May 4, 2024

Dale Olson, Madison District Ranger, Beaverhead-Deerlodge NF

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re: South Tobacco Roots Vegetation Management Project Draft Environmental Assessment (DEA) comments.

Dear Mr. Olson and Madison R.D. staff:

Please accept the following review, comments, and concerns on the South Tobacco Roots Vegetation Management Project Draft Environmental Assessment (DEA) comments on behalf of the Council on Wildlife and Fish, Alliance for the Wild Rockies, Native Ecosystems Council and Center for Biological Diversity.

The project area is roughly 31,354 acres in the southern Tobacco Roots Landscape.

The stated Purpose (and "Need") of the Project was determined by a computer model (*Landfire* using unspecified metrics and geospatial data). The computer model and data "indicate vegetation condition class is departed from historic conditions across all vegetation types within the South Tobacco Roots project area." So, a computer program identified the Purpose and Need, and apparently, the boundaries defining the Project area.

A computer model is a simulation of reality. The DEA provides little to no actual data gathered and analyzed by 'ground-truthing' or direct observation by qualified/competent District staff. This makes the case for "treatment" arbitrary and capricious, and weak.

It is unclear what the interdisciplinary team (IDT) did, and what the computer model did for the IDT.

For example, did the computer model determine the actual within the "Wildland Urban Interface (WUI)?" Was AI (Artificial Intelligence) used to search and evaluate potential WUI areas?

What definition is the DEA using for WUI areas? HFRA?

What definition is being used to define "vegetative class condition?" Did the computer model determine if "vegetation condition class is departed from historic conditions across all vegetation types within the South Tobacco Roots Project area?

Apparently, "habitat type" as defined in *Forest Habitat Types of Montana*, Pfister, et al., 1977 (hereinafter, *Pfister et al.*) was never considered when identifying and "historic condition" or whether the Project area is functioning within the historical range of variability (HRV).

HRV is the variation in ecosystem and landscape characteristics before European settlement in North America. It is also known as Natural Range of Variation (NRV). HRV can be used to compare current conditions with the reference HRV time series.

HRV represents some of the most ***fundamental*** questions in environmental science, such as what the natural range of variability in a system is, and in what manner have human activities altered this range. Emphasis added.

HRV can provide an ecological reference against which contemporary and future conditions can be evaluated to determine status, trend, and magnitude of departure.

HRV is useful for determining a range of desired future conditions. It offers ***an objective reference*** for many applications, and it still offers a comprehensive reference for the short-term and possible long-term management of landscapes. Emphasis added.

The HRV identifies the scope, magnitude, variability, and probability of occurrence for processes that govern the form and function.

Definition of HRV- The Historical Range of Variation or Variability (HRV) is a description of the change over time and space in the ecological condition of ***potential natural vegetation types and the ecological processes*** that shape those types. Emphasis added.

In fact, the DEA scarcely mentions HRV or NRV:

> *The ongoing presence of roads in the Middle Mountain IRA would perpetuate soil conditions and disturbance that is not conducive to site recovery by native plants. Diversity of plant and animal communities would remain unchanged and have no effect on this roadless characteristic in the short-or long-term at a large scale. However, small-scale degradation is expected to persist within the temporal bounds of analysis where these roads remain in place. Succession would continue to increase vegetative homogenization in sagebrush communities, reducing plant and animal community diversity at a small scale in the short- and long-term. This trend is also expected where 600.5 acres of broadcast burning is proposed, remaining departed from conditions within the historic range of variability and reduced ecological integrity as conifer presence increases in sage and grass dominated communities in the short- and long-term.* DEA, p. 59

This proposal to "treat" responds to goals and objectives outlined in the Beaverhead-Deerlodge Forest Plan such as maintaining or improving wildlife and aquatic habitat, increasing the diversity and distribution of Forest vegetation, improving watershed and riparian area conditions, and providing for other resource uses, such as recreational opportunities. The proposed action would help move the project area towards desired conditions for these resources as described in the Forest Plan.

These so-called "natural re-sources" are of man's imagination (fiction). When the word *resource* is attached to a legal concept, the purpose and intention of the word *natural* changes from one of respect to one of conquest (purchase). To re-source something necessarily means to re-purpose it; to refine and therefore recreate it and to alter its intent for the service and benefit of another. And once Nature is touched, it is no longer of the Source of God's Being of Creation. Fiction is never of Source, only a re-source for re-purposing. In short, this is the abandonment of God and Nature.

Ecosystem processes and functions.

Focal species (multiple) research, monitoring and reporting is the preferred (best available science) means to assess and disclose the ecological conditions required under 219.9 of the 2012 Planning Rule. The Rule calls for "a small subset of species" (219.19) that are **selected based on their functional role in the ecosystem**. Emphasis added.

White bark pine and wolverine have important relationships to the function of the Greater Yellowstone Ecosystem.

The proposed Project has failed to adopt an appropriate monitoring program to measure the effectiveness of the plan in maintaining or restoring ecological conditions at an ecosystem scale, or a forest-wide scale for that matter. Within the Greater Yellowstone Ecosystem, it makes sense using appropriate scientific methodology to use of the same focal species throughout the ecosystem in which they occur (across planning units). Among the multiple forests that comprise the GYE, no consistency has yet been coordinated or implemented in the various monitoring programs. This means, to date, no coordinated commitment to ecosystem management under the 2012 Revised Forest Planning Rule has been enacted. This is an opportunity lost to enhance and protect biological diversity, as required by NFMA § 6(G)(3)(B).

The Forest Service has failed "provide for diversity" and to assess and disclose the cumulative impacts of stochastic events, man-made impacts from industrial-machine logging and roadbuilding with the equally destructive impacts of industrial-machine development on adjoining private and corporate lands. The DEA has failed to consider the **significant** combined impacts of private and public plunder on water, wildlife, native fisheries, or quality of life.

The cumulative effects on wide-roaming four-legged creatures and birds are indisputable. The presence of cumulative impacts is self-evident and underestimated. It is apparent that the Forest Service eschews any ecosystem-wide environmental analysis and/or disclosure.

It as if the Beaverhead-Deerlodge NF is in total denial of the existence of the ecosystem and its connecting ecological corridors. This is a critical failure, ecologically, biologically, morally, and legally in violation of NEPA (National Environmental Act).

This blindness to ecosystem science and management is systemic. The 2012 Revised Forest Planning Rule is the direct cause of this myopic perception of the reality of ecosystems and their validity as the best available science when trying to understand the functions and processes that sustain aquatic and terrestrial lifeforms. The 2022 Revised Plan and 2012 rule are in violation of NEPA, MFMA, the ESA and APA.

Obviously, "treatment" and "management" are top-of-mind" with the IDT, desperate to "get the cut out" at the expense of net pubic benefit, wildlife and fish, wilderness and every living creature that is trying to make a living in the Greater Yellowstone Ecosystem, and immediate project-area war (against Nature) zone. Deforestation is the method of attack against an imagined enemy of mountain pine beetles, dwarf mistletoe, old-growth habitat, lodgepole pine habitat type in general, and old growth lodgepole pine habitat type, specifically.

Computerized models cannot estimate qualitative impacts to habitat quality or habitat effectiveness at an ecosystem scale. And without sufficient data and proper ground-truthing, computer models are worthless at any scale.

The DEA is devoid of any discussion, analysis or disclosure which focuses on ecosystem processes and functions. Specific groupings of specific species of specific ages are neither processes nor functions that could correlate to man-made ecological disturbances, combined with natural stochastic events on a broad, landscape-level perspective.

Simulation is never source. Simulation is never the Real, no matter how Real it seems. Government cannot regulate or control Nature, only the names it claims as its own property.

Pfister/Habitat Types

The DEA doesn't mention the best available science on habitat types. Pfister et al. is often described as "the bible" is properly identifying habitat types and appropriate management strategies in those various habitat types. This is a fatal omission.

Failing to comprehend the habitat type in areas where the Forest Service bemoans "conifer encroachment," may be an expected result of succession of the time had been taken to identify the habitat type before sounding off. What is an appropriate conifer stand? It is not defined in DEA.

Define “conifer encroachment” in biological literature, and please explain why the U.S. Forest Service is not totally thrilled to accept free, natural reproduction of Douglas fir and lodgepole pine seedlings.

The analysis is inadequate if habitat types are not identified using *Pfister et al.* and mapped so the public and Forest Service have some scientific foundation by which to compare the Project area’s habitat types and current conditions. Without this knowledge incorporated into the DEA this whole project is little more than a highly subjective, predetermined farce.

Please do not dismiss the importance of the following information relating to Pfister, et al. (1977), which was not cited in the DEA.

Quote from *Pfister et al.* (1977):
RESEARCH SUMMARY
A land-classification system based upon potential natural vegetation is presented for the forests of Montana. It is based on an intensive 4-year study and reconnaissance sampling of about 1,500 stands. A hierarchical classification of forest sites was developed using the habitat type concept. A total of 9 climax series, 64 habitat types, and 37 additional phases of habitat types are defined. A diagnostic key is provided for field identification of the types based on indicator species used in development of the classification. In addition to site classification, descriptions of mature forest communities are provided with tables to portray the ecological distribution of all species. Potential productivity for timber, climatic characteristics, and surface soil characteristics are also described for each type. Preliminary implications for natural resource management are provided, based on field observations and current information. - FOREST HABITAT TYPES OF MONTANA, Robert D. Pfister, Bernard L. Kovalchik, Stephen F. Amo, and Richard C. Presby
INTERMOUNTAIN FOREST AND RANGE EXPERIMENT STATION
Forest Service-U. S. Department of
Agriculture
Ogden, Utah 84401 (hereafter, Pfister, et al. (1977), or Pfister)

Pfister et al. (1977) established a new, and vastly improved, forest classification system which further developed the application of *habitat type classification* to forest ecosystem classification. A better classification system for forest communities and the characteristics of the specific site locations upon which forest vegetation develop and depend.

The habitat type approach to classification of forest sites was developed more than 20 years ago by Daubenmire (1952) for forests of northern Idaho and eastern Washington. His original classification, and a subsequent revision and J. Daubenmire 1961, have proven useful in forest management and research (Laysex 1974; Pfister 1976). Id. p.1

In 2022, *Pfister et al.* is considered the “best available science” in this field (old growth and old-growth habitat) of study. It is often, to this day, spoken fondly of as “The Bible” for habitat-type classification, a detailed expression of the overall environment, ie. an ecological

classification. There is, quite simply, no better system in existence being used for interpreting the ecological potential of the forested landscapes of Montana and the Northern Rockies. Federal land managers attempting to make intelligent prescriptions for managing/manipulating forest vegetation should, and must use Pfister's habitat type classifications as the foundation of forest ecosystem analysis.

Pfister is foundational; it is the ground upon which forest ecology and ecosystem science rests. There is no substitute, and any and all attempts to truncate, or compartmentalize elements within *Pfister's* holistic, habitat-type classification system, represents a most objectionable form of "scientism" that reeks of a hidden agenda that has little to do with interpreting the forest's ecological potential.

Pfister and the ESA - As a foundational ecosystem analysis and interpretation tool, *Pfister et al.* is linked directly to specific language, unambiguously articulated by Congress, to describe the *Purposes* of ESA (Endangered Species Act).

(b) PURPOSES

The purposes of this chapter are to provide a means whereby ***the ecosystems upon which endangered species and the threatened species depend may be conserved****, to provide a program for the conservation of such endangered species and threatened species,and to take such steps as may be appropriate to achieve the purposes of the treaties and conventions set forth in subsection (a) of this section.* 16 USC, Chapter 35, §1531(b). Emphasis added.

We urge the Forest Service to simply comply with the clear intent of Congress, and its own (government funded) research to properly identify and disclose the ***habitat type*** in the project area using *Pfister, et al.* and arrive at an intelligent decision based on the best available science, and the intent and purposes of the federal laws which govern these types of project-level management actions. Emphasis added.

….end of project/EA analysis which references Pfister, and then proceeds to depart into a lengthy narrative, not about habitat type, but some typing using inadequate date, insufficient field examination and data and computer modelling that fails to follow Pfister's habitat typing methodology.

Field Testing is Necessary

Journal Article: Classifying Forest Habitat Types Based on Potential Climax Vegetation Robert D. Pfister, Stephen F. Arno

Forest Science, Volume 26, Issue 1, March 1980, Pages 52–70, https://doi.org/10.1093/forestscience/26.1.52

Abstract
The authors describe methods for classifying forest habitat types based on potential climax vegetation. Reconnaissance plots are inventoried on road or trail transects; plots are located

subjectively (but without bias) and are selected to represent the spectrum of environments supporting mature forest communities. Essential quantitative data are obtained using simple, time-efficient procedures, including estimation of canopy-coverage classes for all vegetation. Analysis proceeds through a series of successive approximations utilizing synthesis tables, ordinations, environmental-data correlations, **and field-testing of the preliminary classification.** Content and format of the final classification are discussed. The classification system was developed during extensive habitat type classification studies in the Rocky Mountains of Montana. Similar approaches are being used in many forested areas of western North America. Forest Sci. 26:52-70. Emphasis added.
https://academic.oup.com/forestscience/article-abstract/26/1/52/4656335

How *Pfister et al.* (1977) is Used:

Some of the current and potential uses of habitat types using Pfister et al. (1977) include:

1. Timber management--developing seed source and seed transfer rules, serving as a stratification for tree improvement programs, selecting species fox planting (Pfister 1972b), comparing natural regeneration (Shearer 1976), evaluating cutting and regeneration methods, and assessing relative timber productivity.

2. Range and wildlife management--assessing relative forage production, comparing potential values for domestic grazing, and evaluating summer and winter use by big game (Lyon 1975; Maxcum 1975).

3. Watershed management--estimating relative precipitation, evapotranspiration, and moisture-holding characteristics.

4. Recreation--assessing suitability for various types of recreational use, evaluating impacts of use on plant communities and sites (Helgath 1975; Dale 19731, and predicting recovery rates following disturbance.

5. Forest protection--categorizing fuel buildup, implementing fuel management, and evaluating the natural role of fire including frequency and intensity of burns (Aldrich 1973; Arno 1976); and assessing susceptibility to various insects and diseases.

6. Natural area preservation--helping to ensure that the environmental spectrum is adequately represented in research natural areas (Schmidt and Dufour 1975).

Some management implications are discussed in the descriptions of the habitat types in this report. Additional implications can be developed from the appendix data.

Valuable information regarding the response of each habitat type to specific treatments can be obtained by carefully documenting and analyzing field observations. Also, field research studies in many functions can use the habitat types as a stratification for designing studies. Study results can then be reported in a form suitable for application on appropriate habitat types. Emphasis added.

Mapping

Habitat type maps have become an important management tool in the Northern Region of the USDA Forest Service (Deitschman 1973; Stage and Alley 1973; Daubenmire 1973). They provide a permanent record of habitat type distribution on the landscape and a basis for acreage estimates for land-use planning.

Maps may be made at various scales and degrees of accuracy, depending upon objectives. For research studies, project planning, etc., maps should be accurate and detailed; each phase of a habitat type should be delineated, especially for research studies. The map scale should range from 4 to 8 inches per mile. At a broader level of planning (multiple use planning unit, National Forests, etc.) map accuracy and detail may decrease and mapping efforts may be extensive. Habitat types are often the finest subdivisions shown, and map scale can range from 1 to 2 inches per mile.

Still broader levels of mapping may be required for regional needs (selection of powerline corridors, State or regional planning); these may employ scales of 1/4 to 1/2 inch per mile, and may depict only habitat type groups or series. These should be synthesized from large-scale habitat type maps whenever the latter are available.

Selecting a mapping approach and appropriate scale to produce an acceptable map must be based on the following: (I) anticipated use of the map, (2) accuracy level required, (3) availability of adequately trained personnel, and (4) amount of time and financial support available to achieve the specified accuracy level.

At scales of 4 to 8 inches per mile, the habitat types or phases are useful as the mapping units, accepting inclusions (up to 15 percent) of other types too small to map separately. In complex topography and at smaller map scales, special mapping units must be developed, which may be called complexes or mosaics. Such mapping-unit complexes must be defined for each area being mapped, rather than on a preconceived grouping. The amount and relative positions of habitat types and phases within a complex must be specified because the management interpretations of a mapping unit are tied to the taxonomic units--series, habitat type, and phase.

Regardless of the mapping scale used, the field reconnaissance should identify stands to the phase level. The amount and location of field reconnaissance should also be specified on the map or in a report for users of the map. Finally, the map accuracy should be estimated and checked to maintain quality control in application of the habitat type classification. Pfister, (1977) p.140. Emphasis added.

Is Green et al. the "best available science" as required by the 2012/2015 Planning Rule? If so, they must follow it, all of it. What I have noticed since dealing with Green et al. – a comprehensive old growth definition and procedural guide – is that the agency (state and/or federal) claiming to be following *Green* never do so in total, usually ignoring the qualitative elements that require extensive field surveys and monitoring – especially old-growth habitat conditions, quality, habitat effectiveness and connectivity – resorting to quantitative minimums

(spacing, dbh, canopy cover, etc.) elements with a lot of numbers, computer models and happy talk. **Alway, always** there is less/lower habitat effectiveness/quality and fewer high-quality acres of old-growth habitat following project completion when misapplying *Green.*

Back to the basics; liars lie. Biostitute cherry-pickers are liars.

Green et al. is based on (Pfister et al.) ***habitat types.*** **Emphasis added.**

re: the foundation of *Green et al. is Pfister.* IMO, Pfister is "crucial in conducting the regional level analysis." The following quote explains the "ecologically based classification" methodology.

Quote from Green et al. (April, 1992) *developed in Oregon and Washington or emphasized structural characteristics related to old growth-associated wildlife species. Pfister (1987) conducted the first quantitative analysis based on ecological data for the Northern Rockies. This effort concentrated on the Kootenai and Nez Perce National Forests and provided a structure for the analysis presented in this paper. The analysis provided a basic review of concepts and provided an ecologically based classification of old growth based on numbers of large trees, snags, and down logs and described associated attributes of layers, canopy cover, age, and basal area. Pfister (1987) provided eight recommendations for further analysis, some of which have been* ***crucial*** *in conducting the regional level analysis. Emphasis added*

Ecological Stratification for the Northern Region

In order to classify old growth forests it was decided that the most applicable system for stratification of site potential would be groups of habitat types. ***The habitat type classification systems used for this grouping are the "Forest Habitat Types of Northern Idaho: A Second Approximation" (Cooper and others 1991) and "Forest Habitat Types of Montana" (Pfister and others 1977).*** Emphasis added.

OLD-GROWTH FOREST TYPES OF THE NORTHERN REGION by P. Green, J. Joy, D. Sirucek, W. Hann, A. Zack, and B. Naumann* NORTHERN REGION USDA FOREST SERVICE APRIL 1992 R-1 SES 4/92 (errata corrected 02/05,12/07,10/08/,12/11)

The Forest Service would rather expire than fully comply with Pfister's habitat type classifications. So, if they want to fake it with irrelevant computer models and numeric minimums, while pretending to follow the comprehensive meaning and intent of *Green,* I say: Bring it! The bigger they come, the harder they fall -- one and all.

Jimmy Cliff said it best: https://www.youtube.com/watch?v=l5aTh3vTSMM

Within the Northern Rockies various attempts at old growth definition were made during the Forest planning process. Unfortunately, these efforts continued to follow the definitions being

21st Century Plunder/Destruction of the Divine (NWO/ Agenda 21/2030)

Did the DEA ever mention the Greater Yellowstone Ecosystem or the Continental Divide being one of the poorest growing sites in the continental United States? No one - and certainly no corporation needing to show a profit stream to their shareholders -- in their right mind -- would invest in timber futures at this site. This isn't even a sane "timber-mining" project.

A recurring theme in many essays in the *Economic Sophisms* is that of plunder (la spoliation) by one group of people of another group. According to [Frédéric Bastiat (1801-1850)] people the fact that they were being deceived and that wholesale plundering was going on around them under the guise of subsidies to industry…

"The Physiology of Plunder:" Bastiat believed that the era of theocratic plunder provided a case study of how trickery and sophistic arguments could be used to ensure compliance with the demands of the plundering class. He argued that the rule of the Church in European history was one which he believed had practiced plunder and deception "on a grand scale".

What are the impacts of geoengineering, GMO trees, and other bio-tech applications on the lifeforms that currently occupy lands in the Project area?

Artificial intelligence engineers imagine that they can 'do a better job than God.' At bottom this is a religious war. So, whereas, the narrative in the SPLAT and from above has to do with Nature in all her aspects, being the source of all energy, life, and matter, we must ask: What happens to Nature in the time of the new, 4th Industrial Revolution?

It happens that Nature in her form as matter and life is being systematically dismantled down to its cellular, molecular and even atomic structure, and recombined afterwards to a new "creation," but a creation beyond all its natural forms, limits, evolution and evolutionary boundaries (Chargaff, 1988). This "new alchemy" in which the complete dissolution of all matter and its "mortification", becomes the precondition of a new "creation", an Opus Magnum beyond Nature as we know it. (See: Werlhof 2020, Bizarri 2012).

Resilience is a common thread across the three United Nations pillars of development, human rights, and peace and security– and is reflected in many important global policy agendas and frameworks that acknowledge that risks and their manifestation can hinder the implementation of the 2030 Agenda for Sustainable Development and the Sustaining Peace Agenda. The United Nations' **17 Sustainable Development Goals (SDGs)** are integrated—they recognize that action in one area will affect outcomes in others, and that development must balance social, economic and **environmental sustainability**. The UN is now a full partner with the World Economic Forum (WEF.) Whether the Forest Service is aware of this push for global, one-world government or not, it is implementing, by definition, extra-legal, global goals and planning, Agenda 2030. Emphasis added.

This revolution may be the most decisive ever. Global capitalists are investing heavily in the invention of a completely new world, a mixture of life and machine, different life forms and

matter as such, unseen to the present day. But this revolution has nothing to do with Nature, life, and even human life within the natural order on Earth anymore.

On the contrary, it wants to supersede and despiritualized (to deprive of spiritual character or influence) Nature in all its appearances, ties, and bonds. The same is true for Mother Earth. "Hacking the planet" by military geoengineering means taking control of its energies and life support systems and recombining them in the form of a global system of weaponized, giant machinery. The entire South Tobacco Roots landscape is being de-spiritualized.

***Johnson v. M'Intosh*/Domination/Dominion**

The Shoshone, Bannock, and other Indian nations of the Yellowstone plateaus hunted from west to east across lands now called Yellowstone National Park annually. Blackfeet and Crow nations hunted in and around Yellowstone. The National Park Service claims that 27 Indian nations utilized Yellowstone lands in some way.

The Gallatin Custer National Forest is totally overlooking the true value in these "promised lands," originally seized (conquered) by the U.S. government (God's "chosen people").

Logic and reason cannot begin to explain the historical, moral and legal foundation for the truly abstract, cognitive model this bizarre project represents. The illegitimacy of ultimate (absolute) title being exercised by the United States to these lands, originally (First) possessed by indigenous nations, in question must be raised here and now.

Please disclose documents that give the U.S. government the right to absolute land title to these lands. Please disclose when absolute title and possession to these lands in the project area were legitimately transferred from indigenous stewards to the U.S. government.

Absolute title to these U.S. government lands have been assigned and reassigned over centuries, all under the divine powers granted by Pope Alexander VI (papal bulls of 1493), which is the source and foundation of the Doctrine of (Christian) Discovery." This is 21st-century, Christian colonialism and American imperialism ***dominating*** (*Genesis 1:28*) all of God's creatures in the Project area. See: *Johnson v. M'Intosh (1823)* for the full legal story and background.

The United States, then, have unequivocally acceded to the great and broad rule (of discovery) by which its civilized inhabitants now hold this country. They …maintain, as all others have maintained, that discovery gave an exclusive right to extinguish the Indian title of occupancy, either by purchase or by conquest; and gave also a right to such a degree of sovereignty, as the circumstances of the people would allow them to exercise." (*Johnson* at 587)

In his ruling, Chief Justice John Marshall suggested that by the Treaty of Paris (1783), Great Britain had transferred its assertion of ultimate dominion to the United States. Subsequently, the United States took its newly assigned claim, and asserted its assigned right of possession over Indian lands. It is time to overturn Supreme Court precedent established in *Johnson.* The CRS report below demonstrates how precedent can, and routinely is, overturned.
https://crsreports.congress.gov/product/pdf/R/R45319

The Roman Church in 15th century Europe practiced plunder and deception on a global scale. The South Plateau project is a 21st century version of church and state (theocracy) working in tandem at the centuries-old practice and rule of colonial plunder and deception for power, riches and dominion over man, especially indigenous nations, and Nature.

Let this project begin a new awareness of the wrongs that need righting. It is time for the U.S. government to formally repudiate and fully renounce the Doctrine of Christian Discovery as racist, genocidal, scientifically indefensible, legally invalid, morally despicable and socially unjust before the United Nations general assembly.

Only the Vatican can formally rescind the Doctrine of Christian Discovery, which is made up of a "body of papal bulls," collectively known as the "Doctrine of Discovery."

"War is peace, freedom is slavery, ignorance is strength, and to lose is to win". In the United States, plunder and domination will always mean "winning the war," against non-Christians and Nature. No matter what actually happens in this perpetual war, even when their self-destructive loss is indisputable, that will be unimportant – the U.S. will certainly be in the middle of winning a new war against indigenous nations and Nature to further "American imperium." Insurmountable neo-colonial gibberish. The South Tobacco Roots Project is just another outpost of American imperium.

Windthrow/perpetual clearcut logging

Clearcutting in the Project area will cause widespread windthrow, and perpetual "salvage logging." Clearcutting is not the "optimum method" in this location, and the FS has made no effort to determine that it is optimum. It is out of habit, not proper NEPA assessment and disclosure.

We oppose the use of clearcutting in patches over 40 acres. This is an arbitrary and capricious decision, solely based on financial considerations and not public net public values or wildlife concerns. This is an all-out assault on old growth lodgepole pine and old-growth habitat, in violation of the NFMA (National Forest Management Act).

Please disclose how a field of stumps – an ever-expanding clearcut – creates a "more resilient" forest. The size of units will expand as trees on the perimeter blow down. Please estimate and disclose the ultimate size of clear-cut units after windthrow/blowdown.

NFMA§ 6(g)(3)(F) …insure that clearcutting, seed tree cutting, shelterwood cutting, and other cuts designed to regenerate an even-aged stand of timber will be used as a cutting method on National Forest System lands only where—

(i)

for clearcutting, it is determined to be the optimum method, and for other such cuts it is determined to be appropriate, to meet the objectives and requirements of the relevant land management plan;

(ii)

the interdisciplinary review as determined by the Secretary has been completed and the potential environmental, biological, esthetic, engineering, and economic impacts on each advertised sale area have been assessed, as well as the consistency of the sale with the multiple use of the general area;

(iii)

cut blocks, patches, or strips are shaped and blended to the extent practicable with the natural terrain;

(iv)

there are established according to geographic areas, forest types, or other suitable classifications the maximum size limits for areas to be cut in one harvest operation, including provision to exceed the established limits after appropriate public notice and review by the responsible Forest Service officer one level above the Forest Service officer who normally would approve the harvest proposal: Provided, That such limits shall not apply to the size of areas harvested as a result of natural catastrophic conditions such as fire, insect and disease attack, or windstorm; and

(v)

such cuts are carried out in a manner consistent with the protection of soil, watershed, fish, wildlife, recreation, and esthetic resources, and the regeneration of the timber resource.

(h)SCIENTIFIC COMMITTEE TO AID IN PROMULGATION OF REGULATIONS; TERMINATION; REVISION COMMITTEES; CLERICAL AND TECHNICAL ASSISTANCE; COMPENSATION OF COMMITTEE MEMBERS

(1)

In carrying out the purposes of subsection (g) of this section, the Secretary shall appoint a committee of scientists who are not officers or employees of the Forest Service. The committee shall provide scientific and technical advice and counsel on proposed guidelines and procedures to assure that an effective interdisciplinary approach is proposed and adopted. The committee shall terminate upon promulgation of the regulations, but the Secretary may, from time to time, appoint similar committees when considering revisions of the regulations. The views of the committees shall be included in the public information supplied when the regulations are proposed for adoption.

Let's see the "Secretary's letter" approving this unjustified, illegitimate use of clearcutting.

"There is no polite way to suggest to someone that
they have devoted their life to a folly." -Daniel Dennett

We thank you for this opportunity to comment and express our concerns.

Sincerely,

Steve Kelly, Pres.

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