From:	Dick Artley
To:	FS-objections-pacificsouthwest-regional-office
Subject:	Objection to the Craggy Vegetation Management Project EIS and draft ROD
Date:	Monday, March 26, 2018 7:29:58 PM
Attachments:	_____Scanned signature for Dick Artley.doc

March 26, 2017

ATTN: Randy Moore, objection reviewing officer

Below you will find my objection to the EIS and draft ROD for the Craggy Vegetation Management Project.

Required 36 CFR § 218.8(d) Objection Information

Proposed Project Name: Craggy Vegetation Management project

Name and Title of the Responsible Official: Patricia Grantham, forest supervisor

Proposed Project will be Implemented on: Salmon/Scott River Ranger District, Klamath National Forest

Objection Introduction

This objector submitted his comments on the DEIS, for the proposed project on October 22, 2017

Please direct Supervisor Grantham to modify the final NEPA document to remove or correct the illegal sections and issue a new draft decision document

that responds to the modified NEPA document that complies with United States law.

Objection Point #1---The Responsible Official does not acknowledge that the research conclusions of scores of independent scientists' indicate that even casual exposure to glyphosate may cause significant health problems … even cancer.

The objector requested the Responsible Official to assure the Proposed Action specifically states "herbicides that contain the chemical glyphosate will not be applied."

None of this was done. The EA still does not indicate glyphosate will NOT be applied. Incredibly, Supervisor Grantham does not care if she applies a chemical that research shows can cause cancer, autism, birth befects, miscarriages, neurological disorders and liver/kidney disease. Most public servants would avoid the risk since there are at least a dozen alternatives.

What type of person would take action if there were even a small chance it would cause a child to die painfully from cancer later in life … just because her employer says it's OK?

Therefore, the final EA violates 40 CFR 1501.2 (b), 40 CFR 1502.16(a) and (b), and 40 CFR 1508.8(b) because Chapter 3 omits important environmental effect disclosures. Keep in mind 40 CFR 1508.3 defines "Affecting" to mean the action "will or may (emphasis added) have an effect on" the human environment. An adverse effect need not be certain to qualify for Chapter 3 disclosures. Also 40 CFR 1508.8(b) defines effects as being ecological and "aesthetic, historic, cultural, economic, social, or health." Since herbicides containing glyphosate clearly will or may , adversely affect health, these possible effects on health must be discussed in Chapter 3. Unfortunately, the Responsible Official chose to omit this discussion.

The final EA also violates the Apr. 21, 1997 Executive Order No. 13045 because the Responsible Official does not ensure that this project will not disproportionately expose children to environmental health risks and safety risks.

The draft FONSI violates 40 CFR §1508.27(b)(2) because the intensity discussion fails to discuss the degree to which the proposed action affects public health or safety. The selected alternative will apply herbicides containing glyphosate. Recent research conclusions by many independent scientists link glyphosate exposure to the following health issues. Some are potentially lethal.

- birth defects,
- non-Hodgkin's lymphoma (a form of cancer),
- mitochondrial damage,
- cell asphyxia,
- miscarriages,
- attention deficit disorder,
- endocrine disruption,
- DNA damage,
- skin tumors,
- thyroid damage,
- hairy cell leukemia (another cancer),
- Parkinson disease,
- premature births,
- decrease in the sperm count,
- harm to the immune system in fish
- death of liver cells,
- severe reproductive system disruptions
- and chromosomal damage.

How this objection point can be resolved: Comply with the objector's request above.

Objection Point #2---The Responsible Official allowed the need to accumulate volume (merchantable sized fuels removal) to transcend effective action that will 1) reduce the risk that homes located in the WUI will burn, and 2) increase the risk that residents will be injured should a wildfire occur.

The objector requested the Responsible Official to Analyze another action alternative that will educate people about Dr. Cohen's methods and help people living in the WUI to implement Dr. Cohen's methods if they are unable to do the work themselves.

This wasn't done.

Therefore, the final EA violates 40 CFR 1500.2(e) because the Responsible Official does not identify and assess a Cohen fine fuels removal as a reasonable alternatives to the Proposed Action that will "avoid or minimize adverse effects of upon the quality

of the human environment."

It also violates:

- NEPA Sec. 101(b)(2) because the Responsible Official does 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 the Responsible Official does not "make it a high priority to identify and assess environmental health risks and safety risks that may disproportionately affect children."

  - 40 CFR §1508.27(b)(2) because the Responsible Official will be unable to write a FONSI. The intensity category discusses "The degree to which the proposed action affects public health or safety."

  - Agency policy to use best science. The objector's comments included quotes from and links to many, many scientific papers that clearly shows logging to reduce fuels does not reduce fire intensity or rate of spread … and sometimes exacerbates fire behavior. In addition this non-acientific behavior violates: A March 9, 2009 White House Memorandum to heads of executive departments and agencies states:

    > *"Science and the scientific process must inform and guide decisions of my Administration on a wide range of issues, including improvement of public health, protection of the environment, increased efficiency in the use of energy and other resources, mitigation of the threat of climate change, and protection of national security.*

    In addition it violates Executive Order #13563 issued on January 18, 2011 requires federal agencies to use best available science:

    > *"General Principles of Regulation.* (a) Our regulatory system must protect public health, welfare, safety, and our environment while promoting economic growth, innovation, competitiveness, and job creation. It must be based on the best available science."

<u>How this objection point can be resolved:</u> Comply with the objector's request above.

Sincerely,

Dick Artley's scanned signature is contained in the "signature" attachment.

Dick Artley [retired Nez Perce National Forest forest planner)
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"*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