Data Submitted (UTC 11): 4/13/2019 4:09:34 PM
First name: Dick
Last name: Artley
Organization:
Title:
Comments: Dear Ranger Francomb and selected IDT resource specialists,

Before I begin my scoping comments I'll offer an observation. After reading the March 28, 2019 "Dear Interested Citizens, Stakeholders and Partners" letter for your Fandango Forest Health Project that describes the tragic, unthinkable proposed Fandango commercial timber sale it's clear the non-timber IDT members deposit their land ethics each morning at the door before entering the Warner Mtn. District office. Most have been taught they must embrace the forester's proposals regardless of how the timber sale will decimate the resource they represent. They all know this is required for them to be considered a "team player" by their Ranger. Thus, I have good reason to question every statement describing how this timber sale will benefit the amenity resources in and downstream from the sale area, and create a healthier forest. Remember, a forest is more than conifer trees. A healthy forest requires healthy trees and healthy amenity resources. If the process to create healthy trees harms or destroys the countless other forest resources the forest is not healthy.

Below I will describe the destruction inflicted by this timber sale on the amenity resources so loved by the public. Incredibly, the "treatments" are still emphasized and recommended by the Green Mtn NF forest plan. The scoping package cites the Plan many times.

Supervisor Sinclair, Ranger Francomb, Mr. Ready, Mr. Roy, Ranger Vanselow, Ranger Mattrick, Gordie Blum, Trish Adams and Kathy Lynn the Forest Plan needs at least 9 significant amendments. Please start the amendment process now so it won't appear to the public that this timber sale complies with NFMA.

As the Opposing Views Scientific Attachments show, if you really wanted a healthy forest you would not subject it to the plunder caused by commercial logging. Ranger Francomb, I know and some of your IDT specialists know you are tricking the public into believing your timber sale is ecosystem friendly. Your behavior is unacceptable. Of course your real motive is to:

Help meet Supervisor Sinclair's volume expectations. You know the USFS culture and agenda are centered around volume. Line-officers who don't make their cut aren't promoted.

Spend all your NFTM funding the same FY you received it.

Ms. Deller, Mr. Strand, Mr. DiSanto, Mr. McKinley, Ms. Burbank, Mr. Tripplet, Pat D'Andrea, Mr. Serpico, Ms. Lauderdale, Mr. Klink, Ms. Quintana, Ms. Edmonds, Ms. Stratton, Mr. Austin, Ms. Reichert and Mr. Hillman, you are helping Ranger Francomb to slowly create private industrial tree farm conditions in the Manchester RD. Some of you know private industrial tree farms are not functioning forests, but are so frightened you play the game anyway.

Most IDT members justify their behavior by thinking: "My USFS job pays well. I have bills to pay. So why not serve the USFS's corporate masters in the natural resource extraction industries? After all, most American workers spend the best years of their lives helping to create corporate profit. I'm doing what the agency pays me to do."

The fact that any IDT biologist, soils scientist, recreation specialist and other non-timber USFS employees violate their previous land ethics serving on IDTs to create timber sale NEPA documents shows me the agency brainwashing machine on the Green Mtn NF is working well and turning out clueless timber sale enablers. You

should all hang your heads in shame. You embrace the USFS lie that most forested areas are sick because they are inconsistent with human needs ……. $$$$$$$$$$$ and the solution is commercial logging.

Ranger Francomb, face reality. You are clinically obsessed by the need to generate volume for personal gain. Sadly, the IDT resource specialists masquerading as people who care assist you in your witless quest for volume. Ask yourself what future generations of kids growing up in 100 years will want: 1) their forests harmed in order to provide short term corporate profit in the year 2019, or 2) undeveloped national forest land where the natural resources function properly.

Somerset Integrated Resource Project Proposed Action and Opportunity to Comment document

Your untrue needs statements on pages 6 to 127 of the Somerset Integrated Resource Project Proposed Action and Opportunity to Comment document are straight from the USFS book of tricks. You tell the public it will all be fixed when trees are removed. Some members of the public are getting wise to this scheme to justify logging with lies as is the case here. You supply an endless number of reasons why industrial equipment weighing 20,000 pounds with spinning wheels and tracks must operate on fragile forest soils saying the logging will "restore aquatic, fisheries, and riparian habitats." (pg 10) You assault the public again by claiming such plunder will create a healthier forest. To wit:

"These treatments would provide forest products to the local and regional economy, improve forest health and diversity, and move the existing forest habitat composition and age classes toward the objectives as provided in the Forest Plan." (pg 14)

How does the Green Mtn. NF assemble such a large number of clueless and/or incompetent employees who would admit to knowingly being a part of this proposal to plunder the land owned by 324 million Americans?

Once again, here are P&N quotes that tell the public logging will fix everything:

Forest Habitat

"Hardwood/Mixed-wood/Softwood Habitat
Enhancement of softwood seedlings, saplings, and small poles in areas with tendencies to move toward softwoods is needed to increase habitat diversity and help restore a more ecologically appropriate forest composition." (pg 7)

"Aspen and Birch Habitat
Mature aspen is present in a few small groups scattered in the southern part of the project area. Many stands show diminished growth levels and are now ready to be harvested before saw log quality is reduced or the trees decline in economic value." (pg 8)

This is sad. The IDT members are obedient. A few know trees are supposed to decompose in the forest to increase the organics in the soil. They ignore this fact and instead genuflect to their corporate masters. Tragically, the IDT members will all skip home after work thinking the did what the national forest owners wanted. The USFS uses brainwashing methods developed by the military. It worked well on the IDT members.

"Oak Habitat
Oak requires frequent disturbance (such as fire or past firewood cutting practices) to establish seedlings and out-compete other tree regeneration. Silvicultural treatments can replicate the disturbance process to promote oak regeneration and subsequent growth into the forest canopy." (pg 8)

"Non-Native Softwood Plantations

All plantation stands are considered mature and so could be regenerated or thinned to allow native regeneration to become established." (pg 8)

"Permanent Upland Openings
There is a need to increase the amount of permanent upland openings maintained for meadow and shrub wildlife habitat to within the desired 1 to 2 percent composition objective. Contrasting with temporary openings created by timber harvests, permanent openings offer important wildlife habitat over the long-term through a wide range of vegetative conditions from grass-forb meadows to openings with young, shrub-scrub, woody vegetation." (pg 8)

"Regenerating/Early Successional Habitat
Various timber harvesting methods can create temporary openings in the forest canopy providing early successional habitat for up to 20 years which is important to many wildlife species. It also contributes to the vertical and horizontal structure across the overall forest landscape." (pg 8)

"Uneven-aged Conditions
There is a need to manage a minimum of 20 percent of acres suitable for timber production in an uneven-aged condition." (pg 8)

"Extended Rotations
Some unhealthy stands need to be thinned or regenerated in order to enhance the longevity of mature and old stands." (pg 9)

"Apple Trees
Removal of over-topping trees immediately around the apples invigorates their growth and promotes fruit production." (pg 9)

Each non-timber member of the IDT should have had the courage to refuse to write untruths to please Mr. Braun and Mr. Tilley. Although their numbers are decreasing, I know of specialists who are not afraid to write the truth … even if it does not embrace the claimed (untrue) timber sale's positive effects.

Timber Resource

"There is a need to harvest timber to achieve Forest Plan objectives for creating and maintaining healthy, productive forests, and quality habitats (Forest Plan, page 15). Timber harvesting also provides high-quality sawtimber and other timber products on a sustained yield basis (Forest Plan, page 14 and 47) and supports regional and local economies through resource use, production, and protection (Forest Plan, page 17)." (pg 9)

Of course getting the volume is the real reason for your timber sale. Claiming this sale will enhance Visual Quality, Fisheries and Water, and Soil and Wetlands clearly indicates there is no end to your lies to assure your next promotion.

Had there been resource specialists on the IDT who were not frightened to buck the timber IDT members and you Ranger Francomb by refusing to genuflect to their corporate masters Timber Resource would have never appeared in the scoping package.

"Fisheries and Water
"There is a need to add large wood in streams to help maintain and restore aquatic, fisheries, and riparian habitats (Forest Plan, page 13). Principles of stream geomorphology and habitat management are used to restore and enhance fisheries habitat while knowledge of riparian/floodplain functions and large wood dynamics are used to restore and enhance stream ecosystem processes. A majority of stream habitat within the Somerset

project area lacks the quantities of large wood which would naturally be found in upland streams (see Figure 2). Large wood in streams is critical to create diverse stream habitats for fish, amphibians, and aquatic insects. Channel stability and stream function, and related riparian health along the Deerfield River are also not at desired levels to provide for optimum aquatic habitat conditions." (pg 10)

Even a child knows large wood can be placed in the streams without logging the riparian areas. Had there been a fisheries biologist on the IDT the skidders would be kept away from the RHCA. Read Opposing Views Scientific Attachments #1 and #4 if you are interested in the truth.

"Soil and Wetlands
There is a need to address ongoing resource impacts to improve soil productivity and restore wetland functions where degradation of these resources is occurring. The existing soil and wetland conditions show undesirable effects of acid deposition, the presence of invasive earthworms, and erosion of some non-system roads and trails. Forest Plan goals include maintaining or restoring the natural and ecological functions of the soil and wetland habitats (Forest Plan, page 13). Important ecological soil functions include regulating nutrient and water cycles, including the processes of water flow, energy transfer, nutrient uptake and release, carbon transfer, and chemical processing. Associated objectives are to minimize the adverse impacts on soils from management activities and restore soil processes and functions on degraded soils." Pg 10

Had there been a Soil Scientist on the IDT this ridiculous statement would never have been written. Read Opposing Views Scientific Attachments #1 and #4 if you are interested in the truth.

Visual Quality
"Management activities are needed to provide new vistas and maintain existing vistas especially along the Appalachian Trail/Long Trail. One of the most popular public activities on the Green Mountain National Forest is viewing scenery provided by established vistas (Forest Plan Environmental Impact Statement, pages 3-211 and 3-306). Forest Plan Goal 15 is to maintain or enhance visual resources such as viewsheds, vistas, overlooks, and special features (Forest Plan, page 16)." Pg 12

Had there been a Landscape Architect on the IDT this ridiculous statement would never have been written. Vistas are located at turnouts. Only a few trees need to be felled.

Ms. Deller, Mr. Strand, Mr. DiSanto, Mr. McKinley, Ms. Burbank, Mr. Tripplet, Pat D'Andrea, Mr. Serpico, Ms. Lauderdale, Mr. Klink, Ms. Quintana, Ms. Edmonds, Ms. Stratton, Mr. Austin, Ms. Reichert and Mr. Hillman, the USFS brainwashing machine is alive and well on the Green Mtn NF. You have been taught to reject science not authored by USFS employees. They kept this science from you and you didn't complain. Although you will ignore the best science I present to you please read Opposing Views Scientific Attachments #1 and #4. Then ask yourself of your education and experience justify spurning the science authored by scientists with Ph.D.s who are experts on their fields.

Who are you People?

If what you say is true it would be rare to find an intact, fully functioning forest that hadn't been logged in the past. Do you really expect knowledgeable members of the public to believe you? If you would think a little and forget the agency pressure to produce timber you would come up with ways to accomplish your goals without commercial logging. Nature has been taking good care of our forests for thousands of years without logging and roading.

Even seasonal USFS employees know the recreating public does not want their forests logging and roaded. It's obvious none of you care. I have worked with USFS employees like you. Your goals are to assure your next QSI, cash award and promotion opportunity by genuflecting to your corporate natural resource extraction masters

and the silviculturists who enable them.

My scoping comments on your proposed Somerset timber sale are shown below. They are short because I won't waste my time trying to convince you to change your Proposed Action. Your IDT members know 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 Ranger Francomb. They know they are paid by the public to protect and preserve the resources they represent. However, they also know they must gratify and please the USFS's corporate masters with volume to remain competitive for future promotion opportunities.

You must acknowledge that land allocated to a timber MA and suitable land is not "anything goes" land. You are not allowed to trash the non-timber resources and violate the law to generate precious volume. As is the case here, most USFS silviculturists think this opens the door to creating private industrial tree-farm conditions. A few IDT members hide the fact that they know private industrial tree-farms are not functioning forests … yet they play the game anyway to prove they are "team players."

I saw it as a USFS employee. Some irresponsible Responsible Officials would never read the scoping comments submitted by the public. They directed their IDT leader to assure the names, addresses and emails of those who submitted scoping comments are kept on file for the project so they could notify them that the DEIS or pre-decisional EA is available for comment. Incredibly, they claimed the Proposed Action in the NEPA document was based on public comments and IDT input.

I become so tired of reading USFS timber sale draft EAs and EISs with copy & paste Purpose & Need statement that that are not valid. The vast majority of EAs and EISs use the same P&N statements word for word that might apply to any location. They are pulled from other NEPA documents.

IDT members who sometimes risk their careers by thinking 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. The Opposing Views Scientific Attachments expose you all to independent science information that your agency does not want you to see. Please see Opposing Views Scientific Attachment #15. This contains quotes of past USFS leaders who tell the public best science drives USFS projects. Apparently, you and your IDT members have chosen to reject the best science that might constrain volume outputs. Opposing Views Scientific Attachments #1 and #4 contain quotes by many independent scientists not affiliated with the USFS who hold Ph.D.s in the biological sciences. Their quotes represent "best science." Please have the courage to open these 2 attachments and read the quotes. Then ask yourself why the quotes would persuade any unbiased, reasonable person that this timber sale must never occur if maintaining the proper functioning of the countless natural resources in and downstream from the sale area is a goal. Conifer tree health definitely does not represent forest health.

As the Opposing Views Scientific Attachments indicate, your proposed timber treatments will inflict major damage that only time will heal. You know the natural resources in the sale area are functioning properly, yet you lied to the public telling them they needed "treatment" (a.k.a. commercial logging).

Have you ever wondered why the findings and conclusions of well respected scientists contradict most of what the USFS teaches you? Either the experts are right or the USFS has it right. Did you ask yourself who might be biased? If you got this far reading my comments you know the answer.

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 as you have done here.

It's Clear the Green Mountain NF does not Build
Temporary Reads that are Temporary.

Mr. Austin, Mr. Donahue and Mr. McKinley you must know old so-called "temporary" roads left on the landscape after they are used and not fully obliterated such that the running surface no longer exists are read-made linear sediment generators.

You say:

"Table 17 provides proposed temporary road construction needed to access timber stands within the Somerset project. The vast majority of temporary roads would follow the template of existing non-system woods roads or trails (see Figure 15). Only 2.86 miles of temporary road construction would be in locations where no non-system woods roads or trails exist." (pg 28)

There are also 2 photos of temporary roads on page 28. You conveniently show temporary roads on flat ground. This is an attempt to deceive the public. Reconstructing old "temporary" roads that exist on slopes greater then 20% creates almost as much sediment as new construction.

If you build 2.3 moles of new "temporary" road and reconstruct 29.5 miles of old "temporary" road and trails you will hammer the Fisheries and Water resource that you say are so important on page 10. This inconsistency is astounding. Perhaps the IDT members should communicate more.

You do not follow the NEPA process the way
Congress intended. They designed NEPA
to encourage Federal Agencies to give
the public maximum (emphasis added)
opportunities to submit feedback
on proposed projects.

Ranger Francomb, you have consciously shortened the opportunity for the public to submit scoping comments. I shouldn't need to quote the NEPA text describing the scoping process to you. Where did you hear the public is only allowed 30-days to submit scoping comments? I quote the IDT's cut & paste paragraph below that robs the public of time to prepare scoping comments:

"Comments will be accepted for a 30-day period ending April 29, 2019 initiated by the March 29, 2019 publication of the Somerset Integrated Resource Project legal notice in the Rutland Herald, our newspaper of record." (pg 2 of March 29 Proposed Action document)

Of course the public is legally required to submit their comments on pre-decisional EAs and DEISs in 30 days and 45 days respectively. This does not apply to scoping comments.

Public feedback is the essence of NEPA. I quote the laws below:

40 CFR §1500.2 Policy.
Federal agencies shall to the fullest extent possible:

(d) Encourage and facilitate public involvement in decisions which affect the quality of the human environment.

40 CFR §1506.6 Public involvement.
Agencies shall:

(a) Make diligent efforts to involve the public in preparing and implementing their NEPA procedures.

Scoping comments are more effective if they are submitted early in the NEPA process, but they must be accepted by the Responsible Official up to and including the day the DN or ROD is signed. Some USFS Responsible Officials understand the public involvement laws and act accordingly.

Hare are a few samples of how competent USFS line-officers solicit scoping comments from the public:

Fremont-Winema NF Ranger Lehman's November 5, 2018 "Dear Planning Participant" letter states

"I invite you to review and comment on the Chiloquin Ranger District's proposal for the Hog Creek Oregon Spotted Frog Habitat Enhancement project. For your comments to be most helpful, please respond by November 21st, 2018."

Salmon-Challis NF Ranger Povirk's "Dear Interested Public" letter at page 3 states:

"To be most useful, your comments concerning these proposals should be received by November 19th, 2018 and should address specific concerns regarding this proposal."

Link to letter: https://www.fs.usda.gov/nfs/11558/www/nepa/110304_FSPLT3_4475119.pdf

Tongass NF Ranger Goularte's scoping letter states:

"To be most useful your comments should be received before September 1, 2011. I look forward to working with you on this and future projects."

Link to letter:
http://a123.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/82040_FSPLT2_057164.pdf

Salmon-Challis NF Ranger Gebhardt's "Dear Interested Party" letter at page 3 states:

"To be most useful, your comments concerning these proposals should be received by December 1st, 2014 and should address specific concerns regarding this proposal."

Link to letter:
http://a123.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/99786_FSPLT3_2405582.pdf

Gifford Pinchot NF Ranger Cross' "Dear Partners, Friends, and Interested Citizens of the scoping letter of Gifford Pinchot NF" letter states:

"To assure your comments are fully considered during this scoping phase of the project, we request that you submit comments by April 29, 2016. Additional comments are welcome throughout the planning process."

Link to letter:
http://a123.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/104139_FSP

LT3_3020950.pdf

Ochoco NF Ranger Asbridge's "Dear Interested Citizen" letter states:

"We welcome your thoughts and discussions about the Black Mountain Project and the changes to the proposed action as your input is a vital part of our planning process. We are currently in the preliminary environmental analysis phase of the project. Our goal is to have analysis completed by October 2017 and a Draft Environmental Impact Statement available for review by March 2018. Comments are appreciated anytime, however, for input to be timely and considered in project design, comments should be received by May 15, 2017."

Link to letter:
http://a123.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/99405_FSPLT3_3987125.pdf

Beaverhead-Deerlodge NF Ranger Sabo's "Interested Parties" letter states:

"Your comments are welcome anytime, but will be most helpful if they are submitted by June 3, 2016.

Link to letter:
http://a123.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/104269_FSPLT3_3081947.pdf

There are many, many more examples.

The laws I quote below that governs scoping says nothing about a timeframe do they?

Scoping is required for all Forest Service proposed actions, including those that would appear to be categorically excluded from further analysis and documentation in an EA or an EIS (§220.6). (36 CFR 220.4(e)(1))

Scoping shall be carried out in accordance with the requirements of 40 CFR 1501.7. Because the nature and complexity of a proposed action determine the scope and intensity of analysis, no single scoping technique is required or prescribed. (36 CFR 220.4(e)(2))

There shall be an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action. This process shall be termed scoping . . .
(a) As part of the scoping process the lead agency shall:
(1) Invite the participation of affected Federal, State, and local agencies, any affected Indian tribe, the proponent of the action, and other interested persons (including those who might not be in accord with the action on environmental grounds), unless there is a limited exception under §1507.3(c). An agency may give notice in accordance with §1506.6.
(2) Determine the scope (§1508.25) and the significant issues to be analyzed in depth in the environmental impact statement.
(3) Identify and eliminate from detailed study the issues which are not significant or which have been covered by prior environmental review (§1506.3), narrowing the discussion of these issues in the statement to a brief presentation of why they will not have a significant effect on the human environment or providing a reference to their coverage elsewhere.
(4) Allocate assignments for preparation of the environmental impact statement among the lead and cooperating agencies, with the lead agency retaining responsibility for the statement.
(5) Indicate any public environmental assessments and other environmental impact statements which are being or will be prepared that are related to but are not part of the scope of the impact statement under consideration.
(6) Identify other environmental review and consultation requirements so the lead and cooperating agencies may

prepare other required analyses and studies concurrently with, and integrated with, the environmental impact statement as provided in §1502.25.
(7) Indicate the relationship between the timing of the preparation of environmental analyses and the agency's tentative planning and decision making schedule. (40 CFR 1501.7)

If you fail to correct this error and still stifle public comment you will have an opportunity to discuss the issue with one of Senator Sanders' aides who deal with uncooperative federal agencies for their constituents.

It will also be necessary to inform the public in your area. They need to know you really don't want their feedback. My letter to the editor will be submitted to Rutland Herald.

Why must a member of the public tell you how to do your job?

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/
https://www.shipleygroup.com/

Intelligent people know there is more than 1 way to accomplish any goal. This would include the Purpose & Need goals for timber sales. When EAs and EISs analyze only one action alternative in detail that is nearly identical to the Proposed Action described in the scoping package as is the case here this tells the public something? The IDT members know they must cast away their resource ethics and values when they write ridiculous unsubstantiated claims in their Chapter 3 effects disclosures. Regardless of the situation they know they must depict the Proposed Action effects on their resource in a positive manner and describe No Action (keeping the status quo) as a tragic mistake. This is criminal behavior. These same other resource specialists happily skip home thinking they did their job unaware of their timber sale enabler role.

The USFS Objection Process was Designed
to give the Responsible Official a Reason to
Ignore the Public's Suggestions and Concerns.
It's Hopelessly Biased in Favor of the
USFS Responsible official.

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

Intelligent, unbiased, people understand that the Objection Deciding Officer (ADO) 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 (the Responsible Official) has made an error.

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

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 to rule 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.

Indeed, you all work for an agency led by ruthless mobsters who will do and say anything to please their corporate masters. A few of you probably know your minds have been manipulated to assist with this criminal behavior.

The USFS Claims Best Science Drives their Projects
Why do you Feel you are Exempt from this Policy
Ranger Francomb?

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 Somerset 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 the parts of the national forests that have never been logged are unhealthy and will be restored back to health when they are logged and roaded. Of course best science shows this is untrue.

Opposing Scientific Views Attachments #1 and #4.contain a small sample of this best science. Of course you will reject the science quotes authored by experts because they do not support the USFS way of doing things. This denial is standard operating procedure for USFS line-officers.

A few of your IDT members will know the science quotes are true. Unfortunately, they will remain silent and play the game for obvious reasons. Then they skip home from work each day immersed in their delusional beliefs that they did what the public wants.

The Opposing Scientific Views Attachments should leave no doubt in your mind that your proposal to log 14.7 square miles will inflict long-term resource damage that only time will heal. Mucking around trying to fix the plunder at a later date will only make it worse.

Most Human Beings would Never think of Knowingly
doing Something that could Harm another Person.
Your Proposed Action might Kill Someone!!!! Aren't

you or your IDT Members even a Little Concerned?

You indicate you plan to apply herbicides that contain glyphosate as part of your Proposed Action. At page 17 you say:

"Cut-stump application of herbicide (a glyphosate product) would be the preferred method for controlling competing tree seedlings/saplings (primarily, but not limited to, beech and red maple) to ensure success of planted oak seedlings."

Please assure that the pending draft NEPA document bases the herbicide toxicity and safety disclosures on best science supported by a variety of scientific research conclusions … not the single lab (SERA) hired by Monsanto to do the so-called safety testing. There are hundreds of conclusions from research conducted by independent scientists that all (emphasis added) show glyphosate is a highly-toxic carcinogen. Some of the independent science conclusions can be examined in the Glyphosarte kills Scientific Attachment.

What type of people would apply a carcinogenic chemical on public land where children might play? There are several equally effective alternatives to achieve your goal without using Roundup.

Several weeks ago, Dewayne Johnson (a former school groundskeeper) who was diagnosed with lethal non-Hodgkin's lymphoma sued Monsanto alleging the chemical glyphosate (an ingredient in Roundup).caused his cancer. Mr. Johnson used Roundup as part of his job. On August 10, 2018 a jury in San Francisco delivered a verdict in Mr. Johnson's favor. The judge ordered Monsanto to pay Mr. Johnson $289 million in total damages

Unless your final EA or EIS states herbicides containing glyphosate will not be applied its likely you will be the next defendant in a court of law Ranger Francomb.

Here's 1 of the many links to the Johnson verdict available online: The public knows.

San Francisco Jurors Hear Hours of Scientific Data About Herbicide's Link to Cancer
https://www.law.com/therecorder/2018/07/09/san-francisco-jurors-hear-hours-of-scientific-data-about-herbicides-link-to-cancer/?slreturn=20180713081135

No caring, sane person would risk another person's life to please their employer. Decades of scientific research conclusions from around the world conclusively show glyphosate exposure has been known to 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.

Being a retired USFS employee I know most USFS line-officers don't seriously consider or evaluate 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.

Federal officials can be indicted and tried for reckless endangerment id the knowingly put the public in danger. Reckless endangerment is a crime consisting of acts that create a substantial risk of serious physical injury to another person. The accused person isn't required to intend the resulting or potential harm, but must have acted in a way that showed a disregard for the foreseeable consequences of the actions. See:
https://definitions.uslegal.com/r/reckless-endangerment/

Once again I ask you to assure your upcoming pre-decisional EA or DEIS states "herbicides containing glyphosate will not be applied anywhere at any time.

You and your IDT members are the ones that must live with yourself for the rest of your lives.

Sadly, the USFS Measures Line-Officer Success by
Annual Timber Volume Outputs
This Insane Motivation to Plunder National Forest Land Must Stop

Who are you people who go to work each day who willfully assist with tragic actions that will set-up Ranger Francomb for his above-average performance rating?

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 and management success. I saw biologists who skewed and padded their Chapter 3 effects to minimize and play-down the adverse effects of Proposed Action implementation to fish and wildlife they knew would result from timber sale implementation. Ranger Francomb, 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. You and your IDT members must earn their admiration and trust by breaking from agency tradition.

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 isn't it? There are times when promotion potential must not be a consideration.

Your proposal has some actions that are beneficial. Please pursue them and forget logging 14. square miles and constructing 31.8 miles of new. Do the Rx burning, decommission your roads and be done with it.

Please alert me when the DEIS or pre-decisional EA is posted online and you are accepting comments. I ask that you make major changes in the Proposed Action described in the scoping document to assure the natural resources in and downstream from the sale area will not be harmed in any way. This includes "short-term" harm the agency so often accepts.

USFS employees who are not afraid to think outside the agency box, should read this November 22, 2018 Counterpunch article that explains why profit for resource extraction corporations has driven the USFS's forest management policy for many decades.

https://www.counterpunch.org/2018/11/22/industrial-forest-science-industrys-bitch/

Conclusion
I know that you know you will be reprimanded if you don't spend all your NFTM finding this fiscal year. You are expected to log regardless of need … regardless of the clear resource damage you will inflict. Sadly your so-called resource specialists think they serve the public as they help you trash land owned by 324 million Americans. Please have the courage to log areas only where the amenity resources will not be harmed and give back the NFTM dollars you won't need. This would show your employees you don't spend time genuflecting to the natural resource extraction corporations. They will admire you. They will appreciate the fact they will no longer be forced to violate their land ethics and values to keep their jobs.

The USFS brainwashing process teaches employees "short term" damage to natural resources is acceptable when the forests are restored by logging. Here again, this is an irrational, senseless notion. The forest resources owned by 324 million Americans must never be damaged in any way to provide corporate profit opportunities should they?

Sincerely,

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