

Data Submitted (UTC 11): 6/17/2018 11:18:07 PM

First name: Dick

Last name: Artley

Organization:

Title:

Comments: June 17, 2018

Dear Ranger Mattrick and selected IDT members,

"When the last tree is cut down, the last fish eaten, and the last stream poisoned, you will realize that you cannot eat money"

Cree Indian Proverb, about 1885

Please accept and consider these comments on the proposed Robinson timber sale pre-decisional EA and read them with an open mind.

Ranger Mattrick, before I begin the specific comments, I have a few things to say to you and the IDT members.

I spent 31 years working for the USFS on 3 national forests. I was the forest planner for the last 9 years of my career. In that job I was the NEPA and litigation coordinator for the Nez Perce NF on Idaho. After reading the pre-decisional EA I am confident you are clinically obsessed to accumulate volume. Please seek professional help.

I had to work with one of these pathetic people. Thank God this TMA was never promoted to a position where she had Decision-making authority. Had this been the case she would have likely proposed timber sales as tragic as your Robinson sale.

Your IDT members should all be ashamed ... especially the people who claim to care for the non-timber resources.

Its time each IDT member is personally held responsible and accountable for what they write in NEPA documents. The public pays the salaries of these specialists and expects them to be professionals. They expect them to be honest and have above average writing skills. They expect them to present all the information available and withhold nothing.

When reading NEPA documents from other national forests sometimes I encounter skewed, partially true effects analysis conclusions ... especially if honest effects disclosures would describe adverse impacts of sale implementation which make it more difficult for the Responsible Official to select the Proposed Action. Some effects disclosures in this pre-decisional EA are highly suspect.

I'm not that familiar with the ecological conditions of the sale area but I read some things that could not possibly

be accurate.

Competent resource "specialists" would never allow their good names to be associated with an EA that proposes such resource plunder. They should know some of the Proposed Action treatments are considered unacceptable by the recreating American public. Clearly, the employees who work on the Rochester RD believe serving their corporate masters is their goal, yet they skip home after work each day believing they did what the public pays them to do.

Why have you not learned the public does not want you to create private industrial tree farm conditions on the Green Mtn. NF?

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Remove Trees because they are Overmature?  
This is insane!!!!!!!!!!!!!!

Ranger Mattrick, at page 5 you say:

"Providing high-quality sawtimber and other timber products on a sustained yield basis is also an important Forest Plan objective (Forest Plan, page 14). Inventory shows that a number of timber stands in the Robinson project area are low quality as a result of trees with poor form, declining vigor, insect, disease or physical damage. Other stands are now mature or over mature and are now ready to be harvested before saw-log quality is reduced, or the trees decline in economic value."

Your Forest Plan at page 14 should have been amended decades ago. Your FP directs you to treat the Green Mountain NF as if it were a private industrial tree farm. It makes me sick to know you have been spending our tax dollars to gift and please the natural resource extraction corporations. You treat the Green Mountain NF as a wood factory.

Who are you people? Where have you been. Some species of wildlife thrive in decadent over-mature stands. The public thrills to see old-growth trees. Do all your employees agree with your FP? If so, RF Atkinson should clean house and install resource professionals on the Green Mountain NF. It seems a few of your employees would have had the courage to say "NO."

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You may have heard of the 4 men quoted below.  
A few of you might admire and respect them,  
yet you ignore them to assure your actions are  
consistent with the "get out the cut at any cost"  
USFS timber agenda.

Perhaps the IDT members have heard of the 4 men quoted below. A few of you might admire and respect their ideas, yet you ignore them to assure your actions are consistent with the "get out the cut at any cost" Green Mountain NF timber agenda.

"It is horrifying that we have to fight our own government to save the environment."  
Ansel Adams

"We must protect the forests for our children, grandchildren and children yet to be born. We must protect the forests for those who can't speak for themselves such as the birds, animals, fish and trees."  
Chief Edward Moody

"God has cared for these trees, saved them from drought, disease, avalanches, and a thousand tempests and floods. But he cannot save them from fools.

John Muir

"The Eyes of the Future are looking back at us and they are praying for us to see beyond our own time."

Terry Tempest Williams

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The IDT Members Apparently Feel they have more Experience and Resource Knowledge than Jerry Franklin, Ph.D., David Perry Ph.D., Reed Noss Ph.D., David Montgomery Ph.D. Anne Ehrlich, Ph.D., David Foster Ph.D. Peter Raven Ph.D., and Charles Luce, Ph.D. who worked at the USFS, Rocky Mountain Research Station.

The agency teaches you to be proud of your involvement with proposed logging "treatments" which result in a forest that will need real resource restoration in the future to function properly as a result of the resource damage caused by your "treatments." A few of you may have heard of the scientists that made the following observations. Ask yourself why these scientists would be motivated to misrepresent the truth. Ask yourself why the USFS teaches you to reject the scientific conclusions of independent scientists not associated with the USFS such as these.

"The proposition that forest values are protected with more, rather than less logging, and that forest reserves are not only unnecessary, but undesirable, has great appeal to many with a vested interest in maximizing timber harvest. These ideas are particularly attractive to institutions and individuals whose incomes depend upon a forest land base." (page 2)

"On the other hand, approaches that involve reserving of a portion of the land base, or harvest practices that leave commercially valuable trees uncut to achieve ecological goals, are often considered much less desirable as they reduce traditional sources of timber income." (page 2)

Franklin, Jerry Ph.D., David Perry Ph.D., Reed Noss Ph.D., David Montgomery Ph.D. and Christopher Frissell Ph.D. 2000. "Simplified Forest Management to Achieve Watershed and Forest Health: A Critique."  
<http://www.coastrange.org/documents/forestreport.pdf>

"For much of the past century the Forest Service, entrusted as the institutional steward of our National Forests, focused its management on an industrial-scale logging program. The result of the massive logging and road construction program was to damage watersheds, destroy wildlife habitat and imperiled plant and animal species."

"Dr. David R. Foster, a professor of ecology at Harvard University, said that a ban on public-lands logging would not affect the nation's supply of timber. Just 4 percent of the nation's timber comes from federal forest land, according to the letter, an amount Dr. Foster said could be made up through more intensive cutting on tree farms and recycling, among other things."

Ehrlich, Anne Ph.D., David Foster Ph.D. and Peter Raven Ph.D. 2002  
"Scientists Seek Logging Ban on U.S.-Owned Land"  
New York Times, April 16, 2002  
<http://www.nytimes.com/2002/04/16/us/scientists-seek-logging-ban-on-us-owned-land.html>

"Almost everywhere people live and work they build and use unimproved roads, and wherever the roads go, a

range of environmental issues follows."

"Among the environmental effects of unimproved roads, those on water quality and aquatic ecology are some of the most critical. Increased chronic sedimentation, in particular, can dramatically change the food web in affected streams and lakes."

"The nearly impervious nature of road surfaces (or treads) makes them unique within forested environments and causes runoff generation even in mild rainfall events, leading to chronic fine sediment contributions."

"If we look at the issue of what we need to learn or the research priorities for forest road hydrology, I would argue that the areas of cutslope hydrology and effectiveness of restoration efforts are perhaps most critical."

"At a few sites in the mountains of Idaho and Oregon a substantial portion of the road runoff (80-95%) came from subsurface flow intercepted by the cutslope (Burroughs et al., 1972; Megahan, 1972; Wemple, 1998)."

Hydrological processes and pathways affected by forest roads: what do we still need to learn?

By Luce, Charles H. Ph.D., USFS, Rocky Mountain Research Station, Boise Aquatic Sciences Laboratory, 2002  
<https://www.fs.usda.gov/treearch/pubs/23954>

"Few marks on the land are more lasting than roads."

"The negative effects on the landscape of constructing new roads, deferring maintenance, and decommissioning old roads are well documented. Unwanted or non-native plant species can be transported on vehicles and clothing by users of roads, ultimately displacing native species. Roads may fragment and degrade habitat for wildlife species and eliminate travel corridors of other species. Poorly designed or maintained roads promote erosion and landslides, degrading riparian and wetland habitat through sedimentation and changes in streamflow and water temperature, with associated reductions in fish habitat and productivity. Also, roads allow people to travel into previously difficult or impossible to access areas, resulting in indirect impacts such as ground and habitat disturbance, increased pressure on wildlife species, increased litter, sanitation needs and vandalism, and increased frequency of human-caused fires."

National Forest System Road Management

Federal Register: March 3, 2000 (Volume 65, Number 43) Page 11675

A Notice by the Forest Service on 03/03/2000, signed by USFS Chief Dr. Mike Dombeck on February 25, 2000

<https://www.federalregister.gov/documents/2000/03/03/00-5002/national-forest-system-road-management>

Please understand that you have all been subjected to very effective mind-altering (a.k.a. brainwashing) techniques. They teach you to reject/ignore the best science you read and instead embrace the USFS way which has no scientific validity.

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The USFS has been described as  
a "Rogue Agency." The Green Mountain NF  
fits this mold perfectly.

Each day more American people learn that the United States Forest Service is one of the most corrupt agencies in the Federal Government. They understand the USFS has had an all-encompassing timber agenda for many decades. They understand that the USFS is a rogue agency beholden to the natural resource extraction corporations. I invite you to read the Opposing Views Rogue Agency attachment. You will become familiar with:

\*A 1996 article that discusses a national forest in California that sold 24 timber sales based on environmental assessments that were known to have factual errors and did not contain current information. You will learn the

Forest Service paid \$400,000 to three timber companies to settle claims arising out of the breached contracts, valued at up to \$30 million. Incredibly, the former timber management officer for the Eldorado NF responsible for the mess was promoted to a new position in the agency's national timber program in Washington, D.C. He coined the phrase "screw up and move up."

\*A 2005 article that discusses 44 court cases the USFS lost in federal court during a two year period in which the agency was found guilty of "flagrant" violations of the environmental laws of the United States.

Indeed, the corruption and legal violations continue today in the agency at a higher rate. Agency employees are taught to say anything to assure their line-officer achieves his/her volume expectations. Volume means everything in the USFS culture. The success of national forests is based on volume attainment rather than the number of acres where the natural resources function properly. This does not make sense.

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My Comments

The comments on this proposed timber sale are clearly labeled. They are indented using the word Comment that's bold, purple, Arial font, and underlined. The text of the comment is bold, green, Arial font. Please prepare meaningful (emphasis added) responses to all (emphasis added) of my comments and include them in the final EA in the "Response to Comments" section.

There are 26 labeled Comments included below.

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Intelligent, Caring People with Land Values are  
Guided by the Precautionary Principle to Avoid  
taking Actions that Might Adversely Affect  
Human Health or Harm the Environment.  
This was Ignored Here.

Here is the essence of the Precautionary Principle

"When an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some cause and effect relationships are not fully established scientifically. In this context the proponent of an activity, rather than the public, should bear the burden of proof. The process of applying the precautionary principle must be open, informed and democratic and must include potentially affected parties. It must also involve an examination of the full range of alternatives, including no action."

<http://sehn.org/precautionary-principle/>

After Reading Opposing Views Science Attachments #1 and #4 most people would yield to the opinions of many Ph.D. scientists who are experts in their fields quoted in these 2 Attachments. Had the Precautionary Principle been applied to this sale it would have been dropped.

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Logging road construction and reconstruction causes significant ecological harm. You know this yet you consider it necessary collateral damage to removing your precious volume. Please analyze an action alternative that uses only existing roads.

You propose to construct 11.2 miles of new road.

Eliminating the clear resource damage caused by road construction is orders of magnitude more important than the loss of a little volume isn't it? Of course you won't comply with my request because you know an honest analysis would show a decrease in volume and a massive reduction in natural resource destruction.

At page 24 you say you will construct 4.99 miles of system road. I'm sorry Mr. Austin does not understand USFS road terminology. You say "Drainage structures would be removed following use." System roads are permanent roads. You are really proposing to construct 4.99 miles of temporary road with a 14 foot running surface

You can become familiar with the road-related damage to natural resources by reading Opposing Views Science Attachment #4.

Request for changes to be made to the final NEPA document: Analyze a no road construction (including temp roads) action (emphasis added) alternative in detail and assure the environmental effects disclosures are accurate which means you will tell the public the resource damage will be significantly reduced.

Failure to analyze a timber sale with a no new road construction alternative will violate:

40 CFR 1500.2(e) and (f) because you did not choose to avoid or minimize adverse effects of the project upon the quality of the human environment without complete knowledge of all likely adverse effects and NEPA Sec. 101(b)(2) and (c)

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Ranger Mattrick, your draft EA indicates you plan to apply glyphosate for to control beech regeneration and help establish newly planted elm. Of course you might also kill children who visit your forest that are exposed to this herbicide. Most people would never knowingly risk other people's lives even if their employer encourages it. If you continue to plan to apply this poison you will always wonder who is dying a painful death from cancer because of you. Once again, the IDT members embrace your lethal proposal.

At page 57 you say:

"Glyphosate Application

The use of cut-stump application of glyphosate to control beech regeneration in harvested stands and foliar spray application to help establish newly planted elm is proposed. Risk assessments for glyphosate have been prepared (SERA 2011). For each organism or group of organisms assessed, the level of exposure was divided by the level of concern to yield a hazard quotient (HQ). Any hazard quotient that is less than one ( $HQ < 1$ ) indicates a safe level of exposure. It was determined that most of the risk characterizations for application of glyphosate at the proposed application rate of 7.56 pounds of active ingredient per acre without the highly toxic surfactants have a  $HQ < 1$  for mammals, birds and amphibians, below the level at which adverse effects might occur. Mitigation measures including the limited use of the less toxic surfactant for foliar spray application further reduces the exposure of wildlife to glyphosate (Appendix B)."

I suggest Ms. Deller pay special attention to the information below.

You depend on a fraudulent glyphosate toxicity study conducted by Syracuse Environmental Research Associates, Inc. (SERA) as the basis for your conclusion that glyphosate is safe. The agency ignores hundreds of unbiased independent scientists' research conclusions that clearly show the chemical causes cancer. They ignore the close relationship between SERA and Monsanto. This would give any unbiased person reason to question the SERA study results. Glyphosate is the primary active chemical in Roundup.

Comment: Ranger Mattrick, I ask you and your IDT members to have the courage to read the science conclusions in the Glyphosate kills attachment. This chemical is a carcinogen.

If glyphosate is safe why would herbicides that contain the chemical be banned Denmark, England, Italy, El Salvador, Sri Lanka, France, Holland, Austria, Bulgaria, Germany, Greece, Hungary, Ireland, Japan, Chile, South

Africa, Luxembourg, Madeira, Cameroon, New Zealand, Peru, South Australia, Russia, France, Switzerland, Columbia, and Costa Rica?

<https://www.baumhedlundlaw.com/toxic-tort-law/monsanto-roundup-lawsuit/where-is-glyphosate-banned/>

Comment: Ranger Matrick, I have submitted comments by hundreds of independent Ph.D. scientists (many chemists and medical doctors). Without exception they present evidence that even casual exposure to herbicides that contain the chemical glyphosate causes cancer. I ask you to use an alternative to Roundup. There are many that will satisfy your goals.

The Public Reads about the Dangers of Glyphosate  
Quite Often and Still you Propose to Apply the Poison.  
Do you Enjoy Putting the Public (including children) at  
Risk of being Diagnosed with Cancer?

Article Title: Monsanto Relied on These 'Partners' to Attack Top Cancer Scientists

Excerpts:

"The Monsanto plan names more than a dozen "industry partner" groups that company executives planned to "inform / inoculate / engage" in their efforts to protect the reputation of Roundup, prevent the "unfounded" cancer claims from becoming popular opinion, and "provide cover for regulatory agencies." Partners included academics as well as chemical and food industry front groups, trade groups and lobby groups - follow the links below to fact sheets that provide more information about the partner groups.

Together these fact sheets provide a sense of the depth and breadth of the corporate attack on the IARC cancer experts in defense of Monsanto's top-selling herbicide."

Published by the Sustainable Pulse, June 4, 2018

Link to article:

[https://sustainablepulse.com/2018/06/04/monsanto-relied-on-these-partners-to-attack-top-cancer-scientists/?utm\\_source=newsletter&utm\\_medium=email&utm\\_campaign=gmos\\_and\\_pesticides\\_global\\_breaking\\_news&utm\\_term=2018-06-16#.WyUmqVVKi1s](https://sustainablepulse.com/2018/06/04/monsanto-relied-on-these-partners-to-attack-top-cancer-scientists/?utm_source=newsletter&utm_medium=email&utm_campaign=gmos_and_pesticides_global_breaking_news&utm_term=2018-06-16#.WyUmqVVKi1s)

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Article Title: Landmark Lawsuit Claims Monsanto Hid Cancer Danger of Weedkiller for Decades

Excerpts:

"At the age of 46, DeWayne Johnson is not ready to die. But with cancer spread through most of his body, doctors say he probably has just months to live. Now Johnson, a husband and father of three in California, hopes to survive long enough to make Monsanto take the blame for his fate.

On 18 June, Johnson will become the first person to take the global seed and chemical company to trial on allegations that it has spent decades hiding the cancer-causing dangers of its popular Roundup herbicide products - and his case has just received a major boost.

Last week Judge Curtis Karnow issued an order clearing the way for jurors to consider not just scientific evidence related to what caused Johnson's cancer, but allegations that Monsanto suppressed evidence of the risks of its

weed killing products. Karnow ruled that the trial will proceed and a jury would be allowed to consider possible punitive damages."

Published by the Guardian newspaper, May 21, 2018

Link to article:

<https://www.organicconsumers.org/news/landmark-lawsuit-claims-monsanto-hid-cancer-danger-weedkiller-decades>

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Article Title: New Study: EPA's 'Safe' Levels of this Chemical in Your Food Aren't So Safe After All

Excerpts:

"Now a new pilot study, soon to be published in the prestigious scientific journal Environmental Health, suggests that EPA "safe" levels aren't safe at all-especially for kids.

The Global Glyphosate Study pilot experimental phase, the first study of its kind, suggests that exposure to glyphosate at levels the EPA wants us to believe are "safe" can in fact lead to "certain important biological parameters, mainly relating to sexual development, genotoxicity and the alteration of the intestinal microbiome."

We were especially intrigued by the study's mention of how glyphosate alters the intestinal microbiome. OCA, along with Beyond Pesticides, is involved in a lawsuit against Monsanto for falsely for misleading consumers who buy Roundup for their lawns about the product's safety. Monsanto tried to get the lawsuit dismissed, but a federal judge recently ruled in favor of allowing the lawsuit to proceed."

Published by the Organic Consumers Assn., May 17, 2018

Link to article:

<https://www.organicconsumers.org/blog/new-study-epas-safe-levels-chemical-your-food-arent-so-safe-after-all>

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Article Title: Weedkiller products more toxic than their active ingredient, tests show

Excerpts:

"According to a Guardian story published just today, government researchers in the US have found evidence that "some popular weedkilling products, like Monsanto's widely-used Roundup, are potentially more toxic to human cells than their active ingredient is by itself." "

"Even though Monsanto introduced glyphosate-based Roundup in 1974 and even though doctors and scientists have had issues with it for years, only now, after more than 40 years of widespread use, is the government investigating the toxicity of "glyphosate-based herbicides"1 on human cells."

Published in The Guardian, May 8, 2018

Link to article:

<https://www.healthnutnews.com/breaking-the-guardian-weedkiller-products-more-toxic-than-their-active-ingredient-tests-show/>



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Article Title: Weedkiller found in granola and crackers, internal FDA emails show

Excerpts:

"The Food and Drug Administration (FDA) has been testing food samples for residues of glyphosate, the active ingredient in hundreds of widely used herbicide products, for two years, but has not yet released any official results.

But the internal documents obtained by the Guardian show the FDA has had trouble finding any food that does not carry traces of the pesticide.

"I have brought wheat crackers, granola cereal and corn meal from home and there's a fair amount in all of them," FDA chemist Richard Thompson wrote to colleagues in an email last year regarding glyphosate. Thompson, who is based in an FDA regional laboratory in Arkansas, wrote that broccoli was the only food he had "on hand" that he found to be glyphosate-free."

Published by The Guardian, April 30, 2018

Link to article:

<https://www.theguardian.com/us-news/2018/apr/30/fda-weedkiller-glyphosate-in-food-internal-emails>

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Article Title: Germany Will Phase Out Glyphosate Herbicides "As Fast As Possible"

Excerpts:

"The new German government will aim to end the use of glyphosate herbicides "as fast as possible", according to the draft deal to establish a new German coalition government published on Wednesday on the homepage of Chancellor Angela Merkel's CDU party.

The draft states; "We will with a systematic minimalisation strategy significantly restrict use of plant protection chemicals containing glyphosate, with the goal of fundamentally ending usage as fast as possible.

"We will develop alternatives jointly with the agricultural sector as part of an arable farming strategy which will regulate environmentally friendly and nature-compatible use of plant protection chemicals." "

Published by Sustainable Pulse, April 28, 2018

Link to article:

<https://sustainablepulse.com/2018/02/09/germany-will-phase-out-glyphosate-herbicides-as-fast-as-possible/#.WuPs7Kvn-1s>

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Article Title: Popular Beer and Wine Brands Contaminated With Monsanto's Weedkiller, Tests Reveal

Excerpts:

"Over 1,000 plaintiffs, most of them farmers, have filed lawsuits against Monsanto, a leading manufacturer of glyphosate, for Roundup exposure leading to non-Hodgkin Lymphoma."

Published by Alternet Food, March 27, 2018

Link to article:

<https://www.alternet.org/food/popular-beer-and-wine-brands-contaminated-monsantos-weedkiller-tests-reveal?akid=16875.303761.VhNxb1&rd=1&src=newsletter1090311&t=37>

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Article Title: Monsanto's Toxic Legacy: An Investigative Reporter Talks Glyphosate

Excerpts:

"Editor's Note: In the following interview, for Acres U.S.A., Tracy Frisch interviews Carey Gillam about her first book: Whitewash: The Story of a Weed Killer, Cancer, and the Corruption of Science."

"As I've stressed, glyphosate is the most widely used herbicide in history, but it's the only pesticide that neither the USDA nor the FDA have tested for."

"On top of that, didn't the federal government bump the maximum residue level for glyphosate up many times higher than it used to be?"

Yes. Over the years, the legal limits for residues of glyphosate have been raised many times, for many different foods and feed crops."

Published by In these Times, March 23, 2018

Link to article: <https://www.alternet.org/environment/glyphosate-monsantos-toxic-legacy?akid=16860.303761.X2S1xb&rd=1&src=newsletter1090183&t=27>

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Article Title: Monsanto in Epic Fail with Attempted Attack on Global Glyphosate Study

Excerpts:

"The results of the short-term pilot study showed that glyphosate-based herbicides (GBHs) were able to alter certain important biological parameters in rats, mainly relating to sexual development, genotoxicity and the alteration of the intestinal microbiome, at the 'safe' level of 1.75 mg/kg/day set by the U.S. Environmental Protection Agency (EPA).

As is normal practice for Monsanto, their Public Relations department was soon in action to try and crush the scientists involved and the study results, which could cause major damage to the product that supports their whole business model - the glyphosate-based herbicide Roundup.

However, this time their PR campaign against the Study was only met with contempt and disdain from journalists, politicians, scientists and the public in countries across Europe."

Published by Sustainable Pulse, May 22, 2018

Link to article:

[https://sustainablepulse.com/2018/05/22/monsanto-in-epic-fail-with-attempted-attack-on-global-glyphosate-study/?utm\\_source=newsletter&utm\\_medium=email&utm\\_campaign=gmos\\_and\\_pesticides\\_global\\_breaking\\_news&utm\\_term=2018-05-28#.Wwv3HO4vy1s](https://sustainablepulse.com/2018/05/22/monsanto-in-epic-fail-with-attempted-attack-on-global-glyphosate-study/?utm_source=newsletter&utm_medium=email&utm_campaign=gmos_and_pesticides_global_breaking_news&utm_term=2018-05-28#.Wwv3HO4vy1s)

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Article Title: Link between Monsanto's Roundup weed killer and cancer 'cannot be ignored'

Excerpts:

"Last week eight scientists told two California judges that the evidence points them in one direction: Exposure to Monsanto's Roundup weed killer can cause non-Hodgkin lymphoma (a potentially deadly cancer) in humans.

It's now up to U.S. District Court Judge Vince Chhabria and California State Court Judge Ioana Petrou to decide whether to believe the scientists and allow hundreds of lawsuits against Monsanto go to trial or deny cancer victims their day in court, based on Monsanto's claims that Roundup is safe."

Published by Organic Consumers Association, March 18, 2018

Link to article: [https://action.organicconsumers.org/content\\_item/oca-email?email\\_blast\\_KEY=1386813](https://action.organicconsumers.org/content_item/oca-email?email_blast_KEY=1386813)

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Article Title: European Authorities Violated Own Rules to Conclude Glyphosate is Not Carcinogenic

Excerpts:

"A new peer-reviewed analysis shows that EFSA and ECHA twice watered down the statistical strength of evidence linking glyphosate with tumor increases."

"The new analysis shows that if the European authorities had properly applied their own benchmarks and "weight of evidence" approach, they would have inevitably concluded that glyphosate is carcinogenic. The analysis includes a science-based rebuttal of ECHA's claim that it adequately addressed concerns about how it applied statistical analyses and the weight of evidence approach.[2]"

Published by Sustainable Pulse, March 17, 2018

Link to article: [https://sustainablepulse.com/2018/03/17/european-authorities-violated-own-rules-to-conclude-glyphosate-is-not-carcinogenic/?utm\\_source=newsletter&utm\\_medium=email&utm\\_campaign=gmos\\_and\\_pesticides\\_global\\_breaking\\_news&utm\\_term=2018-03-21#.WrMVMWrwa1s](https://sustainablepulse.com/2018/03/17/european-authorities-violated-own-rules-to-conclude-glyphosate-is-not-carcinogenic/?utm_source=newsletter&utm_medium=email&utm_campaign=gmos_and_pesticides_global_breaking_news&utm_term=2018-03-21#.WrMVMWrwa1s)

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Article Title: New Study Links Glyphosate to Shortened Pregnancy Lengths in American Women

Excerpts:

"A new peer-reviewed study published in Environmental Health on Friday has linked glyphosate levels with

shortened pregnancy lengths, in the first ever study of glyphosate exposure in pregnant women in the U.S.. This study adds to the pressure on regulatory authorities to take action on the world's most used herbicide."

Published by Sustainable Pulse, March 11, 2018

Link to article: [https://sustainablepulse.com/2018/03/11/new-study-links-glyphosate-to-shortened-pregnancy-lengths-in-american-women/?utm\\_source=newsletter&utm\\_medium=email&utm\\_campaign=breaking\\_new\\_study\\_links\\_glyphosate\\_to\\_shortened\\_pregnancy\\_lengths\\_in\\_american\\_women&utm\\_term=2018-03-11#.WqXPh2rwa1t](https://sustainablepulse.com/2018/03/11/new-study-links-glyphosate-to-shortened-pregnancy-lengths-in-american-women/?utm_source=newsletter&utm_medium=email&utm_campaign=breaking_new_study_links_glyphosate_to_shortened_pregnancy_lengths_in_american_women&utm_term=2018-03-11#.WqXPh2rwa1t)

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Article Title: Monsanto's Toxic Legacy: An Investigative Reporter Talks Glyphosate

In the following interview, for Acres U.S.A., Tracy Frisch interviews Carey Gillam about her first book: *Whitewash: The Story of a Weed Killer, Cancer, and the Corruption of Science*.

Interview excerpts:

"In *Whitewash*, you write about the failure of government agencies to test food for glyphosate residues, despite the existence of monitoring programs for many types of pesticides. How did they manage to avoid testing for glyphosate?

A number of years ago this became a pet peeve of mine. Every year the USDA and the FDA monitor food for pesticide residues. They're required to do this testing and keep track of it in a database. This allows government agencies to determine if food producers are violating the allowable levels determined by the EPA for particular pesticides. The monitoring program also enables us to understand what we're taking into our bodies. As I've stressed, glyphosate is the most widely used herbicide in history, but it's the only pesticide that neither the USDA nor the FDA have tested for. (The USDA did one special project in 2011 looking at glyphosate residues in soybeans and found residues of the weed killer in more than 90 percent of the samples.) For decades they have refused to test for it. Many years ago I started asking them why they didn't test for glyphosate. They told me that, first, it's so safe so it doesn't matter if they test for it. Second, they would say that it's really expensive to test for. The third reason was, "We know that if it's in the food, it's probably not in very high amounts." I found that laughable.

Published by In these Times, March 9, 2018

Link to Article: [http://inthesetimes.com/rural-america/entry/20981/carey-gillam-monsanto-glyphosate-roundup-cancer-whitewash-pesticides?link\\_id=11&can\\_id=f5b503c97d8ff0adc2865a8c2b98e655&source=email-a-new-movement-for-rent-control-is-spreading-across-the-us-where-are-the-major-human-rights-orgs-on-the-us-war-on-yemen&email\\_referrer=email\\_315469&email\\_subject=a-new-movement-for-rent-control-is-spreading-across-the-us-where-are-the-major-human-rights-orgs-on-the-us-war-on-yemen](http://inthesetimes.com/rural-america/entry/20981/carey-gillam-monsanto-glyphosate-roundup-cancer-whitewash-pesticides?link_id=11&can_id=f5b503c97d8ff0adc2865a8c2b98e655&source=email-a-new-movement-for-rent-control-is-spreading-across-the-us-where-are-the-major-human-rights-orgs-on-the-us-war-on-yemen&email_referrer=email_315469&email_subject=a-new-movement-for-rent-control-is-spreading-across-the-us-where-are-the-major-human-rights-orgs-on-the-us-war-on-yemen)

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Article Title: Spinning Science and Silencing Scientists on the Dangers of Glyphosate

Excerpts:

"What happens when Monsanto doesn't like what the World Health Organization (WHO) has to say about its flagship product, Roundup weedkiller?

The chemical company convinces U.S. lawmakers to hold a "smoke and mirrors" Congressional hearing, under the guise of "defending scientific integrity," but really to undermine the unanimous determination by 17 international scientists, based on their analysis of independent, peer-reviewed science, that Roundup is "probably carcinogenic to humans." "

Published by Organic Consumers Association, February 7, 2018

Link to Article: <https://www.organicconsumers.org/blog/spinning-science-and-silencing-scientists-dangers-glyphosate>

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A Minority Staff Report Prepared for Members of the Committee on Science, Space & Technology U.S. House of Representatives, February 2018

Excerpts:

"What happens when Monsanto doesn't like what the World Health Organization (WHO) has to say about its flagship product, Roundup weedkiller?

The chemical company convinces U.S. lawmakers to hold a "smoke and mirrors" Congressional hearing, under the guise of "defending scientific integrity," but really to undermine the unanimous determination by 17 international scientists, based on their analysis of independent, peer-reviewed science, that Roundup is "probably carcinogenic to humans." "

Link to Report: <https://www.baumhedlundlaw.com/pdf/monsanto-documents/Final-minority-report-glyphosate-spinning-science-silencing-scientists.pdf>

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Article Title: Ranking Member Bonamici's Opening Statement for Glyphosate Assessments Hearing

Excerpts:

"Attempts by industry to mischaracterize the scientific debate appear intended to undercut the scientific evidence regarding the possible dangers of glyphosate and its potential impact on human health. We must make sure any chemical review is not undone by undue corporate influence or misleading scientific studies."

A February 6, 2018 Press Release

Link: <https://democrats-science.house.gov/news/press-releases/ranking-member-bonamici-s-opening-statement-glyphosate-assessments-hearing>

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Article Title: Ranking Member Johnson's Opening Statement for Glyphosate Assessments Hearing

Excerpts:

"Mr. Chairman, chemicals have the potential to greatly improve our quality of life, when developed and produced

in a responsible manner. However, when produced or proliferated irresponsibly or without sufficient understanding of their potential impacts, chemicals can pose a grave and significant risk to every one of us. Unfortunately, by the time we realize the harm being caused by unsafe exposure to such toxic chemicals, the damage has often already been done, and we are left regretting the fact that there might have been preventative actions we could have taken to protect ourselves if we had a better understanding of the hazards."

"The Minority Staff has produced a staff report that documents some of the tactics Monsanto has used to undermine the IARC monograph and scientific findings on glyphosate in general. I am attaching this report to my statement."

A February 6, 2018 Press Release

Link: <https://democrats-science.house.gov/news/press-releases/ranking-member-johnson-s-opening-statement-glyphosate-assessments-hearing>

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Article Title: Shocking Study Shows Glyphosate Herbicides Contain Toxic Levels of Arsenic

Excerpts:

"Prof. Gilles-Eric Seralini from the University of Caen Normandy, France, and his colleagues Dr. Nicolas Defarge and Dr. Joël Spiroux, have discovered several new findings which crush the pesticide industry's claim that the 'inert' ingredients in glyphosate-based herbicides do not need regulating:

"Seralini and his team also searched for other known toxic and endocrine-disrupting elements in 22 pesticides, including 11 glyphosate-based herbicides. They discovered several heavy metals in most formulations, in particular arsenic, chromium, cobalt, lead and nickel, which are known to be toxic and endocrine disruptors. All diluted formulations except one contained a cocktail of these metals."

Published by Sustainable Pulse, January 8, 2018

Link to Article: <https://sustainablepulse.com/2018/01/08/shocking-study-shows-glyphosate-herbicides-contain-toxic-levels-of-arsenic/#.WlfZIKvTm1s>

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Article Title: The Monsanto Papers: MDL Glyphosate Cancer Case Key Documents & Analysis

Excerpt:

"More than 270 lawsuits are pending against Monsanto Co. in U.S. District Court in San Francisco, filed by people alleging that exposure to Roundup herbicide caused them or their loved ones to develop non-Hodgkin lymphoma, and that Monsanto covered up the risks. The cases have been combined for handling as multidistrict litigation under Judge Vince Chhabria. The lead case is 3:16-md-02741-VC. Additionally, at least 1,100 plaintiffs have made similar claims against Monsanto in state courts. The first trial in the Roundup litigation is set for June 18, 2018 in the Superior Court for the County of San Francisco."

Published by US Right to Know, November 2017

Link to Article: <https://usrtk.org/pesticides/mdl-monsanto-glyphosate-cancer-case-key-documents-analysis/>

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Article title: How Monsanto captured the EPA (and twisted science) to keep glyphosate on the market

Excerpts:

"We have closely examined the publicly available archive of EPA documents from the earliest days of the agency's consideration of glyphosate. Significant portions of the relevant documents have either been partially redacted or omitted entirely. But this archived material reveals that EPA staff scientists, who found much of the data submitted by Monsanto unacceptable, did place great weight upon a 1983 mouse study that showed glyphosate was carcinogenic."

"Yet their interpretation was subsequently reversed by EPA upper management and advisory boards, apparently under pressure from Monsanto. In years to come, that pivotal 1983 mouse study would be buried under layers of misleading analysis to obscure its meaning. Today, the EPA and Monsanto continue to cite that study as evidence that glyphosate poses no public health risk, even though the study's actual evidence indicates otherwise."

Published on Nation of Change, November 3, 2017

By Elizabeth Grossman

Link to full article: <https://www.nationofchange.org/2017/11/03/monsanto-captured-epa-twisted-science-keep-glyphosate-market/>

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Article title: Excretion of the Herbicide Glyphosate in Older Adults Between 1993 and 2016

By Paul J. Mills, PhD1; Izabela Kania-Korwel, PhD2; John Fagan, PhD2; et al

Excerpts:

"The herbicide Roundup is sprayed onto genetically modified crops and applied as a desiccant to most small non-genetically modified grains. Use of this herbicide has increased since 1994 when genetically modified crops were introduced in the United States. Glyphosate, the primary ingredient in the herbicide, is found in these crops at harvest.<sup>1</sup> Environmental exposure through dietary intake of these crops has potential adverse health effects and can be assessed by measuring urinary excretion.<sup>2- 4</sup> We measured excretion levels of glyphosate and its metabolite aminomethylphosphonic acid (AMPA) in participants from the Rancho Bernardo Study (RBS) of Healthy Aging."

Published in the Journal of the American Medical Association (JAMA), October 24/31, 2017

Link to full article: <https://jamanetwork.com/journals/jama/article-abstract/2658306>

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Article title: Monsanto Secret Documents

Excerpts:

"On June 30, 2017, attorneys from Baum, Hedlund, Aristei & Goldman, along with the leadership of the

Roundup multidistrict litigation (MDL), challenged the protection of the documents below, in an effort to make them available to the public. In a meeting to discuss the matter, Monsanto told the plaintiffs' attorneys to "go away" and that the company would not voluntarily agree to de-designate any documents."

"The documents below allow people to see what is happening "behind the curtain" of secrecy that normally shrouds ongoing litigation. Along with each document, you will find a short description, along with the document's relevance to the ongoing Monsanto Roundup litigation. These documents tell an alarming story of ghostwriting, scientific manipulation, collusion with the Environmental Protection Agency (EPA), and previously undisclosed information about how the human body absorbs glyphosate. The following secret documents help us better understand the serious public health consequences of Monsanto's conduct in marketing the herbicide Roundup."

Published by attorneys from Baum, Hedlund, Aristei & Goldman, September 2017

Link to full article: <https://www.baumhedlundlaw.com/toxic-tort-law/monsanto-roundup-lawsuit/monsanto-secret-documents/>

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Article Title: Judge Threatens to Sanction Monsanto for Secrecy in Roundup Cancer Litigation

Excerpts:

"Nearly a year after a mysterious leak of industry-friendly information from the Environmental Protection Agency, many pressing questions remain about the agency's interactions with agribusiness giant Monsanto Co. and its handling of cancer concerns with Monsanto's top-selling herbicide. But thanks to a federal court judge in California, we may soon start getting some answers.

The transcript of a recent court hearing reveals that Judge Vince Chhabria, who is overseeing a combination of more than 55 lawsuits filed against Monsanto in the U.S. District Court for the Northern District of California, warned Monsanto that many documents it is turning over in discovery will not be kept sealed despite the company's pleas for privacy. He threatened to impose sanctions if Monsanto persists in "overbroad" efforts to keep relevant documents out of public view."

Published in Huffpost, May 16, 2017

Link to article:

[https://www.huffingtonpost.com/entry/judge-threatens-to-sanction-monsanto-for-secrecy-in\\_us\\_58c2de66e4b0c3276fb78433](https://www.huffingtonpost.com/entry/judge-threatens-to-sanction-monsanto-for-secrecy-in_us_58c2de66e4b0c3276fb78433)

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Please read about these recent lawsuits against  
Monsanto related to glyphosate

Agricultural laborers and gardeners are filing lawsuits against Monsanto which allege that Roundup caused their non-Hodgkin's lymphoma

Source: Class Action .com,

Link: <https://www.classaction.com/roundup-weed-killer/lawsuit/>

Lawyers for Roundup Cancer Claims: Free Case Review

Source: Saiontz & Kirk, P.A.

Link: <https://www.youhavealawyer.com/roundup/>



Roundup and Lymphoma: What You Need To Know

Source: NAPOLI SHKOLNIK, Attorneys at Law

Link: <https://www.napolilaw.com/article/roundup-lymphoma-need-know/>

Thousands of people now have non-Hodgkin's Lymphoma due to glyphosate (Roundup) exposure, warns legal firm that's suing Monsanto

Source: Natural News

Link: <http://www.naturalnews.com/2017-03-23-thousands-of-people-now-have-non-hodgkins-lymphoma-due-to-glyphosate-roundup-exposure-warns-legal-firm-thats-suing-monsanto.html>

Roundup Cancer Lawsuit -- Get a Free Legal Consultation

Source: NastLaw LLC

Link: <https://nastlaw.com/roundup-lawsuit/>

Products Liability Litigation for Cancer and Lymphoma after Exposure to Roundup Weed Killer

Source: OnderLaw

Link: <http://www.onderlaw.com/products-liability/roundup-cancer.aspx>

Roundup Lawsuit

Source: Schmidt Firm, PLLC

Link: <https://www.schmidtlaw.com/roundup-lawsuit/>

Roundup Non-Hodgkins Lymphoma Lawsuit

Source: Matthews and Associates,

Link: <http://dmlawfirm.com/roundup-non-hodgkins-lymphoma-lawsuit/>

Roundup and Non-Hodgkin Lymphoma Lawauit

Source: Brown & Crouppen, P.C.

Link: <http://www.browncrouppen.com/defective-products/roundup-non-hodgkin-lymphoma/>

Comment #: I have just presented the research conclusions of scores of independent scientists who all agree glyphosate exposure causes Non-Hodgkins Lymphoma which is a form of cancer. Ranger Mattrick, you base your conclusion that this chemical is safe on a single questionable study done by Syracuse Environmental Research Associates. How can you justify using this chemical that on July 7, 2017 California's Office of Environmental Health Hazard Assessment listed as a known carcinogen under California's Proposition 65? How can you justify using this chemical that the World Health Organization's International Agency for Research on Cancer said was "probably carcinogenic" in a controversial ruling in 2015?

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The USDA has been in bed with the Corporations that Manufacture Herbicides & Pesticides (including Monsanto) for Decades, thus, your Agency Withholds Herbicide Toxicity Information from You. You Know Now. Please act Responsibly.

Obama's Highly Corrupt USDA: END Monsanto.

<http://www.thomhartmann.com/users/telliottmbamsc/blog/2013/10/obamas-highly-corrupt-usda-end-monsanto>

A Government of Monsanto, by Monsanto, and for Monsanto

<http://farmwars.info/?p=5860>

USDA to Give Monsanto's New GMO Crops Special 'Speed Approval'

<http://naturalsociety.com/usda-to-give-monsantos-new-gmo-crops-special-speedy-approval/>

Another Monsanto man in a key USDA post? Obama's ag policy's giving me whiplash  
<http://grist.org/article/2009-09-24-usda-obama-monsanto-organic/>

GMO Science Deniers: Monsanto and the USDA  
<http://www.wanttoknow.info/a-gmo-science-deniers-monsanto-the-usda>

USDA Forces 'Whole Foods' To Accept Monsanto  
<http://humansarefree.com/2012/02/usda-forces-whole-foods-to-accept.html>

Is the USDA Covering Up Potential Dangers That Affect Your Health?  
<http://www.liveinthenow.com/article/is-the-usda-covering-up-dangers-that-affect-your-health>

USDA and Monsanto "Biotech" Industry Collusion  
<http://www.truthwiki.org/usda-and-monsanto-biotech-industry-collusion/>

Corruption at the USDA  
<https://newhomeeconomics.wordpress.com/2010/03/09/corruption-at-the-usda/>

USDA Admits Exterminating Birds, Crops, and Bees  
<http://worldtruth.tv/usda-admits-extminating-birds-crops-and-bees/>

USDA: Stop Killing Bees and Butterflies (CCD) While Saving Monsanto (Round-Up)  
<https://www.change.org/p/usda-stop-killing-bees-and-butterflies-ccd-while-saving-monsanto-round-up>

Are you aware that the USDA is attempting to corrupt organic standards?  
[http://www.carbonproduct.net/Health\\_and\\_Fitness/Are\\_you\\_aware\\_that\\_the\\_USDA\\_is\\_attempting\\_to\\_corrupt\\_oranic\\_standards/\\_17096](http://www.carbonproduct.net/Health_and_Fitness/Are_you_aware_that_the_USDA_is_attempting_to_corrupt_oranic_standards/_17096)

NEW SCANDAL FOR USDA & MONSANTO: Whistle Blowers at USDA say MONSANTO Influences Agency Suppression of Critical Science.  
<http://mauicauses.org/new-scandal-for-usda-monsanto-whistle-blowers-at-usda-say-monsanto-influences-agency-suppression-of-critical-science/>

USDA moves to let Monsanto perform its own environmental impact studies on GMOs  
[http://axisoflogic.com/artman/publish/Article\\_62860.shtml](http://axisoflogic.com/artman/publish/Article_62860.shtml)

Monsanto's GMO Crops Ravage US, USDA Ignores Dangers  
<http://www.alipac.us/f19/monsanto%92s-gmo-crops-ravage-us-usda-ignores-dangers-247146-print/>

THE BITTER TRUTH ABOUT THE USDA AND MONSANTO SUGAR BEETS  
<http://geneticallyengineeredfoodnews.com/monsanto-sugar-beets>

USDA Approves Toxic Herbicide Amidst Great Public Outcry  
<http://healthimpactnews.com/2014/usda-approves-toxic-herbicide-amidst-great-public-outcry/>

USDA Gives Green Light to 2,4-D Resistant GM Crops  
<http://sustainablepulse.com/2014/01/03/usda-gives-green-light-pesticide-promoting-gm-crops/#.VIIUtJbTm1s>

USDA refuses to test foods for glyphosate contamination, says pesticides are safe to eat.  
[http://www.naturalnews.com/048237\\_glyphosate\\_contamination\\_USDA.html](http://www.naturalnews.com/048237_glyphosate_contamination_USDA.html)

USDA Secretary Vilsack's proposal for product labeling: companies will voluntarily, use barcodes to tell consumers if their products contain GMOs. This would require you to scan the product, then be directed to the company's website where you'd have to wade through the advertising and search the fine print.  
<https://www.organicconsumers.org/essays/%E2%80%98%E2%80%99-barcodes-latest-plot-keep-you-dark-about-gmos>

Herbicide Use To Increase Dramatically  
<http://www.enn.com/agriculture/article/47711>

USDA Approval of Second-Generation of GMOs  
<http://undergroundhealthreporter.com/usda-approval-of-second-generation-of-gmos/#axzz3sFaNPdRd>

US Department of Monsanto (a.k.a. USDA)  
<http://www.anh-usa.org/us-department-of-monsanto-a-k-a-usda/>

USDA Drops Plan To Test For Monsanto Weed Killer In Food  
[https://www.huffingtonpost.com/entry/usda-drops-plan-to-test-for-monsanto-weed-killer-in\\_us\\_58d2db4ee4b062043ad4af84](https://www.huffingtonpost.com/entry/usda-drops-plan-to-test-for-monsanto-weed-killer-in_us_58d2db4ee4b062043ad4af84)

USDA okays Monsanto's herbicide-resistant GMO corn w/o permits  
<https://www.rt.com/usa/337088-usda-deregulates-monsanto-corn/>

The FDA and USDA have become the legislative and executive branches of Monsanto, Dow, Bayer and the likes.  
<http://peopleforethicaliving.com/fda-usda-monsanto-pharma-gmo/>

USDA Censoring Anti-Monsanto Science?  
<https://www.foodandwaterwatch.org/news/usda-censoring-anti-monsanto-science-0>

USDA betrays American people, approves Monsanto's new GMOs  
[https://www.naturalnews.com/048751\\_GMOs\\_USDA\\_Monsanto.html](https://www.naturalnews.com/048751_GMOs_USDA_Monsanto.html)

Six Reasons Why Obama Appointing Monsanto's Buddy, Former Iowa Governor Vilsack, for USDA Head Would be a Terrible Idea  
<https://www.organicconsumers.org/news/six-reasons-why-obama-appointing-monsantos-buddy-former-iowa-governor-vilsack-usda-head-would>

Another Monsanto man in a key USDA post? Obama's ag policy's giving me whiplash  
<https://grist.org/article/2009-09-24-usda-obama-monsanto-organic/>

Tell the Senate: Don't Let Monsanto Run the USDA and EPA!  
[https://action.organicconsumers.org/o/50865/p/dia/action3/common/public/?action\\_KEY=19679](https://action.organicconsumers.org/o/50865/p/dia/action3/common/public/?action_KEY=19679)

Trump's top pick for USDA chief is a friend of Monsanto  
<https://dcinfowarrior.wordpress.com/2016/12/02/trumps-top-pick-for-usda-chief-is-a-friend-of-monsanto-sambrownback/>

Sonny Perdue: In the Pocket of Big Ag  
<https://medium.com/center-for-biological-diversity/sonny-perdue-in-the-pocket-of-big-ag-b127043dfea5>

5 Reasons Why Food Experts Are Worried About Trump's New Agriculture Secretary  
<http://www.grubstreet.com/2017/01/5-reasons-experts-worry-about-trumps-agriculture-secretary.html>

Trump Makes His Pick for Agricultural Secretary - And It Looks Like Good News for Big Ag (and Monsanto For That Matter)  
<https://www.march-against-monsanto.com/tag/monsanto-sonny-perdue/>

Please Sign: Dump Trump's Monsanto Man! NoPerdue! No SwampCabinet!  
[https://action.organicconsumers.org/content\\_item/oca-email?email\\_blast\\_KEY=1365277](https://action.organicconsumers.org/content_item/oca-email?email_blast_KEY=1365277)

Trump Meets With Leaders From Monsanto, Bayer  
<https://www.chem.info/news/2017/01/trump-meets-leaders-monsanto-bayer>

Being a retired USFS employee I know most USFS line-officers don't seriously consider or evaluate suggested project changes suggested by the public because they selected the alternative that will be implemented prior to scoping. They feel the NEPA process is a needless, expensive waste of time. They also know the vast majority of the Americans they claim to serve will never take them to Federal District Court.

There is something you cannot run & hide from Ranger Mattrick. Our God knows everything. When given the evidence for glyphosate safety, even a child would conclude that no human being should be exposed to glyphosate. God will hold you accountable for knowingly and willingly subjecting people you don't know to cancer. No caring, sane person would risk another person's life because their employer approves. Decades of scientific research conclusions from around the world conclusively show glyphosate exposure also might cause DNA damage, autism, irreparable kidney and liver damage, infertility, learning disabilities, ADHD and other neurological disorders (especially in children), mitochondrial damage, cell asphyxia, endocrine disruption, bipolar disorder, skin tumors, thyroid damage, decrease in the sperm count, chromosomal damage and birth defects.

You are the one that must live with yourself for the rest of your life.

Request for changes to be made to the final NEPA document: Clearly indicate "herbicides that contain glyphosate will not be used anywhere, at any time, for any reason as part of this timber sale."

Failure to tell the public this chemical will not be applied to vegetation in your forest leaves the door open for you to apply glyphosate. This violates 18 U.S.C. § 1001(c), 40 CFR 1501.2 (b), 40 CFR 1502.16(a) and (b), 40 CFR §1508.27(b)(2), 40 CFR and the Apr. 21, 1997 Executive Order No. 13045

A person who is guilty of reckless endangerment creates a substantial risk of death or serious physical injury to another person. Your witless need to please the USDA by embracing man-made chemical corporations shows your next promotion on the USFS is more important than human lives. Reckless endangerment is a felony.

40 CFR §1508.27(b)(2) because the FOIA intensity discussion will not discuss the degree to which the proposed action affects public health or safety.

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Vigor and Increased Growth of Trees is Important only to Foresters who Manage Private Industrial Tree Farms where Every Tree is Destined for the Mill to Generate Profit. Who are you People?

Obviously a goal of the Robinson timber sale is to create tree-farm conditions and reject conditions that exist in healthy, biodiverse forests which are a mixture a vigorous, dead, dying and slow growing trees. You should know this, yet your obsession with pleasing your corporate masters clouds your mind. I'm sorry for you.

Comment: You are taking action to create vigorous trees and in doing so are damaging many other amenity

resources in the forest according to the science contained in Opposing Views Science Attachments #1 and #4. You know the vast majority of the people who pay the taxes to make your salaries would not consider this an acceptable tradeoff.

At page 50 you say:

"Timber management would harvest trees that are over-mature, high risk, or with defect or disease, while retaining the healthy and most vigorous trees."

Spending tax dollars to enrich corporate America with trees having few defects and eliminating the possibility of beneficial natural disturbance events occurring and still claiming you are creating a healthy forest clearly show you don't know about the proper functioning of a real forest.

There is no need to increase the growth rate of trees in national forests. There is no need to increase the vigor of trees in national forests. In natural forests some trees will grow fast and others slower. Slow growing trees benefit other forest resources.

In the national forests there are forest values that are infinitely more important than the money generated by harvesting merchantable trees. Undeveloped forests contain different conifer species that grow under different conditions. This contributes to varying growth-rate levels. This is the essence of biodiversity.

A biodiverse forest contains unique habitat niches for wildlife species that are not found in "managed," simplified stands containing vigorous fast growing trees.

Comment: Your pre-decisional EA for the Robinson timber sale indicates one of your objectives is to create conditions that will produce vigorous trees. Forests with vigorous fast growing trees are what foresters managing private industrial tree farms strive to create. Why? These forests maximize profit because the trees grow to merchantable size sooner. Unlike tree farms, a healthy national forest has a mixture of decadent, slow growing trees and vigorous trees.

All healthy populations of living things have dead and dying individuals. Your wildlife biologist knows there are many wildlife species dependent on dead and dying conifer tree species. They are frightened to express their professional opinion because they know you are desperate for volume. Please stop trying to control a natural forest to maximize the corporate profit when its logged next time.

Comment: You present no monitoring data showing there is a shortage of vigorous trees in the sale area. You present no data showing why and how increasing the percentage of vigorous trees will enhance the health of the countless natural resources in the area. A man-made forest as you are attempting to create will never contain natural biodiversity.

Once again, the Green Mountain national forest must not be managed as tree farms.

Request for changes to be made to the final NEPA document: Please tell the public why spending their tax money to take action to create fast growing, vigorous trees is more important than letting the trees grow at their own rate which provides biodiversity. Also, identify the flora and fauna in the forest that thrive in decadent slow-growing forest conditions and how these species will be harmed in Chapter 3.

Failure to do so will violate 40 CFR 1500.2(f), 40 CFR 1500.1(b) and (c), and 40 CFR 1500.2(f)

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Clearcutting the land owned by 322 million Americans directly assaults them and future generations.

The Table at page 12 of the pre-decisional EA indicates 479 acres will have the clearcut Rx.

Please learn what the experts say about clearcutting in Opposing Views Science Attachment #19.

Survey after survey shows the public does not want their land clearcut. You know this, yet you allow Mr. Graziadei to practice what he learned to do on college ... create a fast growing industrial tree farm devoid of biodiversity. Can you even comprehend the public's hatred of clearcuts? Perhaps you do but don't care. If this is the case, you have no business making decisions that involve the land communally owned by 324 million Americans. Here's a tiny sample of the many online articles detailing how Americans feel about clearcutting their national forests:

Article Title: A clear-cut controversy---Some logging halted after outcry over Mass. forestry mistakes

Excerpts:

"These are largely the handiwork of state foresters who, in the past five years, dramatically changed the way they manage trees on many public lands. After a decade of little logging, the state began using clear-cuts to weed out diseased and aging timber.

While some clear-cutting is allowed, forestry officials now acknowledge that, in the process, they sometimes violated their own rules."

[http://www.boston.com/news/science/articles/2010/03/04/a\\_clear\\_cut\\_controversy/](http://www.boston.com/news/science/articles/2010/03/04/a_clear_cut_controversy/)

Article Title: The perceived scenic effects of clearcutting in the White Mountains of New Hampshire, USA

Excerpts:

"The scenic effects of clearcutting have been a volatile issue for the American public for much of the past century. A better understanding of the scenic perceptions associated with the cumulative visible effects of clearcutting should contribute to better decisions about its use."

"A random sample of local citizens, four groups of opinion leaders, and US Forest Service employees evaluated these alternatives."

"All groups indicated a statistically significant decrease in visual quality as the intensity of harvesting increases."

<http://www.sciencedirect.com/science/article/pii/S030147970700237X>

Article Title: A Shameful Legacy---The Shocking Mismanagement of America's Public Lands

Excerpts:

"This essay is not intended to be a criticism of most of the employees of the forest service or the Bureau of Land Management. Most are dedicated employees who work for those agencies as much to make a difference as to make a living. And it has been my experience that many, if not most, are discouraged by the policies forced on them by ignorant bureaucrats and self-serving politicians in Washington. When I described my ideas for forest management to one forester, for example, tears welled up in his eyes, and he told me he'd dreamed all his life of

managing a forest that way. But he can't, and neither can the other dedicated, hardworking managers who really understand the problem and want to solve it."

"Today, the situation has changed. Forests in the west have shrunk, through overharvesting and bad management, to less than five percent of what they once were. Population has grown by orders of magnitude, placing intense new pressures on the land, not just for timber, but as places of recreation and sources of water and minerals. No longer can we, as a nation, afford to look at the forest system as merely a source of timber, to be managed on a "maximum sustained yield" basis."

<http://www.bidstrup.com/publiclands.htm>

Article Title: Clearcutting Oregon

Excerpts:

"That's right. Despite Oregon's "green" reputation, the laws that regulate logging in our state encourage clearcutting that destroy precious wildlife habitat, pollutes clean drinking water, warms the planet, endangers the health of communities, and threatens Oregon's natural heritage and beauty."

<http://www.clearcutoregon.com/>

Silviculture is the science of planting and tending trees to maturity in order to maximize the revenue when the timber is sold. Colleges that teach silviculture prepare the student for a career managing the trees growing in private industrial tree farms. Unfortunately, when the USFS hires silviculturists their line-officer supervisors do not teach them that the goals of national forest land and private industrial tree farms are not the same. Without this counseling, USFS silviculturists believe it's their job to maximize volume and profit from each national forest timber sale. They think the trees on "suitable" land must be treated like those that grow on tree farms ... money on the stump that are all eventually hauled to the mill. They are practicing what they were trained to do.

Since the agency has no formal training for entry-level silviculturists, their line-officers are expected to do it. Many USFS line-officers have more important things to do.

Competent, professional line-officers would never approve clearcuts even if clearcutting was the optimum regeneration method. They had the sense to compromise. They knew their job was not to grow large trees as quickly as possible, but to serve the public. They had the maturity to tell their silviculturists "NO." It didn't take long for the silviculturists to learn what their supervisor wanted. These silviculturists didn't dictate prescriptions. They proposed prescription options to the line-officer and explained the pros and cons for each.

Comment: Each non-timber resource specialist should know clearcutting is opposed by the vast majority of the American public. The photo's at the link below show why. There are reasonable alternatives to clearcuts. Please don't allow Mr. Graziadei to let regeneration success dictate anything. Even though shelterwood is not the optimum regeneration method, it will be more pleasing to the public and still comply with NFMA's reforestation requirement.

<http://www.bing.com/images/search?q=clearcut+photos&qpv=clearcut+photos&qpv=clearcut+photos&FORM=IGRE>

Comment: Here are videos of clearcutting. Is it so important to regenerate shade intolerant conifer tree species that you feel it's acceptable to reject the more visually acceptable shelterwood Rx? It's really all about volume isn't it?

<http://www.bing.com/videos/search?q=clear+cutting+forests&qpv=Clear+Cutting+Forests&FORM=VD>

RE

Comment: The American public has been clear. They do not want their forests clearcut at any location for any reason. Many USFS employees were trained to be foresters. Foresters are trained to manage tree farms on private land for the maximum revenue per acre. Foresters hired by the USFS defy the will of the public by practicing their trade on public land rather than tree farms. They reject Pinchot's wise words "the greatest good for the most number of people." There is no "timber famine just around the corner" in America as the USFS has been saying for many decades. Isn't this right Mr. Graziadei?

Comment: Ranger Mattrick, will you be proud to pockmark and disfigure the public's land with ugly visual scars? Does it make you feel powerful? How will you justify your actions when recreationists come to your office complaining about clearcuts? Do you really think they will buy the optimum regeneration method BS?

Don't allow the timber employees on the IDT to control your decisions. Don't capitulate and succumb to their advice. Be a leader. Really serve the public.

Please let the wisdom of Opposing Views Science Attachments #19 and #26 guide your actions.

Request for changes to be made to the final NEPA document:

Eliminate ALL proposed clearcut units. Use a partial cut RX and consider restoring the area to what it was before it was logged by planting the same on-site species.

Failure to do this will violate 40 CFR 1500.2(e) and (f), NEPA Sec. 101(b)(2) and NEPA Sec. 101(c)

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The pre-decisional EA indicates there will be seedtree and shelterwood prescriptions associated with the Proposed Action.

The Table at page 12 of the pre-decisional EA indicates 32 acres will have the seedtree Rx and 1771 acres will have the shelterwood Rx.

You prescribe seedtree and shelterwood as a way to regenerate these forested areas. You fail to include information required by NFMA:

Request for changes to be made to the final NEPA document:

\*provide data and text demonstrating that soil, slope, or other watershed conditions will not be irreversibly damaged by seedtree and shelterwood silvicultural prescriptions.

\*provide data and text demonstrating that seedtree and shelterwood silvicultural prescriptions are appropriate to meet the objectives and requirements of the relevant land management plan.

Failure to do so will violate NFMA Section 6 (E)(i) and (iii) as well as NFMA Section 6 (F)(i).

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The pre-decisional EA does not discuss how the timber sale's logging and slash/RX burning activities will be mitigated to assure protected migratory bird species' individuals and their habitat are not harmed in any way.

Neotropical migratory birds are mentioned only once in the EA at page 43:



"Openings greater than four acres have been found to provide habitat for a large diversity of bird and other wildlife, including many neotropical migratory birds that are considered to be interior forest species."

Comment: It is not only possible but highly likely that that logging and slash/RX burning you propose will harm the habitat and/or kill individual birds. This is especially true of young birds that cannot flee the danger: The Treaty requires the NEPA document to include information showing why the following damage will not occur. The plaintiffs' attorney will expect the NEPA document to contain specific action that will be taken to prevent:

"harm the birds with logging-related pollution",  
"detrimentally alter the bird's habitat",  
"environmentally degrade the area surrounding the bird's habitat", and  
"kill bird chicks by destroying their nests or eggs".

Note: The 4 quotes above come directly from the Act.

The Robinson draft EA doesn't come close to complying with the Act.

As you can see at the link below, the Migratory Bird Treaty Act is a major issue with the National Audubon Society. On May 24, 2018 the Society filed Audubon v. Dept of the Interior. Unless the final NEPA document clearly complies with mandate of the Act this comment concerning the MBTA and instructions on how to access your EA and draft decision will be sent to the Society in Washington DC. You sir might be infamous. There's a good chance you will be responsible for Audubon v. USDA.

Request for changes to be made to the final NEPA document: Identify the birds that exist in and near the project area that are protected under the Migratory Bird Treaty Act and discuss how these birds will be protected during burning and timber harvest operations. The Act makes no allowance to consciously harm these birds for any reason.

Failure to do so will violate the Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-712; Ch. 128; July 13, 1918; 40 Stat. 755) as amended by: Chapter 634; June 20, 1936; 49 Stat. 1556; P.L. 86-732; September 8, 1960; 74 Stat. 866; P.L. 90-578; October 17, 1968; 82 Stat. 1118; P.L. 91-135; December 5, 1969; 83 Stat. 282; P.L. 93-300; June 1, 1974; 88 Stat. 190; P.L. 95-616; November 8, 1978; 92 Stat. 3111; P.L. 99-645; November 10, 1986; 100 Stat. 3590 and P.L. 105-312; October 30, 1998; 112 Stat. 2956)

Violating an international Treaty isn't trivial.

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Descriptions of how logging this sale will affect climate change do not exist in the pre-decisional EA.

You mention "climate change" many times throughout the pre-decisional EA DEIS describing how climate change will affect many of the resources in the area. It does not disclose how sale implementation will intensify climate change as USFS policy requires.

Comment: The pre-decisional EA mentions climate change several times in the context of how climate change will affect the natural resources in the sale area. This is not a disclosure of how the Robinson sale will affect the climate change process as required by law.

Comment: Ranger Mattrick, you conveniently omit research that finds logging emits more CO2 than wildfire. Here's an excerpt from Oregon State University researcher Beverly Law and her colleagues' research conclusions:

"The wood products sector generated about one and a half times more emissions than the transportation or energy sector emissions reported by the Oregon Global Warming Commission. Wood product emissions are the result of fuel burned by logging equipment, the hauling of timber, milling, wood burned during forestry activities, and the ongoing decomposition of trees after they are cut. Forest fire emissions were less than a quarter of all forest sector emissions in each of the five-year increments studied between 2001 and 2015."

Climate change is a major issue world-wide. So what do you propose to do? Make it worse by logging 14.5 square miles.

Link to research conclusions:

<https://mountainwestnews.org/harvesting-co2-2d88711b644d>

Comment #: National Geographic magazine features logging's effect in climate change. Here are excerpts from the article at the link below:

"Modern-Day Plague

Deforestation is clearing Earth's forests on a massive scale, often resulting in damage to the quality of the land. Forests still cover about 30 percent of the world's land area, but swaths half the size of England are lost each year."

"Deforestation can have a negative impact on the environment. The most dramatic impact is a loss of habitat for millions of species. Eighty percent of Earth's land animals and plants live in forests, and many cannot survive the deforestation that destroys their homes.

Deforestation also drives climate change. Forest soils are moist, but without protection from sun-blocking tree cover, they quickly dry out. Trees also help perpetuate the water cycle by returning water vapor to the atmosphere. Without trees to fill these roles, many former forest lands can quickly become barren deserts."

[http://www.nationalgeographic.com/environment/global-warming/deforestation/?utm\\_source=NatGeocom&utm\\_medium=Email&utm\\_content=video\\_20170811&utm\\_campaign=WatchThis\\_PM&utm\\_rd=917302404](http://www.nationalgeographic.com/environment/global-warming/deforestation/?utm_source=NatGeocom&utm_medium=Email&utm_content=video_20170811&utm_campaign=WatchThis_PM&utm_rd=917302404)

Comment: Forests are natural carbon sinks. Carbon sinks absorb carbon dioxide. Un-manipulated (unlogged) Forests reduce the concentration of greenhouse gases into the atmosphere and delay the sordid effects of climate change. Trees store carbon dioxide. When the trees are removed (logged or burned) the stored carbon dioxide is released into the atmosphere.

Here is science authored by independent scientists who unlike you, have no interest in volume:

Timber is Oregon's biggest carbon polluter

Published in High Country News, May 16, 2018

Link: [https://www.hcn.org/articles/climate-change-timber-is-oregons-biggest-carbon-polluter?utm\\_source=wc1&utm\\_medium=email](https://www.hcn.org/articles/climate-change-timber-is-oregons-biggest-carbon-polluter?utm_source=wc1&utm_medium=email)

Excerpts:

"Last summer, the skies of Oregon turned a foreboding shade of gray. Forest fires up and down the state blackened forests and left people gasping for air. Politicians stumped about the need to ramp up logging to improve Oregon's air, environment and economy. The fires and heated rhetoric got Oregon State University researcher Beverly Law thinking about carbon storage and emissions from Oregon forests.

Because of the human health impacts of smoke, the conversation about pollution and forests is typically centered on fires. But the study Law and her colleagues put together earlier this year found that wildfire is not the biggest source of climate-warming carbon dioxide in Oregon forests - logging and wood products are. Figuring out the role of forests and wood in carbon pollution could have major policy implications in Oregon, as Gov. Kate Brown has pledged to meet the emissions goals of the Paris Climate accords."

To curb climate change, we need to protect and expand US forests.

Published in Truthout, June 18, 2017

Link: <http://www.truth-out.org/news/item/40775-to-curb-climate-change-we-need-to-protect-and-expand-us-forests>

Excerpt:

"In a new report published by the nonprofit Dogwood Alliance, my co-author Danna Smith and I show that we have a major opportunity to make progress on climate change by restoring degraded US forests and soils. If we reduce logging and unsustainable uses of wood, we can increase the rate at which our forests remove carbon dioxide from the atmosphere and ensure that it will remain stored in healthy forests.

Accounting for Climate-Related Risks in Federal Forest-Management Decision

A Federal Forest Carbon Coalition Background Paper, 2015

Link:

[http://a123.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/95412\\_FSPLT3\\_2571365.pdf](http://a123.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/95412_FSPLT3_2571365.pdf)

Excerpt:

"The value of carbon storage in uncut forests "Outweigh the additional timber-related benefits by more than 30-to-1. The value of this carbon storage is equal \$1.6 million per additional timber-related job." (page 1)

"Actions that reduce the amount of carbon stored in federal forests contribute to disruption of the global climate by increasing atmospheric concentrations of carbon dioxide. The climate disruption raises the risk of economic harm-locally, nationally, and globally-from extreme weather events, higher temperatures, changes in precipitation, rising sea levels, acidification of oceans, and changes in ecosystems. Laws and executive orders require managers of federal forests to account for these risks." (page 2)

"The Bureau of Land Management, U.S. Forest Service, and other federal forest-management agencies have legal and administrative obligations to account for and clearly disclose the climate-related risks of the timber-harvest and other activities that reduce the amount of carbon stored on their lands. These obligations will become more imperative as human-caused disruption of the climate becomes more severe and the likelihood of catastrophic outcomes increases." (page 6)

Deforestation and climate change

Published by Greenpeace

Link: <http://www.greenpeace.org.uk/forests/climate-change>

Excerpts:

"Mature forests store enormous quantities of carbon, both in the trees and vegetation itself and within the soil in the form of decaying plant matter. Forests in areas such as the Congo and the Amazon represent some of the world's largest carbon stores on land.

But when forests are logged or burnt, that carbon is released into the atmosphere, increasing the amount of carbon dioxide and other greenhouse gases and accelerating the rate of climate change. So much carbon is released that they contribute up to one-fifth of global man-made emissions, more than the world's entire transport sector."

Forest fuel reduction alters fire severity and long-term carbon storage in three Pacific Northwest ecosystems.

Published by Ecological Applications. 19(3), 2009, pp. 643-

Mitchell, Stephen Ph.D., Harmon, Mark Ph.D. and O'Connell, Kari Ph.D.

Link: <http://onlinelibrary.wiley.com/doi/10.1890/08-0501.1/abstract>

#### Abstract

"However, reducing the fraction by which C is lost in a wildfire requires the removal of a much greater amount of C, since most of the C stored in forest biomass (stem wood, branches, coarse woody debris) remains unconsumed even by high-severity wildfires. For this reason, all of the fuel reduction treatments simulated for the west Cascades and Coast Range ecosystems as well as most of the treatments simulated for the east Cascades resulted in a reduced mean stand C storage."

Trees Are Our Climate Saviors - So Stop Logging on Public Land

By Ellen Moyer, Ph.D.

Published in The Huffington Post, April 14, 2014

Link: [http://www.huffingtonpost.com/ellen-moyer-phd/trees-are-our-climate-logging\\_b\\_4775894.html](http://www.huffingtonpost.com/ellen-moyer-phd/trees-are-our-climate-logging_b_4775894.html)

#### Excerpts:

"President Obama could combine his aspirations for climate protection and land protection by stopping commercial logging on federal lands so forests can capture more carbon dioxide from the atmosphere. He could challenge state and local governments to follow suit."

"Photosynthesis is one of only two significant mechanisms for removing carbon dioxide from the atmosphere (the other being dissolution into water, leading to destructive ocean acidification). Carbon dioxide is released when trees are cut down, and deforestation accounts for at least 15 percent of global carbon emissions. Thus, cutting down trees is a double-whammy because we not only lose carbon capture capacity, but we release more carbon, too."

"Large amounts of carbon are stored in the living wood and the soil of old forests. Forests left undisturbed for 1,000 years or more continue to suck carbon into the soil. Recent studies show that Northern Hemisphere forests capture large amounts of carbon dioxide from the atmosphere. Forests in the United States sequester 10 percent of the total annual United States carbon dioxide emissions from burning fossil fuels. Uncut forests store more carbon than do forests that are logged, and the loss of carbon is proportional to the extent of harvesting. Over two-thirds of the total carbon in forest ecosystems is stored in forest soil, and significant release of soil carbon occurs from logging."

"Trees are our climate saviors, and it takes decades or centuries - time we don't have - to recover from the mistake of cutting them down."

"We need all levels of government to start preserving forests - and fast. In addition to switching from dirty to clean energy, President Obama should halt commercial logging on federal lands, eliminate biomass power plant subsidies that drive forest destruction, and permanently protect forests for carbon capture (in addition to forests' many other public benefits)."

Comment #: Dr. Moyer's article stressing the fact that live trees capture the greenhouse gas carbon published in the Huffington Post in 2014 states:

"Trees are our climate saviors, and it takes decades or centuries - time we don't have - to recover from the mistake of cutting them down."

"Photosynthesis is one of only two significant mechanisms for removing carbon dioxide from the atmosphere."

"Uncut forests store more carbon than do forests that are logged, and the loss of carbon is proportional to the extent of harvesting. Over two-thirds of the total carbon in forest ecosystems is stored in forest soil, and significant release of soil carbon occurs from logging."

Link: [http://www.huffingtonpost.com/ellen-moyer-phd/trees-are-our-climate-logging\\_b\\_4775894.html](http://www.huffingtonpost.com/ellen-moyer-phd/trees-are-our-climate-logging_b_4775894.html)

Ranger Matrick, you clearly believe the trees in the Green Mountain National Forest don't Photosynthesize or Dr. Moyer doesn't know what she's talking about. Which is it?

Effects of fuel treatments on carbon-disturbance relationships in forests of the northern Rocky Mountains  
Published in Forest Ecology and Management 259 (2010)

By Reinhardt, Elizabeth, and Holsinger, Lisa

Link: <https://naldc.nal.usda.gov/download/39942/PDF>

Excerpt:

"Although wildfire emissions were reduced by fuel treatment, the fuel treatments themselves produced [carbon] emissions, and the untreated stands stored more carbon than the treated stands even after wildfire. ... Our results show generally long recovery times."

How State and private forest practices are subverting Oregon's climate agenda

Published by

By John Talberth

Link: <http://sustainable-economy.org/how-industrial-forest-practices-are-subverting-oregons-climate-agenda/>

Excerpt:

"These emissions are four to seven times higher those associated with coal combustion by the Boardman coal-fired plant in 2012, are equivalent to 2-4 million new cars on the road, and make logging on State and private lands one of Oregon's biggest GHG polluters and a major impediment to Oregon's ambitious GHG reduction targets."

There are many, many more scientific references that describe how logging increases CO2 in the atmosphere available on request. You are probably a climate change denier, nevertheless you are legally required to address it.

Request for changes to be made to the final NEPA document: Include an accurate, truthful discussion of the direct and indirect effects of how logging this sale will affect greenhouse gases. Also include the best science documents shown above in your Reference section and cite them in the text.

Failure to do so violates:

1) Climate Change Considerations in Project Level NEPA Analysis (Washington Office Memo January 13, 2009);

2) Executive Order 13514 of October 5, 2009; and

3) The National Environmental Policy Act. NEPA states that all Federal agencies "to the fullest extent possible" must provide a detailed environmental impact statement (EIS) (42 U.S.C. 4332). Neither Congress nor the courts have indicated precisely how much detail an EIS must contain. However, courts consistently have held that, at a minimum, NEPA imposes a duty on Federal agencies to take a "hard look at environmental consequences" (Natural Resources Defense Council v. Morton, 458 F.2d 827, 838 (D.C. Cir., 1972).

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If you care about maintaining aquatic species' health you will indicate in the final EA that all newly constructed temporary roads will be obliterated after use by returning the ground to the natural angle of repose and eliminating the road's running surface. If you were really concerned about aquatic species' health you wouldn't propose any new road construction.

You indicate your temporary roads will be decommissioned after use. At page 25 you say:

"Road decommissioning brings the road to a sustainable condition. This includes the removal of all structures, ensuring adequate drainage, scarifying existing road surface to promote vegetative growth and, where needed, stabilize embankments and slopes. The road template would not be removed in its entirety due to the cost prohibitive nature of this work."

Comment: You indicate you will construct 6.22 miles of temporary road.

Ranger Mattrick, you never build true "temporary" roads on the Rochester Ranger District do you? You say your decommissioned roads will be in a "sustainable condition." When a temporary road is no longer needed line-officers who care about aquatic resources take action to eliminate the road.

Comment: We have all walked short sections of "temporary" roads that were constructed and located by employees working for the purchaser. Their goal was to minimize cost ... not reduce aquatic damage by eliminating the possibility that sediment might enter streams. Your IDT hydrologist and fisheries biologist should know Temporary roads are outsloped, thus they are linear sediment generators each time it rains and when the snow melts in the spring. It appears we have a competency problem here. You propose to build 6.22 miles of so-called "temporary" road and leave it in a "sustainable condition" after it is no longer needed. You cannot comprehend the aquatic damage these roads will cause.

Professional, knowledgeable USFS line-officers, hydrologists and fisheries biologists always propose to obliterate temporary roads the same year they are no longer needed to avoid overwintering. An obliterated road has no running surface to seed. A backhoe places the fill back into the cut. The CMPs are taken out. I am aware that 36 CFR 212.1, FSM 7705 - Transportation System) and Forest Service Manual (7712.11- Exhibit 01) define Road decommissioning as "Activities that result in the stabilization and restoration of unneeded roads to a more natural state." FSM 7712.11 identifies five levels of treatments for road decommissioning which can achieve the intent of the definition. These include the following:

1. "Block entrance
2. Revegetation and waterbarring
3. Remove fills and culverts
4. Establish drainageways and remove unstable road shoulders
5. Full obliteration recontouring and restoring natural slopes"

Even a child (and also a judge) would understand treatments 1-4 do not "restore unneeded roads to a more natural state." If you care about aquatic health want to comply with the law [36 CFR 212.5(b)(2)] you will fully obliterate your temporary roads after they are no longer needed for this project.

Here is more obliteration information that you and your IDT members should already know but have chosen to ignore:

#### "Obliteration

Obliteration can be the most effective treatment for both aquatic and terrestrial species. In full obliteration, culverts are removed, road surfaces are ripped and slopes are recontoured (see below for explanations of these treatments). In simple decommissioning, sites (such as stream crossings) are treated, but the segments (such as the roadbed between two stream crossings, or between water bars) are left intact. In obliteration, all sites and segments are treated. Subsurface water flow is no longer interrupted, allowing water to flow normally throughout the system and therefore aiding with vegetative recovery and reconnecting fragmented habitat. Recovering the original topsoil may also aid in revegetative success and limit the spread of non-native species on the site. Road obliteration, therefore, addresses both the aquatic/hydrologic and terrestrial problems caused by roads."

From "AN EXPLANATION AND ASSESSMENT OF ROAD REMOVAL IN VARIED HABITATS"

By Bethanie Walder and Scott Bagley

Published by the Wildlands Center for Preventing Roads, Missoula, MT

Link: <http://www.icoet.net/downloads/99paper39.pdf>

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"Unless a road is fully obliterated, it is bound to continue receiving human use and fail to fully revegetate."

"These facts and common sense show clearly that a road will not cease functioning as a road or trail until it is fully obliterated to the point where travel off of the former roadbed is easier than travel on it. As the following discussion on the benefits of road obliteration will show, simply gating a road or taking it off of the inventory does not make the impacts or the road go away."

From: "Road Obliteration: Benefits to the Watershed and Its Inhabitants"

A Swan View Coalition publication by Keith Hammer, 1994

Link: [http://www.swanview.org/articles/reports-documents/road\\_obliteration\\_benefits\\_to\\_the\\_watershed\\_and\\_its\\_inhabitants/56/](http://www.swanview.org/articles/reports-documents/road_obliteration_benefits_to_the_watershed_and_its_inhabitants/56/)

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"The recontouring technique described here is considered the highest attainable level of mechanical obliteration and hydrologic restoration for low volume roads. This includes reestablishing original contour-removing embankments and removing cuts-removing drainage structures, establishment of subsurface flow, debris and rock placements, treatments to gullies and their connectivity to stream systems, and vegetative plantings, seeding and mulching." (pg 20)

From: "A Guide for Road Closure and Obliteration in the Forest Service" 1994

By Jeffery E. Moll, P.E. who worked at the San Dimas Technology & Development Center

Link <http://www.fs.fed.us/eng/pubs/pdfimage/96771205.pdf>

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"obliteration - to completely remove the road feature from the landscape. This is accomplished by full recontouring. See full recontouring."

"full recontouring - the treatment of a road that completely eliminates (obliterates) the road from the landscape. Full recontouring is accomplished by recovering all available fill and burying the cutbank until the surrounding terrain is fully matched. This type of treatment is also referred to as road removal or road obliteration. See obliteration."

"Best Management Practices for Road Rehabilitation -- Full Road Recontouring", May 2003

Prepared by: Brian R. Merrill, C.E.G. and Ethan Casaday, C.P.E.S.C.

Published by North Coast Redwoods District California State Parks

Link: [http://www.parks.ca.gov/pages/23071/files/fullroadrecontourbmp5\\_03.pdf](http://www.parks.ca.gov/pages/23071/files/fullroadrecontourbmp5_03.pdf)

Consider what this expert has to say:

Article title: Permanent Damage From Temporary Logging Roads

Published online by Counterpunch, March 19, 2009

By George Wuerthner, ecologist and biologist

Link: <https://www.counterpunch.org/2009/03/19/permanent-damage-from-temporary-logging-roads/>

Exerpts:

"To fully reclaim a road is more than putting up a gate to block vehicle travel. It requires ripping up the road bed to remove the compacted soil layers. The side slope soil has to be put back on the site, and reshaped so sub surface and surface water flow is restored. Culverts need to be removed, and stream channels fully restructured and reconstituted. Vegetation needs to be planted-and grass seed is not enough-especially if the area once supported forest. And logs, rocks, and other natural structures need to be put back on the slope. And even if all these things are done, an old road does not magically disappear overnight. It continues to have impacts for years until the vegetation has grown sufficiently to more or less emulate the pre-road condition.

By contrast, I've seen a lot more minimally reclaimed roads. I've been on forest service lands where a "temporary" road is just a road that the FS didn't put on its travel maps as a legal road. It was still there on the ground, but since it was not included in the official travel plan as a road, as far as the FS was concerned, the road did not exist any longer."

Please see Opposing Views Science Attachment #4.

Request for changes to be made to the final NEPA document: Tell the public all temporary roads will be obliterated such that the terrain where the road was constructed is returned "to a more natural state" which means returning it to the condition it was before the road was constructed. This means the running surface will no longer exist except on flat ground.

Also, please assure the final NEPA document includes a road obliteration monitoring plan to assure the sediment is being reduced as expected. The resulting draft decision documents should indicate the USFS will provide funding for monitoring and evaluation.

Failure to do so will violate the Clean Water Act, 40 CFR 1500.1(c), 40 CFR 1500.2 (e) and (f) and 36 CFR 212.5(b)(2)

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The Proposed Action will clearly cause the resource degradation and destruction described in the OPPOSING VIEWS SCIENCE ATTACHMENTS to these comments.

The vast majority of scientific logging-related effects literature is authored by independent scientists not affiliated with the USDA. These independent scientists describe how logging activities will damage, impair and sometimes destroy the proper functioning of numerous natural resources.

You can learn about the logging-related resource damage in Opposing Views Attachment #1.



Comment: The public does not want natural resources in their public land that will be inherited by future generations to be destroyed in order to provide corporate profit opportunities. Opposing Views Science Attachment #10 gives you the results of 16 statistically significant nationwide polls revealing the public's feelings about national forest logging. Depending on the poll between 63% and 81% didn't want logging. You propose to log \*\*\*\* square miles. How can you justify calling yourself a public servant? In reality you are serving your corporate masters.

Professionals (whether they be scientists or public land administrators) do not selectively choose literature citations that will support their case and systematically exclude those that don't.

Request for changes to be made to the final NEPA document: Include some source documents from the Opposing Views Science Attachments in the References/Literature Cited section, and also, cite the applicable specific quotes presented in the Opposing Views Science Attachments.

Failure to do so will violate 40 CFR 1500.1(b) and (c) and 40 CFR 1500.2(e) and (f)

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Please respond to all quotes that express opposing views contained in the Opposing Views Attachments.

I have included 8 Opposing Scientific Views Attachments with these comments. Please comply with the law by responding to each responsible opposing view quote contained in the Opposing Views Attachments.

Request for changes to be made to the final NEPA document: Comply with the request described above.

Failure to do so will violate 40 CFR 1502.9(b).

"(b) Final environmental impact statements shall respond to comments as required in Part 1503 of this chapter. The agency shall discuss at appropriate points in the final statement any responsible opposing view which was not adequately discussed in the draft statement and shall indicate the agency's response to the issues raised."

Comment: As you can see above, 40 CFR 1502.9(b) requires meaningful responses to all "responsible" opposing views. If the Responsible Official feels the opposing view is irresponsible then please describe why. The law does not exclude opposing views because of the source. Opposing views contained in newspapers, magazines, and other sources are still opposing views and require a response. Please do not conclude an opposing view is not responsible because they are opinions. "Viewpoint" and "opinion" are synonyms.

Comment: Please do not conclude that an opposing view is not "responsible" because it is not site-specific. A review of the References section of this EA reveals a few documents do not include the name Robinson. They are not site specific to the sale. Ranger Matrick, you cannot justify using a standard for the public and another less-restrictive standard for the USFS. What will the judge say?

Comment: Please do not conclude that an opposing view is not "responsible" because they are not site-specific. A review of the References section of this draft EA reveals only 1 of the 55 documents included in the References section of the Robinson timber sale draft EA mentions the name of the project. Thus, none of your references are site specific. Ranger Matrick, you cannot justify using a standard for the public and another less-restrictive standard for the USFS. What will the judge say?

Remember, Responsible Officials have the option of not responding to an Opposing View only if the viewpoint is irresponsible and you describe why it's irresponsible. The law does not exempt responsible opposing views that are "opinion pieces." Indeed, "viewpoint" and "opinion" are synonyms. You must reply to all viewpoints that are

not irresponsible. Once again, how would a judge interpret the law?

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You ignore and neglect the public you are paid to serve? You rejected their suggestions to analyze other action alternatives on detail. The reasons are obvious. You did not want another action alternative competing with your Proposed Action you selected for implementation prior to scoping.

Comment: Alternatives to the Proposed Action were staring you in the face. Your constituents asked you to analyze the following alternatives in detail in their scoping comments. Their requests were forthright and sincere. They knew you are required to analyze all "reasonable" alternatives in detail. They knew their request for a detailed analysis of their alternative might change outputs, but they knew that didn't make their alternative "unreasonable" as used in 40 CFR §1506.2 (e). The public knew their alternative suggestion met the Purpose & Need in spite of the fact the timber outputs were different than the Proposed Action. Your IDT members knew you wanted all citizen generated alternatives (regardless of their merit) to be placed in the "alternatives were considered but eliminated from detailed study" section. They were obedient.

Comment: Your first exposure to the citizen-generated alternatives was when you first read the draft EA developed by the IDT which was after you had already selected your Proposed Action. Therefore you did not "Consider" the citizen-generated alternatives as required by law. Of course you are not concerned because it's impossible to prove.

Comment: You knew before you started scoping you would reject all alternatives suggested by American citizens who own the Green Mountain National Forest didn't you? Here are the reasonable alternatives that the public asked you to analyze in detail. You rejected them all because since you chose the Proposed Action before scoping started you knew it would be a waste of time and money analyzing them in detail.

#### 2.2.1 No Road Construction

#### 2.2.2 Decreased Road Construction

Comment: As a retired USFS NEPA coordinator I know its routine for USFS NEPA documents to list all citizen generated alternatives in the "Considered but eliminated from detailed study" section. After all, how else would the Responsible Official guarantee justification to select the Proposed Action? This is certainly the case here.

Request for changes to be made to the final NEPA document: Analyze the citizen-generated alternatives in detail. Not doing so backhands the people who supply the money for the salaries for you and the IDT members.

Failure to do so will clearly violate 40 CFR 1503.4.

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Never, ever entertain the notion you serve the public.

Most Americans want future generations of kids to have the opportunity to experience the quietness and solitude in an undeveloped, natural forest. This will become more important in 2070 when the predicted population of the United States will be 418 million people. The wild UNDEVELOPED national forests will provide one of the only escapes from the insanity of a world driven even more by money than it is now ... yet each IDT member has chosen to deny this opportunity to future generations to please you Ranger Matrick.

Most IDT members have science backgrounds. Most understand the value of biodiversity in the forest. By helping to plan this timber sale they are helping to simplify the forest which eliminates the biodiversity. Aren't there some decisions that should not be based on money?

The IDT members should remove themselves from their denial mode and have the courage to examine the cut & paste Purpose & Need closely and ask themselves if the P&N statement reflects the needs of the countless non-timber natural resources in and downstream from the sale area? Will a commercial timber sale accomplish these needs? Of course not. As my attachments show, best science indicates commercial timber sale activity harms and sometimes destroys the proper functioning of the forest resources that won't be hauled to the mill. Some IDT members know this, but why jeopardize a job that pays well. You all prefer to live a life of hypocrisy for the money.

As is the case here, the IDT knows they must assume the trees in a natural, biodiverse forest are sick and may die because someone concludes they are not resilient to natural disturbance events such as insects, disease and fire. Why is killing the trees with chainsaws and removing them for corporate profit better than allowing them to die a natural death as God intended and remain in the forest to replenish the organics in the soils and serve as habitat for some wildlife species?

The IDT members have never asked themselves why a human vision of how things should be in the forest should override God's vision when He created the forest and allowed it to pass through different successional stages ... where each stage benefits the other natural resources in different ways.

Comment #: The Robinson timber sale will take away more undeveloped national forest acres from the legacy the unborn kids of the future should inherit. Which is most important: the future kids of America seeking solitude and quietness, or another summer home and yacht for the CEO of the timber extraction corporation that purchases this timber sale? Do the IDT members have the courage to ask themselves why the USFS defies the wishes of the American public by logging and roading-up the precious national forest land? How can an agency mandated to serve the public do so by taking action the public does not want or like?

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Ranger Matrick, after reading the science attachments any rational person would immediately understand that this is an insane, unprecedented assault on the land owed by 324 million Americans who provide the tax dollars to pay your salary and that of the IDT members. Please, please withdraw this tragic timber sale and do your job.  
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My Pending Objection

The public is now starting to realize the Objection process is a joke. 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.

I know that you know the agency treats objections fairly and professionally only if they are filed by groups or individuals who have a history of taking the USFS to court. My motivation for writing these comments is to identify how unprofessional, naive and clueless you all are. For those of you who know what's going on and still press on because your job pays well, I hope the guilt sneaks upon you later in life. Generations of the future will want to know who was responsible for the development and plunder of their public land. Wanna see plunder? Take another look at photos of USFS "restoration" projects by opening the Opposing Views Science Attachment #27.

Finally Ranger Mattrick, for all future projects on the Rochester RD I suggest you find a contractor to do the NEPA work.

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Sincerely,

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

Dick Artley (retired forester, logging engineer and forest planner - Nez Perce National Forest ... and someone who is sad his great, great, great grandchildren will not have the opportunity to explore and enjoy the Green Mountain NF in an undeveloped condition.

415 NE 2nd Street  
Grangeville, Idaho 83530  
da99333@gmail.com

CCs emailed to:

Supervisor Sinclair  
Ranger Vanselow  
Ranger Francomb  
Ethan Ready  
Donna Grosz  
Brian Austin  
Steve Roy  
Nick Pardi-RO  
Jayson Kirchner-RO  
Cheryl Holbrook-RO

Copies will be emailed to:

National Forest Protection Alliance  
Western Environmental Law Center  
Grist Magazine  
Truthout Website  
Native Forest Council  
Common Cause Website  
High Country News

Hardcopies will be mailed to: Senators Leahy/Sanders and Rep Welch. I guarantee they will not allow you to serve corporate America by trashing the birthright of the future generations of children. It's no secret that USFS Rangers and Supervisors who reward and genuflect to the natural resource extraction corporations by supplying volume will put them near the top of the agency promotion ladder. Unlike you, the Vermont Congressional delegation understands their constituents and know what they want.