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First name: Dick
Last name: Artley
Organization:
Title:
Comments: June 6, 2018

Dear Ranger Holloway,

My scoping comments on the proposed East Eagle/Mud Springs Hazardous Fuels Reduction timber sale are shown below. They are short because I won't waste my time trying to convince you to change your Proposed Action. You made up your mind to implement the Proposed Action prior to scoping and reading your IDT's Chapter 3 environmental effects disclosures. You will prove this when you analyze only 1 action alternative in the EA or EIS. You certainly won't allow the pesky public to interfere in important USFS business. Perhaps the most frightening thing is your IDT resource specialists gladly assist you in your plunder. Sadly, they soon forget they are paid by the public to protect and preserve the resources they represent. They know they must gratify and please the USFS corporate masters.

You all play the game well.

You see, I was the forest planner on the Nez Perce NF during the last 11 years of my USFS career. In that position I was the NEPA and litigation coordinator and NEPA document legal compliance reviewer. I saw it all. The NEPA was signed into law by President Nixon on January 1, 1970. During the last 4 decades the USFS was successful in their scheme to circumvent the NEPA and still make it appear they complied with the law.

NEPA requires the Responsible Official to seriously consider public comments. This includes scoping comments. Of course this is a joke. Sometimes the Responsible Official doesn't even read the scoping comments. They rely on the IDT members to reject all but trivial suggestions to modify the Proposed Action. Often the IDT members use copy & paste rejection language when they write the Response to Comments as will be the case here.

NEPA requires the Responsible Official to "identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment" [40 CFR 1500.2(e)] In the vast majority of cases this never happens when USFS line-officers pass proposed projects through the NEPA process. Why? The Responsible Official has already selected the Proposed Action described in the scoping package for implementation; however they know they must make it appear that they have complied with the law.

Relatively intelligent people know there is more than 1 way to accomplish any goal. This would include the Purpose & Need goals for timber sales. Why then do most timber sale EAs and EISs analyze only one action alternative in detail that is nearly identical to the Proposed Action described in the scoping package? A few IDT members know this but they look the other way. They also know they must make ridiculous unsubstantiated claims in their Chapter 3 effects disclosures to make it appear the Proposed Action will create

healthier natural resources after the forest has been log and roading-up. These IDT members conveniently forget what independent, unbiased scientists say.

USFS Responsible Officials have been Violating the NEPA for
Decades by not Considering the No Action Alternative. IDTs
Know they Must Write Nothing that Makes
No Action seem Reasonable.

There is a reason a USFS Responsible Officials have not selected the No Action alternative in 17 years. The obedient IDT members make it easy to reject No Action

Their USFS mind manipulation (a.k.a. brainwashing) programmed them to always describe the environmental effects of No Action in Chapter 3 as tragic and horrendous. They know they must tell the public that selection of the No Action alternative is sure to cause long-term resource destruction of its not logged.

The IDT members don't plan on the public wondering why this resource destruction hasn't occurred during the least few centuries because the area has not been logged (e.g. No Action). I look forward to pointing this out when I comment on the draft NEPA document. Indeed, USFS employees are programmed to believe logging really does create a healthy forest.

Who are you people? How could a competent resource specialist be unable to comprehend this clear inconsistency?

Please analyze at least 2 action alternatives in detail

Below I present information about NEPA alternatives that comes from the Shipley Group. The Shipley NEPA experts are contracted by the USFS to teach the NEPA process to USFS employees. Please be guided by the red highlighted text below.

"Remember not to be silent about the reasons for considering some alternatives and ignoring others. Silence is a gift to a possible plaintiff. So plan for and provide even a brief rationale about your range of alternatives. Such a discussion is especially important if your EA or EIS includes only a single action alternative. A single action alternative is a risky agency choice, especially if you determine that your EA or EIS is likely to be a high-risk and controversial document."

Range of Reasonable Alternatives
Feature Article, November 2009
by Larry Freeman, PhD
The Shipley Group, Senior Consultant

Please see:
https://www.fs.fed.us/emc/nepa/

The USFS Objection Process is a Joke

You all work for an agency that tricks the public into believing they actually have influence over USFS decisions that affect their land.

Sadly, most USFS employees believe the agency can do no wrong. The English language has a word to describe this "Pollyanna." Webster defines it as "a person characterized by irrepressible optimism and a tendency to find good in everything."

Intelligent, unbiased, un-brainwashed people understand that the Objection Deciding Officer must be an unbiased 3rd party with no interest in whether a project is implemented or not. The USFS rigged the Appeal process against concerned members of the public and the same is happening with the Objection process. They assure the ADO is a USFS employee who will claim anything to avoid the appearance that another USFS employee has made an error.

I know that you know my objection will be rejected by the Objection Deciding Officer before he/she reads my objection.

Please consider this. If you had a child who was critically injured in an accident caused by corporate negligence and sued the corporation would you want an unbiased judge to decide the case or the corporate CEO? Allowing a USFS employee torule on an American citizen's objection to a project proposed by another USFS employee is no different. The Objection Deciding Officer will be biased and support the Responsible Official unless the objector has a history of taking court action.

Are you proud to work for an agency that backhands the people it claims to serve?

It would be to your advantage to become familiar with 40 CFR 1502.9(b) to learn how to deal with the quotes in the Opposing Views Scientific Attachments.

Future generations of kids will seek-out natural undeveloped landscapes for solitude. How will they feel about your decision here? Will they support development of the Boulder Park sale area to provide corporate profit opportunities?

The public is getting wise to the USFS trying to deceive them.

The USFS wants the public to believe all parts of the national forests that have never been logged are unhealthy and will be restored to health when they are logged and roaded. Please examine Opposing Scientific Views Attachments #1 and #4.

You will find statements by scores of independent Ph.D. scientists in the attachments who are experts in their fields. They all describe how logging and roading a forest CREATES future restoration opportunities to correct the damage caused by these timber sale activities you propose with the help of your IDT members.

The public is becoming aware of the USFS's overriding timber agenda and culture. The agency programs its employees to believe the amount of timber cut each year on a forest defines the importance forest. I saw biologists who skewed and padded their Chapter 3 effects to minimize and play-down the predicted adverse effects to fish and wildlife. Even if they write the truth Ranger Holloway you will ignore it. Why? Because the agency programmed you to believe amenity resource destruction is acceptable collateral damage when you take action to "get-out-the-cut." The public knows this is going on, thus you must earn their admiration and trust. How? Please stop genuflecting to the USFS's corporate masters at every opportunity.

I think you know what to do. It's more important to leave the forest intact, biodiverse and functioning properly than it is to spend all your NFTM funding this FY. There are times when promotion potential must not be a consideration.

Please alert me when the DEIS or pre-decisional EA is posted online and you are accepting comments. Studies show the vast majority of national forest visits are made by people seeking outdoor recreation experiences. Please assure the Proposed Action does not degrade recreation importunities in any way even in the short-term.

Sincerely,

Dick Artley (retired forest planner, NEPA legal compliance reviewer, forest NEPA coordinator, forest appeals/litigation coordinator)
Grangeville, Idaho 83530
da99333@gmail.com

PS: I have grandchildren who enjoy visiting their national forests to experience solitude and natural sounds in a natural setting. The way the future looks, their grandchildren will find these experiences precious. They will be horrified to learn you destroyed this opportunity to meet your supervisor's annual volume expectations. You know USFS line-officers who fail to "get-out-the-cut" are passed over for higher paying jobs with the "outfit." Also, its time NEPA IDT members are held accountable for what they write.