Public Comment on Pete Lien and Sons Rochford Mineral Exploratory Drilling Project (#67838)

Submitted by: Elijah Small Date: May 16, 2025 Location:

To my friends, colleagues, and adults that still remember being a kid and chasing after critters in the wood at the Forest Service,

You don't need another form letter. You don't need another box checked. What you need is someone to tell you the truth, because it's clear no one inside your institution is willing to do that anymore.

I'm writing not just as an ecologist, but as someone who once believed, wholeheartedly, in the mission of this agency. I believed that the Forest Service was a place where science, courage, and stewardship aligned. That belief is dead now, and it didn't die quietly. It was euthanized, piece by piece, by moments exactly like this.

What you are doing by fast-tracking exploratory drilling near *Pe' Sla* under a Categorical Exclusion is not just bad science. It's not just bad policy. It is a betrayal. A betrayal of the land. A betrayal of Indigenous communities. A betrayal of your stated mission. And a betrayal of those of us who entered this field not to enable extraction but to defend what is sacred.

Let me be blunt. Facilitating exploratory drilling in an ecologically sensitive, culturally sacred, hydrologically complex site without requiring a full Environmental Impact Statement is not just a lapse in judgment. It is professional malpractice. It is dereliction of duty. It is cowardice wrapped in bureaucracy.

There is no ecological justification for approving this project under a CE. None. The area in question contains steep terrain, thin soils, faulted bedrock, and the kind of hydrological complexity that makes "low impact" a scientific impossibility. The headwaters feeding Rapid Creek are not theoretical. They are real, vulnerable, and already stressed by past mismanagement. You know this. If you don't, then you are incompetent. If you do, then you are complicit.

And that's the part that hurts the most. You do know. There are sharp people in your agency. People who understand landscape ecology, hydrogeology, treaty rights, and the weight of this place. And yet, this is what you put forward. This is what you let through. This is what you rubber-stamp.

This isn't about confusion. It's about complicity. And it makes me sick.

You claim to serve the public good, yet you side-step your obligations under NEPA, NHPA, and your trust responsibilities with procedural sleights of hand that any undergraduate policy student could see through. You act like your hands are tied, but it's you who keeps knotting the rope.

Do you know what it feels like to dedicate your life to restoring watersheds, reintroducing lost species, and fighting for the last intact fragments of wild land, only to see your own colleagues turn those same places over to speculative mineral extraction because it's politically easier? It feels like betrayal. It feels like desecration.

We in this field are supposed to be stewards. And yet the Forest Service has become a facilitator of industry, a doorman for corporations, a shield for politicians. You've traded bravery for procedural cover, ethics for political convenience.

You're not protecting the land. You're not protecting communities. You're not even protecting your own integrity. And in doing so, you're alienating an entire generation of conservation professionals who no longer believe that the system we work in is salvageable.

Look around you. Staff morale is in the gutter. Field offices are understaffed and overruled. Indigenous partners don't trust you. And the public sees you as a rubber stamp for whoever shows up with the right paperwork and a drill rig.

I'm tired of watching the Forest Service act like it's neutral in all of this. You are not neutral. You are making choices. Choices that sacrifice sacred places. Choices that undermine trust. Choices that push those of us who still have a spine into the margins, labeled as radicals for speaking the truth.

You don't need more training. You don't need more public comment periods. You need courage. You need to remember who you work for. Not the company. Not the politics. Not the convenient lie of "balance."

You work for the Earth.

You work for the watersheds. For the soil microbiomes. For the lynx. For the hawk moths. For the suckers and sculpins. For the kids whose rivers are slowly being poisoned while you shuffle papers.

Do you remember that? Or did you leave that behind in grad school with your thesis and your ethics?

Because I haven't. And I won't.

Aldo Leopold said, "To keep every cog and wheel is the first precaution of intelligent tinkering." You are not keeping the cogs. You are throwing them into the fire. You are allowing the core machinery of ecological integrity to be dismantled by greed and indifference, one permit at a time.

Maybe you're under pressure. I know what it's like to work under political interference, to watch your work edited by people who don't understand the land and don't care to. I know the sting of being told to stay in your lane when you try to raise ecological red flags. I know what it's like to

see grant funds dry up, to watch good staff burn out, to feel like the enemies of the land have more friends in the agency than the land itself.

So I will offer you this: I understand your position. I understand the fear of pushing back. I understand the bureaucratic exhaustion. I understand how compromise becomes habit and habit becomes culture. I know what it feels like to wonder if it's even worth fighting anymore.

But if you are reading this and feeling that knot in your chest, the one that tells you this letter is not an attack but a mirror, then do something. Say no. Pull the CE. Demand a full EIS. Talk to the people who pray on this land. Stand up in your meetings. Push back. Take the hit. Be the person you wanted to be when you applied for this job.

Because if you're not here to protect the sacred, then what are you here for?

If you're not here to say no when it matters, then why are you in the room?

And if you're not willing to fight for the land, then please, get out of the (I want to swear here so badly, and I think you know the swear word too) way for those of us who will.

Sincerely,

Elijah J. Small, MS Ecologist, holder of Earth Knowledge (ITECK)