

Data Submitted (UTC 11): 12/29/2019 12:07:37 PM

First name: Dick

Last name: Artley

Organization:

Title:

Comments: Dear Ranger Swanson and Ms. Schmidgall,

"The nation behaves well if it treats the natural resources as assets which it must turn over to the next generation increased, and not impaired, in value."

Theodore Roosevelt

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

John Muir

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

Cree Indian proverb

Ranger Swanson, your proposed Quartzville-Middle Santiam timber sale proves you are pathologically obsessed by the need to accumulate volume regardless of how it destroys the integrity of a forested ecosystem owned by 324 million Americans. Your swarm of so-called specialists on the IDT know their jobs depend on 1) writing a cut & paste, ridiculous, laughable P&N that always requires tree removal, and 2) populating their Chapter 3 effects analysis with unsubstantiated statements intended to convince the public that the Proposed Action is wonderful and choosing No Action would be a tragic mistake. These people are either clueless or hopelessly and unknowingly brainwashed by the USFS.

During my 29 years with the USFS I saw it regularly. Resource specialists would skip home after work so happy that they protected their resource from harm. After reading this NEPA document its clear to me your IDT members are no different. People who have been subjected to a well-oiled brainwashing machine have no idea it happened. Their minds have been programmed to accept the USFS way without question. Most people would wonder why:

...the vast majority of science books and papers authored by experts not affiliated with the USFS caution against using USFS "treatments" if resource health is a goal. A very small sample of this independent science can be read in the Opposing Views Science Attachments.

...resource specialists are not outraged and complain to the Ranger when they visit timber sales in the field with units that look like those "restored" area photos in Opposing Views Science Attachment #27s and they see that their resource no longer functions properly.

...nationwide polls reveal most members of the public do not want their national forests commercially logged and the USFS does it anyway and justify that stance by saying USFS action are not subject to a vote. See Opposing Views Science Attachment #10

...the vegetation management (aka timber) section of each forest is run by foresters (who were educated in industrial forestry) and not forest ecologists.

...the measure of success for line-officers is volume offered and not acres where all natural resources function properly.

After reading the pathetic QMS Project Description document it's clear to me the IDT members masquerading as resource specialists have little understanding of what causes the countless resources in the forest to stop functioning properly. As I will show, their jobs require them to write anything (regardless of factual basis) to assure the public believes this tragic timber sale is ecosystem friendly. They were certainly not hired for their knowledge. When President Nixon signed the National Environmental Policy Act into law in 1970 the USFS needed their names and specialties to comply with the "interdisciplinary" requirement,

The public should not be forced to pay for the salaries of corporate lap-dogs. You and the IDT members either reject or don't know about best science that your agency assures the public will drive new projects. Either way you have no business making decisions for land owned by the American public.

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Ms. Bracamonte, Ms. Smith, Mr. Braun, Mr.  
Donaldson, Mr. Sorensen, Mr. Matthews, Ms.  
Schmidgall, Mr. Gatchell, Ms. Swanson, Mr. Farque,  
Mr. Doer, Mr. Anderson and Mr. Stratton, you are all  
spending the best years of your lives  
backhanding the public while simultaneously  
deluding yourselves to believe that you serve them. Someday the guilt will catch up with you.

You all know the QMS timber sale will decimate the proper functioning of many resources in and downstream from the sale area but you don't care. Why? Your Ranger needs the volume to "make the cut" and to justify her NFTM funding. You have no qualms about destroying the splendid symbiotic relationship between the countless forest resources to assure she spends every dime of the NFTM funding this FY do you?

After reading the QMS Project Description document it became clear your IDT members knew they must make you happy by agreeing to lie for you to justify your selection of the Proposed Action for implementation. Competent, professional resource specialists would refuse to serve on an IDT knowing the Proposed Action will destroy the resources the public pays them to protect.

Comment for which I'd like a meaningful response in the Response to Comments section in the draft NEPA document: Ranger Swanson, below I present you with a tiny sample of the science you either ignore or don't know about ... and should. There are many, many more in Opposing Views Science Attachments #1 which clearly describes how a tragic commercial timber sale like this destroys the proper functioning of many natural resources in and downstream from the sale area. Why does the USFS claim commercial logging and roading "restores" the forest? Do you or any of your IDT members hold Ph.D.s? Are any of you experts on your fields? Well, the scientists who authored the quotes below are experts. What gives you and your IDT members the authority to ignore best science? Your agency assures the public its projects are all grounded in best science. Is volume really that important to you?

"We concluded that commercial timber sales do not meet the criteria for forest restoration." (pgs. 1 and 2)

Western Region Audit Report: Forest Service National Fire Plan Implementation  
Long, Richard D., U.S. Department of Agriculture Office of Inspector General  
Report No. 08601-26-SF, November 2001.  
<http://www.usda.gov/oig/webdocs/08601-26-SF.pdf>

"Biodiversity in managed ecosystems is poor. Less biodiverse communities and ecosystems are more susceptible to adverse weather (such as drought) and exotic invaders, and have greatly reduced rates of biomass production and nutrient cycling." (pg 2)

Biodiversity and Ecosystem Functioning: Maintaining Natural Life Support Processes

Naeem, Shahid Ph.D., F.S. Chapin III Ph.D., Robert Costanza Ph.D.,  
Paul R. Ehrlich Ph.D., Frank B. Golley Ph.D., David U. Hooper Ph.D.  
J.H. Lawton Ph.D., Robert V. O'Neill Ph.D., Harold A. Mooney Ph.D.  
Osvaldo E. Sala Ph.D., Amy J. Symstad Ph.D., and David Tilman Ph.D.

Published in Issues in Ecology No. 4. Fall 1999.

<http://cfpub.epa.gov/watertrain/pdf/issue4.pdf>

"For much of the past century the Forest Service, entrusted as the institutional steward of our National Forests, focused its management on an industrial-scale logging program. The result of the massive logging and road construction program was to damage watersheds, destroy wildlife habitat and imperiled plant and animal species." (pgs 6 and 7)

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

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

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>

I ask the IDT members to be real professionals and remove yourselves from the USFS box. Allow yourselves to think without being constrained by your agency. Most of you will agree the quotes above authored by experts make sense. Now comes the big questions you are all afraid to approach:

\*Why isn't the USFS guided by this science?

\*Why are the management actions used by the USFS they claim will restore the forest back to health is contradicted by what the experts say?

\*Why are you afraid to acknowledge to your line-officer that you agree with the independent science the USFS ignores?

\*How will you feel working on a project not supported by "best Science?"

\*Are you aware that people who have been subject to sophisticated brainwashing techniques don't know their mind has been manipulated?

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You already know what the selected alternative described in the ROD or DN will be. When was the last time your scoping Proposed Action was different from the Preferred Alternative disclosed in the DN or ROD?

Ranger Swanson, most IDT members know you have already chosen this scoping Proposed Action for implementation. You have no intention of using public scoping comments or IDT analysis information to modify the scoping Proposed Action do you? Over the last 35 years the USFS has perfected the pathetic practice of appearing to pass a project through the NEPA process without allowing it to guide the decision-maker to a reasonable selection of the alternative for implementation from multiple action alternatives. Some IDT members know this is going on and obediently backhand the public by playing the game.

You will analyze ONLY one Action Alternative in detail in the DEIS or pre-decisional EA to assure a more reasonable alternative won't compete with your chosen alternative.

The USFS has rigged the NEPA process to make it easier to serve its corporate masters. A few of your IDT members know what's going on but they are frightened of you so they keep quiet and continue to play the game.

You got caught stroking your corporate masters didn't you? Oh what fun it is. You sicken me.

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An Explanation of the Opposing Views  
Science Attachments

I am giving you and your IDT members the opportunity to become familiar with the natural resource research conclusions of independent scientists not associated with the USFS in the Opposing Views Science Attachments. Each Opposing Views Attachment is clearly labeled.

These attachments will make you all uncomfortable because they contain a wealth of independent science conclusions that are inconsistent (many times in total conflict) with the so-called USFS science your IDT members used to craft your Proposed Action. An intelligent person would not reject the quotes by Ph.D. experts in their fields contained in the Opposing Views Science Attachments out of hand as your IDT members will do here. An intelligent, unbiased natural resource specialist would be cautious and try to understand why USFS science conclusions and independent science conclusions are so different. The USFS claims commercial logging and roading "restores" the forest. If this is so, then why do independent scientists repeatedly describe why logging is a tragic assault on the forest's natural resources in Attachment #1?

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Your IDT members have been programmed to  
Embrace the USFS corporate-friendly timber agenda.

A few of your IDT members know the USFS's claims about what should and should not occur in a forested ecosystem is the antithesis of what hundreds of science papers and books written by independent scientists say. The agency has a sophisticated process for mind manipulation. They subject new employees to the brainwashing process from their first day on the job. You have all been manipulated to believe the following untrue USFS dogma without question. These claims would have been laughable if you had heard them in college.

- 1) most forests are sick and will become healthy again after they are commercially logging and roaded.
- 2) Opposing Views Science Attachments #1 and #4 describe how commercial logging and roading inflict tragic, long-term damage to the forest resources in and downstream from the sale area yet you people agree with the notion that . commercial logging and roading "restores" the forest. Even kids that have taken a high school science course know logging damages and sometimes renders some important natural resources incapable of functioning properly.
- 3) you have been programmed to believe the health of the commercially valuable trees is the measure of "forest health. You were conditioned to never question USFS claims. Any lay member of the public knows the forest contains countless natural resources other than trees that are symbiotically dependent on one another to create a fully functional forest. So why does the agency place such a high value on merchantable conifer tree species? How else do they serve their corporate masters?
- 4) You have been taught that an "unmanaged" forest is an "unlogged" forest. For over 100 years the USFS has done what the natural resource extraction corporations wanted ... regardless of the other resource damage that the USFS conveniently fails to acknowledge. Do you really think logging is a synonym of management?

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What does a USFS Forester do?

I spent 9 years as a forest planner on the Nez Perce NF in north Idaho. When working with timber sale NEPA IDTs I saw foresters routinely recommend creating conditions that mimic private industrial tree farms. That's what foresters learned to do on college.

Of course such abuse isn't appropriate ... even on national forest "suitable" land.

Foresters are all educated in industrial forestry to prepare them for a job administering a corporate tree farm. They know the goals for private timberland and national forest land are diametrically opposed ... yet they have no problem applying tree-farm silviculture to national forest land. Incredibly, their rangers agree.

The behavior of the biologists, soils scientist, archaeologist, and recreation specialist on the IDT is even more alarming as is the case here. Their need to be "team players" caused them to cast away their resource values and help the foresters pillage the natural resources in the forest to provide opportunities for short-term corporate profit.

Before I begin my specific comments allow me to remind you of something.

Comment for which I'd like a meaningful response in the Response to Comments section in the draft NEPA document: Gifford Pinchot made the following statement on February 5, 1905:

"Where conflicting interests must be reconciled, the question shall always be answered from the standpoint of the greatest good of the greatest number in the long run."

He intended these words to provide guidance to agency employees.

The results of the 16 statistically significant public surveys taken from coast to coast reveal there are major "conflicting interests" with the way the USFS administers the land owned by 323 million Americans. Opposing Views Science Attachment #10 contains these survey results showing the recreating public does not want their public land logged. You are all aware of this, yet you mindlessly forge ahead with your timber sale planning knowing that 75% to 85% (depending on the survey) of the people you supposedly serve want their precious national forest lands to remain undeveloped. Your actions clearly indicate you care more about your climb up the USFS promotion ladder by providing volume than you do for future generations of kids.

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Without a Doubt, your Scoping Package Describes  
a Project that has Major Problems.

Ranger Swanson, if your pending draft NEPA document analyzes a Proposed Action that even remotely resembles the one described in this scoping package you will give the Objection Deciding Officer no choice but to agree with my objection and direct you to make major changes. If the Objection Deciding Officer is one of those who rejects all objection points before they read the objection, legal or Congressional action will be necessary. Also understand the court of public opinion is often more effective at stopping tragic USFS projects than a court of law. You can be sure the people on your area who read the Eugene Register Guard newspaper will become aware of what you are about to do. rgletters@registerguard.com

A reasonable person intent on serving the recreating public would never have chosen to use their tax dollars taking this timber sale through the NEPA process. The public trusts you. They think your first priority is to take action to reduce or eliminate conditions (natural or manmade) that might harm the amenity resources in their national forests. Even a layperson would realize this proposed sale will inflict long-term damage to aquatic resources, wildlife habitat and scenery. You owe it to the public to end this FY with unspent NFTM dollars by withdrawing this needless sale. A few of your IDT members will respect you for that.

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Encountering Unprofessional USFS  
Resource Specialists is not Uncommon.

I have worked with a few USFS IDT members who refused to become knowledgeable about science that disagreed with what the USFS programmed them to believe. They were terribly frightened. Intelligent people whose mind has not been manipulated (a.k.a. brainwashed) would consider all available science regardless of its source before acting.

Sadly, you know volume is incredibly important to you so you all deny reality. After all, why would you allow your ethics and values to guide you when such behavior will jeopardize your job?

Each IDT member has no problem denying and rejecting real science. Why? You all want to climb the agency promotion ladder.

I know it's difficult for seasoned USFS employees to question agency "truths" that have been pounded into them for decades, but please seriously consider applying the wisdom of the 9 people quoted below. An intelligent, competent public lands administrator would understand what these people are saying.

Please don't laugh as you read these quotes. Indeed, they reflect the feelings and wishes of the vast majority of the people who visit their national forests. In spite of what the USFS teaches you, most national forest users prefer to pursue their recreational activities in forests that are natural, wild and undeveloped (emphasis added).

"Every other civilized nation in the world has been compelled to care for its forests, and so must we if waste and destruction are not to go to the bitter end, leaving America as barren as Palestine or Spain."

John Muir

August 1897

"Because we don't think about future generations, they will never forget us."

Henrik Tikkanen

"I believe in God, only I spell it Nature."

Frank Lloyd Wright

"Let us a little permit Nature to take her own way; she better understands her own affairs than we."

Michel de Montaigne

"We abuse land because we regard it as a commodity belonging to us. When we see land as a community to which we belong, we may begin to use it with love and respect."

Aldo Leopold, from A Sand County Almanac

"The tree which moves some to tears of joy is in the eyes of others, only a green thing which stands in their way."

William Blake

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

Chief Edward Moody

"In America today you can murder land for private profit. You can leave the corpse for all to see, and nobody calls the cops."

Paul Brooks, from The Pursuit of Wilderness, 1971

Ansel Adams must have had the US Forest Service in mind when he said this:

"It is horrifying that we have to fight our own government to save the environment." (May 1983)

You (with your IDT assistance) abuse and violate the public you are paid to serve for personal gain and the IDT members assist you. Who are you people?

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The NEPA process was developed to help  
Responsible Officials to determine their Proposed  
Action described in the DEIS or pre-decisional EA.

I am depending on you to assure your pending draft EA or EIS analyzes a project that will be accepted (and even embraced) by the people you are paid to serve. This will require significant changes to your Proposed Action described in this scoping package. Please think about it. Right now at this early stage on the NEPA process your IDT members already know that your "treatments" necessary to maximize volume will hammer the resources so loved by the average national forest visitor.

Caring, professional USFS line-officers would adjust the Proposed Action treatments developed by the IDT such that they will have no chance (emphasis added) of damaging the recreation opportunities, scenery and the proper functioning of the natural resources in and downstream from the sale area in any way.

Competent USFS line-officers instruct and expect their IDT members to disclose honest, accurate effects in Chapter 3 ... especially the No Action alternative. With No Action there will be no logging and road construction damage. Sadly, USFS IDT members know they must portray (lie about) the No Action in a negative way. Why? They must never make it difficult for their line-officer to select the Proposed Action. This is why 99% of USFS-prepared NEPA documents analyze just one action alternative in detail. This is why it has been over 2 decades since No Action was the selected alternative for any timber sale on any national forest in America. What does this tell you?

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Your Purpose & Need tells the public you really  
care about the economic stability of local  
communities. Every USFS timber sale uses this  
untrue P&N statement.

As I said before the P&N statements were copied from previous timber sale EAs and EISs and pasted into this scoping package. NEPA requires site specific analysis. All (emphasis added) USFS Purpose & Need statements contain several trumped up, untrue statements that the timber sale will 1) benefit the other resources in and downstream from the sale area, and 2) help the local community.

Comment for which I'd like a meaningful response in the Response to Comments section in the draft NEPA document: Of course the real reason for this timber sale is to further your career by providing profit opportunities for resource extraction corporations. The USFS hides this real reason for the sale by telling the public the timber is needed to enhance the economics of the local communities. You know this is the USFS approved P&N statement used to reject public suggestions for alternatives that don't include logging and roading. If you really wanted to enhance the economics of the local communities, this sale would be a small business (SBA) sale to keep the large timber companies from buying it.

The "get-out-the-cut" copy & paste P&N statement for this timber sale shown below includes the cooked-up need that appears in 90% of USFS P&N statements for timber sales.. You and your IDT members know this must be included in most USFS timber sales. The agency uses this ridiculous, untrue P&N to eliminate alternatives that might meet the other P&N goals without logging. When the public suggests such an alternative without logging the Responsible Official rejects it because it does not meet the P&N (see below). This is pathetic public deception.

"1. Contribute to a predictable, sustainable supply of forest products to help maintain the stability of local and regional economies and markets." (pg 3 of the QMS Project Description document)

After reading this nonsense, one size fits all P&N, I am certain the public is dealing with either 1) a clueless IDT, or 2) IDT members who will say anything to assure you get your volume. You know your real purpose for this timber sale is to help you spend all your NFTM funding this FY and meet your supervisor's volume expectations. An honorable person would tell the truth and say it.

Preparing an adequate NEPA document requires knowledgeable, honest, caring interdisciplinary IDT members whose goal is to assure their resource won't be harmed.

The conclusions of unbiased independent scientists all agree that water quality, and aquatic/wildlife habitat will be plundered beyond recognition by logging 12.3 square miles and constructing 32 miles of road. I know from experience that most IDT members trying to be "team players" are aware of this but they look the other way because their jobs pay well and they are frightened to say anything critical of a timber sale. They deny reality and embrace the USFS way. It's sad.

For those who don't know what independent scientists' logging-related research conclusions are I suggest you all read Opposing Views Science Attachments #1 and #4. These 2 attachments describe the tragic natural resource damage caused by logging and road construction. Ask yourselves why the USFS teaches you that logging and roading "restore" the forest back to health. Ask yourselves if you want to be part of this scheme to deceive the public.

Now read the P&Ns for past timber sales on your forest. Most are identical aren't they? Copy & paste NEPA documents don't comply with NEPA unless you are dealing with identical conditions. NEPA requires site specificity.

Comment for which I'd like a meaningful response in the Response to Comments section in the draft NEPA document: You have created an untrue Purpose & Need for your scoping package that deceives the public into believing commercial logging will benefit what you claim is a sick forested ecosystem needing "treatment" (a.k.a. logging). Do you really think the public agrees that every biological problem in the forest (real or imagined) will be solved by logging? Of course not. The reality is your proposed "treatments" (aka logging) will inflict more damage than if you left it alone by selecting the No Action alternative.

Comment for which I'd like a meaningful response in the Response to Comments section in the draft NEPA document: Over a decade ago Associate Chief Sally Collins told the public the forest service was changing. She said logging to produce volume in order to provide corporate profit opportunities no longer occurs in the USFS. You provide excellent reasons to believe her statements were wishful thinking.

"our focus today in the Forest Service is no longer on logging and road-building. In the last 5 years, for example, we decommissioned 14 miles of road for every mile of road added to our forest road system. And where we do cut timber, it is usually a byproduct of forest health projects-like cutting 14-inch white fir to protect giant sequoia groves."

from a speech by Forest Service Associate Chief Sally Collins  
"Changing Public Land Uses: A Tale of Two Debates"  
Outdoor Writers Association of America, 76th Annual Conference  
Columbia, MO-June 17, 2003  
<http://www.fs.fed.us/news/2003/speeches/06/collins.shtml>



"Post-World War II, we entered a new period characterized by timber production. From the 1960s to the 1980s, every administration, with strong congressional support, called for more timber harvest from the national forests, with the goal of replacing the depleted stocks of private and state timber as a result of the war effort. We measured success largely in terms of producing timber and providing multiple uses, including outdoor recreation and fish and wildlife.

In the early 1990s, that changed again. Today, we're in a new period focused primarily on ecological restoration and recreation. Maybe more than ever before, we are focusing on delivering values and services like clean air and water, scenic beauty, habitat for wildlife, and opportunities for outdoor recreation. Not only do Americans want these things from their national forests, but this shift is also essential to cope with some huge threats to the sustainability of these forests." (pp 8-9)

Forest Service Associate Chief Sally Collins

"The Future of Partnering with the Forest Service"

A speech presented at the Annual Meeting of the  
National Association of Conservation Districts

Atlanta, GA-February 8, 2005

<http://www.fs.fed.us/spf/coop/library/NACDspeech.pdf>

Comment for which I'd like a meaningful response in the Response to Comments section in the draft NEPA document: This is the most widely used USFS excuse to propose a commercial timber sale. Telling the public you need to log a properly functioning forest because you need to "contribute to a predictable, sustainable supply of forest products to help maintain the stability of local and regional economies and markets" does not serve the American public who use their forests for recreation. Lying to the public does not serve them does it? The public does not want their land developed to please corporate America. The public does not want conditions depicted in the photos shown in Opposing Views Science Attachment #26. You provide absolutely no analysis showing the volume under contract for the local mill is low. You do not mention how you will prohibit mills from other locations from buying the logs. USFS line-officers who really want to enhance local community economic stability by providing logs to local mills sell the sales as SBA (small business administration) sales. Why aren't you proposing this?

Who are you? What are you?

U.S. Undersecretary of Agriculture Jim Lyons stated that recreation revenues from national forests significantly exceed timber revenues. You must know tourists and recreationists avoid logged areas. Where do you take your family to camp & picnic? Do you take them to areas similar to those depicted in Opposing Views Science Attachment #27? Here are Undersecretary Lyons' statements:

Excerpts:

"There's been a perception American forests are only good for servicing American woodlots," said U.S. Undersecretary of Agriculture Jim Lyons before a recent conference of outdoor industry executives. "But our business really is broader than that. There's a huge rise in recreation demand on natural resources. It's getting harder to provide the quality recreation experience Americans enjoy and expect. Despite our efforts, demand is clearly outstripping supply."

"From his perch at the podium, Lyons eyed leading makers of backpacks, wetsuits, tents, hiking boots, canoes and the like. "If recreationists don't have a quality experience, they won't be real interested in buying your stuff. So, you've got a role to play in supporting these changes. Frankly, I think it's time you stepped up to the plate and began to play it."

"Lyons backed up his statements with figures from the draft RPA (Resources Planning Act) of 1995. This document states that \$130.7 billion dollars in gross domestic product will be created from fish and wildlife benefits. Only \$3.5 billion dollars will be generated by timber harvest."

A 1998 presentation to the National Trails Training Partnership by U.S. Undersecretary of Agriculture Jim Lyons' statements quoting figures from the draft RPA (Resources Planning Act) of 1995.  
<http://www.americantrails.org/resources/economics/EconForestRec.html>

Here's more from the Portland Oregonian:

"Increased logging on federal lands will not fix these problems. Instead, it will diminish jobs in one of Oregon's fastest growing industries, outdoor recreation. The outdoor recreation industry employs about 140,000 workers in Oregon (logging and wood-products manufacturing employ fewer than 30,000). Nationally, jobs in outdoor recreation are growing 5 percent annually. High-quality recreation attracts middle- and high-income families to settle in rural counties, too, boosting local economic activity. There is abundant research and data showing that our federal forests would do far more for workers, families and local businesses if managed for ecosystem and human health rather than as tree farms."

From: Logging expansion won't help rural communities  
Portland Oregonian online, June 29, 2014  
[http://www.oregonlive.com/opinion/index.ssf/2014/06/logging\\_expansion\\_wont\\_help\\_ru.html](http://www.oregonlive.com/opinion/index.ssf/2014/06/logging_expansion_wont_help_ru.html)

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Comment for which I'd like a meaningful response in the Response to Comments section in the draft NEPA document: Why do you reject the findings and conclusions of Undersecretary of Agriculture Jim Lyons who states "recreation revenues from national forests significantly exceed timber revenues." Elsewhere in these comments are the results of public survey information indicating the public is less likely to recreate near areas that have been logged, thus logging diminishes recreation revenue. Since recreationists avoid areas that have been logged the many "ma and pa" businesses that depend on recreation are harmed. How do you justify harming the revenues of motels, gas stations, restaurants etc. to increase the profits of a large corporate lumber mill?

Please describe why Undersecretary Lyons' conclusions about community stability do not apply to the Willamette National Forest.

You are abusing and ignoring the small business owners in the area? A well placed letter to the editor in the Portland Oregonian newspaper will educate the public about what you plan to do. My letter will suggest they contact Supervisor Beck with questions. This isn't what you want is it?

Please don't allow this "get out the cut" P&N statement to appear in your pending draft NEPA document. Show the public you serve them and not the natural resource extraction corporations.

Comment for which I'd like a meaningful response in the Response to Comments section in the draft NEPA document: Where is your analysis that shows the "local economy" is suffering because the local mill does not have enough volume? How much volume under contract does the local mill currently have? How long will it last? Will other more environmentally friendly sales be offered that the local mill might bid on? What mill(s) will benefit? How will the local mill be helped if QMS is not an SBA sale and a mill outside the local area buys it?

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Understand most line-officers know what the public wants and do the opposite knowing only court action might force the agency to do the right thing. They

know 99% of the folks who recreate on the national forests and want them undeveloped don't have the money to sue the USFS.

Ranger Swanson, when you all go home tonight please have the courage to contemplate what you are about to do. If your property were surrounded by forest and your drinking water originated in that forest and your family camped and hiked in that forest would you want it logged and roaded like you propose here? Please be honest with yourself. Of course you won't. Why? Corporate lap-dogs are unable to change.

Comment for which I'd like a meaningful response in the Response to Comments section in the draft NEPA document: Most people who visit their national forests do so to watch wildlife, hike, camp, fish and just experience solitude/Nature sounds would recognize that logging 12.3 square miles and constructing 32 miles of road will harm and sometimes destroy the amenity resources they hold dear. How does this serve the public?

Comment for which I'd like a meaningful response in the Response to Comments section in the draft NEPA document: You rely on the advice of your IDT silviculturist(s) who really believes logging and roading will restore the resources that are already functioning properly. They are dependent on offering timber sales for their jobs. How could they not be biased towards logging? They spent 4 years in college learning industrial forestry. Unfortunately, they think this "obtain maximum volume at the lowest cost" forestry they learned applies to national forest land. Only a few biologists on the IDT know these corporate tree-farm treatments create conditions that aren't real, fully functioning, biodiverse forests ... but they are frightened to voice their opinions.

Comment for which I'd like a meaningful response in the Response to Comments section in the draft NEPA document: Opposing Views Science Attachment #1 contains the statements of 221 Ph.D. scientists who discuss the tragic natural resource damage caused by logging. A thinking, responsible USFS line-officer would not rely on the recommendations of a few biased silviculturists knowing 221 experts all conclude logging negatively impacts the amenity resources in and downstream from the cutting units. The IDT specialists know what they are and are afraid to voice their opposition.

After reading these comments this far you are all either feeling uneasy and sheepish or angry that a member of the public would have the audacity to suggest you are wrong. Understand my comments reflect the views of most reasonable adults in America.

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Please Develop 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. See the red highlighted text below.

You know there is more than 1 way to satisfy your P&N, therefore it's not unreasonable to develop a 2nd or 3rd action alternative. Indeed, there are several ways to solve most problems. Some are effective and some less effective. You know the right thing to do. Presenting the public with a "do it or not do it" exposes your motives and clearly indicates you are not about to let the NEPA process jeopardize attaining your precious volume.

"Summarize, as relevant, information from scoping (Step 4 above). In this summary, highlight decisions your team made regarding possible alternatives and potential mitigations that link to different alternatives. This information should further prove that your team was open to different alternatives, especially any that the public suggested."

"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

Link: <http://www.shipleygroup.com/news/articles/0911.pdf>

Please break from the USFS's policy to analyze only 1 action alternative in detail. As I said earlier, too many USFS Responsible Officials choose their Proposed Action prior to scoping or detailed analysis. They know seriously analyzing another action alternative will jeopardize their pre-selected Proposed Action. Think back. Did you do this?

Please be professional and don't allow volume to influence you.

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You Propose to Log 12.3 Square Miles of Forest knowing the Vast Majority of the People who Visit their National Forests do so Seeking Naturally Appearing Undeveloped (emphasis added) Recreation Opportunities.

None of you can comprehend 12.3 square miles of logging. None of you can understand the value of healthy riparian areas. I suggest when you re-do this scoping package you have a fisheries biologist and hydrologist on the IDT. Had they been on this IDT you would never have suggested you log 2.9 square miles in riparian reserves.

Your scoping document fails miserably to convince me the natural resources in and downstream from the sale area will benefit from logging and roading. Trying to convince the public the forest is sick and will be healed by logging & roading is a pathetic, absurd venture. How do people like you get promoted to line-officer?

Once again, I'm tired of reading USFS NEPA documents that claim a properly functioning forest is sick and logging is the only way to bring it back to health. You know this is what USFS line-officers are supposed to say to comply with the agency's overriding timber agenda. You also know if you remove your timber beast hat and concentrate on taking action to maintain amenity resource health your promotion possibilities in the agency will suffer.

If you were a normal, caring, intelligent human being you would be overcome by guilt each time you see the harmful after-effects of what your logging will cause. I have worked with USFS line-officers like you who mentally genuflect and squeal with glee each time they see a loaded logging truck. The public is no longer clueless about what motivates USFS employees. Opposing Views Science Attachment #26 shows why the public feels the way they do about logging.

Comment for which I'd like a meaningful response in the Response to Comments section in the draft NEPA document: Statistically significant nationwide surveys clearly indicate the vast majority of the American public do not want their national forests logged anywhere for any reason.

In 2002, 7,069 Americans were randomly selected in the lower 48 states to respond to the Objectives and Beliefs survey sanctioned by Chief Thomas. Chief Thomas spent the American public's tax dollars on the survey because he believed it would guide future agency management decisions. Chief Thomas didn't anticipate USFS

line-officers would ignore the survey results like you are doing.

Here are a few excerpts from Chief Thomas' survey findings:

"The items in the survey have been extensively pre-tested and applied in various other studies. The values scale was designed to focus on values that people hold for public lands (called the Public Lands Values). It was tested using both students and adults around the United States. The objectives scale items were developed using input from 80 focus groups around the country. The beliefs and attitudes scales tier down from the objectives items." (page 1)

"People see the provision of less consumptive services as more important than those that are more consumptive." (page 2)

"Overall, the protection of ecosystems and wildlife habitat is seen as an important objective for public land management." (page 9)

"It is interesting to note that the public feels that the conservation and protection of watersheds is an important objective, consistent with the USDA Forest Service Organic Act. Also, important objectives for the public are the preservation of natural resources through policies that restrict commodity uses, protection of ecosystems and wildlife habitat, and preservation of the ability to enjoy a "wilderness" experience. A somewhat important objective is the preservation of local cultural uses." (page 27)

"The public sees the restriction of mineral development and of timber harvest and grazing as being more important than the provision of natural resources to dependent communities (although this is still seen as somewhat important)." (page 28)

This survey was done to generate information needed to support the 2000 USDA Forest Service RPA Assessment. Gen. Tech. Rep. RMRS-GTR-95.

Link to survey: [http://www.fs.fed.us/rm/pubs/rmrs\\_gtr095.pdf](http://www.fs.fed.us/rm/pubs/rmrs_gtr095.pdf)

You ignore the wishes of the public for personal gratification. What does this make you? You are paid to serve the public, not yourself and natural resource extraction corporations. Who supplies the money for your salary?

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You Propose to Construct 5 Miles of New Road  
and Reopen 27 Miles of Existing Road that should not  
Exist in the First Place. You know Road Construction  
Causes more Long-Term harm to Aquatic Resource  
Health than any other Human Activity in the Forest.  
I'm sorry you Value your Precious Volume  
More than Aquatic Health.

I suggest when you re-do this scoping package you have a fisheries biologist and hydrologist on the IDT. Had they been on this IDT you would never have suggested you to build 32 miles of sediment producing road.

Ranger Swanson you go out of your way to assure the aquatic resources in and downstream from your sale area are trashed.

On spite of what the agency hammers into your head, a temporary road is a road. A reasonably intelligent person would reject this USFS "temporary" road dogma. Your so-called "temporary" roads will be used many times in the future. Intelligent, professional, competent USFS employees build system roads with gravel

surfacing and a ditch when they will be used in the future.

Comment for which I'd like a meaningful response in the Response to Comments section in the draft NEPA document: A report authored by Gerald Coghlan, WO Acting Director of Engineering in 1998 (17 years ago) indicated there are 372,956 miles of national forest system road (page 5). The agency currently constructs 2,170 miles of system road per year. At this rate there are 410,000 miles now. In addition to that, there is at least double this amount in unsurfaced, sediment producing, out-sloped, temporary roads. The average distance to the moon (it varies) is 384,403 miles ... and you propose more? Go figure! Does this please you? This is one of the many reasons the public's trust in the agency is dwindling.

See: [http://www.fs.fed.us/eng/road\\_mgt/roadsummary.pdf](http://www.fs.fed.us/eng/road_mgt/roadsummary.pdf)

Comment for which I'd like a meaningful response in the Response to Comments section in the draft NEPA document: Opposing Views Science Attachment #4 contains the statements of scores of Ph.D. scientists and engineers (including Chief Dombeck) who discuss the tragic natural resource damage caused by new temporary road construction. In spite of the fact the USFS teaches you otherwise, a temporary road is a road. You also know USFS so-called temporary roads are not temporary because the running surface exists for future logging long after they have been used. Each time you tell the public you will construct "temporary" roads you are lying aren't you? You know this is true. Be a professional.

Please consider the following articles. Assure the source documents for the articles are included in the References section and cited in the pending draft NEPA document. These articles represent "best-science." If they don't appear in the References section it means you are frightened to show the public the truth which might jeopardize attainment of your precious volume.

Article Name: "Road Woes for the Forest Service", March 2002

Short excerpt of article: "Since 1975, the construction of timber roads has cost taxpayers in excess of \$5 billion. In addition, the Forest Service gives trees free of charge to logging companies in exchange for building access roads. This system has resulted in enough roads in the national forests to circle the globe more than 17 times, or to travel to the moon and back."

Link to total article online: <http://www.taxpayer.net/library/weekly-wastebasket/article/road-woes-at-the-forest-service>

Article Name: "The United States Forest Service: the World's Largest Socialized Road-Building Company", May 1993

Short excerpt of article: "As implausible as this may seem, the numbers do not lie. So far, the Forest Service has constructed 343,000 miles of road on our national forests. This alone is eight times the entire mileage of the United States Interstate Highway System. Think about that the next time you're driving cross-country on I-80, or heading for Florida on I-95."

Link to total article online: <http://fff.org/explore-freedom/article/united-states-forest-service-worlds-largest-socialized-roadbuilding-company/>

Article Name: "Think Like a River: the Cumulative Effects of Roads on Aquatic Systems", November 1998

Short excerpt of article: "In addition to the site-specific effects of roads on aquatic systems (for reviews see

RIPorters 1:1 and 2:5), one of the least-known and most compelling examples of the cumulative impacts of a road network is found within Montana's Bitterroot National Forest. In 1991 and 1992, U.S. Forest Service researchers examined watersheds within west-draining slopes of the Sapphire Range and found a highly significant correlation between low road densities and healthy watersheds. Additionally, bull trout (*Salvelinus confluentus*) populations were directly associated with low road density watersheds (BNF 1991, 1992). Subsequent research supported these findings by attributing the decline of fish presence (Eaglin and Hubert 1993) and aquatic biointegrity (Roth et al. 1996; Rothrock et al. 1998) to increasing road densities. Even the aquatic assessment for the Interior Columbia Basin Ecosystem Management Project (ICBEMP), concluded that "...increasing road density is correlated with declining aquatic habitat conditions and aquatic integrity" (Lee et al. 1997, p. 1347). The implication is that not only do roads impact local areas, but their cumulative effects can fundamentally alter landscape processes (e.g. seasonal migrations of anadromous fish) which result in a series of cascading ecological effects."

Link to total article online: <http://www.wildlandscpr.org/road-riporter/think-river-cumulative-effects-roads-aquatic-systems>

Comment for which I'd like a meaningful response in the Response to Comments section in the draft NEPA document: Chief Dombeck knew there was nothing more damaging to forest resources than road construction. Chief Dombeck's statement to USFS employees is quoted below. Please include this quote in a conspicuous location in the draft NEPA document.

"Roads often cause serious ecological impacts. There are few more irreparable marks we can leave on the land than to build a road."

Dr. Mike Dombeck, Chief, US Forest Service  
Remarks to Forest Service employees  
and retirees at the University of Montana  
February 1998

More truthful information about temporary roads can be read at the following links:

<http://www.gilawilderness.com/local/roadagn.htm>

[http://lobby.la.psu.edu/068\\_Roads\\_in\\_National\\_Forests/Agency\\_Activities/FS/FS\\_Roads\\_Access.htm](http://lobby.la.psu.edu/068_Roads_in_National_Forests/Agency_Activities/FS/FS_Roads_Access.htm)

[http://lobby.la.psu.edu/068\\_Roads\\_in\\_National\\_Forests/Organizational\\_Statements/PRC/PRC\\_Intro.pdf](http://lobby.la.psu.edu/068_Roads_in_National_Forests/Organizational_Statements/PRC/PRC_Intro.pdf)

<http://www.theharbinger.org/xvii/990223/milligan.html>

I know today's USFS line-officers are taught Chief Dombeck was an "enviro" and should be dismissed and disliked? Why? He wasn't afraid to put the needs of the American public above the natural resource extraction corporations. He took action to serve the public. See below.

"Michael Dombeck, the chief of the United States Forest Service, will soon announce a moratorium on construction of new logging roads in remote sections of most of the national forests."

The moratorium will protect millions of acres from new logging, elevating the forests' environmental values -- clean water and wildlife -- above commercial values."

Published by the NY Times, January 14, 1998

Link to story: <http://www.nytimes.com/1998/01/14/opinion/a-positive-shift-in-forest-policy.html>

Comment for which I'd like a meaningful response in the Response to Comments section in the draft NEPA document: Even a child would understand that when you say you will constrict 27 miles of temporary road "on previously used road" you spill the beans. You are telling the public the Sweet Home Ranger District does not

construct temporary roads that are really (emphasis added) temporary. Had your old temporary roads really been temporary they would have been obliterated such that the "previously used road" would have no running surface.

I suggest you include a hydrologist and fish bio on your next timber sale IDT.

Comment for which I'd like a meaningful response in the Response to Comments section in the draft NEPA document: In spite of the fact the volume will be reduced, please analyze an Action alternative in detail that eliminates all (emphasis added) new road construction. This will eliminate the natural resource plunder inflicted by new roads. This will serve future generations of kids. A real professional would not be frightened to jeopardize precious volume. A competent USFS line-officer would honestly analyze a no new roads alternative and display the natural resource impacts that will not occur. A real public servant would weigh the advantages of logging more acres with the road-related resource damage vs. logging less acres with no road construction natural resource damage.

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Please alert me when the draft NEPA document that addresses these comments is posted online and you are accepting comments.

I ask you to seriously consider my comments and modify your timber sale proposal. My Opposing Views Science Attachments show your timber sale will eliminate the proper functioning of some important non-timber natural resources in and downstream from the timber sale area ... especially aquatic related resources. Please modify the sale to eliminate these actions. Future generations of kids will appreciate it.