Data Submitted (UTC 11): 9/12/2018 4:51:08 PM
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Organization:
Title:
Comments: September 12, 2018

Dear Ranger Schroyer and selected IDT resource specialists,

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

Here we go again. I become so tired of reading about USFS timber sales that are named inappropriately using USFS-approved lies. IDT members who sometimes think outside the USFS box know commercial logging and roading an undeveloped forest does not create a healthy forest as you claim here. High school science classes teach this. I present you with independent science information the agency does nor want you to see. It is contained in the Opposing Views Scientific Attachments authored by independent scientists with PhDs who are experts in their fields. It represents "best science" that USFS leaders tell the public drives all agency projects. Please see Opposing Views Scientific Attachment #15. A few of you will be afraid to read them. Perhaps 1or 2 of you know the USFS way of doing things is the antithesis of best science, but you play the public deception game anyway because your job pays well and you have bills to pay. You won't admit you traded away your land ethics and values for your monthly salary. I'm sorry for you. The memories of this hypocrisy will be with you for the rest of your life.

The environmental damage that will be inflicted by this proposed timber sale is unprecedented. You know the natural resources in the sale area are functioning properly. Yes, trees die in healthy forests. You were unable to restrain your insane, mindless quest for volume weren't you? Your silviculturist found stands of large, healthy trees so you applied several of your cut & paste Purpose and Need statements unrelated to specific resource conditions of the area to justify logging the large trees. You know exactly what I mean don't you? Do you really think the public trusts your agency?

I ask the NEPA IDT members to allow the science in the Opposing Views Science Attachments to guide them as they write the NEPA document.

Most of you should know the conclusions of these experts are diametrically opposed to and the antithesis of what your agency teaches you. A few of you were bothered by this disparity. You wondered why hundreds of experts' findings contradict most of what the USFS teaches you is the right thing to do. Either the experts were right or the USFS has it right. Did you ask yourself who might be biased? If you got this far you know the answer, but

your job pays well and you have bills to pay.  So it comes down to this.  To live with yourself you learned to deny the truth.

This allowed you to play the game well without 2nd thoughts or guilt.

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

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

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

Relatively intelligent people know there is more than 1 way to accomplish any goal.  This would include the Purpose & Need goals for timber sales.  Why then do most timber sale EAs and EISs analyze only one action alternative in detail that is nearly identical to the Proposed Action described in the scoping package?  A few IDT members know this but they look the other way.  They also know they must make ridiculous unsubstantiated claims in their Chapter 3 effects disclosures to make it appear the Proposed Action will create healthier natural resources after the forest has been logged and roading-up.  These IDT members conveniently forget what independent, unbiased scientists say.

USFS Responsible Officials have been Violating the NEPA for
Decades by not Considering the No Action Alternative.  IDT Members
Know they Must not Write anything that Makes
No Action seem Reasonable.

There is a reason USFS Responsible Officials have not selected the No Action alternative in 17 years.  The obedient IDT members make it easy to reject No Action by disclosing ridiculous untrue effects of allowing the existing condition to remain into the future.  I often wonder why the IDT members who describe No Action as a horrid alternative aren't smart enough to seek information on how long the existing condition has existed and why their predictions have not occurred during this time period.

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Please analyze at least 2 action alternatives in detail

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

"Remember not to be silent about the reasons for considering some alternatives and ignoring others. Silence is a gift to a possible plaintiff. So plan for and provide even a brief rationale about your range of alternatives. Such a discussion is especially important if your EA or EIS includes only a single action alternative. A single action

alternative is a risky agency choice, especially if you determine that your EA or EIS is likely to be a high-risk and controversial document."

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

Please see:
https://www.fs.fed.us/emc/nepa/
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The USFS Objection Process is a Joke

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

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

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

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

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

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

I am a dues paying member of an environmental group located in Moscow Idaho. They retain 2 attorneys. Try me.
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It would be to your advantage to become familiar with 40 CFR 1502.9(b) to learn how to deal with the quotes in the Opposing Views Scientific Attachments.

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

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

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

Attachments #1 and #4. You will understand real logging science. You will learn that logging 1.7 square miles and constructing 19 miles of road as you propose is insane if your goal is to protect the proper functioning of the natural resources in the forest. Please ask yourself who you strive to serve … the public or the natural resource extraction corporations.

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

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

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

Please alert me when the DEIS or pre-decisional EA is posted online and you are accepting comments.

Sincerely,

Dick Artley (retired forester, logging systems specialist, FEI instructor, forest planner, NEPA legal compliance reviewer, forest NEPA coordinator, forest appeals/litigation coordinator)
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PS: Each IDT member will write the predicted environmental effects of implementing each alternative in Chapter 3 of the pending draft EA or EIS. Their job is just starting when they complete their Chapter 3 effects disclosures.

If the Responsible Official selects an action that will cause the damage they describe then they must talk with her. Specialists who care about the post-sale condition of their resource will seek answers. The USFS emphasizes that line-officers have the final say. However, it's up to each IDT member to assure the Responsible Official made an informed decision using public comments and the IDT Chapter 3 disclosures. It's up to the IDT members to make sure the Responsible Official read the predicted effects and they are sure the damage the IDT members describe is an acceptable tradeoff for the silly claims in the P&N listing the ecological benefits of logging and roading an undeveloped, biodiverse forest. I ask everyone who reads these scoping comments to compare the P&N claims against the "best science" authored by experts in Opposing Scientific Views Attachments #1 and #4. Only a fool would reject this science. Ask yourself why the science conclusions in the attachments are the opposite of that you learned from the USFS.

You indicate you will create openings greater than 40 acres with your clearcuts. I'm surprised a USFS lin-officer does not understand what the public wants. A statistically significant poll was taken by national forest visitors in 2013. The were asked to indicate wht they don't want on their forests. The vast majority said clearcuts. Please restrain your need for volume at public expense.

Then ask yourself who you are serving by continuing to work on the IDT which will pave the way for timber sale implementation.