From:	Greg Grant
To:	FS-objections eastern region
Subject:	Buffalo Springs Restoration Project
Date:	Sunday, October 27, 2024 10:57:34 PM

Submitting a PDO to the USFS-Hoosier National Forest, Tell City Ranger District, Christopher Thornton, District Ranger
Attn: Buffalo Springs Restoration Project #60940
Submitted by: Greg Grant
Home Address: (b) (6)
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Thank you for considering my objections to the Buffalo Springs Restoration Project #60940.

I object to the Final Environmental Assessment (FEA) of the Buffalo Springs Restoration Project – Hoosier National Forest (HNF) on the following points that were not adequately addressed by the USFS to my satisfaction in their response to my original public comment on the Draft Environmental Assessment (DEA).

My Original Comment or Comment Summary on the DEA:

“I believe Hoosiers’ recreational interests in the HNF can best be met by continuing the process of restoring the highly diverse old-growth forests that the pioneers encountered in their earliest efforts to settle in Indiana. The old-growth forests then consisted of a highly diverse mix of trees, not just oak and hickory, like the proposed BMP appears to stress primarily for their relatively minor timbering value.”

Agency Consideration (the Forest Service’s response to my original comment on the DEA):

“Approximately half of the 204,000-acre Hoosier National Forest occurs in management areas that limit active forest management, which puts them on a trajectory toward old growth characteristics under the current Forest Plan.

“The Forest (Service) manages the area primarily for plant and animal habitat diversity and timber harvest is an appropriate tool for use in this area.” “The proposed treatments in the project would improve vegetative structure and age diversity of the forest, resulting in improved forest health.”

PDO Response (my reply to the Agency Consideration):

I appreciate the Forest Service’s response that approximately half of the acreage of the Hoosier National Forest (HNF) is currently in areas that limit “active forest management” and,

therefore, “puts them on a trajectory toward old growth characteristics under the current Forest Plan.” Such an approach, if applied to the rest of the HNF as well, would enable the entire HNF to return to the highly diverse old-growth character found by the pioneers at the time of their earliest efforts to settle in Indiana, as well as moving through Indiana, particularly along the Buffalo Trace, to settle in other areas further to the West, such as Illinois.

By limiting “active forest management” throughout the entire HNF, this public land could and should be returned as close to its natural state as possible to restore a even greater expanse of the natural habitat required by many threatened and endangered species. For example, the threatened or endangered Northern Long-eared Bat, Tricolored Bat, and Little Brown Bat have recently been determined to be living in the Buffalo Springs area proposed for timbering and burning. Many other threatened and endangered bat, bird and other animal species are believed to live in the relatively less disturbed areas of the HNF. Likewise, natural forest habitat loss is one of the primary reasons for the 73% loss of all animals on Earth during the 50-year period of 1970-2000. Additionally, no naturally occurring species inhabiting the HNF and its nearby areas should have to be listed as threatened or endangered before the Forest Service decides to make plans and takes steps to preserve or seek to restore the habitat supporting a more natural balance and number of animals and their corresponding flora, particularly in light of their generally disastrous decline from the early 1800s to the time of the initial formation of the HNF in 1934, due to the relatively poorly informed, unsustainable agricultural, timbering and other development efforts in the HNF area before then.

Furthermore, it is now abundantly clear that mankind is responsible for the increase in carbon-dioxide (CO_2), methane (CH_4) and other solar heat trapping gases that are raising the temperature in the lower atmosphere and the ocean, further threatening the viability of many additional animal species, including humans, worldwide. This threat will clearly increase with time, unless and until we humans drastically reduce our emissions of greenhouse gases and start reduce the concentration of CO_2 in our atmosphere. Toward this urgent need, the U.S. Forest Service, along with other Federal agencies, has been ordered by Presidential Executive Order (EO) to inventory all mature and old-growth trees on all federal lands, and to revise its plans accordingly, to preserve these mature and old-growth trees particularly for their benefit to pulling carbon from our lower atmosphere. Besides pulling CO_2 from the atmosphere and sequestering it most cost-effectively, it has more recently been found that the bark of many tree species also extract CH_4 out of the air and sequester it. This is especially important for reducing the rate of heating of our lower atmosphere in the near-term, to avoid potentially catastrophic feedback effects from even greater warming because a molecule of CH_4 has more than 28 times the heat-trapping effect as a molecule of CO_2, and methane currently accounts for 30% of the excessive heat-trapping of all our emissions, but is currently rising even faster than CO_2 in our atmosphere. Besides accelerating our warming globally, CH_4 moving into our upper atmosphere has recently been found to be destroying our upper atmospheric ozone (O_3) that shields life on our planet from life-threatening, genetics-

disrupting, high-energy ultraviolet radiation from the sun.

While the Forest Service has completed its inventory of mature and old-growth in some of the federal lands, they have not completed its inventory for the HNF area, let along revising its forest management plans accordingly.

Since the Forest Service clearly has not as yet identified the mature and old-growth trees in the HNF and, likewise, clearly has not adjusted its plans accordingly, as needed to respond to the new, most urgent responsibility identified in the EO, I object to the statement that "The proposed treatments within the project would improve the vegetative structure and age diversity of the forest, resulting in improved forest health." Instead, it is now clear that the basic purpose of the Forest Service planning must redefine what type of age diversity is most important or valuable overall, since merely increasing age diversity is likely to lead to a result directly opposite that intended by the EO, where the EO's preference is clearly to shift the age diversity more toward older trees, rather than younger trees, to maximize the federal forest's capacity to both retain previously stored carbon, as well as to maximize the extraction and sequestering of carbon from the lower atmosphere, in its woody mass both above and below the ground, most particularly in the nearer-term and doing so in a most cost-effective way, particularly compared to most or all other currently known means for capturing and sequestering carbon from our atmosphere. Likewise, the warming and more extreme weather that warming of the lower atmosphere and ocean will bring in the future needs to be incorporated into the Forest Service's planning to effectively restore the natural plant and animal habitat for as many of the species that were found prior to the wholesale timbering of the trees and the resulting loss of the related natural habitat that occurred before the initial formation of the HNF in 1934.