

January 14, 2020

Sent via email to: appeals-northern-regional-office@usda.gov and via US Mail

**Attention: Objection Review Officer
Gold Hill Project
USDA Forest Service
26 Fort Missoula Road
Missoula, MT 59804**

RE: OBJECTION to the Gold Hill Project EA and draft decision notice

Responsible Official: Stefani Spencer, Palouse District Ranger, Nez Perce-Clearwater National Forest

Pursuant to 36 CFR Part 218, the Friends of the Clearwater (FOC) and Alliance for the Wild Rockies (AWR) file this Objection to the Final Environmental Impact Statement (FEIS and draft Record of Decision (ROD) issued by District Ranger Stefani Spencer for the Gold Hill Project. This timber sale is proposed for the Palouse Ranger District of the Clearwater National Forest (a portion of the administratively combined Nez Perce-Clearwater National Forests).

Pursuant to Part 218, FOC is the lead objector. Contact Person: Gary Macfarlane, FOC Ecosystem Defense Director, P.O. Box 9241, Moscow, ID 83843 (209-882-9755). Attachments, references and other incorporated documents are included on the data CD with the version sent to the Forest Service (FS) via US mail postmarked this date.

The draft decision notice selected the only action alternative proposed, "Alternative 2." Alternative 2 authorizes the following:

- Regeneration logging on 825 acres
- Fuel treatments on 825 in harvest units
- 10 miles of temporary roads
- Undisclosed mileage of maintenance and reconstruction

FOC and/or AWR, filed timely comment letters during the original scoping period on May 30, 2019 and again for the draft EA on September 25, 2019.

Pursuant to 36 CFR 218.8, the Objectors state that the following content of this Objection demonstrates connections with previous comments for all issues raised herein, unless the issue or statement arose after the opportunity for comment. Pursuant to 36 CFR 218.8(b), the previous comments mentioned above are hereby incorporated by reference. Also, any statute or regulation we have cited in this document incorporate by reference.

Sincerely submitted,

A handwritten signature in black ink, appearing to read "Gary Macfarlane". The signature is fluid and cursive, with the first name "Gary" being more prominent than the last name "Macfarlane".

Gary Macfarlane
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And for

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We object to the comments that the Forest Service has failed to consider or answer in the EA comments that the scoping comments that we have submitted in connection with this project. As much of these comments have gone unanswered, instead of repeating them here, we incorporate all of our scoping and EA comments into this document in addition and object to all unanswered points for the reasons that they were first raised. This violates NEPA by failing to disclose high quality information to the public, violates NEPA by failing to take a hard look at the potential impacts of this project, and violates NFMA by failing to show that the Forest Service is complying with the forest plan. For these reasons and the reasons further articulated below, the final EA produced by the Forest Service for the Gold Hill Project is utterly insufficient.

We've augmented our objection with supporting documentation and incorporate all of the supporting documentation we have submitted in earlier comments on the Gold Hill Project into this objection.

OBJECTION ON EA'S FAILURE TO HAVE EXISTING CONDITIONS

As we noted in our scoping comments, the Gold Hill Project Proposal does not disclose the current conditions for key parts of the project area ecosystem including, but not limited to, soils and fisheries. We noted on page four of our September EA comments that the EA was missing disclosure of existing conditions for every resource. The Gold Hill Project EA still does not thoroughly disclose existing conditions of the proposed project area. There is no detail to existing conditions. Pursuant to the definition of "environmental assessment," 40 C.F.R. §1508.9 dictates a Federal agency (i.e. The Forest Service) is responsible to "(1) Briefly provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact." The evidence and analysis are incomplete without reference to existing conditions, making the finding of no significant impact invalid. Furthermore, it is important to provide this information to grasp the full significance of any impacts of the project especially cumulative impacts. As indicated by 40 CFR §1508.7

Cumulative impact is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

It is impossible to judge any potential cumulative impacts of this project if there isn't an understanding of the present conditions. While cumulative effects are referenced in the EA as having "contributed to current conditions," or as "unlikely to have measurable cumulative effects," this information is insufficient. Please discuss in detail the impacts of past projects on the proposed project area, the existing conditions, and potential cumulative effects of the current project proposal.

Courts will set aside agency decisions that do not have baseline data. Take, for example, *Northern Plains Res. Council v. Surface Transp. Bd.*, 668 F.3d 1067, 1083–85 (9th Cir. 2011). In *Northern Plains Resource Council*, the court set aside the agency's decision for not taking

NEPA's "hard look" at the impacts of its action when it deferred gathering baseline data on fish and the sage grouse until after approval of the project and for mitigation efforts. "Without establishing the baseline conditions which exist...there is simply no way to determine what effect the proposed [action] will have on the environment and, consequently, no way to comply with NEPA." *Half Moon Bay Fisherman's Mktg. Ass'n v. Carlucci*, 857 F.2d 505, 510 (9th Cir. 1988). The Forest Service has either violated NEPA by not having existing baseline data or not disclosing it in the environmental assessment.

Remedies:

- 1) Choose the no-action alternative;
- 2) Withdraw the project;
- 3) Provide detailed reports of existing conditions for all attributes of the forest within the proposed project area and proper discussion on how these conditions will contribute to cumulative impact

OBJECTION ON ELK HABITAT ANALYSIS

The Forest Service is violating NEPA and NFMA by not analyzing impacts to elk in this area. As stated in our scoping comments, the Forest Service has an obligation to consider certain analysis, including elk. We also raised this issue in our May 2019 EA comments (p. 11) and our September 2019 comments (pp.6-10). We commented that we would like to see a discussion of monitoring performed to this date on elk (May 2019 comments p. 4) and how this relates to assumptions the Forest Service is making in this project. Monitoring would also contribute to baseline conditions, which the EA doesn't disclose for elk. There is simply no information on this in the Gold Hill Project EA. We found it alarming that no monitoring data or assessment of any kind was referenced for Elk in the EA.

In E1 management areas, the Clearwater Forest Plan sets a wildlife standard for managing for at least a "25 percent maximum elk potential habitat effectiveness." Clearwater Forest Plan Chapter III-57. There is simply no discussion as to whether this exists or is true for this E1 area.

According to the Clearwater Forest Plan, the Forest Service aims to

Provide the proper mix of hiding and thermal cover, forage, and protection from harassment during critical periods on big-game summer range (primarily elk) in accordance with criteria contained in the 'Guidelines for Evaluating and Managing Summer Elk Habitat in Northern Idaho.'¹

The Gold Hill project proposes converting as much as 825 acres of forested habitat into large openings, resulting in the loss of cover in these areas for elk (as well as other species). While the EA discusses the implementation of forest growth management techniques that would maintain some overstory trees and dispersal corridors, they are unlikely to meet the management standards for wildlife set out by the Clearwater Forest Plan. In appendix B of the Guidelines for Evaluating and Managing Summer Elk Habitat in Northern Idaho, Table 3 states that the following

¹ As amended by Servheen et al. 1997.

requirements must be met in reference to size and distribution of hiding and thermal cover to result in a 0% reduction in Elk use for a particular area.

At least 40% of evaluation area qualifies as hiding cover. At least 15% of evaluation area qualifies as thermal cover. At least 25% of each quadrant qualifies as cover.

Furthermore, for forage areas, “All openings less than 1,000 ft. wide. At least 800ft. of cover between all openings. Forage appears adequate and present in all quadrants.”

Because there is no detail how the Gold Hill Project will meet these wildlife management standards for elk as outlined in the Clearwater Forest Plan, this EA violates NEPA’s hard look as well as failing to comply with the forest plan, which violates NFMA. There is just no information from which the agency could conclude that the proposed project leaves the minimum 25 percent cover for elk. And, there is no existing information about this area. From what we can glean, the surrounding lands have been logged pretty heavily, in addition to the Crane Point Project authorized and the White Pine Project in the works. We reference you to the Google Timelapse pictures that we provided with our May 2019 comments. For these reasons, you cannot even guess at a cumulative analysis.

Remedies:

- 1) Choose the no-action alternative;
- 2) Withdraw the project;
- 3) Provide detailed plans on how the proposed project will maintain the Forest Plan standards for Elk Habitat

OBJECTION ON FAILING TO CONSIDER THE SCIENTIFIC UNCERTAINTY, THE CONTROVERSIAL STRATEGY OF LOGGING TO REDUCE WILDFIRES, AND CARBON EMISSIONS FROM LOGGING IN THE FACE OF CLIMATE CHANGE

We object to a complete absence of climate change discussion in this NEPA document. We addressed issues with climate change and carbon sequestration in our May 2019 comments on pages 9-10 and 12, and again in our September 2019 comments on page 4. Even as a smaller project, Gold Hill can still have serious ramifications relating to climate change and these contributions should be thoroughly considered before going ahead with the proposed project plan. Logging contributes to accelerated anthropogenic climate change. Logging also will not only fail to protect the forest, but will increase the risk of fire. We introduced science that support these statements, and this conflicts with some of the premises upon which action is based in this EA.

Despite repeatedly raising it, the Gold Hill EA is still missing a significant discussion on climate change and carbon sequestration, which is an ever-increasingly urgent issue. The EA fails to consider that the effects of climate change on the project area, even as the Forest Service itself has acknowledged that, in many places, climate change has altered ecosystem functions that it would no longer be possible to maintain a historic range of variability. USDA Forest Service 2017b. There is no analysis on the veracity of the project’s purpose and need. The Forest Service

has not addressed any of this, and has violated NEPA by failing to consider or failing to respond to this.

The EA ignores scientific opinion on forest management's negative effects on carbon sequestration. The best available science supports the proposition that forest policies must shift away from logging if a priority is carbon sequestration. Forests should be preserved indefinitely for their carbon storage value.

In the scientific article by Davis et al., *Wildfires and climate change push low-elevation forests across a critical climate threshold for tree regeneration*, in the Proceedings for the National Academy of Sciences, 116(13): 6193-6198, these researchers found, "Annual rates of tree regeneration exhibited strongly nonlinear relationships with annual climate conditions, with distinct threshold responses to summer VPD, soil moisture, and maximum surface temperatures []. Across the study region, seasonal to annual climate conditions from the early 1990s through 2015 have crossed these climate thresholds at the majority of sites [], indicating conditions that are increasingly unsuitable for tree regeneration, particularly for ponderosa pine." The study region includes the Northern Rockies, and spans areas within the Clearwater Basin and close to and within the Nez Perce-Clearwater National Forests.

The EA fails to analyze and disclose how climate change already influences forest ecology and expected to do so in the future. All science we've cited, and even science the Forest Service has cited, strongly suggests that reforestation will change in this changing climate, and the Forest Service hasn't attempted to address that issue, which can have vast ramifications as to whether the forest in the project area will respond as the FS assumes it will.

Additionally, climate-related environmental change will speed up with carbon emissions, and logging increases carbon emissions more than wildfires. Law et al. 2018 states that reducing carbon emissions must happen quickly to counter rising temperatures: "Alterations in forest management can contribute to increasing the land sink and decreasing emissions by keeping carbon in high biomass forests, extending harvest cycles, reforestation, and afforestation."

One of the key messages from the Joyce et al. 2014 article is that U.S. forests "currently absorb and store the equivalent of about 16% of all carbon dioxide (CO₂) emitted by fossil fuel burning in the U.S. each year" but that "Climate change, combined with **current societal trends in land use and forest management**, is projected to **reduce** this rate of forest CO₂ uptake." (emphasis added).

We've included an article about climate change and fires (Pierre-Louis 2018) and the driving forces of wildfires for this century and in the future. Pechony and Shindell 2010. Based on the science, logging is going to contribute to (and not mitigate) increasing temperatures, which will lead to more wildfire behavior. Logging is not an answer—it is exacerbating a problem.

The EA fails to provide any credible analysis as to how realistic and achievable its objectives are in the context of a rapidly changing climate, along an unpredictable but definitely changing trajectory.

The Resources Planning Act of 1974 (RPA) and National Forest Management Act of 1976 (NFMA) mandate long-range planning which impose numerous limitations on timber extraction practices and the amount of timber sold annually. These long-range plans are based on assumptions, which are based on data, expert opinion, public participation and other factors which mostly view from a historical perspective. So it's time to peer into the future to examine closely (NEPA: "take a hard look at") those assumptions. Clearly, the FS is not considering best available science on this topic in violation of NEPA. Alternatively, the Forest Service is falling short of NEPA because it is failing to even recognize the science we provided, which often conflicts with what the Forest Service claims.

While our science has been constant, Forest Service statements are unsupported or outright conflict between EA drafts. For example, the difference between the draft EA and the final EA to justify fuel activities is the difference between a natural occurrence that the Forest Service claims it needs to solve and a problem generated from the logging that the Forest Service wants to do. For example, in the draft EA (August 2019) on page 13, the agency claimed,

Fuels treatments following harvest would reduce surface fuels and canopy densities on up to 825 acres to create a lower intensity and lower severity fire behavior. Fuels reduction will also enhance or restore seral, fire-resilient species on sites where the vertical fuel profile is primarily removed by harvest. Surface fuels will be treated to reduce the horizontal fuel profile generated by harvest activities to within acceptable limits. The objective of these fuel treatments is to minimize fuel hazard generated through harvest activities and prepare sites for reforestation where prescribed, to aid in achieving the silvicultural prescription.

So, fuel treatments would, among other things reduce canopy densities. The Forest Service described the need to reduce surface fuels, which we understand would be found naturally. But, the reason for fuel treatments change in the final EA to reduce *what logging generates*. On page 12 of the final November EA,

Activity fuels will be treated **to reduce the horizontal fuel profile generated by harvest activities** to within acceptable limits. The objective of these fuel treatments is to minimize fuel hazard generated through harvest activities and prepare sites for reforestation where prescribed, to aid in achieving the silvicultural prescription.

(emphasis added).

For the above reasons, the Forest Service has violated NEPA, among which includes its duty to disclose high-quality information, its duty to meaningfully respond to the public's comments, its duty to honestly analyze the adverse impacts of the project, its duty to engage in any analysis on the project and regional level, its duty not to misrepresent the science it relies upon, and its duty to take a hard look at the consequences of its actions.

Remedies:

1) Choose the no-action alternative;

- 2) Withdraw the project;
- 3) Do a climate change/carbon sequestration analysis that addresses the issues raised above.

OBJECTION ON MONITORING AND CUMULATIVE EFFECTS

The EA does not disclose monitoring analysis.

NEPA requires that high-quality information is available to the public and that NEPA documents, like EAs, must concentrate on issues truly significant to the action in question. One such truly significant issue is cumulative effects. We raised monitoring concerns in our May 2019 comments on page 4-5 and again in our September comments on pages 11.

It is vital that the results of past monitoring be incorporated into project analysis and planning. This means including in the analysis:

- A list of all past projects (completed or ongoing) implemented in the analysis area.
- A list of the monitoring commitments made in all previous NEPA documents covering the analysis area.
- The results of all that monitoring.
- A description of any monitoring, specified in those past project NEPA for the analysis area, which has yet to be gathered and/or reported.
- A summary of all monitoring of resources and conditions relevant to the proposal or analysis area as a part of the Forest Plan monitoring and evaluation effort.
- A cumulative effects analysis which includes the results from the monitoring required by the Forest Plan.
- The regional impacts of projects that border each other

There has been no answer to the concerns repeatedly raised in both EA comments. Because monitoring demonstrates a cause-effect analysis, it can inform correct Forest Service assumptions are when it takes specific actions. For example, Clearwater National Forest monitoring reports stopped in 2009. If the agency had actually been monitoring over the past decade, the agency would have information about what is a baseline of tree disease and death in this area of the Clearwater National Forest. Tree mortality is a natural process, and any forest will have its own levels of tree mortality. *See Franklin et al. 1987.* If the agency had been monitoring over the past decade, the agency would have data that informs this agency's assumption that regeneration logging, which involves removing trees with insects and disease but also removing healthy trees that have so far shown individual resilience to insects and disease, on the whole and over time makes forests more resilient.

Monitoring a critical part of the NEPA analysis. Without it, the validity of many FS assumptions are baseless. Without analyzing the accuracy and validity of the assumptions used in previous NEPA processes one has no way to judge the accuracy and validity of the current proposal. The predictions made in previous NEPA processes also need to be disclosed and analyzed because if these were inaccurate, and the agency is making similar decisions, then the process will lead to failure. For instance, if for previous projects the FS said they were going to do a certain monitoring plan or implement a certain type of management and these were never effectively implemented or monitored, it is important for the public and the decision maker to know. If there

have been problems with FS implementation or monitoring in the past, it is not logical to assume that implementation will now all of a sudden be appropriate. If prior logging, prescribed fire and other “forest health” or “fuel” treatments have not been monitored appropriately, then there is no valid justification for this project.

Even in the final EA, it states, “Surveys have not been 100% completed, but are ongoing and will be complete prior to a decision being signed.” p. 23. What document is the final decision going to rely upon if surveys are done in even the final EA? What surveys are these? The public has no information.

The Clearwater Forest Plan is in complete accord with what we are arguing. Old Forest Service NEPA documents support this as well; they were published by the agency during the days when the Forest Service demonstrated an interest in the impacts of its actions by setting out project-specific monitoring, like those in White Pine I project. Because there has been no monitoring, there is just no support for a lot of assumptions in this project. For these reasons, the Forest Service has failed to do the following in violation of NEPA: disclose high-quality information to the public, use the best science, take a hard look at the impacts of its project. The Forest Service has also failed to follow the Clearwater Forest Plan in violation of NFMA.

Of course, without monitoring and existing conditions, any discussion about cumulative impacts is completely arbitrary because the agency needs to know the on-the-ground conditions and have an idea about the validity of its assumptions before discussions past, present, and reasonably foreseeable future activities. For this reason all cumulative analysis discussions are deficient and violate NEPA by failing to take a hard look, failing to have existing conditions, and failing to disclose high quality information to the public. For these same reasons, the agency’s cumulative analysis discussion cannot demonstrate compliance with the forest plan or NFMA, either.

Remedies:

- 1) Choose the no-action alternative;
- 2) Withdraw the project;
- 3) Reanalyze the environmental assessment in a manner that addresses the issues above.

OBJECTION THAT THE SOILS ANALYSIS DOES NOT DEMONSTRATE A HARD LOOK AT IMPACTS OR COMPLIANCE WITH THE FOREST PLAN

We raised issues with the EA analysis on soil resources in our May 2019 comments on page 12 and again in our September comments on page 13. The Forest Service’s analysis remains unchanged, and our comments unaddressed. We object to this analysis for the same reasons we raised the issue. There is no existing condition, or baseline, to either inform the public whether this area is meeting the forest plan or regional standards, or whether the soil standards would be exceeded. Only the specialist report provides any information and it shows that several of the units would exceed DSD standards after the project, yet it only mentions design criteria that would supposedly mitigate the damage.. This is a failure to take a hard look at the potential impacts of this project and a failure to disclose high-quality information to the public, in

violation of NEPA. This also is a failure to demonstrate compliance with the forest plan under NFMA.

Remedies:

- 1) Choose the no-action alternative;
- 2) Withdraw the project;
- 3) Gather data so the agency has the existing, on-the-ground DSD levels for the project area, and use that data to determine what kind of cumulative impacts would happen from this project. Issue a new EA that discloses that data to the public and allow the public to comment on it.

OBJECTION ON VEGETATION

We raised issues with the Forest Service's stated goals of this project in terms of promoting the seral species that the agency has logged in our September 2019 comments on pages 13-14. None of these issues have been answered, and remain issues for the reasons discussed in the comments. There's no discussion on what evidence supports the assumption that the area was dominated by Western white pine, Western larch, and ponderosa pine that were more resistance to root rot. We questioned that in the face of red cedar, which is a disease resistant tree. Minore 1983, pp. 26-30 (This document is a Forest Service literature review of western red cedar). There was no answer to our question asking where in the forest plan does it consider native Douglas fir, grand fir, and cedar to be undesirable. And there has been no answer to our question on how the Forest Service planned to maintain a minimum of five percent redcedar on lands where it grows, which would comply with the forest plan. For these reasons, the Forest Service has violated NEPA by not applying the best available science, not supporting its assumptions with science, not taking a hard look at the impacts of this project, and failing to disclose a high level of information to the public. The Forest Service has also failed to demonstrate that it is complying with the Clearwater Forest Plan.

Remedies:

- 1) Choose the no-action alternative;
- 2) Withdraw the project;
- 3) Reissue an EA with a public comment period that addresses the comments that the agency has thus far failed to address.

OBJECTION THAT THE STATED DESIRED CONDITIONS ARE NOT DEFINED BY THE FOREST PLAN

Creating desired conditions when the forest plan does not list as goals or desired conditions violates the Forest Plan. In our May 2019 comments on page 8, we commented that the desired conditions that the Forest Service is pushing are not those in the Clearwater Forest Plan. In our May 2019 comments, we noted that the proposed action asserted that the project area is generally dry, and the Forest Service noted that western red cedar (which generally does not grow in dry places) paradoxically grows in this area, too. By creating entirely new desired conditions that don't exist in the forest plan, this is not complying with the forest plan, and there seems to be no analysis on trying to move to a different habitat type when the Forest Service has no control over precipitation or temperature. For these reasons, the Forest Service has violated the forest plan

(and violated NFMA) and has not taken a hard look at the environmental impacts of such a futile effort (in violation of NEPA).

Remedies:

- 1) Choose the no-action alternative;
- 2) Withdraw the project.

OBJECTION TO OLD GROWTH ANALYSIS

In our May 2019 comments (p. 11), we noted that the Forest Service is not meeting its forest-plan old growth on the Clearwater National Forest. Although the Forest Service maintained that it is not logging in old growth or old growth replacement, there is no evidence in anything the Forest Service has actually provided to the public that demonstrates that. In our September 2019 comments, on pages 5-6, we asked the Forest Service to disclose maps showing where the old growth and old growth replacement is. We noted our concern with timelapse photos to accompany the September 2019 comments.

We have only seen conclusions. We've requested evidence that the Forest Service has field verified old growth, required by the forest plan and settlement agreement, which also hasn't happened. Included with our documents is a screenshot of the supporting documentation for the EA, and there are no maps of old growth or step-down old growth. We are also concerned the Forest Service is using a non-forest-plan definition of old growth, which the Ninth Circuit has very recently held is arbitrary and capricious, and a violation of the National Forest Management Act. *See Alliance for the Wild Rockies v. U.S. Forest Service*, 907 F.3d 1105 (9th Cir. 2018). We don't know if the stands are meeting the optimal 80-acre or minimal 25-acre stand size requirement. The Forest Service keeps maintaining that it's identified old growth, but won't tell us how much or where that is.

As we stated in our September 2019 comments, showing compliance and providing high-quality information to the public would include a list of the timber stands considered old growth, a topographic map that identifies this old growth overlaid with the logging units identified, and perhaps of discussion as to whether this area has changed location during project planning. Failing to follow these steps would violate NEPA because it would deny the public high quality information and would likely fail to take a hard look at impacts or cumulative impacts because there is no information on where these stands are. Failing to follow these steps would also violate NFMA because the Forest Service cannot demonstrate that it is complying with the forest plan, especially since the Forest Service has not been meeting old-growth on this forest and has increased logging in recent years. *See* Reilly memo, USDA (2006) and R1 Timber sold annual reports.

This particular drainage is surrounded by state and private lands that focus on timber harvesting, so the Forest Service has also violated NEPA by failing to consider the cumulative effects of the likely absolute lack of this habitat in the immediate vicinity other than what occurs on Forest Service land.

Remedies:

- 1) Choose the no-action alternative;

- 2) Withdraw the project;
- 3) Address the issues above by releasing this information to the public and providing another comment period so the public can alert the Forest Service to any issues with old-growth analysis and evidence to support the conclusions that the Forest Service reached.

OBJECTION ON FAILURE TO ADDRESS SCIENCE PRESENTED

The science we have provided is the best science out there. The Forest Service did not consider our science, nor address science the agency may or may not have considered controversial. For these reasons, we think an EIS should be prepared or, minimally, the Forest Service offer an explanation supported by rational reasoning. The Forest Service is relying on the following controversial assumptions for insects and disease as well as fire (see our May 2019 comments at pages 8-9). The Forest Service is also relying on the controversial assumption that logging will help with insects or fire (May 2019 comments at 10-11) The Forest Service has ignored these comments. For these reasons, the Forest Service is ignoring a factor, controversial science, that often indicates significance and requires an EIS under the CEQ NEPA regulations. The Forest Service also hasn't taken a hard look at the impacts of this project under NEPA because it is scientifically questionable that the Forest Service can achieve anything it's aiming for other than logging and the money to be gained from that.

Remedies:

- 1) Choose the no-action alternative;
- 2) Withdraw the project.
- 3) Discuss and analyze the science we've raised.