources, and*

*silvicultural treatments, ecosystem restoration, or any related activities that involve selling, cutting and/or removing trees, the sale of which generates revenues*

*And with respect to any revenues generated by silvicultural treatments and related tree cutting and selling activities, please provide information regarding which of the following six funds your agency deposited funds into, the dollar amounts deposited, the sources of those revenues, and the percentages of those revenues deposited:*

- Brush Disposal
- Credit for Purchaser-Built Roads
- Knutson-Vandenberg (K-V) Fund
- Salvage Sale Fund
- Stewardship Contracting Fund
- Timber Sales Pipeline Restoration Fund

*Please also include any estimates of the dollar amounts that you anticipate could be generated by silvicultural treatments or any related activities in the Buffalo Springs proposal over the duration of the implementation of that project and what proportion of any such revenues you project to deposit into these six funds.*

*Finally, there is nothing you have proposed in the Buffalo Springs area that requires immediate action. In fact, based on your description, any portion of the project could be implemented in the near future or ten years from now; which means that no harm will be done by a simple delay to gather additional information through a more detailed assessment of conditions in the project area irrespective of ownership, such as we are proposing in the Citizens' Preferred Restoration Alternative. This assessment is not only mandated by the NFMA and the 2012 Planning Rule but will be essential to your planning team whether they conduct an EIS or a full round of forest planning to craft a new, more forward looking, balanced and inclusive plan to guide the management of the Hoosier National Forest as we face an uncertain climate future in the years to come.*

Thank you

Andy Mahler  
Linda Lee  
Helen M. Vasquez  
Larry Gillen  
Jeanette Haworth  
Phyllis Haworth  
Robbie Heinrich  
Jesse Laws  
Kathy Klawitter  
Sam Klawitter  
MaryBeth Gibbons  
Keith Gibbons  
David Crecelius  
Maria Crecelius  
Steven Stewart  
Frankie Stewart  
Sally Stewart  
Mike Stewart

Brandi Stewart  
Shane Murphy  
Amanda Murphy  
Waylon Murphy  
Knox Murphy  
Major Murphy  
Jerry Murphy  
Nancy Murphy  
Melinda Grimes Sketo  
Janet Kennedy  
Nathan Pate  
Richard Hockett  
Brandon Query Bey  
Rachael Himsel  
Brian Blankenship  
Wyatt Blankenship  
Sandi Sears  
Lonnie Sears  
Brenda Cornwell  
Terry Cornwell  
Janet Powell  
Edward Powell  
Mary Mininger  
Phil Mininger  
Nancy Garth Kimmel  
E. Joseph Kimmel, Jr.  
Andrew Gerber  
Dawn Bratton  
Kirk Bratton  
Rock Emmert  
Kris Lasher  
Jeremy Temple  
Drew Spatt  
Donald Winslow, Ph.D.  
Mark Nowotarski  
Karyn Moskowitz  
Cicada Hoyt  
Robert Hoyt  
David Haberman, Ph.D.  
Mary-Kay Rothert  
Richard Langdon  
Sandy Kendall  
Calvin Chesnut  
Christy Collins

Donna Gerkin Kendall  
Karen Fiscus  
Carol Fischer  
Pat Berna  
Jeanne Melchior  
Roger Crews  
Aaron Spicer  
Elisa Young  
Karyn Zaremba  
How Kuff  
ML Stoll, Ph.D.  
Bonnie Gordon-Lucas  
W. Lee Van Buskirk  
Trudy Dunaway-Brown  
Greg Buck  
Eric Goldsmith  
Carter Hays  
Julianna Dailey  
Linda Greene  
Jeffrey St Clair  
Rae Schnapp, Ph.D.  
Jeff Stant  
Indiana Forest Alliance  
Matt Peters  
David Nickell  
Heartwood  
Mike Garrity  
Alliance for the Wild Rockies  
Denise Boggs  
Conservation Congress

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It is worth noting that the FS employee (a career silviculturist whose entire career has been spent preparing timber sales) who assembled the team and then provided project direction and supervision, was then promoted to District Ranger, in which capacity he then approved his own proposal. To quote Upton Sinclair:

**It is difficult to get a man to understand something when his salary depends on his not understanding it.**

Or, put another way, to a man with a nail to drive everything starts looking like a hammer (and to a man with a hammer every problem starts looking like a nail).

Let me be clear, the vast majority of Forest Service employees are good hard-working people who want to do what's right by the land and by the American people who pay their

salaries. But those who advance to decision-making authority within the agency do so by replacing loyalty to the mission, to loyalty to the agency.

Let me repeat that:

**those who advance to decision-making authority within the agency do so by replacing loyalty to the mission, to loyalty to the agency**

a seemingly subtle distinction, but with disastrous consequences.

Because when decision-makers equate what is good for the Forest Service budget with what is good for the forest, then they can easily justify proposing a dubious and deeply unpopular project like the Buffalo Springs logging and burning proposal, the largest project in the history of the Hoosier National Forest, which will lock in revenue generating timber sales (cutting down the biggest and healthiest trees) and will spend as much Congressionally appropriated money as possible (repeatedly burning our hardwood forests) for decades into the future, with a clear conscience and their loyalties intact.

Forest Supervisors and District Rangers become simple cogs in a much larger machine whose primary loyalty is to the bottom line and the agency that employs them rather than either the land or the American people.

The tragedy is that Congress will not appropriate adequate funds for the many other purposes they mandate the Forest Service to perform and so the managers find themselves with few options other than cutting down the trees that American people think they are paying the Forest Service to protect, in order to fund the many other worthwhile activities the law requires them to conduct.

It is not about bad people doing bad things for bad reasons. It is about good people doing bad things for bad reasons. It is about bad policies and a worse incentive structure that rewards those who come up with new and creative rationalizations for cutting down OUR trees and bend themselves into logical and ethical pretzels in the process.

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To be clear, if the American people wanted to have their National Forests cut down, the competent and highly professional timber sale planners of the USDA Forest Service would be the people we would want to hire to do the job.

But the American people, whenever they have had a chance to express their opinions, and in poll after poll all across the country - and in comment after comment after comment in the above captioned proposal - have expressed a clear and substantial preference for leaving the forests standing.

**The American people do not want the Forest Service to cut down our big old trees** regardless of the stated rationale. If there are benefits to be had from such wholesale disturbance and commercial extraction, then demonstrate those benefits on the abundant privately owned forest land that is subject to logging on a regular and recurring basis.

Regardless of the wishes of the current owners, when land changes hands, logging tends to occur.

Everything proposed in this massive project is highly speculative and ultimately entirely experimental. And with the relatively short careers and lives of forest managers compared to the life cycle of a forest, let alone some of the oldest individuals of some species, like white oak that can reach 600 years, no one currently living will see the long term results of these experiments.

If there are benefits to be had, then apply the principles and practices on our nation's and our state's abundant privately owned land.

The money the American tax-payers would save from not cutting down and repeatedly burning these precious publicly-owned remnant hardwood forests could be used instead to acquire more public land, or to pay private landowners to leave their forests standing; or if they choose to log, to provide incentives to private landowners to employ professional assistance in preparing and conducting the sales.

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On a more personal note, some have suggested that the stresses - the fear, the anger, and the grief - of the past three and a half years of dealing with this grievous threat to all I hold dear may have contributed to my current metastatic cancer diagnosis.

Others have suggested that it is no coincidence that the Forest Service has proposed the largest and most aggressive logging and repeated burning project in the history of the Hoosier National Forest adjacent to our property lines and all around the forest I have spent my adult life trying to protect, by way of "pay back."

Either or both may be true, but at this point neither really matters.

Those of us who love this forest and want to see it protected will do whatever we have to protect our homes, our history, our community, our way of life, our local economy, our childrens' health, and our exceptional water quality.

We will organize we will make our voices heard and we **WILL** protect Buffalo Springs.

## Conclusion

As we wrote to the Forest Service early on in this process,

From the start, concerned members of the public sought a more collaborative relationship, a respectful dialogue, and to be included in the planning process in a meaningful way, rather than to adopt the adversarial and confrontational relationship that characterized the public response to an earlier period of Forest Service disregard for the impact of their actions on the host community back in the mid 1980s.

We continue to hope that a mutually beneficial path forward can be found. If the Forest Service adopts this proposal as written, it will do lasting harm to community-agency

relations for a generation or more, to say nothing of the harms to the forest, the interests of neighboring landowners and inholders, and the local tourism and recreation economy.

There are two paths forward:

- The Forest Service will recognize the overwhelming public opposition to the BS project as written; their legal obligations under NEPA; the commitment made by Undersecretary Wilkes to initiate a new Forest Plan; and the dramatically changing circumstances associated with a warming planet that are in fact already occurring, from dramatic weather events to disruptions to virtually every ecosystem on the planet; and will **commit to preparing an Environmental Impact Statement** for the BS project. That EIS will represent a “good faith effort” to initiate the planning process, as all of the information gathered and evaluated will have direct and immediate relevance to the Forest Planning process.
- Or the Forest Service will simply do what they have intended to do all along and further their own narrow administrative and budgetary interests by locking in a disastrous, and deeply unpopular multi-decade logging and burning proposal. If so, in response a broad coalition of interests and organizations dedicated to the well-being of this precious recovering remnant of the native hardwood forest in public ownership, will call for all lands currently managed by the USDA Forest Service to be transferred to the competent and responsive care of another federal agency such as the Department of Interior or the National Oceanic and Atmospheric Administration, to be administered as National Park and Climate Preserve or some other such designation, for the benefit of future generations.

We hope you will choose the former and look forward to working with the Forest Service to find a mutually agreeable path forward that fulfills the agency's stated mission of “Caring for the Land and Serving People;” one that fully engages the public, that brings the management of the Hoosier National Forest in line with the growing scientific consensus regarding the importance of forest protection in mitigating the extremes associated with a warming planet, and that provides for the many public values this precious public land represents in a population dense and public lands poor state like Indiana.

Either way, we will continue organize and our numbers will only grow, as the stakes become clearer.

We will be heard, and **we WILL protect Buffalo Springs.**