

Glubczynski, Ann -FS

From: Dick Artley <da99333@gmail.com>
Sent: Thursday, August 10, 2017 2:27 PM
To: FS-comments-pacificsw-shasta-trinity-mtshasta-mccloud; Bachmann, Steve -FS; Bonivert, Dustin J -FS; Cooper, Rebecca R -FS; Courtney, Anna M -FS; Cutright Smith, Elisabeth - FS; Glubczynski, Ann -FS; Mapula, Justin A -FS; McRae, Heather -FS; Montagne, Brenna T -FS; Navarre, Annette L -FS; Sewell, Craig T -FS; Womack, Jennifer - FS; Angwin, Pete -FS; Domanski, Edward B -FS; Hamilton, Todd A -FS; Johnson, Leslie -FS; Jordan, Christine -FS; Losi, Christopher J -FS; Mai, Christine -FS; McBath, Alex -FS; McElroy, Keli M -FS; Napper, Carolyn -FS; Nelson, Julie K -FS; Shoemaker, Lois -FS
Subject: [CAUTION: Suspicious Link]Comments on DEIS for the Highway 89 Safety Enhancement and Forest Restoration Project.
Attachments: ____Scanned signature for Dick Artley.doc; ____Opposing Views Attachment 1.doc; ____Opposing Views Attachment 4 .doc; ____Opposing Views Attachment 21.doc; ____Opposing Views Attachment 26.doc; ____Opposing Views Attachment 15.doc; ____Opposing Views Attachment 11.doc; ____Opposing Views Attachment 8.doc

PROCEED WITH CAUTION: This message triggered warnings of **potentially** malicious web content. Evaluate this email by considering whether you are expecting the message, along with inspection for suspicious links.

Questions: Spam.Abuse@wdc.usda.gov

August 10, 2017

Dear Supervisor Myers and selected IDT members,

Please accept these comments on the draft EIS for the proposed Highway 89 Safety Enhancement and Forest Restoration Project.

Mr. Myers, your attempted public deception is extraordinary. You disguise this large 16.8 square mile commercial timber sale restores as a “safety enhancement” and “restoration project.” Of course the only thing a commercial timber sale restores is the purchaser’s financial bottom line. A few of your IDT members know this but are afraid to voice their professional opinion. It does not take long for USFS employees to figure out they must never say or write anything negative or critical of a timber sale if they wish to maintain their promotion opportunities in the agency with an all-encompassing timber agenda. They learn nothing must stand in the way of volume attainment. Trading off amenity resource health, recreation opportunities, biodiversity for volume is SOP.

I invite everyone reading these comments to read **Opposing Views Attachments #1, #4 and #26** to read real, unbiased science. After each photo and science quote ask yourself what resources are restored. You all know “restoration project” is the USFS’s new deceptive, sugar-coated name for timber sale.

A competent USFS line-officer would categorically exclude the Highway 89 Safety Enhancement logging and write a DEIS on the commercial timber sale.

My Observations after Reading this draft DEIS.

I was the Forest Planner and NEPA coordinator during my last 5 years as a USFS employee before I retired. I often worked with IDTs as they developed NEPA documents for proposed timber sales. I encouraged the IDTs to plan the sales such that there would be no harm to the natural resources, recreation opportunities, scenery, and cultural resources in and downstream from the sale area. I stressed that “short-term” damage was unacceptable. I wasn’t popular with the timber and engineering staff but I kept my job.

Most IDT members agreed that the public who visited their national forests did so for recreation (hiking, camping, wildlife viewing, fishing, scenery and solitude). Thus, it made sense to maintain and sometimes enhance the opportunities to enjoy these forest attributes.

I learned that most IDT other resource specialists I worked with fit into 2 groups:

1) those with a Pollyanna-like trust in the USFS. These naïve, gullible people believe:

a) USFS science must always trump non-USFS natural resource-related research conclusions. Many were afraid to even read literature authored by independent scientists not affiliated with the agency. I have included a small sample these independent science conclusions in **Opposing Views Attachments #1 and #4** for these types of people on this IDT,

b) forests will be “restored” back to health when they were logged and roaded ... in spite of the fact the vast majority of the literature authored by independent scientists indicates the opposite is true,

c) the silviculturists when they said the forest was sick and needed to be “treated” and/or “managed” and

d) their job was to assist the timber employees to create conditions similar to private industrial tree-farms where maximum profit \$\$\$ for resource extraction corporations is the goal. To them, amenity resource destruction was an acceptable (and obvious) tradeoff for volume.

2) those who understand the resource damage (sometimes destruction) that roading and logging the fragile forest will inflict. They deposit their resource ethics and values at the office door each morning knowing they will write lies to enable timber sales regardless of the resulting natural resource destruction.

Destructive timber sale EAs and EISs would not exist without these timber sale enablers from both groups masquerading as caring, professional biologists, hydrologists, archaeologists etc. who sell their good names.

After Reading the DEIS for the Highway 89 timber sale I must conclude most IDT members fit into group #1. However, it really doesn’t matter which group the IDT members are in does it? You all enthusiastically work to eliminate the naturalness, biodiversity and proper functioning of the forest to help your boss to get out the cut by gifting the natural resource extraction corporations with public trees.

I was in group #2. I found a way to salvage my dignity and reduce the national forest plunder. How? I undermined the timber beasts. As the forest NEPA coordinator I reviewed timber sale EAs and EISs to assure legal compliance. Often I went to the Timber Staff and suggested the Responsible Official modify the NEPA document to eliminate the violations of NEPA and ESA. He always refused and scolded me for doing my job. With my home computer I communicated with the staff of several conservation organizations that

retained full-time attorneys. It didn't take long for the forest to start loosing in most of their timber sale related court cases.

IDT members writing the Highway 89 DEIS can regain their self-respect by taking this type of action.

My Comments are Labeled

This comment letter contains 26 clearly labeled comments. I expect to see 26 meaningful responses to my comments posted online with your final NEPA document. I labeled and numbered them so you would not overlook or miss them. They are indented and numbered using the word **Comment #** that's bold, purple, 11-pitch font, and underlined.

Opposing Views are Attached to these Comments

The opposing views attachments to these comments present the research conclusions of many independent scientists. Often the USFS ignores and rejects this science because it is inconsistent with what the USFS teaches its employees that is not based on credible science.

lies needed to motivate agency employees to embrace the agency timber agenda.

The attachments are identified in the text of these comments in bold red type and underlined (i.e. **Opposing Views Attachment #?**). I invite you all to find reputable science authored by an unbiased scientist that refutes the disclosures in the **Opposing Views Attachments**.

I am including the opposing views science attachments because they contain research conclusions that are the antithesis of what the USFS teaches its employees is the right thing to do. I am hoping there might be at least 1 professional IDT member who isn't afraid to explore independent natural resource science that's not approved by the USFS. Perhaps they will wonder why there is a difference. Keep in mind the scientists not affiliated with the USFS have no interest in volume and their promotion opportunities are based on "getting out the cut."

Responsible Officials are legally required to provide meaningful responses to each Opposing View contained in the attachments. Each opposing viewpoint is different and is related to a unique subject, therefore a single response attempting to deal with all opposing views simultaneously does not respond to responsible opposing views as required by 40 CFR 1502.9(b) quoted below:

40 CFR 1502.9(b) "*Final environmental impact statements shall respond to comments as required in part 1503 of this chapter. The agency shall discuss at appropriate points in the final statement any responsible opposing view which was not adequately discussed in the draft statement and shall indicate the agency's response to the issues raised.*"

Sadly, most so-called USFS resource specialists know they must never remove their USFS-supplied blinders and consider other science. Those of you who choose to remain loyal to the agency and its corporate masters will reject the independent science conclusions I present in the Attachments without thinking. I'm sorry for you. Someday after you retire you will realize you spent the best years of your lives living in the dark and living with fear that you might be caught thinking outside the USFS box.

Note that the courts require federal agencies to comply with 40 CFR 1502.9(b).

In ***Center for Biological Diversity v. United States Forest Service***, Argued and Submitted July 15, 2003, In the United States Court of Appeals, Ninth Circuit, the court stated:

“Accordingly, we find that the Final EIS fails to disclose and discuss responsible opposing scientific viewpoints in the final statement itself in violation of NEPA and the implementing regulations. We therefore reverse the district court's grant of summary judgment and remand to the district court with directions that it remand the final statement to the Forest Service for further proceedings consistent with this opinion.”

In *Sierra Club v. Eubanks* 335 F. Supp. 2d 1070 (ED Cal. 2004), the court stated:

"credible scientific evidence that [contradicts] a proposed action must also be evaluated and considered."

In *Seattle Audubon Society v. Lyons* 871 F. Supp. 1291, 1318 (W.D. Wash. 1994), the court stated:

"[the EIS] must also disclose responsible scientific opinion in opposition to the proposed action, and make a good faith, reasoned response to it."

In *Seattle Audubon Society v. Moseley* 798 F. Supp. 1473 (WD Wash. 1992), the court stated:

"[t]he agency's explanation is insufficient under NEPA ... not because experts disagree, but because the FEIS lacks reasoned discussion of major scientific objections."

In *Sierra Club v. Bosworth* 199 F.Supp.2d 971, 980 (N.D. Cal. 2002), the Court held that the Forest Service violated NEPA when it failed to:

"disclose and analyze scientific opinion in support of and in opposition to the conclusion that the...project will reduce the intensity of future wildfires in the project area."

Please respond to each opposing view and post the responses online.

I ask you to Understand what the Wise People below are Saying and let them Guide your Actions.

"It is horrifying that we have to fight our own government to save the environment."
Ansel Adams

"We must protect the forests for our children, grandchildren and children yet to be born. We must protect the forests for those who can't speak for themselves such as the birds, animals, fish and trees."
Chief Edward Moody

"God has cared for these trees, saved them from drought, disease, avalanches, and a thousand tempests and floods. But he cannot save them from fools."
John Muir

"The Eyes of the Future are looking back at us and they are praying for us to see beyond our own time."
Terry Tempest Williams

The choice is yours: serve your agency or serve the public who depends on you to assure the current conditions are available for future generations who visit the Shasta-Trinity National Forest.

Have the Bravery to Examine your Purpose and Need Statements for Accuracy

Many timber sale Purpose & Need statements are so fraudulent and irresponsible they are ludicrous. The notion that logging & roading will solve most problems in the forest (real but mostly cooked-up problems) has been hammered into your brains since your first day with the USFS. You didn't question this because you didn't want to jeopardize your job.

I routinely see the same copy and paste word-for-word P&N statements for timber sales with major differences in conditions.

Even children understand allowing skidders and cats weighing 35,000 pounds with spinning wheels and tracks to operate on the fragile forest floor "restores" nothing and does not create a healthier forest. You all know timber sale P&N statements focus on tree species that are valuable at the mill. A forest is infinitely more than merchantable trees.

Opposing Views Attachment #1 contains statements by 69 independent Ph.D. scientists that describe the environmental damage caused by logging. They were motivated to write the truth. They had no interest in volume accumulation.

Timber Harvest Opposing View #72 is a 2002 letter signed by 221 Ph.D. scientists to President Bush. Here's an excerpt from the letter:

"As conservation-minded scientists with many years of experience in biological sciences and ecology, we are writing to bring your attention to the need to protect our National Forests. Logging our National Forests has not only degraded increasingly rare and valuable habitat, but also numerous other services such as recreation and clean water."

Opposing Views Attachment #4 contains statements by 43 independent Ph.D. scientists and 26 currently employed or retired USFS employees that describe the environmental damage caused by road construction. A temporary road is a road.

Please have the curiosity to read these 2 attachments. Then, reevaluate what you have done as an IDT member for this timber sale draft EIS.

Here's a Small Sample of the Science contained in Attachments #1 and #4.

If logging really created a healthier forest would a Ph.D. forestry professor, several Ph.D. forest ecologists, and a Federal Auditor make the following statements? For those of you who are USFS true believers with tragically closed minds don't waste your time reading this.

"Scientists Seek Logging Ban on U.S.-Owned Land"

Excerpt:

"For much of the past century the Forest Service, entrusted as the institutional steward of our National Forests, focused its management on an industrial-scale logging program. The result of the massive logging and road construction program was to damage watersheds, destroy wildlife habitat and imperil plant and animal species."

"The continued logging of our National Forests also wastes American tax dollars and diminishes the possibilities of future economic benefits. The Forest Service lost \$2 billion dollars on the

commercial logging program between 1992-1997. Annually, timber produces roughly \$4 billion while recreation, fish and wildlife, clean water, and unroaded areas provide a combined total of \$224 billion to the American economy. Forests purify our drinking water - 60 million Americans get their drinking water from National Forests. When the dramatic values of ecological goods and services are taken into account, it is clear that protecting National Forests creates more economic benefits than continued logging."

Ehrlich, Anne Ph.D., David Foster Ph.D. and Peter Raven Ph.D. 2002
New York Times, April 15, 2002
http://www.nativeforest.org/campaigns/public_lands/stb_5_30_02.htm

Statement at a Press Conference with Senator Robert Torricelli by Dr. Arthur Partridge

Excerpt:

"Forests are structured systems of many life forms interacting in intricate ways and disturbances are essential to their functioning. It's not fire, disease, fungi, bacteria and insects that are threatening the well being of forests. Disease, fire, windthrow, and other disturbances are a natural part of the forest ecosystem and assist in dynamic processes such as succession that are essential to long term ecosystem maintenance. The real threat facing forests are excessive logging, clearcutting and roadbuilding that homogenize and destroy soil, watersheds and biodiversity of native forests."

Partridge, Arthur Ph.D., professor emeritus, University of Idaho
about S. 977 and HR 1376), the Act to Save America's Forests
April 28, 1998, U.S. Capitol
<http://www.saveamericasforests.org/news/ScientistsStatement.htm>

"Simplified Forest Management to Achieve Watershed and Forest Health: A Critique"

Excerpt:

"The proposition that forest values are protected with more, rather than less logging, and that forest reserves are not only unnecessary, but undesirable, has great appeal to many with a vested interest in maximizing timber harvest. These ideas are particularly attractive to institutions and individuals whose incomes depend upon a forest land base. (page 2)"

"On the other hand, approaches that involve reserving of a portion of the land base, or harvest practices that leave commercially valuable trees uncut to achieve ecological goals, are often considered much less desirable as they reduce traditional sources of timber income. (page 2)"

Franklin, Jerry Ph.D., David Perry Ph.D., Reed Noss Ph.D., David
Montgomery Ph.D. and Christopher Frissell Ph.D. 2000
<http://www.coastrange.org/documents/forestreport.pdf>

"Audit Faults Forest Service on Logging Damage in U.S. Forests"

Excerpts:

"Federal auditors have found that the Forest Service frequently fails to assess, prevent or correct environmental damage from logging on the national forests."

After inspecting 12 timber projects in the field from 1995 to 1998, the Agriculture Department's inspector general found that all were deficient and that 'immediate corrective action is needed.'

A new report on the audits found that the environmental studies required before logging was approved were poorly done, the rules to protect streams and wildlife habitat from undue damage during logging were not followed, and the steps planned to repair some of the harm after logging were not carried out."

The inspector general, Roger C. Viadero, reported on Jan. 15 to Mike Dombeck, chief of the Forest Service, that the review had found "numerous serious deficiencies." Agency officials generally agreed with the report's conclusions and recommendations."

Cushman, John H. Jr.

Published in the *New York Times*, February 5, 1999

<http://query.nytimes.com/gst/fullpage.html?res=9B00E2DF163BF936A35751C0A96F958260&sec=&spon=&pagewanted=print>

http://www.ncpa.org/sub/dpd/index.php?Article_ID=12468

When most Americans Visit their National Forest, they don't want to Visit an area Resembling a Private Industrial Tree Farm.

As you might know there are Americans by the tens of millions who escape from their stressful modern life to their national forests to experience undeveloped natural settings, solitude, and quietness. Supervisor Myers, your IDT members march in lockstep as you directed them to pass this timber sale through the NEPA process. Some of them know this sale will harm the resources the public pays them to protect. They know you need volume to keep you competitive for future career advancements.

I find it unbelievable that any professional fisheries or wildlife biologist actually thinks the aquatics and terrestrial wildlife habitat will be improved by human manipulation of the forest to generate corporate profit opportunities. They know the ecological benefits claimed in the Purpose & Need are a joke. I ask each IDT member to please have the curiosity to read **Opposing Views Attachments #1 and #4**. Then ask yourself why the USFS encourages its employees to do what independent scientists recommend should never be done. Hint: **VOLUME**.

Here's something the USFS does not want it's employees to see. Don't reject it because it's published by the Sierra Club.

"Stop the Logging, Start the Restoration"

Excerpt:

"According to a 1998 poll by a firm that has worked for several Republican House members and two presidents, 69 percent of Americans oppose commercial logging on federally owned land. The Forest Service's own poll showed that 59 percent of Americans who expressed an opinion oppose timber sales and other commodity production in national forests."

"Many Americans are surprised to learn that logging is even allowed on public lands. Alas, it has been since the Organic Act of 1897 first authorized logging in America's new forest reserves. That legislation called for watershed protection and a steady supply of timber - what the Forest Service calls 'multiple use.' "

"But the agency has been unable to balance those goals. More often than not, the integrity of the forest ecosystem has been sacrificed to maximize timber and other commodities. And at taxpayer expense, notes Bernie Zaleha, chair of the End Commercial Logging on Federal Lands (ECL) campaign. The Forest Service lost \$2 billion on its logging program from 1992 to 1997, according to the General Accounting Office. It spends more on building roads and preparing sales than it gets back in timber receipts."

Barry, John Byrne.

from *The Planet* newsletter

June 1999, Volume 6, Number 5

<http://vault.sierraclub.org/planet/199905/ec11.asp>

Believing humans can improve upon Nature is the ultimate arrogance. I'm sorry that you all have such a poor understanding of the natural world.

Before I begin my specific comments I'll share an observation that applies to all USFS timber sale NEPA documents. The absurdity of the Purpose & Need is a good indicator of the 1) level of likely ecosystem destruction that will be caused by the logging and roading activities and 2) the level of the Responsible Official's panic and hysteria related to not "getting-out-the-cut."

Most IDT members should know logging 16.8 square miles does not accomplish the goals described in the Purpose and Need statements. Mr. Bachmann, Ms. Cooper, Ms. Courtney, Ms. Cutright-Smith, Ms. Glubczynski, Mr. Mapula, Ms. Montagne, Mr. Angwin, Ms. Johnson, Ms. Jordan, Ms. Mai, Ms. Nelson, and Ms. Shoemaker, rather than speaking up to eliminate the clear resource damage that this timber sale will cause you look the other way and play the game, and pretend everything is fine. Self deception is not healthy. Can any of you comprehend 16.8 square miles of logging units will look like?

As I will show below, the IDT members have collectively 1) violated the public trust and 2) violated the law. Ranger Hancock, they know you desperately want this timber sale offered so you will receive “credit” for the volume. Indeed, when a line-officer does not meet his/her supervisor’s volume expectations their climb up the USFS promotion ladder is stifled. The IDT members know they must do whatever is necessary to assure you are happy.

Some IDT members understand the natural resources in the forest enjoy a splendid symbiotic relationship with each other. A few of them know (but won't acknowledge to their peers) that natural disturbance events are beneficial to the countless resources in the forest in spite of the fact trees will die as a result of the fires, windstorms or insect activity etc. A few IDT members know wildfires in the general forest far from the WUI are not "catastrophic" as the agency portrays to the public. However, you need the job to pay the bills so you are silent. IDT members should all know the USFS culture and agenda is centered around timber. What does this tell you about the importance of amenity resource protection

So who is pushing the USFS to ignore and deny the will of the American people? Of course it's the lobbyists hired by the natural resource extraction corporations who control your members of Congress using "gifts" and "donations." This is really who you work for. They are all part of a wicked scheme to deceive the American public for corporate gain.

IDT members should not be afraid to shed their USFS-supplied blinders sometimes. It's refreshing to deal with reality.

I ask Mr. Bachmann, Ms. Cooper, Ms. Courtney, Ms. Cutright-Smith, Ms. Glubczynski, Mr. Mapula, Ms. Montagne, Mr. Angwin, Ms. Johnson, Ms. Jordan, Ms. Mai, Ms. Nelson, and Ms. Shoemaker to consider the following questions. Your answers will reveal a lot about yourself.

- Have you ever had the courage to admit that your mind has been manipulated by the USFS since your first day at work?

- Have you ever had the courage to ask yourself why the USFS teaches you things about your resource that contradict what you learned in college?
- Have you ever wondered why the USFS teaches you that Americans who don't want their national forest developed are rabid "enviros" to be disliked or hated?
- The last time you helped to plan and design a project that you knew would devastate your resource, did you look the other way and believe everything was fine because your Ranger or Supervisor said so?
- Why does your Ranger or Supervisor hide the fact that their real priority is volume and not properly functioning natural resources?
- Are you comfortable working for an agency with a timber agenda and culture?
- Do your Chapter 3 effects disclosures tell the public that No Action will harm your resource? Do you really believe logging and roading the area benefits your resource more than maintaining the status quo?
- If you would have written the Purpose & Need yourself and were certain nobody would know the author, would it have been similar to the P&N for this sale?
- Do you really believe logging and road construction will satisfy the P&N goals for this sale?

and last but not least

- Do you really believe logging and roading the fragile forest will "restore" it and bring it back to health?

Comment #: It's clear that the line-officers on the Shasta-Trinity National Forest did not learn from the Agriculture Department's inspector general's findings based on a 1999 audit of the USFS timber program. The first sentence of the *New York Times* article describing the audit findings says this:

"Federal auditors have found that the Forest Service frequently fails to assess, prevent or correct environmental damage from logging on the national forests."

The complete text of the NYT disclosure can be read at the following link:

<http://www.nytimes.com/1999/02/05/us/audit-faults-forest-service-on-logging-damage-in-us-forests.html>

Here's the same information reported by the National Center for Policy Analysis:

http://www.ncpa.org/sub/dpd/index.php?Article_ID=12468

Here's the text of the audit:

<https://www.usda.gov/oig/webdocs/088011.pdf>

This DEIS smoothes-over and is sometimes silent about the environmental damage from logging that will be caused by the Highway 89 timber sale. A few IDT members know this but their position pays to well to jeopardize it by doing the right thing for future generations of Americans.



**Obedient Forest Service IDT Members know they must never
Describe the No Action Alternative in a Positive Manner**

timber sale “restores” nothing but the purchaser’s financial bottom line and the Responsible Official’s Promotion Opportunities.

I cannot believe there are still USFS employees who really believe commercial timber sales “restore” anything. You know “restoration project” is the new USFS buzzword for timber sale. It seems that someone on the Shasta-Trinity National Forest would have known Webster’s definition of “restoration” before they incorrectly use the term in this draft NEPA document. This is the ultimate public trickery. A few IDT members know this and are frightened to speak up. To please you they use USFS-approved sugar-coated words trying to trick the public into believing timber sales are ecosystem friendly.

Anyone! I repeat, anyone who really believes logging and road construction “restores” the forest ecosystem has either 1) never seen the tragic after effects of logging firsthand in the field, or 2) is clinically obsessed by the need to generate volume the will try to trick and deceive the public in any way.

People who aren’t driven to comply with the agency’s timber agenda understand the tragic ecological impacts of logging especially after reading [**Opposing Views Attachments #1and #4.**](#)

[**Attachment #26**](#) contains aerial photos of post-harvest conditions in western national forests taken between 2011 and 2013 by a conservation group. They were chosen because (like yours) the timber sale names indicated they were “restoration” projects. I invite you to view the photos and determine the natural resource(s) that were restored. Then compare them with the likely post-harvest condition that the Highway 89 timber sale will create. If you are honest, you will understand my point. You have all been taught logging restores the natural resources to a previous healthy condition since your first day on the job. What previous healthy condition will the Highway 89 timber sale restore. Of course after reading this you shifted into your denial mode haven’t you? I’m sorry for you.

Those with the courage to read the attachments to this comment letter with an open mind will understand the Highway 89 timber sale does not “restore” anything according to the real definitions of “restore” shown below:

Webster – “to bring back to or put back into a former or original state”

American Heritage – “To bring back to an original or normal condition: restore a building; restored the patient to health.”

Collins – “to return (something, esp a work of art or building) to an original or former condition”

[**Comment #2:**](#) Supervisor Myers, your proposed timber sale is called a “restoration” project. The Collins dictionary defines “restore” as “to return something to an original or former condition.” Please 1) identify the “original” or “former” condition you will emulate. 2) describe how the prior condition came about without commercial logging, 3) tell the public the year(s) the prior condition existed, and 4) disclose how you determined the prior condition existed when you say it did.

[**Comment #3:**](#) Supervisor Myers, how will exposing the forest’s natural resources to noisy skidders and tractors weighing 17 tons with spinning wheels and tracks create a healthier”, “restored” forest? A forest is infinitely more than trees.

Indeed, the USFS uses the term “restore” and “restoration” to trick and deceive the public into believing timber sales are ecologically friendly. Agency employees who use these slimy tactics do not serve anything but their own self interest. Do you really want to be a part of this? A few of you know exactly what’s happening ... but your job pays too well to jeopardize it.

Here’s a little history on “restoration projects.” The public’s opposition to timber sales and commercially logging their national forests had been steadily increasing. In the fall of 2008 Chief Kimbell took action

hoping to regain agency credibility. She knew she must never take action to really reduce the adverse impact of logging so she chose deception to maintain agency timber goals as part of her attempt to placate and pacify the public. She issued verbal direction to the Regional Foresters to phase out the use of the terms “timber sale” and “logging” in documents that might be read by the public. “Timber sale” was to be replaced with “restoration project” and “logging” was to be replaced by “treatment.” USFS line-officers are taught to say and do anything to serve-up volume to their corporate masters. The well meaning members of this IDT know they must play the game and be “team players” to maintain their promotion opportunities in the timber dominated agency. Perhaps by now a few IDT members know they are selling their good names.

Comment #4: The USDA Office of Inspector General concludes that commercial timber sales are not restoration projects. To wit:

"We concluded that commercial timber sales do not meet the criteria for forest restoration." (Pg. 11)

Long, Richard D., U.S. Department of Agriculture Office of Inspector General
"Western Region Audit Report: Forest Service National Fire Plan Implementation"
Report No. 08601-26-SF, November 2001.
<http://www.usda.gov/oig/webdocs/08601-26-SF.pdf>

Supervisor Myers, what is different about the Highway 89 sale area that makes the OIG conclusion that “commercial timber sales do not meet the criteria for forest restoration” inapplicable?

Comment #5: Supervisor Myers, after reading your DEIS its clear you reject the following scientific advice. Please assure the Chapter 3 effects disclosures for fisheries and aquatic habitat in your final EIS explain why Dr. Ehrlich’s, Dr. Foster’s and Dr. Raven’s conclusions below do not apply to the Shasta-Trinity National Forest.

“For much of the past century the Forest Service, entrusted as the institutional steward of our National Forests, focused its management on an industrial-scale logging program. The result of the massive logging and road construction program was to damage watersheds, destroy wildlife habitat and imperil plant and animal species.”

“The continued logging of our National Forests also wastes American tax dollars and diminishes the possibilities of future economic benefits. The Forest Service lost \$2 billion dollars on the commercial logging program between 1992-1997. Annually, timber produces roughly \$4 billion while recreation, fish and wildlife, clean water, and unroaded areas provide a combined total of \$224 billion to the American economy. Forests purify our drinking water - 60 million Americans get their drinking water from National Forests. When the dramatic values of ecological goods and services are taken into account, it is clear that protecting National Forests creates more economic benefits than continued logging.”

Ehrlich, Anne Ph.D., David Foster Ph.D. and Peter Raven Ph.D. 2002
“Scientists Seek Logging Ban on U.S.-Owned Land”
New York Times, April 15, 2002
http://www.nativeforest.org/campaigns/public_lands/stb_5_30_02.htm

Comment #6: Accumulating volume and spending all your NFTM allocation this FY simply isn’t worth the natural resource damage you will inflict. How can you possibly claim the Highway 89 timber sale is a “restoration project?” This is not a rhetorical question.

Request for changes to be made to the final NEPA document: Eliminate “Restoration” from the sale name and eliminate the word “restore” from the text of the final EIS.

Failure to do so will violate:

18 USC § 1519 and the public trust.

40 CFR § 1500.1(b) because actions were not taken to protect, restore, and enhance the environment, and

40 CFR 1500.2(f) because actions were not taken to avoid or minimize any possible adverse effects of their actions on the quality of the human environment.

18 U.S.C. § 1001 (a)(3) because you knowingly and willfully “relied on false writing or document” inconsistent with the science conclusions of scores of independent Ph.D. scientists “knowing the same to contain any materially false, fictitious, or fraudulent statement or entry.”

Issue #2 ----- NEPA requires federal officials to produce professional NEPA documents using resource specialists with the education necessary to disclose accurate predictions of the environmental effects of implementing a Proposed Action.

Throwing together an EIS with whoever might be available for convenience and to save money as is the case here is unacceptable. A responsible, competent line-officer examines scoping comments, identifies major issues and staffs the IDT with people having the education and experience to address the issues.

The public expects (and the law requires) **ALL** USFS line-officers acting in a Responsible Official capacity to staff their IDTs with employees able to professionally analyze and disclose environmental effects.

There is no fisheries biologist listed as an IDT member in spite of the fact you will construct 10 miles of sediment producing temporary road. Chapter 3 contains a section describing the effects of sale implementation to the Redband Trout, yet there is no fisheries biologist listed as an IDT member. A wildlife biologist does not have the education to predict fisheries effects.

Chapter 3 contains a section describing the effects of sale implementation to scenery, yet there is no landscape architect listed as an IDT member. A recreation specialist does not have the education to predict scenery effects. This is obvious because the description of the scenery effects at page 148 of implementing Alternative 3 which proposes 16.8 square miles of logging in “the remaining project area” state:

“Remaining Project Area –Direct effects to scenery will be the same for the highway and river corridors and developed recreation areas, but may be more visible to the casual forest visitor driving and recreating on primary travel routes since skid trails and temporary roads have the potential to create an uncharacteristic linear feature visible on the landscape from primary travel routes. However, all temporary roads will be decommissioned after project completion. Slash treatments have the potential to adversely affect scenery resources; however, these slash piles will be removed or burned and therefore, visual quality will be impacted for a short duration. Limiting the size of landings or placing landings behind existing vegetation or topography to hide them from the main travel routes or make them appear more natural in the landscape will reduce visual impacts.

Indirect effects will be minimal as vegetation will grow back over temporary roads and skid trails reducing the visibility of the linear features. Slash piles will be removed or burned, and landings will revegetate, also reducing the length of time they will be visible.”

Whoever wrote this conveniently forgot to describe the scenery effects of commercially logging 16.8 square miles.

Request for changes to be made to the final NEPA document: Add a fisheries biologist and landscape architect to the IDT and have him/her re-write and modify the analysis of effects to fisheries and scenery.

Failure to do so will violate:

40 CFR 1502.6 because the disciplines of the preparers are not appropriate to the scope and issues identified in the scoping process.

40 CFR 1502.24 because without appropriate IDT members having the education and experience to professionally assess and analyze a resource, the professional integrity (including scientific integrity) will be compromised.

40 CFR 1507.2 because the team that prepared the DEIS is not interdisciplinary and does not contain the necessary members “capable (in terms of personnel and other resources) of complying with” (a) through (f) of the law.

FSH 1909.15-12.2 because:

- 1) The disciplines and skills of the interdisciplinary team are not appropriate to the scope of the action, the issues, and potential effects identified.
- 2) The IDT does not have the expertise to identify and to evaluate the potential direct, indirect, and cumulative social, economic, physical, and biological effects of the proposed action and its alternatives.

FSH 1909.15-12.22-3 because: the IDT does not have “knowledge of and degree of experience in the subject discipline and the environmental analysis process.”

Issue #3 ----- The DEIS does not discuss how the timber sale's logging and slash/RX burning activities will be mitigated to assure protected bird species' individuals and their habitat are not harmed in any way.

On page 223 Mr. Mapula identifies the Yellow Rail as a bird species protected under the Migratory Bird Treaty Act of 1918. He says they are more likely to nest in the McCloud River corridor. He says their nesting area will be prescribed burned.

At page 259 Mr. Mapula says:

“Implementation of the project is expected to maintain and enhance the existing functional habitat used by migratory birds in the project area over the short and long term while contributing to long-term diversity of habitat conditions at multiple spatial scales.”

Any so-called wildlife biologist who thinks burning the nesting area of a bird species “maintains and enhances” their “functional habitat” should see other employment.

proposing to apply Dr. Cohen's fine fuel removal methods in this DEIS shows you are more concerned with the volume generated by fuels logging than you are someone's home and the lives of their family members.

Without changes between draft & final you will risk people's lives. There are severe civil penalties for federal officials convicted of knowingly putting the public at risk.

The research conclusions of Dr. Jack Cohen (a USFS employee) explaining why and how logging is an ineffective way to reduce fire intensity and rate of spread are contained in [Opposing Views Attachment #11](#).

When you are confronted with this information in a court of law how will you and your IDT members refute the research results from research conducted by a person with a Ph.D. on fire physics? A person who is guilty of reckless endangerment creates a substantial risk of death or serious physical injury to another person. Your witless quest for volume caused you to withhold from the public the most effective fire risk reduction method used world wide developed by Dr. Cohen. His research conclusions show commercial logging to remove "hazardous fuels" is a waste of the taxpayer's dollar compared to removing fine fuels within several hundred feet of a structure at risk.

Of course the USFS rejects this science because fine fuels reduction that requires no commercial logging and thus, does not produce timber volume. Supervisor Myers, you will be infamous. You will not be able to claim "I didn't know" in court because I am presenting this information in these comments and in [Opposing Views Attachment 11](#). The IDT members will be partners in the crime.

I suggest you prepare yourself. Soon the WUI-related parts of these comments will be emailed to Mount Shasta mayor Morter and City Council members Wagner, Engstrom and Stackfieth who will give them to the city attorneys to address. They will ask you why you reject Dr. Cohen's methods that are the effective treatment methods to reduce fire damage and save lives:

This 2014 High Country News article describes the effectiveness Dr. Cohen's fine fuels removal methods: <http://www.hcn.org/articles/the-loss-of-homes-to-wildfire-is-as-much-a-sociopolitical-problem-as-it-is-a-physical>

Comment #8: Supervisor Myers, one of your fellow USFS employees' research conclusions indicates fine fuels removal is far superior to commercial hazardous fuels logging farther away from the WUI than 100 yards, yet your draft EIS doesn't mention Dr. Cohen's research conclusions. Dr. Cohen states several times in the many scientific papers he authored that commercial fuels removal farther than "100 to 200" feet from the WUI is ineffective. Why then do you propose widespread fuels logging? Of course I know the answer ... you want the volume.

Request for changes to be made to the final NEPA document: Analyze another action alternative that will educate people about Dr. Cohen's methods and use USS employees to help people living in the WUI (with permission) to implement Dr. Cohen's methods if they are unable to do the work themselves. This alternative would require you to do the following:

- distribute handouts to WUI residents describing Dr. Cohen's fine fuels removal methods (where and how).

- This issue is too serious to sweep under the rug.

- **40 CFR 1500.2(e)** because you were unable to avoid or minimize adverse effects of the project upon the quality of the human environment without complete knowledge of all likely adverse effects. Most adverse effects of project activities described by scientists in the **Opposing Views Attachment #11** and the **Logging and Fire Spread attachment** was not mentioned in the draft EIS.
- **40 CFR 1500.2(f)** because you were unable to avoid or minimize any possible adverse effects upon the quality of the human environment without knowledge of the adverse effects. Had you known about these effects you would have acknowledged the existence of some adverse effects described in the Opposing Views Attachment #11 and the Logging and Fire Spread attachment in the draft EIS.
- **NEPA Sec. 101(b)(2)** because the you do not “assure for all Americans safe, healthful, productive, and esthetically and culturally pleasing surroundings;”
- **NEPA Sec. 101(c)** because “The Congress recognizes that each person should enjoy a healthful environment and that each person has a responsibility to contribute to the preservation and enhancement of the environment.”
 - **Ex. Ord. No. 13045, Apr. 21, 1997 [section 1-101(a)]** because you do not “make it a high priority to identify and assess environmental health risks and safety risks that may disproportionately affect children.”

17

scientists all agree fire is Nature's way of really (unlike logging) restoring the forest.

I have spent too long trying to convince Responsible Officials to eliminate the need for hazardous fuels removal from their timber sale NEPA document's Purpose and Need. I present irrefutable science evidence that 1) logged over areas do not affect fire behavior and 2) fire restores some of the forest's natural resources. Isn't it sad that many USFS line-officers ignore the need to provide conditions for natural resources to function properly? Indeed, seeking to be responsive to the all-encompassing USFS timber agenda is the reason IDT biologists, hydrologists, archaeologists, landscape architects, and recreation specialist enthusiastically support logging to reduce fuels. They know specialists who put amenity resource health higher in importance than volume attainment will not climb the USFS promotion ladder. The IDT members who wrote this draft EIS should hang their heads on shame.

Hazardous fuels removal is the primary excuse used by the USFS to serve their corporate masters with logging opportunities. Most so-called resource specialists know this. They know they are expected to play the game. They are terrified that they will be punished if they don't cite this bogus excuse to log a properly functioning tract of forest because without it the Responsible Official will have more difficulty justifying removal of their precious volume.

The IDT members all know there are 2 parts of NEPA documents where IDT members are expected to lie and look the other way ... the Purpose & Need and the Chapter 3 effects disclosures. Most timber sale P&N statements are so ridiculous they are comical. They portray logging and roading undeveloped forests as Gods gift to forest health. You all know your job requires you to tell the public unmanaged (a.k.a. unlogged) forests cannot function properly. The silviculturists and a few obedient other resource specialists on this IDT actually believe this is true. The others play the game because their jobs pay well.

Frankly, I am tired of being ignored by USFS employees who accept their salaries provided by the public's tax dollars while they simultaneously serve the natural resource extraction corporations.

After working for 9 years as a forest planner and NEPA coordinator I learned most natural resource specialists fit into 2 categories:

- clueless, brainwashed, mindless robots who would write anything to prove their loyalty to the USFS, and
- intelligent resource specialist who know the agency has tried to brainwash them into believing logging the forest actually "restores" it and makes it "healthier." They choose to play the "logging saves it all" game because they won't jeopardize their high paying job.

Where do you all fit?

Opposing Views Attachment #8 contains the opinions of 24 PhD independent scientists, 2 USFS scientists and the Congressional Research Service. The science is compelling and would not be rejected by a professional land manager.

Please think about this a little. There are other reasons why you should not waste taxpayer's money commercially logging fuels. There are scores of research papers authored by independent scientists not connected with the USFS whose research shows logged-over areas do not stop fires. The research conclusions and explanations are there. A few examples are contained in the **Logging does not affect Fire** Attachment. Please have the courage and curiosity to check it out and compare it with what the USFS teaches

you. Here are some examples of science you will of course reject because it is the antithesis of the USFS teachings that have been pounded into you all for so long:

Commercial Logging Causes Forest Fires

Published in *FOREST CONSERVATION NEWS TODAY*, July 20, 2002

OVERVIEW & COMMENTARY by Forests.org

Link: http://forests.org/archived_site/today/recent/2002/grgrurge.htm

Excerpts:

"It is well known scientifically that "commercial logging actually increases fire severity by removing large, fire-resistant trees and leaving behind very small trees and flammable "slash debris"--branches, twigs and needles from felled trees. The removal of mature trees also decreases the forest canopy, creating hotter, drier conditions on the ground. The additional sun exposure encourages the growth of flammable brush and weeds. Reduction of flammable underbrush can reduce fire severity, and environmental groups have encouraged such projects. However, the Bush administration has grossly misused the funds that Congress appropriated for brush reduction near homes. In Sierra Nevada national forests last year, more than 90% of these funds were instead earmarked for preparation of large timber sales focused on the removal of mature and old-growth trees miles from the nearest town."

"The Forest Service, Bush administration and anti-environmental members of Congress are spreading a great deal of misinformation about wildfire, hoping to capitalize on public fire hysteria and minimize public opposition to increased logging and roadbuilding in our national forests," said Jake Kreilick of the National Forest Protection Alliance based in Missoula, Montana. "With virtually all new timber sales couched in terms of 'reducing fuels' or 'restoring forest health,' fire hysteria has emerged as the driving force behind the Forest Service's logging program and the administration's efforts to 'streamline' our nation's environmental laws," Kreilick said."

A Report to the President in Response to the Wildfires of 2000

By Lyle Laverty USDA Forest Service and Tim Hartzell U.S. Department of the Interior, September 8, 2000

Link: <http://frames.nacse.org/6000/6269.html>

Excerpts:

"Most of the trees that should be removed to reduce accumulated fuels are small in diameter and have little or no commercial value."

"Mechanically removing fuels (through commercial timber harvesting and other means) can also have adverse effects on wildlife habitat and water quality in many areas. Officials told GAO that, because of these effects, a large-scale expansion of commercial timber harvesting alone for removing materials would not be feasible. However, because the Forest Service relies on the timber program for funding many of its activities (including reducing fuels) it has often used this program to address the wildfire problem. The difficulty with such an approach, however, is that the lands with commercially valuable timber are often not those with the greatest wildfire hazards."

Comment #9: Mr. Lyle Laverty was a USFS employee who placed forested ecosystem health above volume when he told the public the truth about the need to log hazardous fuels. In a Report to the President in Response to the Wildfires of 2000 he stated: *"Most of the trees that should be removed to reduce accumulated fuels are small in diameter and have little or no commercial value."* Supervisor Myers, please tell the public why you propose to commercially log large, merchantable trees that are **NOT** small in diameter and have little or no commercial value.

Western National Forests: A Cohesive Strategy is Needed to Address Catastrophic Wildfire Threats

Published by the Government Accounting Office, GAO/RCED-99-65

Link: <http://www.gao.gov/archive/1999/rc99065.pdf>

Excerpts:

“The notion that commercial logging can prevent wildfires has its believers and loud proponents, but this belief does not match up with the scientific evidence or history of federal management practices. In fact, it is widely recognized that past commercial logging, road-building, livestock grazing and aggressive firefighting are the sources for “forest health” problems such as increased insect infestations, disease outbreaks, and severe wildfires.”

“How can the sources of these problems also be their solution? This internal contradiction needs more than propaganda to be resolved. It is time for the timber industry and their supporters to heed the facts, not fantasies, and develop forest management policies based on science, not politics.”

Comment #10: In the 1999 GAO report titled *Western National Forests: A Cohesive Strategy is Needed to Address Catastrophic Wildfire Threats* they state: “past commercial logging, road-building, livestock grazing and aggressive firefighting are the sources for “forest health” problems such as increased insect infestations, disease outbreaks, and severe wildfires.” Supervisor Myers, please tell the public why you reject the opinion and conclusions of GAO experts and instead rely on a few USFS interdisciplinary team members who are financially motivated to sell timber. Their proposal to commercially log what you refer to as “hazardous fuels” to reduce fire intensity and rate of spread is the antithesis of what “best science” recommends.

Testimony to the Agriculture, Nutrition and Forestry Committee United State Senate. Hearing to Review Healthy Forests Restoration Act, HR 1904 on June 26, 2003

By:, Arthur Partridge Ph.D., Professor Emeritus, University of Idaho

Link: http://www.univision.co.za/offer-day-oA2A392Cr1N3B2x_2F2du3g3-music.shtml

Excerpt:

“The current focus on ‘fuels’ is, in itself, misguided because almost anything in a forest will burn, given the right conditions. Any fire specialist will tell you that the principal factors affecting fire are temperature and moisture, not fuels. No legislation will prevent or even reduce fires in the vast areas of the national forests and to pretend so is fraudulent.”

Comment #11: Dr. Art Partridge is an expert in fire behavior. In his testimony to the US Senate he stated: “The current focus on ‘fuels’ is, in itself, misguided because almost anything in a forest will burn, given the right conditions.” Supervisor Myers, please tell the public why you reject the opinion and conclusions of experts and instead rely on a few USFS interdisciplinary team members who are financially motivated to sell timber. Their proposal to commercially log what you refer to as “hazardous fuels” to reduce fire intensity and rate of spread is the antithesis of what “best science” recommends.

Objectives and considerations for wildland fuel treatment in forested ecosystems of the interior western United States (page 10)

By: Dr. Jack Cohen (a USFS fire physicist)

Published in *Forest Ecology and Management*, issue 256, 2008

<http://www.firewise.org/Information/Research-and-Guidance/WUI-Home-Ignition-Research/~media/Firewise/Files/Pdfs/Research/CohenFuelTreatment.pdf>

Excerpts:

“Treating fuels to reduce fire occurrence, fire size, or amount of burned area is ultimately both futile and counter-productive.” (Pg.1999)

"Some viable fuel treatments may actually result in an increased rate of spread under many conditions (Lertzman et al., 1998; Agee et al., 2000). For example, thinning to reduce crown fire potential can result in surface litter becoming drier and more exposed to wind. It can also result in increased growth of grasses and understory shrubs which can foster a rapidly moving surface fire." (Pg.2000)

Comment #12: Dr. Cohen (a USFS employee) is an expert in fire behavior. In his paper *Objectives and Considerations for Wildland Fuel Treatment in Forested Ecosystems of the Interior Western United States* he states: “*Treating fuels to reduce fire occurrence, fire size, or amount of burned area is ultimately both futile and counter-productive.*” Supervisor Myers, please tell the public why you reject the opinion and conclusions of a fire physicist employed by the USFS who spent his entire career developing ways to reduce fire damage to homes in the WUI and instead rely on a few USFS interdisciplinary team members who are financially motivated to sell timber. Their proposal to commercially log what you refer to as “hazardous fuels” to reduce fire intensity and rate of spread is the antithesis of what “best science” recommends.

By now you are asking yourself “who is this guy that wrote these comments.” You are shocked that a retired USFS employee would write this aren’t you? I hope so. I am a person who has watched IDT members routinely write untrue, ridiculous NEPA document text intended to pave the way for volume for their supervisor for decades. You all thought you were safe as IDT members working behind the scenes. Its time for you to be held accountable for what you are doing. The line-officer signs the decision. Without the fraudulent NEPA document you created, that would not be possible. The choice is clear. You can play the USFS volume accumulation game, or demand timber sale design changes to eliminate (not reduce) any and all damage logging and roading will inflict on the resource the public pays you to protect.

Issue #6 ----- Supervisor Myers, the IDT members know you expect them to say anything (usually untrue according to best independent science) that will make it easier for you to reject No Action. They have been obedient.

The USFS teaches them to tell the public the resource the IDT member is paid to protect will be destroyed by fire unless the area is logged. Of course this is untrue. Issue #11 quotes the experts that the IDT choose to ignore. These experts say logging does not affect fire rate of spread or intensity. A few say logging exacerbates fire behavior.

Comment #13: Supervisor Myers, your IDT members obediently and mindlessly parrot what the USFS taught them. They know you selected the Proposed Action before you started the public scoping process. Why? The Proposed Action presented here is the same as the scoping Proposed Action and you analyze only 1 action alternative in detail. They know you will be happy if they reject anything that questions the effectiveness of fuels logging. They know they are expected to conclude fires will destroy their resource if you foolishly select the No Action alternative. Here, are a few examples of this pathetic “get-out-the-cut-at-any-cost” behavior contained in your IDT’s ridiculous No Action effects disclosures:

Ms. Johnson does not describe the effects of No Action to cultural resources. NEPA requires the predicted effects of implementing all alternatives to be disclosed.

Ms. Mr. Sewell wrote these untrue, agency/corporate-friendly, unscientific effects of No Action on vegetation:

“Refer to Table 14 (page 98) for the change in species composition over 40 years with No Action for the mixed conifer and knobcone stands. The knobcone pine dominated stands would continue on with their current cycle of growing for 60-100 years, dying and adding to the fuel load. The species would continue to dominate the sites and would continue to die and fall adding to the already high fuel loads, which would in turn put the areas in and around these stands at elevated risk for uncharacteristically extreme wildfires.” (pg 96)

Ms. Cooper wrote these untrue, agency/corporate-friendly, unscientific effects of No Action on recreation:

“Without fuel treatment, fuel loads would continue to rise, increasing the hazard of wildfire, and felling hazard trees within the campgrounds would continue at their current levels.” (pg 125)

“Without fuel treatment, fuel loads would continue to rise, increasing the hazard of wildfire, and felling hazard trees within the campgrounds would continue at their current levels.” (pg 126)

Ms. Cooper wrote these untrue, agency/corporate-friendly, unscientific effects of No Action on scenery:

“Overall high fuel levels would continue to be cause for potential catastrophic wildfire which visually would be more undesirable with the potential of large expansion of charred or dead trees.” (pg 145)

Mr. Mapula wrote these untrue, agency/corporate-friendly, unscientific effects of No Action on sensitive wildlife species:

Northern Goshawk

“It also increases the probability that high-severity fire would reduce or remove the amount and distribution of nesting and foraging habitat available to NGO and their prey, such as snags, vertical and horizontal structure and large CWD in addition to larger trees and dense canopy cover. Over time, the no-action alternative leads to the deterioration of NGO habitat, as a denser understory provides fewer foraging opportunities to NGO.” (pg 206)

Fisher

“The risk of a high severity fire that removes or significantly reduces a large proportion of suitable habitat elements for fisher in the project area and Riparian Reserves, such as a denser canopy of larger trees, large diameter snags and logs, and hardwoods, would continue to increase.” (pg 212)

Pacific Marten

“The risk of a high severity fire that removes or significantly reduces a large proportion of suitable habitat elements in the project area and Riparian Reserves, such as a denser canopy of larger trees, large-diameter snags and logs, and hardwoods, would continue to increase.” (pg 218)

Willow Flycatcher

“Existing trends within the project area are leading toward possible large-scale loss of habitat from fire due to increasing fuel loads from overstocking, disease, and insect impacts.” (pg 221)

Yellow Rail

“Existing trends within the project area are leading toward possible large-scale loss of habitat from fire due to increasing fuel loads from overstocking, disease, and insect impacts.” (pg 223)

Bats – Pallid, Townsend’s big-eared, and Fringed Myotis

“The risk that a high-severity fire removes or significantly reduces a large proportion of suitable habitat elements in the project area and Riparian Reserves, such as large trees and large diameter snags, mature forest, and adjacent shrub habitats and hardwoods, would continue to increase.” (pg 228)

Fish - McCloud River Redband Trout

“Stands would remain at risk to loss from wildfire.” (pg 233)

Request for changes to be made to the final NEPA document: Really serve the public by giving them both sides of the hazardous fuels story. This would mean including the text of the **Logging does not affect Fire Attachment** as an Appendix and citing it at appropriate locations in the text if the final DEIS.

Supervisor Myers, if you refuse, it shows you are comfortable hiding important information (best science) from the public to enhance your promotion opportunities in your agency that’s tragically dominated by the need to produce timber. You know there are countless natural resources in the forest besides commercially valuable trees. You are paid to protect these resources, yet you focus on commercially valuable tree species. You claim to make the forest healthier by trashing countless forest resources as you create conditions that favor the rapid growth of large diameter commercially valuable tree species.

Some of your IDT members know exactly what’s going on. They also know that their USFS promotion opportunities will be adversely affected unless they keep quiet and obediently play the game.

A competent, responsible, professional USFS line-officer would assure their final EIS includes science that explains:

- 1) the effectiveness and ineffectiveness of fuels reduction at modifying fire behavior, and
- 2) a small sample of scientific information from **Opposing Views Attachment #8** that explains the many ways fire benefits the countless other natural resources in the forest other than trees.

If you ignore my request your IDT members will know. They will know you will do anything for volume. Will they all respect you for this?

You know the agency expects you to violate the laws of the United States to maximize your timber outputs. You know I don’t have the money to take court action when my objection is rejected by the DRF. Do you think your IDT members with self-esteem embrace your “its OK to break the law of you think you won’t get caught” attitude?

If you ignore my request to provide a balanced fuels reduction argument you will violate the following laws. Of course you don’t care do you?

18 USC § 1519 because you conceal, cover up, falsify a government document with the intent to impede, obstruct, or influence the proper administration of a matter within the jurisdiction of the USDA.

18 USC § 1001(a)(3) because you have written a document knowing it contains materially false, fictitious, or fraudulent statements.

40 CFR § 1500.1(b) because the information in your draft NEPA document is not “high quality” or “accurate” which will lead to a flawed “scientific analysis.”

40 CFR §1500.2 .because withholding information from the public does not encourage and facilitate public involvement in decisions which affect the quality of the human environment.

16 U.S. Code § 1600(4) because omitting the knowledge derived from private research programs does not promote a sound technical and ecological base for effective management, use, and protection of the Nation's renewable resources;

40 CFR § 1502.24 because your discussion of the need to reduce fuels does not represent a summary of the scientific community's entire collective thinking (good and bad) about a proposed project.

40 CFR § 1507.22 because this draft EIS fails to include the important information that gives the public the details that you will used to make your final decision

Issue #7 ----- Supervisor Myers, if you care about maintaining aquatic species' health you would indicate in the final EIS that all newly constructed temporary roads will be obliterated after use by returning the ground to the natural angle of repose and eliminating the running surface. If you were really concerned about aquatic species' health you wouldn't propose any new road construction. This includes the 2.6 miles of proposed system road construction.

You indicate you will construct 10 miles of temporary road. This includes 4 miles of new construction and 6 miles on the templates of unauthorized roads.

Supervisor Myers and Mr. Bonivert, please walk a temporary road constructed by an employee of the timber corporation without the location being flagged by a USFS road locator. It will be obvious these temporary roads were constructed as quickly as possible without concern for resource damage. Your timber sale administrator gives rubber-stamp approval. There will be no ditch and the road is outsloped. This creates a linear sediment generator each time it rains.

At page 34 you say “All temporary roads constructed for the project will be decommissioned.” On that same page you say:

“Decommissioning activities include one or more of the following : (1) reestablishing former drainage patterns, stabilizing slopes, and restoring vegetation; (2) blocking the entrance to a road or installing water bars; (3) removing culverts, reestablishing drainages, removing unstable fills, pulling back road shoulders, and scattering slash on the roadbed; (4) completely eliminating the roadbed by restoring natural contours and slopes; and (5) other methods designed to meet the specific conditions associated with unneeded roads (FSM 7734.1).”

Don't tell me what you might do. Tell me that you will fully obliterate these roads. If you are guided by your decommissioning options above you will select the least expensive option: "block the entrance to a road or installing water bars." This allows the so-called temporary road to muddy the streams with sediment from 10 miles of road for decades. This minimizes your reconstruction costs the next time you log the area. Mr.

Bachmann must have been out of town when this DEIS was written. A caring hydrologist would have handled the temporary road in a professional manner.

Comment #14: Roads that will be used again in the future must be constructed to system road standards with surfacing and a ditch to reduce sediment generation. If the final EIS does not clearly indicate that your proposed temporary roads will be obliterated such that a running surface no longer exists, it will show you plan to allow these temporary roads to pump sediment for decades until the so-called temporary road is used again for the next timber sale. Please become familiar with the Clean Water Act.

Comment #15: At page 34 you say you will decommission “Approximately 6 miles of existing unauthorized routes.” How were these unauthorized roads created? Why weren’t they obliterated when they were first discovered? This would have eliminated the sediment generated from them. How long have these unauthorized roads been pumping sediment into the streams during and after each precip event?

Comment #16: Since temporary roads are outsloped with no ditch, sediment that is generated during precipitation events finds its way to streams and harms the aquatic resources ... unless the road is really obliterated after use which you aren’t proposing to do. You know roads that are really obliterated have the fill returned to the cut to restore the original sideslope that existed before the temp road was constructed. Your proposal to decommission your temporary roads will leave the road surface in place so you can access the cutting units with less reconstruction costs the next time you log the area.

Your so-called temporary roads are not temporary. You know this and choose to hide it from the public

Comment #17: A report authored by Gerald Coghlan, WO Acting Director of Engineering in 1998 (17 years ago) indicated there are 372,956 miles of national forest system road (page 5). The agency currently constructs 2,170 miles of system road per year. At this rate there are 410,000 miles now. This is the average distance to the moon. Isn’t this enough?

See: http://www.fs.fed.us/eng/road_mgt/roadsummary.pdf

Links to science showing complete obliteration is more effective at reducing long-term sediment generation than any other closure methods are included below:

“Obliteration

Obliteration can be the most effective treatment for both aquatic and terrestrial species. In full obliteration, culverts are removed, road surfaces are ripped and slopes are recontoured (see below for explanations of these treatments). In simple decommissioning, sites (such as stream crossings) are treated, but the segments (such as the roadbed between two stream crossings, or between water bars) are left intact. In obliteration, all sites and segments are treated. Subsurface water flow is no longer interrupted, allowing water to flow normally throughout the system and therefore aiding with vegetative recovery and reconnecting fragmented habitat. Recovering the original topsoil may also aid in revegetative success and limit the spread of non-native species on the site. Road obliteration, therefore, addresses both the aquatic/hydrologic and terrestrial problems caused by roads.”

From **“AN EXPLANATION AND ASSESSMENT OF ROAD REMOVAL IN VARIED HABITATS”**

By Bethanie Walder and Scott Bagley

Published by the Wildlands Center for Preventing Roads, Missoula, MT

Link: http://ntl.bts.gov/DOCS/ICOWET_III/icowet3paper.pdf

“Unless a road is fully obliterated, it is bound to continue receiving human use and fail to fully revegetate.”

“These facts and common sense show clearly that a road will not cease functioning as a road or trail until it is fully obliterated to the point where travel off of the former roadbed is easier than travel on it. As the following

discussion on the benefits of road obliteration will show, simply gating a road or taking it off of the inventory does not make the impacts or the road go away.”

From: **“Road Obliteration: Benefits to the Watershed and Its Inhabitants”**

A Swan View Coalition publication by Keith Hammer, 1994

Link: http://www.swanview.org/home/articles/reports-documents/road_obliteration_benefits_to_the_watershed_and_its_inhabitants/56

“We also believe that roads which cannot be properly maintained should be considered for closure or decommissioning, with natural landscapes and drainages restored (i.e., culverts removed). Road density in the Whitetail-Pipestone area is very high and reduction in road density is needed to protect resources. We believe road networks should be limited to those that are necessary for access and management, and which can be adequately maintained within agency budgets and capabilities. Roads that impact water quality, fisheries and/or sensitive and listed wildlife species should be prioritized for closure and/or decommissioning to maximize ecological benefits. We also recommend road obliteration or full road recontour as a preferred method of road closure, since it is often difficult to effectively restrict motorized access and protect public lands with simple gated road closures.”

From: a November 5, 2008, letter to Bruce Ramsey, Forest Supervisor, Beaverhead-Deerlodge National Forest written by John F. Wardell, Director, EPA Montana Office.

Link: [http://yosemite.epa.gov/oeca/webeis.nsf/\(PDFView\)/20080402/\\$file/20080402.PDF?OpenElement](http://yosemite.epa.gov/oeca/webeis.nsf/(PDFView)/20080402/$file/20080402.PDF?OpenElement)

Comment #18: In 1996, Jeffery E. Moll, P.E. who worked at the San Dimas Technology & Development Center wrote *A Guide for Road Closure and Obliteration in the Forest Service* link <http://www.fs.fed.us/eng/pubs/pdfimage/96771205.pdf> At page 20 Mr. Moll states:

“The recontouring technique described here is considered the highest attainable level of mechanical obliteration and hydrologic restoration for low volume roads. This includes reestablishing original contour-removing embankments and removing cuts-removing drainage structures, establishment of subsurface flow, debris and rock placements, treatments to gullies and their connectivity to stream systems, and vegetative plantings, seeding and mulching.”

Here’s a definition of road obliteration used by the North Coast Redwoods District of the California State Parks written in May, 2003:

“obliteration - to completely remove the road feature from the landscape. This is accomplished by full recontouring. See full recontouring.”

“full recontouring - the treatment of a road that completely eliminates (obliterates) the road from the landscape. Full recontouring is accomplished by recovering all available fill and burying the cutbank until the surrounding terrain is fully matched. This type of treatment is also referred to as road removal or road obliteration. See obliteration.”

Source: http://www.parks.ca.gov/pages/23071/files/fullroadrecontourbmp5_03.pdf

The EPA’s description of road obliteration is quoted below:

“Road closure and obliteration is one of the most important methods used to improve and protect watersheds within the National Forests of the Pacific Northwest. These are generally compacted, have little sideslope, and usually have grades less than 15%. Road obliteration is the process of removing and treating roads, resulting in partial to complete recontouring of the site to match the surrounding natural terrain.

The main objectives of forest road obliteration are to restore hillslope hydrology, decrease surface erosion and the risk of mass wasting, and promote the re-establishment of native vegetation.” (page 2)

Source: <http://www.epa.gov/wastes/conservation/tools/greenscapes/pubs/compost-uw.pdf>

Since you do not propose to “recontour the site to match the surrounding natural terrain” you are not obliterating your temp roads. EPA says “Road closure and obliteration is one of the most important methods used to improve and protect watersheds within the National Forests of the Pacific Northwest.” You are not interested in “improving and protecting watersheds” are you?

Here are links to other sources clearly showing the superiority of road obliteration:

http://www.swanview.org/home/articles/reports-documents/road_obliteration_benefits_to_the_watershed_and_its_inhabitants/56
<http://www.parks.ca.gov/pages/939/files/Full%20Road%20Recontour.pdf>

After the temp roads are obliterated or decommissioned they must be monitored over time to assure they are not generating sediment. This DEIS contains no such monitoring plan.

The forest service discusses the need to monitor road decommissioning methods:

“Several national forests have developed road decommissioning monitoring plans. This report builds on their hard work and careful thought to creating a successful monitoring plan. Instead of advocating one method or process for each monitoring project and budget, this document enables selection of the monitoring technique(s) for each situation. Monitoring forms and protocols are attached that can help a district or forest interdisciplinary team design a road decommissioning monitoring program for their area.”

From : “**Road Decommissioning**” by Carolyn Napper, USFS Soils Scientist
A USDA Forest Service Technology and Development paper
Link to paper: http://www.fs.fed.us/t-d/programs/im/road_decommission/road_decommissioning.shtml

Comment #19: You ignore agency best management practices. You have no temporary road monitoring plan. Spending a little money on monitoring is better than spending a lot of money cleaning the stream ... or hiding the fact that temporary roads are the reason the stream is muddy. The DEIS does not contain a discussion explaining why you believe temporary road monitoring is not necessary on this project.

Please see **[Opposing Views Attachment #4.](#)**

Request for changes to be made to the final NEPA document: Please indicate all temporary roads will be obliterated such that the terrain where the road was constructed is returned to the condition it was before the road was constructed. This will mean the running surface will no longer exist except on flat ground.

Also, please assure the final NEPA document includes a road obliteration monitoring plan to assure the sediment is being reduced as expected. The resulting draft decision documents should indicate the USFS will provide funding for the monitoring and accomplish the monitoring.

Failure to do so will violate:

- The **Clean Water Act** requires federal official to secure National Pollutant Discharge Elimination System (NPDES) permits when federal officials create point sources for water pollution. NPDES permits have been required since 1972. This case shows some federal officials don’t seek out these permits from the EPA because they know the EPA won’t grant the permit. Here, the Responsible Official cares more about accumulating volume than complying with United States law.
- **40 CFR 1500.1(c)** because the ineffective proposal to decommission temporary roads using one or more of the 5 methods after use will not “protect, restore, and enhance the environment.”

- **40 CFR 1500.2(f)** because the ineffective proposal to decommission temporary roads using one or more of the 5 methods after use will not “restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment.”
- **40 CFR 1500.2(e)** because the ineffective proposal to decommission temporary roads using one or more of the 5 methods after use will not “avoid or minimize adverse effects of these actions upon the quality of the human environment.”
- **36 CFR 212.5(b)(2)** because decommissioning temporary roads using one or more of the 5 methods will not restore the road to a more “natural state.”



Issue #8 ----- The DEIS does not discuss the items shown below required by 40 CFR 1502.16:

- (e) Energy requirements and conservation potential of various alternatives and mitigation measures.
- (f) Natural or depletable resource requirements and conservation potential of various alternatives and mitigation measures.
- (g) Urban quality, historic and cultural resources, and the design of the built environment, including the reuse and conservation potential of various alternatives and mitigation measures.

Request for final NEPA document modifications: Please comply with the law by including the missing information above.

Failure to do so violates **40 CR 1502.16**



Issue #9---Professional USFS line-officers would never hide important project-related information from the public.

Comment #20: Supervisor Myers you hide important documents related to this project as hardcopies in the Project Record located in McCloud, California. Most of these documents were created on your computer. Even a child has the computer skills to post electronic documents online. If the document was not created on the computer these children would know how to scan them and create a PDF file that could be posted online. Obviously, you do not want the public to read these documents. Why? Either they don't exist or they don't support this project. Please tell the public why you didn't hire an 8th grader to do the computer work for this project.

Comment #21: Important information that would help the public understand the proposed project analysis disclosed in your draft EA is hidden away in the project file. It's sad you use this illegal and unethical scheme to hide information from the public you claim to serve.

There are 9 important documents located in the Project Record on the district. These documents are needed by the public to help them understand the DEIS. You know they can be easily posted online. Do you really expect a member of the public to drive (or fly) thousands of miles to view this public information? The information belongs to the public. Will you pay for the trip? Will you accept the liability if someone has an accident? Who are you?

Comment #22: There is **absolutely** no reason to keep information from the public by hiding 9 important documents in the Project Record. You could scan information and post the PDF files online. All information on file can be made available to the public as attachments. Especially relevant documents should be included in their entirety in an Appendix. Clearly, you do not want the public to see the information in the Project Record.

At page 17 you say This:

"A list of non-significant (non-key) issues and reasons regarding their categorization as non-significant may be found in the project record."

At page 75 you say This:

"Many reports included in the project record are incorporated by reference in this chapter. The planning record is located at the McCloud Ranger Station."

At page 143 you say This:

"A Scenery Report (Cooper, 2017) was completed for this project, can be found in the project record, and is incorporated by reference."

At page 157 you say This:

"This updated draft BA is in the project record and is incorporated by reference."

At page 185 you say This:

"A comprehensive review of the past, ongoing and reasonably foreseeable future activities on federal and private lands within the NSO action and cumulative effects analysis areas was completed and is included in the project record."

At page 203 you say This:

"Actions authorized under previously completed NEPA in the CEAA include the Mudflow Vegetation Management Project, Algoma Vegetation Management Project, and the Mountain Thin and Fuels Management Project; road closures; and numerous special uses and timber stand improvement and reforestation activities (see project record for a complete list of past, ongoing, and future actions in the CEAA)."

At page 246 you say This:

"Additional information on air quality requirements and project effects can be found in Air Quality Memorandum to the Project Record (Glubczynski, et al., 2016) and the Preliminary Fire, Fuels, and Air Quality Report (McRae, 2017)."

At page 269 you say This:

"A Late Successional Reserve (LSR) compliance report was completed for the project and can be found in the project record (Barnum 2016)."

At page 323 you say This:

“Navarre, A. 2016. GIS assessment of gray wolf and northern spotted owl cumulative effects analysis areas and action area. s.l. : Unpublished data on file in the project record, 2016.”

Clearly, Shasta-Trinity NF employees haven't come to grips with the fact the public reads NEPA documents from cover to cover and wants to understand the EA or EIS without flying long distances. How many times have you read a novel where the last chapter was available hardcopy where the author lives and you had to travel to read it?

This was not an oversight by IDT members. They knowingly hid this information from the public. During my 30 year USFS career I saw this scheme occur 3 times. Each time, the suppressed information because it:

- 1) did exist in the project record, or
- 2) the IDT members are so ashamed of their work they choose to hide it from the public.

Myers, its clear the Shasta-Trinity NF is led by a pathetic little man clinically obsessed by the need to accumulate volume.

Who do you think you are? What will the judge say? I suggest you start reading the Redding *Searchlight*. If your final NEPA document still hides public information Regional Forester Moore will find out. How will he respond to the public calls of outrage he receives? Is this what you want?

Request for changes to be made to the final NEPA document: Make **ALL** the documents that currently reside in the Project Record available as 1) online Appendices to the NEPA document, or 2) attach them to the EA.

This legal violation is not trivial.

Failure to do so will violate:

40 CFR 1500.2(b) because no evidence is presented for environmental effects conclusions.

40 CFR 1501.2(a) because the environmental effects and values are not identified in detail.

40 CFR 1500.1(b) because there is no substantiating evidence for effects conclusions, thus, the public cannot determine if they are accurate and based on best science.

40 CFR 1506.6 (a) because you did not Make diligent efforts to involve the public in preparing and implementing NEPA for this project.

40 CFR 1506.6 (b) because you did not make environmental documents available so as to inform those persons and agencies who may be interested or affected.

40 CFR 1500.2 (d) because you did not encourage and facilitate public involvement in decisions which affect the quality of the human environment.

Issue #10 ----- Please respond to all quotes that express opposing views contained in the Opposing Views Attachments.

I have included 7 Opposing Views Attachments with these comments. Please comply with the law by responding to each responsible opposing view quote contained in the Opposing Views Attachments.

Request for changes to be made to the final NEPA document: Comply with the request described above.

Failure to do so will violate **40 CFR 1502.9(b)**.

“(b) Final environmental impact statements shall respond to comments as required in Part 1503 of this chapter. The agency shall discuss at appropriate points in the final statement any responsible opposing view which was not adequately discussed in the draft statement and shall indicate the agency's response to the issues raised.”

Comment #23: As you can see above, **40 CFR 1502.9(b)** requires meaningful responses to all “responsible” opposing views. If the Responsible Official feels the opposing view is irresponsible then please describe why. The law does not exclude opposing views because of the source. Opposing views contained in newspapers, magazines, and other sources are still opposing views and require a response. Please do not conclude an opposing view is not responsible because they are opinions. “Viewpoint” and “opinion” are synonyms.

Comment #24: Please do not conclude that an opposing view is not “responsible” because they come from a document that has not been peer reviewed. 40 CFR 1502.9(b) does not require them to come from peer-reviewed literature. Remember, Responsible Officials have the option of not responding to an Opposing View only if they are irresponsible.

Comment #25: Please do not conclude that an opposing view is not “responsible” because they are not site-specific. A review of the References section of this DEIS reveals none of the documents included in the References section of this DEIS mentions the name of the project. Thus, none of your references are site specific. Supervisor Myers, you cannot justify using a standard for the public and another less-restrictive standard for the USFS. What will the judge say?

Remember, Responsible Officials have the option of not responding to an Opposing View only if the view is irresponsible and you describe why it’s irresponsible.

The children born 50 years from today will not appreciate the ecological plunder caused by this timber sale. How could anyone ignore the children for personal gain? Is accumulating volume to

maintain your promotion possibilities really worth it? Who are you? **What are you?**

Never, ever entertain the notion you serve the public.

Most Americans want future generations of kids to have the opportunity to experience the quietness and solitude in an undeveloped, natural forest. This will become more important in 2070 when the predicted population of the United States will be 418 million people. The wild UNDEVELOPED national forests will provide one of the only escapes from the insanity of a world driven even more by money than it is now ... yet each IDT member has chosen to deny this opportunity to future generations to please you Supervisor Myers. They are all accomplices in this crime. Why? Once again, money drives the plunder. The USFS pays well.

Most IDT members have science backgrounds. Most understand the value of biodiversity in the forest. By helping to plan this timber sale they are helping to simplify the forest which eliminates the biodiversity. Aren't there some decisions that should not be based on money?

The IDT members should remove themselves from their denial mode and have the courage to examine the cut & paste Purpose & Need closely and ask themselves if the P&N statement reflects the needs of the countless non-timber natural resources in and downstream from the sale area? Will a commercial timber sale accomplish these needs? Of course not. As my attachments show, best science indicates commercial timber sale activity harms and sometimes destroys the proper functioning of the forest resources that won't be hauled to the mill. Some IDT members know this, but why jeopardize a job that pays well. You all prefer to live a life of hypocrisy for the money.

As is the case here, the IDT knows they must assume the trees in a natural, biodiverse forest are sick and may die because someone concludes they are not resilient to natural disturbance events such as insects, disease and fire. Why is killing the trees with chainsaws and removing them for corporate profit better than allowing them to die a natural death as God intended and remain in the forest to replenish the organics in the soils and serve as habitat for some wildlife species?

Some IDT members know the Purpose & Need for this sale identifies excuses to log a properly functioning forest. Let me remind you the trees in a forest are infinitely more important if left in place to serve their function than if removed using a trumped-up excuse in order to provide corporate profit. You know the P&N identifies these excuses. You also know your positions pay well. Money!!!!!!!!!!!!!! So what do you do? Each IDT member looks the other way and masquerades as a caring natural resource specialist. A few of the IDT members have been convinced by the USFS rhetoric that serving corporate America simultaneously serves the tens of millions of Americans who depend on their national forests for recreation.

Have any of the IDT members asked themselves why a human vision of how things should be in the forest should override God's vision when He created the forest and allowed it to pass through different successional stages ... where each stage benefits the other natural resources in different ways? Why? Money!!!!!!!!!!!!!!

Finally, do any of the IDT members believe the national forest landscape should be changed to mimic a private, industrial tree farm as is being done here?

Comment #26: The Highway 89 timber sale will take away more undeveloped national forest acres from the legacy the unborn kids of the future should inherit. Which is most important: the future kids of America seeking solitude and quietness, or another summer home and yacht for the CEO of the timber extraction corporation that purchases this timber sale? Do the IDT members have the courage to ask themselves why the USFS defies the wishes of the American public by logging and roading-up the precious national forest land? How can an agency mandated to serve the public do so by taking action the public does not want or like? There is a reason the USFS euphemizes the word logging. They think using the terms “timber harvest” and “treatment” will trick the public into believing that ravaging the forest with skidders, tractors, chainsaws and poison herbicides is what should be done to “manage” the forest. Why do they assault the land this way? Money!!!!!!!!!!!!!!

By now you may have read the information contained in the Opposing View Attachments. Reasonable people would have doubts about the wisdom of this timber sale proposal. Under what circumstances are the beliefs of several biased USFS timber employees more valid, responsible and justified than hundreds unbiased of Ph.D. scientists? When you are paid to participate in the plunder. Money!!!!!!!!!!!!!!

Responsible people that contemplate any action intuitively engage the Precautionary Principle. Perhaps you have never heard of it. Here it is in a nutshell:

The precautionary principle or precautionary approach states that if an action or policy has a suspected risk of causing harm to the public or to the environment, in the absence of scientific consensus that the action or policy is not harmful, the burden of proof that it is not harmful falls on those taking an action.

See: http://en.wikipedia.org/wiki/Precautionary_principle

You all genuflect to the natural resource extraction corporations while simultaneously accepting you paycheck supplied by the American taxpayers who trust you to administer the national forests so the undeveloped landscapes will remain wild, and unspoiled for future generations to enjoy. Myers, you demonstrate to caring, intelligent Americans that some USFS line-officers will do and say anything in their witless quest for volume. Over time most USFS understand the public pays them to protect & conserve all natural resources so the cast away their timber beast hats.

My Pending Objection

Myers, I know that you know my objection will be rejected by the Objection Deciding Officer regardless of my objection points. I know that you know the agency treats objections fairly and professionally only if they are filed by groups or individuals who have a history of taking the USFS to court.

Conclusion

Supervisor Myers and IDT members, your indoctrination (a.k.a. brainwashing) started during your first week with the USFS. They knew new employees all had different backgrounds and land ethics. They wanted all employees to embrace the unwritten agency mission --- get-out the cut. They wanted “team players” who believed timber harvest will correct and solve all forest problems ... real, but mostly contrived. They borrowed the industrial tree farm goals and taught you this is how the national forest’s conifer tree species must be managed. You were taught natural, biodiverse forests must be manipulated to provide healthy forest conditions. They told you most forests are sick and logging is the only way to bring them back to health.

Most importantly, you were taught doing nothing and monitoring the natural resources in the forest is unacceptable. Why? This does not generate volume or corporate profit.

Some of you are clueless to this fact and obediently help prepare NEPA documents for timber sales that will inflict major damage to national forest resources without questioning what you are doing.

Some of you know exactly what you are doing and participate with the clueless ones as they help prepare NEPA documents for timber sales that will inflict major damage to national forest resources. You believe trashing the national forests is justified because your salary is generous. I feel sorry for you.

Sincerely,

*Dick Artley's scanned signature is contained in the
“signature” attachment.*

Dick Artley (retired forester, logging engineer and forest planner - Nez Perce National Forest)
415 NE 2nd Street

Grangeville, Idaho 83530

da99333@gmail.com

Note: I am filing these comments etc. in my own individual capacity, as well as on behalf of WildLands Defense in Boise, Idaho. I am a member of the group. It retains full-time attorneys. I fully expect the Deputy Regional Forester to reject the parts of my objection that aren't trivial. When that happens other action will be necessary, including involvement by Democratic members of Congress.

--

"Never doubt that a small group of thoughtful, committed citizens can change the world. Indeed, it is the only thing that ever has."

Margaret Mead