

Data Submitted (UTC 11): 8/12/2019 3:03:04 AM

First name: Dick

Last name: Artley

Organization:

Title:

Comments: Dear Ranger Nedlo and selected IDT members,

Children know more about the requirements of the National Environmental Policy Act than the Daniel Boone NF employees. When I was still working for the USFS I taught the 1900-1 course (beginning NEPA). Before the class had begun, my students knew enough about NEPA to not make the legal violations that are present in the Pine Creek Forest Restoration project pre-decisional EA.

You ignore the NEPA requirement to include a No Action alternative.

It's obvious none of you have ever taken the time to read 40 CFR 1500-1508. Here it is:

https://www.fws.gov/r9esnepa/NEPA_Handbook/40_CFR_1500.pdf

Here's an excerpt:

40 CFR Sec. 1502.14 Alternatives including the proposed action.

This section is the heart of the environmental impact statement. Based on the information and analysis presented in the sections on the Affected Environment (Sec. 1502.15) and the Environmental Consequences (Sec. 1502.16), it should present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public. In this section agencies shall:

- (a) Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated.
- (b) Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits.
- (c) Include reasonable alternatives not within the jurisdiction of the lead agency.
- (d) Include the alternative of no action.

40 CFR Sec. 1508.25 Scope.

Scope consists of the range of actions, alternatives, and impacts to be considered in an environmental impact statement. The scope of an individual statement may depend on its relationships to other statements (Secs. 1502.20 and 1508.28). To determine the scope of environmental impact statements, agencies shall consider 3 types of actions, 3 types of alternatives, and 3 types of impacts. They include:

(b) Alternatives, which include:

- 1. No action alternative.
- 2. Other reasonable courses of actions.
- 3. Mitigation measures (not in the proposed action).

Request for changes to be made to the final NEPA document: Rewrite the EA to include a No Action alternative and distribute it again to the public for comment.

Failure to do so will violate: 40 CFR Sec. 1502.14(d), 40 CFR Sec. 1508.25(b)(1) and 40 CFR §1506.6(a)

I'm amazed that your brains have been so tragically manipulated by the USFS that you actually believe the Pine

Creek Forest Restoration Project will restore a forested ecosystem. Please view the photos showing post-harvest restoration on national forest land at Opposing Views Science Attachment #27

The vast amount of science available today that discusses the natural resource damage caused by logging and roading would even convince children that timber sales are not "restoration projects." Of course this euphemism was invented by the USFS trying to trick the people they claim to serve. You have all visited logged over areas. Only people unable to think outside the USFS box believe something was restored.

Here's a little history about so-called restoration timber sales in national forests.

In 2009 the USFS stopped calling timber sales "timber sales" and started referring to them as "restoration projects." Why? The public was outraged that their forests were being harmed and degraded by logging and roading. So what does the agency do? It throws another euphemism at the public and still claims to serve the people they trick and deceive as they serve their corporate masters.

Only the name has changed ... not the impacts. Please read independent science conclusions that are of course different than USFS "science." Ask yourself why the science conclusions authored by experts not associated with the USFS are significantly different than the USFS science conclusions on the same subject? They can't both be right can they?

I suggest that those of you who still believe a commercial timber sale will "restore" the forest seek other employment opportunities that aren't connected to natural resources.

Clearly, the IDT contains people whose minds have been manipulated to accept and sometimes actually believe the USFS rhetoric that logging and roading an undeveloped forest actually restores the forest ecosystem. Indeed, the only thing this "restoration" timber sale will restore is the purchaser's financial bottom line.

Any natural resource specialist on the IDT who's not afraid to face the truth and has self respect would demand the Responsible Official remove the word "restoration" from the name of this timber sale.

Comment: Ranger Nedlo, I ask you to have the courage to understand Webster's definition of "restoration." Here's what you will find:

"bringing back to a former position or condition"
"restoring to an unimpaired or improved condition"

How can the Pine Ck. timber sale be a restoration project given the fact it has never been logged before and the former condition was never a harvested landscape?

How can the Pine Ck. timber sale be a restoration project given the conclusions of hundreds of independent Ph.D. scientists quoted in Opposing Views Science Attachments #1 and #4 that describe the tragic, long-term resource destruction caused by roading and logging? What qualifications do you have to declare that the experts quoted below are wrong?

Here's a small sample of quotes authored by independent scientists you will read in the Attachments #1 and #4. The expert's conclusions in these Attachments describe ecosystem destruction not "restoration."

Science Quote Excerpt: "Roads are associated with high sediment inputs and altered hydrology, both of which can strongly influence downstream channel habitats. Roads are also important as a source of indirect human impacts and as an agent of vegetation change and wildlife disturbance."

"Any ground disturbance increases the potential for erosion and hydrologic change, and roads are a major source of ground disturbance in wildlands. Compacted road surfaces generate overland flow, and much of this flow often enters the channel system, locally increasing peak flows. Localized peak flows are also increased where roads divert flow from one swale into another, and where road cuts intercept subsurface flows."

"Overland flow from the road surface is a very effective transport medium for the abundant fine sediments that usually are generated on road surfaces. Road drainage also can excavate gullies and cause landslides downslope in swales. Cut and fill slopes are often susceptible to landsliding, and road-related landsliding is the most visible forestry-related erosional impact in many areas."

What do we know about Roads?

By Reid, Leslie M. Ph.D., Robert R. Ziemer Ph.D., USDA Forest Service Pacific Southwest Research Station, and Michael J. Furniss, USDA Forest Service Six Rivers National Forest, 1994
<http://www.fs.fed.us/psw/publications/reid/4Roads.htm>

Science Quote Excerpt: "If the current pace of logging planned by the Forest Service continues, nearly all of America's ancient and roadless wild forests will soon be lost forever. According to a recent report by the World Resources Institute, only one percent of the original forest cover remains in large blocks within the lower 48 states."

From a February 9, 2001 letter to Senator Jean Carnahan
Written by Peter Raven, Ph.D.,
<http://www.saveamericasforests.org/Raven.htm>

Science Quote Excerpt: "Logging equipment compacts soils. Logging removes biomass critical to future soil productivity of the forest. Logging disturbs sensitive wildlife. Logging typically requires roads and skid trails which create chronic sources of sedimentation that degrades water quality and aquatic organism habitat. Logging roads and skid trails are also a major vector for the spread of weeds. Logging disrupts nutrient cycling and flows. Logging can alter species composition and age structure (i.e. loss of old growth). Logging can alter fire regimes. Logging can change water cycling and water balance in a drainage. The litany of negative impacts is much longer, but suffice it to say that anyone who suggests that logging is a benefit or benign is not doing a full accounting of costs."

Those who suggest that logging "benefits" the forest ecosystem are using very narrow definitions of "benefit." Much as some might claim that smoking helps people to lose weight and is a "benefit" of smoking."

Who Will Speak For the Forests?

By George Wuerthner, ecologist, author and ecological projects director for the Foundation for Deep Ecology
Published in NewWest, January 27, 2009
http://www.newwest.net/topic/article/who_will_speak_for_the_forests/C564/L564/

Science Quote Excerpt: "Roads adversely impact forest soil productivity by directly reducing the productive area, and by causing the greatest amount of soil erosion."

"Harvesting activities reduce surface cover and compact the soil, leading to increased runoff and erosion. Erosion generally decreases productivity of forests by decreasing the available soil water for forest growth, and through loss of nutrients in eroded sediment."

The effects of forest management on erosion and soil productivity.

By William J. Elliot Ph.D., D. Page-Dumroese Ph.D. and Pete .R. Robichaud
Dr. Elliot is the Project Leader for Soil and Water Engineering at the USDA Forest Service's Rocky Mountain

Research Station lab in Moscow, Idaho.

Dr. Page-Dumroese is a Research Soil Scientist at the USDA Forest Service's Rocky Mountain Research Station lab in Moscow, Idaho.

Dr. Robichaud is a Research Engineer at the USDA Forest Service's Rocky Mountain Research Station lab in Moscow, Idaho.

From the proceedings of the Symposium on Soil Quality and Erosion Interaction, Keystone Co.

<http://forest.moscowfsl.wsu.edu/cgi-bin/engr/library/searchpub.pl?pub=1999c>

Note the authors are all USDA scientists.

Science Quote Excerpt: "We concluded that commercial timber sales do not meet the criteria for forest restoration." (pg. 11)

"Rather, we questioned the Bitterroot National Forest's plans to use NFP rehabilitation and restoration program funds to fund the cost to prepare and administer these projects when the primary purpose of the projects may be a commercial timber sale. The FS WO NFP Implementation Program Coordinator for Rehabilitation and Restoration needs to review these projects once their primary purpose has been established to ensure they meet NFP selection criteria." (pg 12)

Western Region Audit Report: Forest Service National Fire Plan Implementation

By Richard D. Long, Assistant Inspector General for Audit

Report No. 08601-26-SF

Presented to Chief Dale Bosworth on November 26, 2001

<http://www.usda.gov/oig/webdocs/08601-26-SF.pdf>

Science Quote Excerpt: "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."

Scientists Seek Logging Ban on U.S.-Owned Land

By Ehrlich, Anne Ph.D., David Foster Ph.D. and Peter Raven Ph.D. 2002

Published in the New York Times, April 16, 2002

<http://www.nytimes.com/2002/04/16/us/scientists-seek-logging-ban-on-us-owned-land.html>

Science Quote Excerpt: "Commercial logging is not a prescription for forest health; it is one of the major causes of unhealthy forest conditions."

The Politics of Forest Fires -- The Abuse of Other People's Hard Times.

A paper by Power, Thomas Ph.D., 8/15/2000

Thomas Michael Power is the Professor and Chairman of the Economics Department, University of Montana

<http://www.forwolves.org/ralph/tompower.htm>

Comment: I have presented quotes by Ph.D. scientists who are experts in their fields above that describe the ecological effects of logging and roading an undeveloped, fully functioning forest. How could a timber sale that 1) "compacts the soil", 2) "leads to increased runoff and erosion", 3) "homogenizes and destroys the soil", 4) "eliminates biodiversity", 5) "eliminates habitat required by bird species", 6) "damages watersheds", 7) "destroys wildlife habitat and imperiled plant and animal species", and 8) "increases fire hazard" be a "restoration" project?

Opposing Views Science Attachments #1 and #4 present scores of quotes by independent scientists who are experts on their field with no interest in volume that describe how logging and reading plunder wildlife habitat,

aquatic habitat and natural biodiversity. The biodiverse condition of undeveloped forests took thousands of years to come about. Human manipulation to generate \$\$\$\$ will only destroy it. This is how the USFS spends the public's tax dollars. Perhaps the USFS employees who assist with timber sales are clueless ... perhaps they know what they are doing but play the game anyway because their jobs pay well. Either way you are all contributing to a "massive biodiversity crisis" that is predicted by U.N. scientists to result in extinction of at least 1 million plant and animal species. You can read about your legacy at this link:

<https://www.nrdc.org/experts/jennifer-skene/report-human-impacts-pushing-forests-brink>

Request for changes to be made to the final NEPA document: 1) Indicate which natural resources will be returned to an "unimpaired or improved" condition by logging and roading this timber sale area, 2) tell the public why you believe the resources are not functioning properly and need restoration, 3) discuss the natural resources in the area that could be harmed by the timber sale "treatments," 4) demonstrate how logging and roading will to "bring back to or put back the natural resources into a former or original" healthy, fully functioning state and 5) list specific independent science quotes that show logging and roading the sale area will achieve natural resource restoration as you claim.

Failure to do so will violate:

18 USC § 1519, 18 U.S.C. § 1001 (a)(3), 40 CFR § 1500.1(b) and 40 CFR 1500.2(f)

You know what you must do to serve the American public.

Issue #3 ----- Ranger Nedlo, Ms. Walker, Mr. Lunsford, Mr. Kazmierski, Bobby Claybrook, Mr. Reed, Mr. Christensen, Ms. Christensen, Ms. Coons, Mr. Boedy, and Ms. Adams, glyphosate (the active ingredient in Roundup) causes cancer.

At page 25 you say:

"No glyphosate will be used within 30 feet of the orchid site because of potential harm to the fungus found in association with the orchid (Druille et al. 2013a, Druille et al. 2013b)."

Even casual exposure to Roundup has been known to cause cancer (non-Hodgkin Lymphoma), 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 and each member of the IDT are partially responsible for taking action to spew a chemical that causes cancer in the Daniel Boone National Forest. Most people wouldn't think of doing such a thing ... even if their employer wants them to. This Sunday in church please ask yourself what He would want you to do. USFS specialists have resigned from IDTs before and kept their jobs.

Please have the courage (and intelligence) to put 2 and 2 together. Read the obituaries in any newspaper at any time. You will find at least 90% died from cancer. We have a cancer epidemic in America. Since Roundup was first introduced and sold in the United States 3.5 billion pounds of the poison has been applied here. This is much, much more than all industrialized nations in the world combined.

Section #1 the courts always rule against Monsanto in favor of the plaintiffs who are dying of cancer

"More than 13,400 plaintiffs allege that Roundup, which contains glyphosate, caused their non-Hodgkin's

lymphoma and that the manufacturer failed to warn about that risk. Most of the lawsuits are pending in state courts." (NY Times, 5/22/2019)

In Nebraska, farmers filed a class action lawsuit against Monsanto. Lawsuits were also filed by a Kona Coffee farm owner in Hawaii, and a widow of a California farmer. All of these lawsuits share one thing in common: Farmers used Monsanto Roundup Weed Killer for years believing it was safe, and were eventually diagnosed with non-Hodgkin's lymphoma.

Monsanto continues to fight these lawsuits, claiming that their product is safe. In fact, they went as far as to file a lawsuit of their own against California, alleging that the state wrongly listed glyphosate as a carcinogen under their Prop 65 law.

Roundup Court Case

On March 27, 2019 a San Francisco jury says Monsanto (now owned by BayerAG) was liable for Mr. Edwin Hardeman's non-curable cancer called non-Hodgkin lymphoma. The judge ordered Monsanto to pay Mr. Hardeman \$200 million.

The jury went on to state:

"It is clear from Monsanto's actions that it does not care whether Roundup causes cancer, focusing instead on manipulating public opinion and undermining anyone who raises genuine and legitimate concerns about Roundup. It speaks volumes that not one Monsanto employee, past or present, came live to trial to defend Roundup's safety or Monsanto's actions. Today, the jury resoundingly held Monsanto accountable for its 40 years of corporate malfeasance and sent a message to Monsanto that it needs to change the way it does business."

Roundup Court Case #2

On May 13, 2019 a jury in Alameda County California ruled that the couple, Alva and Alberta Pilliod of Livermore, Calif., both contracted non-Hodgkin's lymphoma because of their use of a glyphosate-based herbicide. They were each awarded \$1 billion in punitive damages and an additional \$55 million in collective compensatory damages.

Here are a few of the many links to the verdict:

California Jury Awards \$2 Billion To Couple In Roundup Weed Killer Cancer Trial

<https://www.npr.org/2019/05/13/723056453/california-jury-awards-2-billion-to-couple-in-roundup-weed-killer-cancer-trial>

Alva Pilliod & Alberta Pilliod: 5 Fast Facts You Need to Know

<https://heavy.com/news/2019/05/alberta-alva-pilliod/>

Pilliod v. Monsanto Company | California Roundup JCCP

<https://www.baumhedlundlaw.com/pilliod-v-monsanto-trial/>

The EPA says a chemical in Monsanto's weed-killer doesn't cause cancer - but there's compelling evidence the agency is wrong

<https://www.businessinsider.com/glyphosate-cancer-dangers-roundup-epa-2019-5>

Bayer Loses Third Glyphosate Lawsuit; Plaintiffs Awarded More Than \$2 Billion in Damages

<https://www.agriculture.com/news/business/bayer-loses-third-glyphosate-lawsuit-plaintiffs-awarded-more-than-2-billion-in-damages>

Bayer-Monsanto Ordered to Pay \$2 Billion to Glyphosate Cancer Victims

<https://healthimpactnews.com/2019/bayer-monsanto-ordered-to-pay-2-billion-to-glyphosate-cancer-victims/>

Bayer's stock falls after \$2 billion verdict against Roundup maker Monsanto

https://www.washingtonpost.com/business/2019/05/14/bayers-stock-falls-after-billion-verdict-against-roundup-maker-monsanto/?noredirect=on&utm_term=.d1848f7731e6

Roundup Court Case #3

On July 2018, Dewayne Johnson (a former school groundskeeper) was diagnosed with non-Hodgkin's lymphoma. He 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.

Here are a few of the many links to the verdict:

4 Must-See Videos of the Huge Win in the Monsanto Trial

<https://www.organicconsumers.org/blog/monsanto-trial-verdict-videos>

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>

Monsanto Loses Landmark Roundup Cancer Trial, Set to Pay USD 289 Million in Damages

<https://mail.google.com/mail/u/0/#inbox/FMfcgxvxBxtJCGsfZgnVKVKfStZmxqSM>

Monsanto "Taken To The Cleaners" In Jury Verdict Dwayne Johnson v. Monsanto

<https://www.activistpost.com/2018/08/monsanto-taken-to-the-cleaners-in-jury-verdict-dwayne-johnson-v-monsanto.html>

Jury rules Monsanto liable in weed killer case

<https://abc7news.com/society/verdict-reached-in-lawsuit-against-monsanto/3925454/>

Monsanto ordered to pay \$289 million in world's first Roundup cancer trial

<https://www.reuters.com/article/us-monsanto-cancer-lawsuit/jury-orders-monsanto-to-pay-290-million-in-california-roundup-cancer-trial-idUSKBN1KV2HB>

Monsanto Loses \$289 Million Verdict in Roundup Cancer Trial

<https://www.bloomberg.com/news/articles/2018-08-10/monsanto-s-roundup-caused-groundskeeper-s-cancer-jury-finds>

Jury orders Monsanto to pay nearly \$290M in Roundup trial

<https://www.nbcnews.com/news/us-news/jury-orders-monsanto-pay-290m-roundup-trial-n899811>

Section #2 The public is reminded to not become exposed to Roundup or other herbicides that contain the chemical glyphosate on a regular basis. Here are the 4 latest warnings published online and/or in print media.

Article Title: Home Depot and Lowe's Face Roundup Lawsuits over Lack of Cancer Warning

Excerpts:

"Home Depot on Monday was hit with a proposed class action in California federal court over sales of Monsanto's weedkiller Roundup, saying the retail giant fails to warn of its cancer risks."

"There have been three cases that have gone to trial out of 13,400 pending that allege Roundup causes cancer, and have all resulted in verdicts for the plaintiffs."

Published by Sustainable Pulse, August 8, 2019

Link to article: https://sustainablepulse.com/2019/08/08/home-depot-and-lowes-face-roundup-lawsuits-over-lack-of-cancer-warning/?utm_source=newsletter&utm_medium=email&utm_campaign=glyphosate_gmos_and_pesticides_weekly_global_news_bulletin&utm_term=2019-08-08#.XUwlf_JKi1s

Article Title: Bayer CEO Opens Door to Roundup Settlement as Lawsuits Swell

Excerpts:

"Bayer AG Chief Executive Officer Werner Baumann said he'd consider a "financially reasonable" settlement of litigation over the weedkiller Roundup as the caseload swells and the company's shares slump anew."

"The number of lawsuits from people in the U.S. who say the herbicide caused them to develop cancer rose by about 5,000 to 18,400, Bayer said in a statement. The company also revealed more troubles at its crop-science division on Tuesday after bad weather curbed demand from farmers."

"Baumann has staked his credibility on last year's \$63 billion takeover of Monsanto Co., claiming the company is better off balancing its portfolio between agriculture and health care. But the surge in U.S. lawsuits alleging that Roundup - which Bayer inherited from Monsanto - causes cancer suggest settling the claims will become more expensive than previously thought, heaping more pressure on Baumann three months after he received an unprecedented rebuke from shareholders."

Published by Sustainable Pulse, July 31, 2019

Link to article: https://sustainablepulse.com/2019/07/31/bayer-ceo-opens-door-to-roundup-settlement-as-lawsuits-swell/?utm_source=newsletter&utm_medium=email&utm_campaign=glyphosate_gmos_and_pesticides_weekly_global_news_bulletin&utm_term=2019-08-01#.XUNd-fJKi1s

Article Title: Bayer faces skyrocketing US lawsuits over glyphosate

Excerpts:

"The number of plaintiffs in the US claiming they are contracting cancer after using the weedkiller Roundup has leapt to over 18,000. German company Bayer admits it's facing a "challenging environment." "

" "As of July 11, 2019, lawsuits from approximately 18,400 plaintiffs had been served in the United States in connection with the crop protection product glyphosate," Bayer said in a statement. In April, the number of cases stood at 13,400."

"Bayer has since lost three consecutive cases in California courts, which ruled that blood cancer non-Hodgkins lymphoma had been caused by glyphosate-containing products, including Monsanto's flagship Roundup weedkiller."

Published by Deutsche Welle, July 30, 2019

Link to article: <https://www.dw.com/en/bayer-faces-skyrocketing-us-lawsuits-over-glyphosate/a-49797934>

Article Title: Sick Children among Cancer Victims suing Monsanto over Roundup

Excerpts:

"A 12-year-old boy suffering from cancer is among the newest plaintiffs taking on Monsanto and its German owner Bayer AG in growing litigation over the safety of Roundup herbicides and Monsanto's handling of scientific concerns about the products."

"Lawyers for Jake Bellah were in court Monday in Lake County Superior Court in Lakeport, California arguing that Bellah's young age and diagnosis of non-Hodgkin lymphoma (NHL) qualified him for "trial preference," or a speedy trial. In their motion, lawyers for the Baum Hedlund law firm of Los Angeles asked for a trial that would begin before the end of this year, within 120 days after a judge's order if their motion is granted."

"In May, a jury in Oakland, California ordered Monsanto to pay more than \$2 billion in damages to Alberta and Alva Pilliod, a married couple who both suffer from NHL they blame on exposure to Roundup. That followed a verdict in March in which a San Francisco jury ordered Monsanto to pay roughly \$80 million in damages to plaintiff Edwin Hardeman who also suffers from NHL. On July 15, the judge in that case reduced the award to \$25 million. Last year jurors in state court in San Francisco ordered Monsanto to pay \$289 million in damages to school groundskeeper Dewayne "Lee" Johnson, who has been diagnosed with a terminal type of non-Hodgkin lymphoma. The judge in that case lowered the total verdict to \$78 million and the verdict is now on appeal."

Published by U.S. Right to Know, July 16, 2019

Link to article: <https://usrtk.org/monsanto-roundup-trial-tracker-index/>

Section #3 The USDA has been cuddling with the corporations that manufacture herbicides and pesticides for many decades.

Clearly, Monsanto controls the USDA's herbicide science and conclusions. Here are papers & articles that should be read by all Americans:

Six Reasons Why Obama Appointing Monsanto's Buddy, Former Iowa Governor Vilsack, for USDA Head Would be a Terrible Idea

Published by Organic Consumers Association, November 12, 2008

Excerpt:

"Vilsack has a glowing reputation as being a schill for agribusiness biotech giants like Monsanto. Sustainable ag advocated across the country were spreading the word of Vilsack's history as he was attempting to appeal to voters in his presidential bid."

Link:

<https://www.organicconsumers.org/news/six-reasons-why-obama-appointing-monsantos-buddy-former-iowa-governor-vilsack-usda-head-would>

Monsanto Receives Full Deregulation From Vilsack's USDA For Roundup Ready Alfalfa
Published by Alabama Confidential, January 31, 2011

Excerpts:

"Monsanto shill supreme, USDA Head Tom Vilsack pushed hard for his favorite corporate demon, the dreaded Monsanto, to further gain total control of US agriculture with this latest power bestowal by granting full deregulation for Monsanto's genetically modified Alfalfa:"

"Vanity Fair covered this issue in an investigative piece from May 2008 aptly entitled "Monsanto's Harvest of Fear" that is a compelling read and an in-depth probe into the frightening power that Monsanto has and wants.

And thanks to this latest ruling from the USDA, in conjunction with the false Food and Safety Bill that passed in the lame duck session of Congress, they are well on their way to getting it."

Link:

<http://alabamacorruption.blogspot.com/2011/01/monsanto-recieves-full-deregulation.html>

Tom "Monsanto" Vilsack Must Go.
Published by Daily Kos, April 25, 2011

Excerpts:

"He should go to Monsanto, that is, where we know he'll end up in a cushy job making bushels of money following his adventure as Secretary of Agriculture. Why waste our time? Why not just do it now Tom? You're already working for them:"

"Who needs the federal agency responsible for ensuring food safety for Americans? In our brave new world we rely on the "invisible hand" of the market place to regulate itself! So it's only natural that Vilsack would approve a program allowing companies like Monsanto to review itself. I'm sure Monsanto will do the environmental assessments and find that "Oh My Gosh!", GMO's are perfectly safe!"

Link:

<http://www.dailykos.com/story/2011/04/25/969976/-Tom-Monsanto-Vilsack-Must-Go>

Ag Secretary Tom Vilsack: Too much Monsanto in the Mix?
Published by OpEdNews, December 17, 2008

Excerpt:

"Iowans also remember the rides on Monsanto's corporate jet that Vilsack - the Biotech "Governor of the Year" - enjoyed during his time in office. He repayed Monsanto by working with the Republican floor manager in the House, promising to do everything he could to get a seed bill to pass. This bill took away county power to

regulate GMOs within county borders."

Link:

<http://www.opednews.com/articles/Ag-Secretary-Announced-To-by-Jill-Hamilton-and-081216-596.html>

How did Barack Obama become Monsanto's man in Washington?

Published by Infowars, April 29, 2013

Excerpts:

"After his victory in the 2008 election, Obama filled key posts with Monsanto people, in federal agencies that wield tremendous force in food issues, the USDA and the FDA:"

"At the USDA, as the director of the National Institute of Food and Agriculture, Roger Beachy, former director of the Monsanto Danforth Center."

"As commissioner of the USDA, Iowa governor, Tom Vilsack. Vilsack had set up a national group, the Governors' Biotechnology Partnership, and had been given a Governor of the Year Award by the Biotechnology Industry Organization, whose members include Monsanto."

"As the new counsel for the USDA, Ramona Romero, who had been corporate counsel for another biotech giant, DuPont."

"Obama's signing of the Monsanto Protection Act, making that corporation senior in power to the US court system, wasn't an accident. It was taken in keen awareness of his duty to his Globalist betters."

Link:

<http://www.infowars.com/how-did-barack-obama-become-monsantos-man-in-washington/>

Monsanto Has Tom Vilsack Under Its Thumb

Broadcast by Ring of Fire Radio, LLC, March 25, 2013

Excerpt:

"The Agricultural Department sent a budget to the White House last week, with orders from the meat industry and agricultural giant Monsanto on how Secretary Tom Vilsack should do his job. Monsanto, a company known for its controversial and potentially dangerous genetically engineered crop seeds, has been under fire for years for putting profit over consumer need and safety."

Link:

<https://trofire.com/2013/03/25/monsanto-has-tom-vilsack-under-its-thumb/>

USDA Forces Whole Foods to Accept Monsanto

Published by Reader Supported News, February 3, 2016

Excerpts:

"In a cleverly worded, but profoundly misleading email sent to its customers last week, Whole Foods Market,

while proclaiming their support for organics and "seed purity," gave the green light to USDA bureaucrats to approve the "conditional deregulation" of Monsanto's genetically engineered, herbicide-resistant alfalfa.

Beyond the regulatory euphemism of "conditional deregulation," this means that WFM and their colleagues are willing to go along with the massive planting of a chemical and energy-intensive GE perennial crop, alfalfa; guaranteed to spread its mutant genes and seeds across the nation; guaranteed to contaminate the alfalfa fed to organic animals; guaranteed to lead to massive poisoning of farm workers and destruction of the essential soil food web by the toxic herbicide, Roundup; and guaranteed to produce Roundup-resistant superweeds that will require even more deadly herbicides such as 2,4 D to be sprayed on millions of acres of alfalfa across the U.S."

Link:

<http://readersupportednews.org/opinion2/265-34/34968-usda-forces-whole-foods-to-accept-monsanto>

GMO Science Deniers: Monsanto and the USDA

The Huffington Post, May 20, 2015

Excerpts:

"Perhaps no group of science deniers has been more ridiculed than those who deny the science of evolution. What you may not know is that Monsanto and our United States Department of Agriculture (USDA) are among them. That's right: for decades, Monsanto and its enablers inside the USDA have denied the central tenets of evolutionary biology, namely natural selection and adaptation. And this denial of basic science by the company and our government threatens the future viability of American agriculture."

"Now Monsanto and Dow Chemical have received government approval to market new genetically engineered corn, soy and cotton, that are "stacked" with engineered DNA that make them resistant to Roundup as well as 2,4-D (one of the chief elements of "Agent Orange"). Monsanto has also gained approval from the USDA for the same three crops that can tolerate Dicamba. 2,4-D and Dicamba are older, more toxic herbicides than Roundup, and these companies are reverting to them because they have brought us to the point of peak herbicides. They simply don't have any new ones, similar to the current crisis in antibiotics."

Link:

http://www.huffingtonpost.com/andrew-kimbrell/gmo-science-deniers-monsanto-and-the-usda_b_6904606.html

There is not enough room to print excerpts from them all. Here are the links to the rest for those who are interested in reading about Monsanto controlling the USDA ... and of course the USFS.

Is the USDA a wholly owned subsidiary of Monsanto?

Link: <http://www.cornucopia.org/is-the-usda-a-wholly-owned-subsiadiary-of-monsanto/>

Obama's Highly Corrupt USDA: END Monsanto.

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

A Government of Monsanto, by Monsanto, and for Monsanto

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

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

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

Monsanto's GMO Policy Infecting All Levels of Government

Link: <http://www.nationofchange.org/monsanto-s-gmo-policy-infecting-all-levels-government-1373204831>

Another Monsanto man in a key USDA post? Obama's ag policy's giving me whiplash

Link: <http://grist.org/article/2009-09-24-usda-obama-monsanto-organic/>

GMO Science Deniers: Monsanto and the USDA

Link: <http://www.wanttoknow.info/a-gmo-science-deniers-monsanto-the-usda>

USDA Forces 'Whole Foods' To Accept Monsanto

Link: <http://humansarefree.com/2012/02/usda-forces-whole-foods-to-accept.html>

In Defiance of Sanity, USDA Approves Dow's Agent Orange GMO

Link: <http://www.sustainablebusiness.com/index.cfm/go/news.display/id/25907>

Is the USDA Covering Up Potential Dangers That Affect Your Health?

Link: <http://www.liveinthenow.com/article/is-the-usda-covering-up-dangers-that-affect-your-health>

USDA and Monsanto "Biotech" Industry Collusion

Link: <http://www.truthwiki.org/usda-and-monsanto-biotech-industry-collusion/>

Corruption at the USDA

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

USDA Admits Exterminating Birds, Crops, and Bees

Link: <http://worldtruth.tv/usda-admits-exterminating-birds-crops-and-bees/>

USDA: Stop Killing Bees and Butterflies (CCD) While Saving Monsanto (Round-Up)

Link: <https://www.change.org/p/usda-stop-killing-bees-and-butterflies-ccd-while-saving-monsanto-round-up>

U.S.D.A. infiltrated by Monsanto.

Link: <https://legacy.minds.com/blog/view/460310689387388940/usda-infiltrated-by-monsanto>

STOP the Corrupt FDA and USDA Madness Once and For All!

Link: <https://www.change.org/p/athena-telos-stop-the-corrupt-fda-and-usda-madness-once-and-for-all>

Are you aware that the USDA is attempting to corrupt organic standards?

Link: http://www.carbonproduct.net/Health_and_Fitness/Are_you_aware_that_the_USDA_is_attempting_to_corrupt_orangic_standards/_17096

NEW SCANDAL FOR USDA & MONSANTO: Whistle Blowers at USDA say MONSANTO Influences Agency Suppression of Critical Science.

Link: <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

Link: http://axisoflogic.com/artman/publish/Article_62860.shtml

Monsanto's GMO Crops Ravage US, USDA Ignores Dangers

Link: <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

Link: <http://geneticallyengineeredfoodnews.com/monsanto-sugar-beets>

USDA Approves Toxic Herbicide Amidst Great Public Outcry

Link: <http://healthimpactnews.com/2014/usda-approves-toxic-herbicide-amidst-great-public-outcry/>

USDA Gives Green Light to 2,4-D Resistant GM Crops

Link: <http://sustainablepulse.com/2014/01/03/usda-gives-green-light-pesticide-promoting-gm-crops/#.VIIUtJbTm1s>

USDA approves the second generation of GMOs resistant to more toxic herbicide

Link: <http://www.seattleorganicrestaurants.com/vegan-whole-food/usda-approves-second-generation-of-GMOs-resistant-to-toxic-herbicide-isoxaflutole-IFT.php>

USDA refuses to test foods for glyphosate contamination, says pesticides are safe to eat.

Link: 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.

Link: <https://www.organicconsumers.org/essays/%E2%80%98qr%E2%80%99-barcodes-latest-plot-keep-you-dark-about-gmos>

Herbicide Use To Increase Dramatically

Link: <http://www.enn.com/agriculture/article/47711>

USDA Approval of Second-Generation of GMOs

Link: <http://undergroundhealthreporter.com/usda-approval-of-second-generation-of-gmos/#axzz3sFaNPdRd>

If glyphosate were 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? This link describes this on more detail:

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

Section #4 -- Law firms are now advertising on television nationwide telling people that they will represent them if they are diagnosed with non-Hodgkin Lymphoma after having been exposed to Roundup.

Knight Legal

Link: <http://www.knightlinelegal.com/roundup/>

James Harris Law

Link: https://www.recallsuit.com/roundup-lawsuit-b/?msclkid=5be7029551971de0ec305fab2abdbbd2&utm_source=bing&utm_medium=cpc&utm_campaign=Roundup&utm_term=lymphoma%20lawsuits&utm_content=Lymphoma%20Lawsuit

Weitz & Luxenberg

Link:

https://www.roundupinjuries.com/?msclkid=8c1f786987f51dce148c2557fb87c34b&utm_medium=cpc&utm_term=hodgkin's%20lymphoma%20lawsuit&c_id=c-8343&utm_content=search-

ad&utm_source=bing&utm_campaign=evergreen%20-%20roundup%20-%20lymphoma

Sokolove Law

Link:

https://roundup.sokolovelaw.com/?src=bing_webppc_328577675_%2Bmonsanto%20%2Blawsuit_%7Bcontent%7D_b_o_lymphoma%20lawsuits%20against%20monsanto&numberToReplace&campaignId&ringPoolId&jpow=aa_328577675_bb_1233652168336312_cc_%2Bmonsanto%20%2Blawsuit_dd_b_ee_o_ff_%7Bbadposition%7D_gg_c_hh_%7BdeviceModel%7D_ii_jj_110194_kk_ll_%7Bplacement%7D_mm_%7Btarget%7D_nn_kwd-77103363003058%3Aloc-190_oo_%7Bcreative%7D_pp_%7Bbrand%7D_qq_%7Bacid%7D_rr_77103314975124_ss_77103363003058

Class Claims LLC

Link: <https://www.class.claims/round-up-lawsuit>

Trustwell Law Group

Link: https://www.trustwelllaw.com/environmental/roundup/lawsuit?utm_source=bing-ads&utm_medium=paid-search&utm_campaign=roundup&msclkid=7aa5b3c82ae01c32cf94eef65692be31&utm_term=monsanto%20lymphoma%20lawsuit&utm_content=Monsanto%20Lymphoma%20Lawsuit%20%7C%20Exact

Goldwater Law Firm

Link: https://www.therounduplawsuit.com/free-evaluation?cid=864&afid=3&project=Roundup&sid=BingSearch&usid=lymphoma-p&st=BingSearch&vt-k=lymphoma&vt-mt=p&vt-p={{placement}}&vt-n=o&vt-d=c&msclkid=4938411891c811a6ee651c26edba747a&utm_source=bing&utm_medium=cpc&utm_campaign=%5BROUNDUP-SEARCH%5D%202019&utm_term=lymphoma&utm_content=Lymphoma%20Terms

Pintas and Mullins Law Firm

Link:

https://roundupsettlements.com/?utm_source=bing&utm_medium=cpc&utm_campaign=369199413&utm_term=roundup%20lawsuit&utm_content=82875860687107&msclkid=1fb4e9f4b0451049b80eb4ca32754d40

ROUNDUPCANCER ATTORNEYS.COM

Link: https://roundupcancerattorneys.com/roundup-lawsuit?msclkid=b0a975edf092161d3c4628d372a24497&utm_source=bing&utm_medium=cpc&utm_campaign=RoundUp%20Cancer&utm_term=roundup%20lawsuit&utm_content=Lawsuit%20roundup

Trustwell Law Group

Link: <https://www.trustwelllaw.com/environmental/roundup/lawsuit>

Carlson Law Firm

Link: <https://www.carlsonattorneys.com/news-and-update/roundup-2019/>

A Case for Women

Link: https://www.acaseforwomen.com/adv/roundup-lawsuit/?utm_campaign=369081443&utm_source=bing&utm_medium=cpc&utm_content=79439809871843&utm_term=roundup%20lawsuit&adgroupid=1271035841951610&msclkid=f2058d93dd

24196d73b4d0ad5f144d1c

Pulaski Law Firm

Link: <https://www.rounduplawsuit.org/>

Saiontz & Kirk

Link: <https://www.youhavealawyer.com/roundup/cancer-settlements-faq/>

Greenberg & Bederman, LLC

Link: <https://www.gblawyers.com/roundup-lawsuits/>

Rosen Injury Lawyers

Link: <https://roseninjurylawyers.com/roundup-lawsuits/>

Garber Law Offices

Link: <https://www.garber.law/glyphosate-roundup/>

Section #5 Your local public will be warned to avoid the Daniel Boone National Forest.

Unless you convince me otherwise I'll be sending a letter to the editor the Lexington Lexington Herald-Leader soon. Ranger Nedlo, my letter will inform the public that you propose to spray a known carcinogen at various locations in the London Ranger District on the Daniel Boone NF. These newspapers will likely print a letter submitted by someone outside the area on a life and death matter. My letter will include your office telephone number and suggest the public contact you with questions.

You and your IDT members all know there are effective alternatives to glyphosate that will accomplish your goals. If taken to court the plaintiff's attorney will ask you why the alternatives were not used and you instead chose to expose your forest visitors to a chemical that causes cancer. What will you say?

Section #6 Federal workers are not exempt from being charged with reckless endangerment which is a felony.

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.

Any one of you could be called to testify.

Reading these comments establishes the fact that you knew the consequences of your actions.

Section #7 Concluding Comments

This would be enough to convince any reasonably intelligent human to never again apply herbicides that contain glyphosate ANYWHERE. If you would not spew a known carcinogen near your home, it's unreasonable (and probably criminal) to apply it to public land.

Each IDT member is culpable and partially responsible for the effects of sale implementation because the final EA would not have been completed without full IDT input. NEPA requires that the preparation of EAs and EISs be interdisciplinary. Without the input from the WL/fisheries biologists, recreation specialist, soils scientist, archaeologist, silviculturist, botanist, hydrologist, landscape architect, wilderness specialist, and engineer, a final, legal NEPA document would have never been completed. Ms. Walker, Mr. Lunsford, Mr. Kazmierski, Bobby Claybrook, Mr. Reed, Mr. Christensen, Ms. Christensen, Ms. Coons, Mr. Boedy, and Ms. Adams, you are as responsible for setting the stage for providing the conditions that make glyphosate exposure to human forest

visitors and most wildlife species likely as Ranger Nedlo, who will sign the decision. Caring, thinking, compassionate people would never allow their good names to be associated with such a tragic action. They would resign from the IDT in the blink of an eye if after trying to convince the Responsible Official to use an alternative to glyphosate and the Responsible Official refuses.

You are the ones that must live with yourself for the rest of your life. Most caring human beings don't risk the lives of others to please their employer. If the IDT members do nothing the guilt that they were partners in this crime will live with them for the rest of their life.

Section #7 The SERA safety study is fraudulent

The USFS depends on a single (emphasis added) research conclusion that glyphosate is safe by a lab with clear ties to Monsanto (Syracuse Environmental Research Associates--SERA) knowing the research conducted by thousands of independent scientists reveals glyphosate exposure can be lethal.

Syracuse Environmental Research Associates. 2011. Glyphosate - revised human health and ecological risk assessments final report. Rept. SERA TR 02-053-23-03b. Washington DC: U.S. Department of Agriculture, Forest Service, Forest Health Protection. 264 p.

Monsanto initiated the study and chose Syracuse Environmental Research Associates to do the study. The USFA embraces the conclusions of this SINGLE study in spite of the hundreds of independent studies that conclude even casual glyphosate exposure might cause cancer.

How would you feel of your child had a fever and swollen lymph nodes and your doctor told you she has incurable, fatal non-Hodgkin Lymphoma?

Still reject the truth? Google on the 2 words "cancer" and "glyphosate" and you will get 11,800,000 hits.

Request for changes to be made to the final NEPA document: Assure the following quote is included:

"herbicides that contain glyphosate will not be used anywhere, at any time, for any reason as part of this project."

You know 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

40 CFR §1508.27(b)(2) because the FONSI intensity discussion will not discuss the lethal nature of this chemical. Indeed, exposing people to a carcinogen is a "significant impact to the human environment." If your final EA still approves the application of glyphosate you will violate NEPA because your FONSI is fraudulent. Even a biased Objection Deciding Officer would direct you to either 1) prepare an EIS, or 2) use another herbicide.

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

I have included Opposing 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: Respond to each responsible opposing view quote contained in the Opposing Views Attachments

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.

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?

Your Court Visit

The Courts uphold 40 CFR 1502.9(b). See below:

"Accordingly, we find that the Final EIS fails to disclose and discuss responsible opposing scientific viewpoints in the final statement itself in violation of NEPA and the implementing regulations. We therefore reverse the district court's grant of summary judgment and remand to the district court with directions that it remand the final statement to the Forest Service for further proceedings consistent with this opinion. See *Vitarelli v. Seaton*, 359 U.S. 535, 545, 79 S.Ct. 968, 3 L.Ed.2d 1012 (1959) (standing for the well-established principle that an agency is generally required to follow its regulations); ?see also *Cal. v. Block*, 690 F.2d at 769 ("Agencies are . obliged to adhere to the procedures mandated by NEPA.") (citing *Vt. Yankee Nuclear Power Corp. v. Natural Res. Def. Council, Inc.*, 435 U.S. 519, 549 n. 21, 98 S.Ct. 1197, 55 L.Ed.2d 460 (1978)).⁹
REVERSED AND REMANDED."

CENTER FOR BIOLOGICAL DIVERSITY v. UNITED STATES FOREST SERVICE

Argued and Submitted July 15, 2003. -- November 18, 2003

Before: ?KLEINFELD, WARDLAW, Circuit Judges, and POGUE, Judge.*

In the United States Court of Appeals,Ninth Circuit

<http://caselaw.findlaw.com/us-9th-circuit/1173711.html>

Concluding Remark

You people are clueless and have no business administering public land.

Sincerely,

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

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

CCs to selected forest staff