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Objection Reviewing Officer  
Attn: Administrative Review Staff  
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Subject: Objection, Buffalo Springs Restoration Project

27 October 2024

Dear Objection Reviewing Officer:

I would like to file this written notice of objection to the Buffalo Springs Restoration Project in the Tell City Ranger District of the Hoosier National Forest. The responsible official for the project is District Ranger Christopher Thornton. Below I provide the reasons for my objections, suggested remedies for resolving the relevant issues, and connections between these objections and my prior comments (Winslow, 8 November 2021; Winslow, 17 December 2022). I incorporate by reference my prior comments (dated 8 November 2021 and 17 December 2022) and other sources mentioned herein as permitted under 36 CFR 218.8(b). Much new information has arisen since the original scoping and release of the draft Environmental Assessment (Tell City Ranger District, 2022), so some objections may be based on this new information.

I submitted detailed comments (Winslow, 17 December 2022) on the Draft Environmental Assessment (Tell City Ranger District, 2022), but none of my comments were directly addressed in the document summarizing public comments (Tell City Ranger District, January 2024). The Forest Service responded to certain concerns raised by other commenters that were similar to some of the concerns I raised, but many of the points I made were completely ignored by the Forest Service.

*Objection 1.* I object to this project because it is sufficiently large and complex to warrant a full environmental analysis, and yet the Forest Service is neither preparing an Environmental Impact Statement (EIS) for the Buffalo Springs Restoration Project nor showing any efforts to revise the outdated Forest Land and Resource Monitoring Plan (U.S. Forest Service, 2006). The suggested remedy is to develop a new Forest Land and Resource Monitoring Plan, which would entail completing an EIS, before going forward with the Buffalo Springs Restoration Project or any other project that plans multiple vegetation management actions over a broad geographic area that would take place over a period of years.

This reason for objection (which I enumerate as “Objection 1”) is based on my previous comments in which I have raised this issue. On p. 1 of my comments (Winslow, 17 December 2022) on the draft Environmental Assessment (Tell City Ranger District, 2022), I stated, “A project of this magnitude and extent requires a full environmental analysis, so an Environmental Impact Statement needs to be completed. The appropriate way in which to do this would be in the context of a Forest Plan revision,

since it is past time for it...It is past time for a new Land and Resource Management Plan to be developed for the Hoosier National Forest. A project of the magnitude and complexity of Buffalo Springs should not be implemented without conducting a full environmental analysis and preparing an Environmental Impact Statement.”

In response to similar concerns about the outdated Plan raised by other commenters, the comment summary (Tell City Ranger District, January 2024, p. 2) claims that the Secretary of Agriculture is making a “good faith” effort to revise the Hoosier National Forest Plan because “Forest Plan revisions are proceeding on other National Forests across the country in a prioritized manner...”. However, it is absurd to imagine that the Secretary of Agriculture is tasked with personally writing the Land and Resource Management Plans for all the National Forests. Clearly, it would take too long for Secretary Vilsack to do that. The work can be delegated. For instance, the outdated Plan (U.S. Forest Service, 2006) that the Forest Service claims is still in effect was prepared by the Regional Forester for Region 9. One might even imagine that Hoosier National Forest staff might contribute to such an effort rather than preparing “projects” that take place over a broad area spanning years with no current Plan in place. Therefore, the Department of Agriculture is not making a “good faith” effort to prepare a new Land and Resource Management Plan for the Hoosier National Forest, there is no valid Plan in place, and the Buffalo Springs Restoration Project cannot go forward.

*Objection 2.* I object to this project because the active management proposed would not meet the stated objective of improving forest health. The suggested remedy is not to go forward with the Buffalo Springs Restoration Project.

This reason for objection (which I enumerate as “Objection 2”) is based on my previous comments in which I have raised this issue. On p. 1 of my comments (Winslow, 17 December 2022) on the draft Environmental Assessment (Tell City Ranger District, 2022), I stated, “Active management would not improve forest health but rather would create roads that fragment the forest and promote the spread of pests, pathogens, and invasive species.”

The comment summary (Tell City Ranger District, January 2024) ignores the concerns I expressed over spread of spread of pests and pathogens but did state in response to another commenter who raised the issue that the Buffalo Spring Restoration Project would promote the spread of invasive species that “Invasive species effects have been analyzed and disclosed in the effects to plant nonnative invasive species specialist report and the EA, including under Issue #8.”. The specialist report so referenced (Coon, 2022) concludes that the Buffalo Springs Restoration Project has the potential to spread non-native invasive species (NNIS) of plants over 2336 acres of forest, but justifies this by saying that herbicides and other treatments will be used to control NNIS. This is the wrong approach. Instead, managers should avoid taking actions that may introduce NNIS or cause them to spread and should avoid creating the conditions that may require the use of herbicides. Herbicides cost money and can harm plants, animals, the water supply, forest users, foresters, and contractors. Also, efforts to control invasive species may not be successful.

*Objection 3.* I object to this project because it seeks to promote regeneration of oak and hickory (by cutting mature oak and hickory trees, mostly) when it is not at all clear that there is a need to increase the extent of future oak-hickory stands across the landscape. The suggested remedy is not to go forward with the Buffalo Springs Restoration Project.

For one thing, it is absurd to refer to it as a “Restoration Project” when the main method used is to cut down mature oak and hickory trees. That is not restoration of oak-hickory forest; that is destruction of oak-hickory forest.

This reason for objection (which I enumerate as “Objection 3”) is based on my previous comments in which I have raised this issue. On p. 1 of my comments (Winslow, 17 December 2022) on the draft Environmental Assessment (Tell City Ranger District, 2022), I stated, “Oak-hickory ecosystems are more prevalent now than they were in presettlement times, because the climax condition of the mesophytic forest is beech-maple. Therefore, it is questionable whether there is a need for management to promote oak-hickory ecosystems. While there may be concern about a lack of oak regeneration on some sites, it is not at all clear that the proposed management activities will increase oak regeneration.”

The comment summary (Tell City Ranger District, January 2024) ignores the concerns I expressed over the lack of justification for cutting down oaks and hickories to promote their regeneration and does not even consider the question of the prevalence of oak-hickory stands in precolonial times. The Forest Service does, however, respond to a concern raised by another commenter over the possibility that clearcutting of pine stands may disrupt ectomycorrhizal networks and prevent the establishment of oak and hickory on p. 12 of the comment summary where the Forest Service makes this point: “The proof lies in the fact that nearly all the ground in this project area was heavily deforested in the past and still managed to grow back to a forested condition. The ECM fungi had no problem recolonizing the disturbed areas and continuing their symbiotic relationship with the new oaks, hickories, beeches, and pines.” If this is the “proof” on which the Forest Service relies to determine that clearcutting pine stands will result in the establishment of oak and hickory, it is inadequate, because it says nothing about (1) how quickly oak and hickory regenerated after deforestation; does not consider whether oak or hickory seedlings will compete effectively against regenerating pine, tulip poplar, beech, and maple seedlings; and (3) fails to acknowledge that the pines were planted to stabilize the soil and allow the forest to recover.

*Objection 4.* I object to this project because it would degrade habitat for some wildlife species, particularly species adapted to undisturbed interior forest conditions. The suggested remedy is not to go forward with the Buffalo Springs Restoration Project.

This reason for objection (which I enumerate as “Objection 4”) is based on my previous comments in which I have raised this issue. On p. 1 of my comments (Winslow, 17 December 2022) on the draft Environmental Assessment (Tell City Ranger District, 2022), I stated, “The management activities proposed may improve habitat for some wildlife, but they will degrade habitat for other species, particularly species adapted to undisturbed interior forest conditions.” The comment summary (Tell City Ranger District, January 2024) did not directly address my comment but responded to similar concerns raised by other commenters by noting that Section 7 consultation under the Endangered Species Act was initiated for federally listed Threatened and Endangered Species and that the Environmental Assessment disclosed effects on Threatened, Endangered, and Regional Forester Sensitive Species. The Final Environmental Assessment (Hoosier National Forest, 2024) does describe impacts on Threatened, Endangered, and Regional Forester Sensitive Species but fails to address effects on most other species. For instance, the only bird species dependent on interior mature forest that is mentioned is the Cerulean Warbler; effects on other sensitive species such as Worm-eating Warbler, Ovenbird, Acadian Flycatcher, Scarlet Tanager, and Wood Thrush are not considered.

*Objection 5.* I object to this project because it seeks to ameliorate the effects of human activity by causing additional anthropogenic impacts that would be intended to mimic natural disturbance, and this is illogical. If anthropogenic disturbances cause problems and natural disturbances help, it would be simpler and cheaper and more beneficial to let nature take its course. The suggested remedy is not to go forward with the Buffalo Springs Restoration Project.

This reason for objection (which I enumerate as “Objection 5”) is based on my previous comments in which I have raised this issue. On pp. 1-2 of my comments (Winslow, 17 December 2022) on the draft Environmental Assessment (Tell City Ranger District, 2022), I stated:

“The stated objectives of the Buffalo Springs project are to ameliorate the effects of human activity, mimic natural disturbances, and improve the sustainability of the national forest for all native species. However, implementation of the project would result in additional anthropogenic impacts. There is no need to mimic natural disturbances; the word “natural” implies they will happen anyway. For instance, Parker and Ruffner (2004) described a number of tornadoes and winter storms that have occurred in forested areas in southern Indiana and promoted regeneration of shade-intolerant species. The best way to ensure the persistence of native species is to protect large areas of habitat and allow natural disturbance to proceed. Where intervention is required for specific conservation goals, it should be done without road-building or other large-scale disturbance of the forest.

“A timber sale does not mimic natural disturbance. In a logging operation in the Hoosier National Forest, a network of roads and log landings are constructed, mature trees (mostly oaks and hickories) are cut, the limbs are trimmed away and left as slash, the logs are dragged up steep slopes to the logyards, and then heavy equipment loads the logs onto big trucks to be hauled out of the forest. This doesn’t happen with tornadoes or ice storms. This doesn’t happen with fires, whether sparked by lightning or set by humans.

“Reliance on stand data to estimate the percentage of forest in an early-successional state overlooks the role of natural disturbance, since many areas disturbed by natural forces may be undocumented. In any case, the Buffalo Springs project proposes to disturb most of the National Forest within Orange County over a decade or two, so this exceeds the 4-12% early-successional goal stated in the outdated Plan. The draft EA mentions that exclusion of fire may be interfering with oak regeneration, but natural fire has never been frequent in this area. Most fires that have occurred historically were set or otherwise caused by humans (Parker and Ruffner, 2004). The EA states that mid-successional areas are dominated by beech and maple, which is exactly what we would expect and desire in the recovery of a beech-maple forest from prior deforestation.”

The comment summary (Tell City Ranger District, January 2024) ignored my concerns about the lack of justification for using anthropogenic disturbance to mimic natural disturbance and did not address any of the issues I raised in these three paragraphs except for road-building. In response to concerns about road-building mentioned by other commenters, the comment summary stated on p. 11, “The amount of proposed new roads has been reduced to 2.7 miles.” in the Final Environmental Assessment (Hoosier National Forest, 2024). This is an improvement, but the Final Environmental Assessment dismissed the No Roads Alternative, and the 2.7 miles does not include the numerous planned and unplanned skid trails that would occur.

*Objection 6.* I object to this project because it seeks to manage most of the forest as oak-hickory when much of the landscape was historically mixed mesophytic forest with significant components of beech, maple, and other species. The suggested remedy is not to go forward with the Buffalo Springs Restoration Project.

This reason for objection (which I enumerate as “Objection 6”) is based on my previous comments in which I have raised this issue. On p. 2 of my comments (Winslow, 17 December 2022) on the draft Environmental Assessment (Tell City Ranger District, 2022), I stated:

“On p. 7 of the draft EA, the argument is made that much of the Central Hardwood Forest and eastern hardwood forests were historically dominated by oak. However, historical data from Indiana indicate that much of the presettlement forest in this state was dominated by beech (Hanbury, 2018). Many of the sources cited in the EA as evidence for historical oak dominance are not relevant to the project area. For instance, Abrams (2005) presented a table of witness tree data from throughout the eastern United States, but none of the data in the table are from Indiana. Parker and Ruffner (2004) describe historical forest conditions in southern Indiana and Illinois and state that oak and hickory dominated in the Crawford Uplands while beech and sugar maple were more abundant on the Crawford Escarpment and the Mitchell Karst Plain. They also state that fire became more frequent in southern Indiana following European settlement.

“In the Crawford Uplands, oak and hickory were dominant on a lot of the upland sites, but other species were more abundant on north-facing slopes and in stream valleys (Parker and Ruffner, 2004).

Parker and Ruffner (2004) state that the Mitchell Karst Plain was the largest area of western mesophytic forest in Indiana, citing Lindsey et al. (1969). However, they note that the old-growth remnant Donaldson Woods is largely dominated by white oak and other seral species (giant tulip poplars come to mind) due to annual burning by native people.”

The comment summary (Tell City Ranger District, January 2024) fails to address any of the points I raised in these two paragraphs.

*Objection 7.* I object to this project because it includes clearcutting of pine stands, which would have many negative effects and may not accelerate succession to hardwood forest. The suggested remedy is to remove clearcutting from the project.

This reason for objection (which I enumerate as “Objection 7”) is based on my previous comments in which I have raised this issue. On p. 2 of my comments (Winslow, 17 December 2022) on the draft Environmental Assessment (Tell City Ranger District, 2022), I stated: “Many of the pine stands are succeeding naturally into hardwood forest, so overstory removal may not be necessary or desirable in many cases. Indeed, the pines were planted to slow erosion, and the ground-disturbing operations involved in clearing them would undo the efforts of the Civilian Conservation Corps and result in erosion and soil compaction. In fact, there is evidence from Ohio that removal of pine stands can actually slow hardwood regeneration (see, for example, Artigas and Boerner, 1989).”

The Final Environmental Assessment (Hoosier National Forest, 2024) still neglects to cite the study by Artigas and Boerner (1989), despite my having alerting the Forest Service to its findings. The comment summary (Tell City Ranger District, January 2024) did not address any of the points I raised about clearcutting of pine stands, although it did respond to similar concerns shared by other commenters by quoting the outdated Forest Plan (U.S. Forest Service, 2006): “Hardwood species would gradually replace the current pine overstory as these species age and senesce even without management. However, management activities such as timber harvest and prescribed fire would hasten the conversion of this type to native hardwoods (Table 3.10a).”. This clearly ignores the evidence I presented to the contrary.

*Objection 8.* I object to this project because it would involve the use of glyphosate and other herbicides, including the intentional poisoning of native non-invasive maple and beech trees. The suggested remedy is not to go forward with the Buffalo Springs Restoration Project, since any disturbance would invite NNIS and provide more impetus for herbicide use.

This reason for objection (which I enumerate as “Objection 8”) is based on my previous comments in which I have raised this issue. On p. 2 of my comments (Winslow, 17 December 2022) on the draft Environmental Assessment (Tell City Ranger District, 2022), I stated: “Table 9 on pp 49-51 of the draft EA details potential risks to wildlife from herbicide use. The entry for glyphosate dismisses concerns about this herbicide. It should be pointed out that Bayer, since acquiring Monsanto, has been paying billions of dollars in legal settlements to plaintiffs who have developed non-Hodgkin’s lymphoma after exposure to this herbicide (Cohen, 2020). Glyphosate poses risks to birds, mammals, Forest Service employees, and contractors. It certainly should not be used to poison native, non-invasive beech and maple trees.”

The comment summary (Tell City Ranger District, January 2024) did not address any of the points I made about herbicides but did respond to other commenters concerned about herbicide use in the Buffalo Springs Restoration Project. On p. 11 of the comment summary, the Forest Service claims that the planned herbicide use would not harm wildlife but fails to address effects on humans, callously disregarding the safety of its own workers. The Final Environmental Assessment (Hoosier National Forest, 2024) still did not cite the article by Cohen (2020), despite my having alerted the Forest Service to this publication and the large financial settlements reached to avoid litigation by workers sickened by glyphosate.

*Objection 9.* I object to this project because the Environmental Assessment (Hoosier National Forest, 2024) falsely claims the project would help Loggerhead Shrikes. The suggested remedy is not to go forward with the Buffalo Springs Restoration Project.

This reason for objection (which I enumerate as “Objection 9”) is based on my previous comments in which I have raised this issue. On p. 2 of my comments (Winslow, 17 December 2022) on the draft Environmental Assessment (Tell City Ranger District, 2022), I stated: “On p. 61 of the draft EA, the claim is made that clearcuts would be likely to benefit Loggerhead Shrikes. This is untrue; Loggerhead Shrikes breed in open grasslands and savannas and are unlikely to use the forest before or after logging.”

The comment summary (Tell City Ranger District, January 2024) did not address my concern about this misinformation regarding the Loggerhead Shrike; indeed, the word “shrike” does not appear in the comment summary. The Final Environmental Assessment (Hoosier National Forest, 2024) continues to argue on pp. 71-72 that the Buffalo Springs Restoration Project would benefit Loggerhead Shrikes without presenting any evidence that shrike populations occur within the project area or occupy forest habitat.

*Objection 10.* I object to this project because the Environmental Assessment (Hoosier National Forest, 2024) makes false claims about the habitat needs of Ruffed Grouse. The suggested remedy is not to go forward with the Buffalo Springs Restoration Project.

This reason for objection (which I enumerate as “Objection 10”) is based on my previous comments in which I have raised this issue. On p. 2 of my comments (Winslow, 17 December 2022) on the draft Environmental Assessment (Tell City Ranger District, 2022), I stated: “On the same page, it is stated that Ruffed Grouse is the species most specialized to early successional forest in the Central Hardwoods. However, grouse actually use a variety of habitats. Although they certainly use young forest for cover after breeding, the nests I have seen have been in mature forest.” The comment summary (Tell City Ranger District, January 2024) did not address my concerns about the characterization of grouse habitat needs; indeed, the word “grouse” does not occur in the comment summary. The Final Environmental Assessment (Hoosier National Forest, 2024) continues to make the same claim (on p. 71) that the Ruffed Grouse is the species most specialized to early successional forest.

*Objection 11.* I object to this project because fire and other actions proposed would harm Ruffed Grouse and other ground-nesting birds. The suggested remedy is not to go forward with the Buffalo Springs Restoration Project.

This reason for objection (which I enumerate as “Objection 11”) is based on my previous comments in which I have raised this issue. On p. 2 of my comments (Winslow, 17 December 2022) on the draft Environmental Assessment (Tell City Ranger District, 2022), I stated: “As mentioned in the EA, prescribed fire could harm grouse and other ground-nesting birds.” The comment summary (Tell City Ranger District, January 2024) did not address these concerns. The Final Environmental Assessment (Hoosier National Forest, 2024) continues (on p. 71) to acknowledge that Ruffed Grouse may be harmed by prescribed fire that would be included with the implementation of the Buffalo Springs Restoration Project.

*Objection 12.* I object to this project because the actions proposed would harm Cerulean Warblers. The suggested remedy is not to go forward with the Buffalo Springs Restoration Project.

This reason for objection (which I enumerate as “Objection 12”) is based on my previous comments in which I have raised this issue. On pp. 2-3 of my comments (Winslow, 17 December 2022) on the draft Environmental Assessment (Tell City Ranger District, 2022), I stated: “On p. 63 of the draft EA, an attempt is made to dismiss concerns over impacts of logging to Cerulean Warblers. As the EA mentions, ceruleans only use mature forest and nest high in trees. As the EA also mentions, clearcuts eliminate habitat for this species. Populations of Cerulean Warblers have been declining for decades, and they do not appear to use all available habitat. This suggests that factors in their wintering habitat in the tropics or in habitat used during migration may be limiting populations, but care should be taken not to disturb their breeding habitat regardless. There is some evidence that this species may choose sites with complicated stand structure when they are available, but we do not know that their reproductive success is higher in these habitats or that any potential benefits from selection logging would outweigh the harm from felled nest trees, increases in nest depredation or cowbird parasitism resulting from gaps, or the habitat lost to the 1200 acres of even-aged management included in the Buffalo Springs project. A natural experiment in the form of an ice storm of historic magnitude granted Jones et al. (2001) the opportunity to compare reproductive success of Cerulean Warblers before and after habitat disturbance. They observed a dramatic decrease in fledging success during the breeding season after the storm, with a slight rebound the succeeding year.”

The comment summary (Tell City Ranger District, January 2024) did not address any of my concerns about Cerulean Warblers; indeed, the word “warbler” does not occur in the comment summary. The Final Environmental Assessment (Hoosier National Forest, 2024) continues to downplay negative effects on Cerulean Warblers (p. 73) and claim active management may benefit habitat for this species (p. 72) but fails to address the specific issues I raised such as nest depredation, cowbird parasitism, or the potential for declines in reproductive success following disturbance.

*Objection 13.* I object to this project because the actions proposed would harm timber rattlesnakes and other species of reptiles and amphibians. The suggested remedy is not to go forward with the Buffalo Springs Restoration Project.

This reason for objection (which I enumerate as “Objection 13”) is based on my previous comments in which I have raised this issue. On pp. 2-3 of my comments (Winslow, 17 December 2022) on the draft Environmental Assessment (Tell City Ranger District, 2022), I stated: “On p. 62, the draft EA dismisses effects to herps by stating that the species of concern do not occur in the project area. The EA does acknowledge that the timber rattlesnake has been observed within 7 miles of the project area. Considering how easily this species can be overlooked (I once led a school group past one without spotting it!), I think it is likely that there are timber rattlers within the project area.” The comment summary (Tell City Ranger District, January 2024) did not address this concern. The words “rattlesnake” and “snake” do not occur in the comment summary. The word “reptile” occurs once, in a comment by a stakeholder concerned about effects of the project on wildlife. The Forest Service response to this comment does not address effects to reptiles other than to note that the Environmental Assessment (Hoosier National Forest, 2024) analyzed and disclosed impacts on Regional Forester Sensitive Species. The words “amphibian” and “amphibians” do not occur in the comment summary.

*Objection 14.* I object to this project because the actions proposed would contribute to climate change. The suggested remedy is not to go forward with the Buffalo Springs Restoration Project.

This reason for objection (which I enumerate as “Objection 14”) is based on my previous comments in which I have raised this issue. On pp. 2-3 of my comments (Winslow, 17 December 2022) on the draft Environmental Assessment (Tell City Ranger District, 2022), I stated: “The Environmental Assessment should provide a more complete analysis of greenhouse gas emissions and carbon cycling. Although young trees may grow faster than older trees, older trees store a lot more carbon. With the United States and many other nations realizing that we need to make significant changes in less than a decade to avoid the worst effects of climate change, we don’t have time to wait for the trees to grow back. It makes a lot more sense to keep them standing. Also, logging operations cause greenhouse gas emissions from soil disturbance, fuel use, and subsequent decomposition of woody debris. Fire, of course, converts biomass to carbon dioxide.” Although the comment summary (Tell City Ranger District, January 2024) did not address any of my specific points on climate, it did respond to another commenter by stating: “Hoover and Smith (2023) show that in the central states region (Iowa, Missouri, Illinois, Indiana, Ohio), forests have diminishing returns on carbon storage as they approach the 80-120 year age class and these forests tend to become carbon sources when over 120 years old.”

However, the Final Environmental Impact Statement (Hoosier National Forest, 2024) neglects to consider other recent studies that illustrate the value of protecting large trees for carbon sequestration and storage. The studies I mention in this paragraph were published after the comment period for the draft Environmental Assessment (Tell City Ranger District, 2022), so they constitute new information

and I incorporate these articles by reference. Birdsey and coworkers (2023b) found that mature forest and large trees hold substantial potential for accumulating and storing carbon and that middle-aged forests in the Eastern U.S. hold significant climate mitigation potential (2023a). Fraser and coworkers (2023) found that Midwestern old-growth forests continue to accumulate more carbon than do younger forests, with the highest level of carbon accumulation observed in Donaldson's Woods in southern Indiana. Faison and coauthors (2023) argue that active management often reduces carbon accumulation and that intact forests should be protected and kept largely free of human management to advance climate goals. Peng and coauthors (2023) show that carbon costs of timber harvests are substantial and that carbon accounting approaches that purport to show carbon benefits of harvest are misleading. Pan and coworkers (2024) published a new article providing more evidence for a global forest carbon sink. Hogan and coworkers (2024) showed that forest productivity has increased in the Eastern United States, although it has declined elsewhere. Gauci and coworkers (2024) demonstrated that woody surfaces of live trees absorb methane from the atmosphere.

*Objection 15.* I object to this project because the actions proposed would contribute to climate change, and new information that has arisen since the comment period for the draft Environmental Assessment (Tell City Ranger District, 2022) indicates that the effects of climate change are occurring more rapidly than expected a couple of years ago. The suggested remedy is not to go forward with the Buffalo Springs Restoration Project.

This reason for objection (which I enumerate as “Objection 15”) is based on new information that has arisen since the comment period for the draft Environmental Assessment (Tell City Ranger District, 2022). Last year was the hottest year on record and hotter than was expected (Voosen, 2024). This article by Voosen (2024) is new information published since the comment period, so I incorporate it by reference. Just last month, the nation was shocked when Hurricane Helene caused major damages in the mountains of western North Carolina and even knocked down trees in Indiana. This new information indicates that disturbances in the future may be substantially different than anticipated when the outdated Plan (U.S. Forest Service, 2006) was developed.

*Objection 16.* I object to this project because the actions proposed would harm the northern long-eared bat, which has been listed as endangered (U.S. Fish and Wildlife Service, 30 November 2022) since the end of the comment period for the draft Environmental Assessment (Tell City Ranger District, 2022). The suggested remedy is not to go forward with the Buffalo Springs Restoration Project.

This reason for objection (which I enumerate as “Objection 16”) is based on new information that has arisen since the comment period for the draft Environmental Assessment (Tell City Ranger District, 2022). Although the Final Environmental Assessment (Hoosier National Forest, 2024) for the Buffalo Springs Restoration Project mentions on p. 67 that the U.S. Fish and Wildlife Service has reissued the Biological Opinion and Incidental Take Statement on the northern long-eared bat, the public has not had the opportunity to provide input on the Buffalo Springs Restoration Project since the listing decision was made.

*Objection 17.* I object to this project because the actions proposed would interfere with planning and implementation of the National Old-Growth Amendment (U.S. Forest Service, June 2024). Since the draft EIS (U.S. Forest Service, June 2024) was released after the comment period for the draft Buffalo Springs EA, I incorporate this EIS by reference. The suggested remedy is not to go forward with the Buffalo Springs Restoration Project.

This reason for objection (which I enumerate as “Objection 17”) is based on new information that has arisen since the comment period for the draft Environmental Assessment (Tell City Ranger District, 2022). Although the Final Environmental Assessment (Hoosier National Forest, 2024) mentions the old-growth amendment, the public has not had an opportunity to submit input on the Buffalo Springs Restoration Project since the draft EIS for the National Old-Growth Amendment was published.

For these seventeen reasons outlined above, I object to the Buffalo Springs Restoration Project and ask the Regional Forester to reverse the decision to implement the project.

Thank you for your consideration,



Donald Edward Winslow

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