

Data Submitted (UTC 11): 3/23/2020 8:28:19 PM

First name: Dick

Last name: Artley

Organization:

Title:

Comments:

Dear Ranger Lau and selected IDT members,

#### Introduction

I'm not foolish and naïve enough to think my comments will cause you to change anything. You see, I retired from the USFS in 2003 after 31 years with "the outfit." I know how the game is played. I know IDT members are expected to do certain things ... least of which is to take aggressive action to assure their resource is protected and conserved. Face it. IDT members are expected to be timber sale enablers.

As always the Proposed Action from the Scoping Package became the only Action Alternative in this pre-decisional EA. Think about it. Clearly, the selected alternative was chosen before the Scoping Package went to the public. Ranger Lau will reject public comments on this draft (if he reads them) and he will ignore the IDT effects disclosures in Chapter 3. His mind has been made up for many months.

Over the last 6 decades the USFS has shown its disdain and contempt for the public thousands of times. You all feel the people who provide the money for your salaries are pesky outsiders trying to meddle in important USFS business. Admit it !!! There is only 1 way to force the UDFS to obey the law ... a session in Federal Destruct Court. . Your agency isn't concerned because they know most members if the public cannot afford to take court action.

Are you all proud? Never again entertain the notion you serve the public.

Your public deception started before the EA text.

Your deception started on the pre-decisional EA cover page. The photo shows a beautiful panorama of a forest with no logging visible. Had the IDT members been honest with the public you would have tried to convince the Responsible Official to use a photo similar to the ones in Opposing Views Science Attachment #29 wouldn't you?

Of course you all know the duties of IDT members preparing the NEPA document for a timber sale is to do anything to increase the chances that the Responsible Official gets credit for the precious volume.

#### Worshiping your masters

I can visualize it in my mind. Based on reading your corporate-friendly pre-decisional EA, its clear to me you all genuflect at your sacred altar dedicated to the timber corporations that purchase your timber sales. None of you have earned my respect.

IDT members trick and fool the public to please

Ranger Lau

The photo on the cover page shows a beautiful panorama of a forest with no logging visible. Had you all been honest with the public (and yourselves) you would have used a photo similar to the ones in Opposing Views Science Attachment #29 wouldn't you? Your behavior is pathetic. Never again entertain the notion you serve the public.

Admit it folks. You are all timber sale enablers masquerading as resource specialists who claim care about protecting and conserving your resource. How many times have you disclosed truthful, tragic effects to your resource of Proposed Action implementation in Chapter 3 and watched the Responsible Official select the Proposed Action and said to yourself "Oh well"? The public pays you to fight for your resource!!!!!!!!!!!!

It's possible for a USFS line-officer who isn't consumed and driven by the need to accumulate volume like you Ranger Lau to rise to the top of the agency

Mr. Jim Furnish was the forest supervisor of the Siuslaw NF from 1991-1999. He went on from there to serve as Deputy Chief from 1999-2002.

He wrote "Toward a Natural Forest the Forest Service in Transition." It was published in 2015. I talked wit him at a book signing session in Lewiston, Idaho. See:

<https://www.amazon.com/Toward-Natural-Forest-Service-Transition/dp/0870718134>

He said he was quite sure the USFS regional and national leaders had strayed from its mission to conserve and protect the natural resources owned by the public in the national forests. They are sending a clear message to Rangers and Supervisors its OK to cause short-term resource harm if the project generates profit opportunities for natural resource extraction corporations.

He said his book is intended to show current USFS employees how important a properly-functioning, undeveloped national forest is to the American public ... and how maintaining these conditions will not harm their career opportunities.

Here are several quotes from his book.

"What saddens me is that the head of a once-trusted agency implicitly admitted that its leaders lied and broke the law." (page 11)

"He (Jim Hagemeyer) wanted these forests to retain their natural character, not become yet another forest landscape of cookie cutter homogeneity.

For any forester schooled in agency dogma, this meant war. Bureaucratic war anyway. Foresters worked at maximizing timber production, minimizing cost, designing the best logging practices, ensuring a fair price for the sale, and overseeing logging operations toughly but fairly. You log it right, and people will like what they see --- or at least you explain to them that they should like it even if they don't." (pages 28 and 29)

"In large part, forest plans held to the agency's timber-first priority. Environmental groups waged war." (page 59)

"Fewer and fewer people accepted sweeping vistas dominated by clear-cuts and new roads. Instead, they valued naturalness, clean water, abundant fish and wildlife and a deep sense of connection with the land. They were anguished at what the Forest Service was taking from the forest at the expense of future generations." (pages 113 and 114)

"A different set of societal values emerged, inviting the agency to change. The failure to respond to this value shift had profound consequences for the Forest Service. How many polls that show 90 of the people hate clear-cuts does one have to read before concluding that it's time to do something different?" (pages 134 and 135)

"Similarly, roadless areas had long been regarded by the Forest Service as merely the next place one goes to log more trees." (page 151)

"The timber industry, as well as many people in Forest Service leadership, continued to view roadless area protection antithetical of multiple use mandates." (page 151)

"Next, the agency leaders need to explicitly embrace the mandate of ecosystem management, which I would describe as value-driven resource management with a goal of maintaining or achieving naturalness. Primary

values should be clean water and air, abundant fish and wildlife, quality recreation opportunities, and sustaining landscape function." (page 198)

Here is Mr. Furnish's conclusion:

"How much are public forests worth? They are priceless."

My Comments that will Surely be Ignored

Ranger Lau, Mr. Furnish would want you all to read his book and reevaluate your proposed Wynoochee timber sale. I'm so sorry none of you understand the importance of undeveloped public land to the American people. Future generations will consider it precious when the US population doubles in 65 years. You forget that the vast majority of forest users are there for recreation. They don't want their land and resources harmed to please corporate America. They would not want you to choose short-term corporate profit over recreation opportunities now.

You have 2 choices to serve the American public if that's important to you.

1) stop working to prepare this EA (i.e. resign from the IDT), or

2) convince the rest of the IDT to develop another Action alternative that will implement the beneficial parts your Proposed Action and eliminate all proposed logging and road construction. Then request public comments on the new draft EA. This will be so easy. Don't let anyone tell you this cannot be done. If they try, suggest a new sale name. But wait !!! You are too frightened to suggest your Ranger do this. They will consider this a waste of time and money because they already know the selected alternative.

The truth is, your jobs are insignificant and meaningless.

During my USFS career I coordinated the preparation of nearly 100 EAs and EISs. After I retired in 2003 I began reading and commenting on NEPA documents for proposed timber sales that would clearly inflict major damage to the amenity resources in and downstream from the sale area. During this 17 year period I dealt with about 40 or 50 EAs and EISs each year. Never before have had I read a timber sale NEPA document like this. You and your IDT members should be ashamed.

Ranger Lau, only a line-officer that is pathologically obsessed by the need to accumulate volume would send this illegal; nonsensical pre-decisional EA to the public for comment. You obviously didn't read it. How can a line-officer trusted by the public consciously take action that will stop so many important natural resources from functioning properly and not feel shame? Here is where your non-timber IDT specialists failed the public. They helped you plan your plunder. After work they skipped home thinking they had done a good job that day.

I'd guess most IDT members working on the pre-decisional EA for the Wynoochee timber sale will deny and reject the science authored by Ph.D. experts contained in the Opposing Views Science Attachments. Why? It does not jive with the garbage the USFS programs them to believe. Of course none of the IDT members will jeopardize their well paying jobs by allowing something as silly as science to guide them.

Why don't IDT members ever question why they are needed on the IDT? They know the vast majority of timber sale NEPA documents have just 2 alternatives - No Action and Action. They know they must describe the effects of selecting No Action as tragic and disastrous.

This commercial timber sale (otherwise euphemistically known as a vegetation management, mechanical treatment, and active forest management etc.) is predicated on P&N goals that are ridiculous. Once again the IDT members embraced this laughable stuff without question. You all believed the ridiculous USFS claim

that many stands in the forest are unhealthy and sick and they can be brought back to health again by removing the merchantable sized trees. You didn't ask yourselves why generating maximum volume per acre was the best way to "treat" a sick forest.

You learned in college that subjecting the fragile forest resources to skidders and tractors that weigh between 6 and 9 tons with spinning wheels and tracks will devastate the forest resources. The USFS taught you this damage was only "short term" and acceptable collateral damage. Once again the IDT specialists took the bait.

The IDT members claim to care about maintaining the health and proper functioning of their resource. I know from experience after working with resource specialists, too many of them choose to play the timber sale enabler game. They make sure they don't write anything in the NEPA document that might make it more difficult for the Responsible Official to select the Proposed Action for implementation. They routinely omit or water-down their Chapter 3 effects disclosures describing the adverse ecological effects of Proposed Action implementation.

An even more serious situation exists when they write the truth and remain silent. They describe long-term resource damage and the Responsible Official chooses the Proposed Action anyway without asking the IDT to include mitigation measures to lessen the damage. This is when the specialist should really do what the public pays them to do ... meet with the Responsible Official and describe why their decision is unacceptable rather than thinking "Oh well" I'm not the decision maker. Deciding on an action that affects 324 million Americans must be a team effort, therefore the team must unanimously agree to the decision.

Not only does this pre-decisional EA for the Wynoochee timber sale violate the NEPA but a few members of the IDT try to deceive the public with untrue statements. The USFS brainwashing process pounds its employees with things that aren't true so often, many employees start to believe them. They learned in college what should and should not be done to the natural resource they specialize in to assure it is not harmed and functions properly.

Their USFS mind manipulation that started on their 1st day with the USFS is intended to teach them what they learned in college isn't true. How many ask themselves the obvious question: why are the conclusions of scientists who are experts in their fields not associated with the USFS so different from what the USFS teaches them is the right thing to do? They don't ask themselves this question because they are frightened.

You were all told the USFS treats the national forest lands differently because they are used by so many people for many different things (a.k.a. multiple use). Sadly most of the IDT members accepted this without question. You wanted to remain in good standing with the agency so you accepted what you were told without question. After all "why would the United States Forest Service not do everything possible to assure a healthy forest?" People who naively ask this question are unaware of (or refuse the face) the tight relationship between the agency and the natural resource extraction corporations.

None of you can be trusted to perform an unbiased analysis of the environmental impact of the Wynoochee timber sale "treatments" on the amenity forest resources. This is not a pre-decisional EA but a timber sale justification document. I'm sorry for you all. Someday, a few if you may understand you spent the best years of your lives ignoring independent science to serve the USFS's corporate masters.

Before I begin my specific comments about this commercial timber sale I will state a fact. You are all willing to have your reputations sullied by helping to write a NEPA document for this tragic commercial timber sale. You should have known this isn't what the American public want done to their land before you started.

Mr. Senger, Ms. Krier, Mr. McHenry, Mr. Flanagan, Mr. Urresti, Ms. Butler, Ms. Bartlett, Ms. Crider, Ms. Kill, Ms. Howell, Ms. Keene, Ms. LaGioia, Ms. Hauge, Ms. Cornell, Mr. Shelmerdine, Ms. Henriquez, Mr. Messerschmidt and Ms. Hanson, based on your performance on this draft EA I conclude that most of you fit into the following 2

categories:

1) Pollyannas who believe anything and everything the USFS claims in spite of the fact its contrary to (sometimes the antithesis of) best science authored by scientists with no connection with the USFS.

2) Employees who know logging and roading do not restore a forest but have bills to pay and a job that pays well.

The people on group #1 will learn the truth if they have the courage to examine the following 3 attachments authored by experts. You knew the information described in the attachments after you graduated from college and then you were all subjected to the USFS mind manipulation machine.

After reading the science quotes in Opposing Views Science Attachments #1 and #4 please ask yourself why most quotes in the attachments describe natural resource harm caused by roading and logging and why most P&N statements for USFS timber sales tell the public roading and logging will "restore" the forest. Then ask yourself why scientists who are experts in forest ecology who are quoted in the attachments would twist the truth. Please be honest with yourself. Of course you know the answer. The scientists quoted in the attachments are not concerned about the need to validate the USFS's timber agenda.

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Opposing Views Science Attachment #1 describes how logging decimates natural resources in and downstream from the sale area.

Example:

"Major report findings:

1) If we ended the timber sales program on national forests and redirected the logging subsidies we could provide over \$30,000 for each public lands timber worker for retraining or ecological restoration work - - and still have over \$800 million left over for taxpayer savings in the first year alone.

2) We don't need to log national forests for our timber supply, given the fact that the timber cut annually from national forests nationwide now comprises only 3.3% of this nation's total annual wood consumption, and less than 4% of the sawtimber used for construction.

3) Logging on national forests INCREASES the risk of forest fires more than any other human activity.

4) A bipartisan nationwide poll conducted in 1998 found that 69% of Americans now oppose allowing timber companies to log our national forests."

Source: THE FACTS: Ending Timber Sales on National Forests

By Hansen, Chad, Ph.D.,

Published in the Earth Island Journal, June 22, 1999

<https://www.questia.com/magazine/1G1-54451556/the-facts-ending-logging-on-national-forests>

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Opposing Views Science Attachment #4 describes how road construction (especially so-called temporary roads) creates more aquatic damage than logging. Here's one example of the science quote contained in the attachment authored by USFS scientists:

"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 roadcuts 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."

Source: 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>

If, after reading Opposing Views Science Attachment #4 you still propose to build new roads please tell the public in the final NEPA document 1) why you don't care about aquatic resource destruction, or 2) why you think these 3 USFS scientists are wrong.

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Opposing Views Science Attachment #27 shows photos of units that have been logged on USFS timber sales called "Restoration" projects. As you view the logging you will understand why the USFS's use of euphemisms is the ultimate public deception.

Ranger Lau, by proposing this timber sale you show me spending all of your NFTM funding this fiscal year is more important to you than doing what the people who pay your salary want you to do. You are clearly a floundering, unfit, inept USFS line-officer who takes great pride in serving-up volume to your corporate masters. You can choose to abandon your obsession with volume and still keep your job.

Ask yourself why the USFS encourages line-officers to pursue actions that scores of unbiased independent scientists describe as pernicious and likely to destroy the proper functioning of important natural resources. If you have a conscience you know this is not a trivial issue. You know no amount of salary justifies casting away your land values and ethics.

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Even though you will reject them, I ask you to please accept and seriously consider my comments on the proposed Wynoochee timber sale pre-decisional EA. After all, it's what the public pays you to do. Please take action most recreating members of the public will support.

You know the USFS has an overriding timber agenda/culture ... and you are part of it. This includes all non-timber resource specialists on the IDT. You know if you prove your skill at generating volume you will rise to the top of the agency promotion ladder. You also know the USFS measures line-officer success by volume offered.

Some USFS employees have suggested the agency change their measure of success to acres of properly functioning resources. Each time the USFS has refused.

I challenge you to put a sale area map on the wall in your office and ask your District visitors if they approve or would rather have their tax dollars used for less invasive projects

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I hope the non-timber IDT members working on this

NEPA document agree with the wise quotes below.

The public has been led to believe these quotes guide your actions. Are they consistent with what the USFS programmed you to do? Why?

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

Cree Indian Proverb, about 1885

"A nation that destroys its soils destroys itself. Forests are the lungs of our land, purifying the air and giving fresh strength to our people."

Franklin D. Roosevelt

"Thou shalt not destroy the trees thereof by forcing an axe against them: for thou mayest eat of them, and thou shalt not cut them down (for the tree of the field is man's life).

Deuteronomy 20:19

"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

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

Ansel Adams

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

Terry Tempest Williams

John Muir nearly became the first USFS Chief. Future generations will forever look upon Pinchot's rise to power as an unparalleled tragedy:

"God has cared for these trees, saved them from drought, disease, avalanches, and a thousand storms; but he cannot save them from sawmills and fools."

"Any fool can destroy trees. They cannot defend themselves or run away. And few destroyers of trees ever plant any; nor can planting avail much toward restoring our grand aboriginal giants."

John Muir, quotes from Save the Redwoods 1903

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Intelligent, caring people are  
guided by the precautionary principle to avoid  
taking actions that might adversely affect  
human health or harm the environment.  
You ignored this Ranger Lau because  
you knew the result would say this timber  
sale is a huge mistake. A real professional  
would never behave this way.

Here is the essence of the Precautionary Principle

"When an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some cause and effect relationships are not fully established scientifically. In this context the

proponent of an activity, rather than the public, should bear the burden of proof. The process of applying the precautionary principle must be open, informed and democratic and must include potentially affected parties. It must also involve an examination of the full range of alternatives, including no action."

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

Ranger Lau, if you would have had the foresight and courage to apply the Precautionary Principle you would not be proposing this timber sale would you?.

Comment for which I'd like a meaningful response in the Response to Comments section: The precautionary principle is unconsciously applied by most people who are about to make a decision that could or might harm human health or the proper functioning of natural processes. Ranger Lau, the overwhelming independent science I have provided clearly shows logging & roading the Wynoochee timber sale area will inflict long term damage to the amenity resources so loved by the public. Also you propose to apply the herbicide glyphosate (a known carcinogen) to the Olympic National forest where people enjoying the outdoors and wildlife will visit. The precautionary principle says "When an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some cause and effect relationships are not fully established scientifically. Your zeal to generate volume caused you to reject this wise process. A real professional would not do this would they?

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You obviously think volume generation for corporate profit (which increases your promotion opportunities) is more important than assuring future generations of kids will thrill when experiencing the sights and sounds of an undeveloped forest.

Most Americans want future generations of kids to have the opportunity to experience the quietness and solitude in an undeveloped, natural forest. The wild UNDEVELOPED national forests will provide one of the only escapes from the insanity of a world driven even more by money than it is now ... yet each IDT member has chosen to deny this opportunity for future generations to please you Ranger Lau.

As a retired USFS employee I watched as new employees with splendid land and resource ethics were changed by the agency. They were taught that natural resource harm (regardless of magnitude) caused by roading, logging and herbicide application was acceptable collateral damage to "getting out the cut." Over time they actually started to believe this and defend the agency's plunder.

Most IDT members have science backgrounds. Most understand the value of biodiversity in the forest. By helping to plan this timber sale they are helping to simplify the forest which eliminates the biodiversity. They should be ashamed.

Comment for which I'd like a meaningful response in the Response to Comments section: The Wynoochee timber sale will take away more undeveloped national forest acres from the legacy the unborn kids of the future should inherit. Do the IDT members have the courage to ask themselves why the USFS defies the wishes of the American public by logging and roading-up the precious national forest land? How can an agency mandated to serve the public do so by taking action the public does not want or like?

I will say without hesitation that based in what I have read in this EA, a child knows more about biodiversity and forest ecology than most of the IDT members/

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The USFS uses Mind Manipulation (a.k.a. brainwashing) to Purge what Resource Specialists



Learned on College and Replace it with the Forest  
Service way of Doing Things

A person who has been subjected to sophisticated brainwashing methods is not aware it occurred.

"Brainwashing (also known as mind control, menticide, coercive persuasion, thought control, thought reform, and re-education) is the concept that the human mind can be altered or controlled by certain psychological techniques. Brainwashing reduces its subject's ability to think critically or independently."

Long ago agency leaders knew they must convince resource specialists that what they learned in college about the proper ways to conserve and protect their resource is no longer valid. These specialists didn't question what they were told. Their brainwashing eliminated their critical thinking ability. They were not curious why "best science" authored by independent scientists is the antithesis of "science" authored by USFS employees. The Opposing Views Science Attachments contain a small sample of the "best science" authored by experts in their fields who are not infected with USFS bias.

The key to the success of the agency mind manipulation is the gradual introduction of confirmation bias to new USFS employees. The following web site explains confirmation bias:

<https://www.britannica.com/science/confirmation-bias>

Here's a brief description:

"Confirmation bias leads people to hold strongly to false beliefs or to give more weight to information that supports their beliefs than is warranted by the evidence. People may be overconfident in their beliefs because they have accumulated evidence to support them, when in reality much evidence refuting their beliefs was overlooked or ignored, evidence which, if considered, would lead to less confidence in one's beliefs. These factors may lead to risky decision making and lead people to overlook warning signs and other important information."

Mr. Senger, Ms. Krier, Mr. McHenry, Mr. Flanagan, Mr. Urresti, Ms. Butler, Ms. Bartlett, Ms. Crider, Ms. Kill, Ms. Howell, Ms. Keene, Ms. LaGioia, Ms. Hauge, Ms. Cornell, Mr. Shelmerdine, Ms. Henriquez, Mr. Messerschmidt and Ms. Hanson, your natural resource thought process has been harmed by the agency scheme which was intended to teach you all science conclusions authored by scientists that aren't affiliated with the USFS that contradict USFS teachings are invalid and illegitimate. You took the bait again didn't you?

The bottom line? You all believe things now that you would have rejected immediately before you became a USFS employee. Do you like being used? Of course you don't. You are unaware that they have been manipulating your mind because their methods are foolproof.

Before you were converted to an agency drone you knew undeveloped land was biodiverse, the natural resources functioned properly and they were already healthy. It did not need to be restored as the USFS so often claims. You knew assaulting the fragile forest resources with heavy equipment to build roads and skid logs would NEVER enhance forest health or restore an already fully functioning forest.

You knew that just because trees die from natural processes does not make the forest unhealthy as the USFS wants you to believe.

Perhaps now you can grasp the truth but what will you do? Nothing! Your job pays too well and you have bills to pay. Please view the photos of "restored" national forest land in Opposing Views Science Attachment #27. Then ask yourself if the logged area is healthier than the uncut adjacent forested land.

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My Opposing Views Science Attachments

The Opposing Views Science Attachments present quotes authored by scientists with no interest in volume accumulation that describe the long-term irreparable damage that will be inflicted to the natural resources in the Olympic National Forest National forest by logging and roading in the Wynoochee timber sale. Unlike the IDT members, the authors of the science quotes are experts in their fields.

Please be aware of this:

40 CFR 1502.9(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."

You must respond to each opposing view that is not irresponsible.

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The IDT Members Apparently think they have  
More Experience and Resource Knowledge  
than these experts:

Jerry Franklin, Ph.D.,  
David Perry Ph.D.,  
Reed Noss Ph.D.,  
David Montgomery Ph.D.,  
Anne Ehrlich, Ph.D.,  
David Foster Ph.D.,  
Peter Raven Ph.D., and

A few of you may have heard of the scientists that made the following observations. Ask yourself why these scientists would be motivated to misrepresent the truth. Ask yourself why the USFS teaches you to disbelieve the scientific conclusions of independent scientists not associated with the USFS such as these. A resource specialist who isn't hopelessly biased towards logging at any cost to their resource would read the science below and.....

- 1) insist on being removed from the IDT for this timber sale EA, and/or
- 2) take extraordinary measures to assure the sale is withdrawn.

Please have the courage to read what the experts say about logging and forest road construction. Ask yourself why USFS policy is not consistent with the wisdom below:

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

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

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

Source of the quotes below: Scientists Seek Logging Ban on U.S.-Owned Land

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

New York Times, April 16, 2002

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

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

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

Source of the quotes below: Hydrological processes and pathways affected by forest roads: what do we still need to learn?

By Luce, Charles H. Ph.D., USFS, Rocky Mountain Research Station, Boise Aquatic Sciences Laboratory, 2002

<https://www.fs.usda.gov/treearch/pubs/23954>

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

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

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

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

Source of the quotes below: National Forest System Road Management

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

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

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

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

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

habitat disturbance, increased pressure on wildlife species, increased litter, sanitation needs and vandalism, and increased frequency of human-caused fires."

Ask yourself why the USFS encourages line-officers to pursue actions that scores of unbiased independent scientists describe as pernicious and likely to destroy the proper functioning of important natural resources. If you have a conscience you know this is not a trivial issue. You know no amount of salary justifies casting away your land values and ethics.

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I'm amazed that your brains have been so tragically manipulated that you actually believe logging and roading will restore a forested ecosystem. Some of you are intelligent enough to figure out this is ridiculous. You work for an agency with a timber agenda. It expects you to tell the public anything to reduce the critical comments which sometimes lead to timber sale litigation. Please view the photos showing post-harvest "restoration" on national forest land at Opposing Views Science Attachment #27 and ask yourself what is been restored?

Your timber sale is called the Wynoochee Restoration and Road Management Project.

Who are you people who happily masquerade as natural resource specialists who think commercial timber sales restore a properly functioning forest ecosystem? You should all be ashamed. Even lay members of the public understand that subjecting the fragile forest floor to skidders and tractors with spinning wheels and tracks that weigh between 6 and 9 tons will devastate the forest resources. Even lay members of the public understand that the tons of sediment that end up in streams generated by so-called "temporary" roads will devastate the aquatic resources. Restoration? Give me a break.

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 "restoration" euphemism was invented by the USFS 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?

Indeed, the only thing your "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 for which I'd like a meaningful response in the Response to Comments section: Ranger Lau, 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"

There is a vast amount of overwhelming, undeniable independent science that explains how logging and roading creates an impaired forest. How can the Wynoochee 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 Wynoochee 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?

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 they 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>

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. Do you really think "destruction" and "restoration" are synonyms?

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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>

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."

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

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."

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#### 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/](http://www.newwest.net/topic/article/who_will_speak_for_the_forests/C564/L564/)

#### 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."

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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. These 3 scientists all work at the USDA Forest Service's Rocky Mountain Research Station lab in Moscow, Idaho.

The information was part of the proceedings of the Symposium on Soil Quality and Erosion Interaction, Keystone Co. 1996

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

#### 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."

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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>

#### 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)

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### 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>

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."

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### 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>

Excerpt:

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

Ask yourself why the USFS encourages line-officers to pursue actions that scores of unbiased independent scientists describe as pernicious and likely to destroy the proper functioning of important natural resources. If you have a conscience you know this is not a trivial issue. You know no amount of salary justifies casting away your land values and ethics.

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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 now 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.

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

You propose to construct 14 miles of new road. Yes, in spite of what the USFS claims, a temporary road is a road. Please don't deceive yourself into believing it's not just because the USFS teaches you it's not a road. Some resource specialists understand the aquatic destruction caused by the tons of sediment this road construction will cause. It's sad the IDT member's fear causes them to continue to support this project in silence.

All USFS employees know their good standing in the agency will end if they are critical of logging & roading.

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

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

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

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

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

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Ranger Lau, Mr. Senger, Ms. Krier, Mr. McHenry, Mr. Flanagan, Mr. Urresti, Ms. Butler, Ms. Bartlett, Ms. Crider, Ms. Kill, Ms. Howell, Ms. Keene, Ms. LaGioia, Ms. Hauge, Ms. Cornell, Mr. Shelmerdine, Ms. Henriquez, Mr. Messerschmidt and Ms. Hanson, the USDA has been on bed cuddling the pesticide and herbicide manufacturers for many decades. Anyone who thinks the USDA will alert the public to the truth needs professional help. It's up to you. Will you spread a potent carcinogen where children might play to please your employer or do you choose to be human beings?

Your Preliminary EA at page 19 states:

"Invasive Species Treatments

Some invasive plant treatments, including herbicide, would be applied before and after implementation. Treatments are authorized under the 2008 Olympic National Forest Beyond Prevention: Site Specific Invasive Plant Treatment Record of Decision (USDA Forest Service, 2008). Mitigation measures related to invasive plants are listed in project design criteria, Table B-5 in Appendix B."

As you can see, the March 17, 2008 ROD at page 3 allows the use of herbicides that glyphosate:  
[http://a123.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/7635\\_FSPLT1\\_027300.pdf](http://a123.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/7635_FSPLT1_027300.pdf)

Ranger Lau, you knew exactly what this ROD approved. The fact that you and your IDT members hid the type of herbicide that will be applied from the public is criminal.

Consider this:

Indeed, there is a reason why the USFS does not warn its employees about glyphosate toxicity and dangers.

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

Article Title: 6 Reasons Trump's Agriculture Secretary Pick Is Bad for America  
Published by Alternet, January 27, 2017



Excerpt:

"And by now, we also all know that Perdue, who was named 2009 Governor of the Year by the Biotechnology Innovation Organization, counts both Monsanto and Coca-Cola among his many corporate campaign donors."

Article Title: Sonny Perdue: In the Pocket of Big Ag

Published by Medium, January 25, 2017

Excerpt:

"If confirmed as Secretary of Agriculture, Sonny Perdue would not only oversee the agricultural sector but also the U.S. Forest Service and our national forests - from the rainforests of Alaska to the Appalachians in the South, and the wildlife that call these places home. But Georgia's forests are largely industrial tree plantations - which is a model that would be a disaster for our national forests."

There are many more. Search "Perdue" and "monsanto" yourself

Article Title: 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>

Article Title: Monsanto Receives Full Deregulation From Vilsack's USDA For Roundup Ready Alfalfa

Published by Alabama Confidential, January 31, 2011

Excerpts:

"Monsanto still 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>

Article Title: 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>

Article Title: 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>

Article Title: 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/>

Article Title: 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/>

Article Title: 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>

Article Title: 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](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 more information showing why the USDA would not direct the USFS to stop using Roundup.

Article Title: Is the USDA a wholly owned subsidiary of Monsanto?

Published by:

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

Article Title: A Government of Monsanto, by Monsanto, and for Monsanto

Published by: Farm Wars, 2011

Link:

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

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

Published by: Natural Society, Feb 23, 2012

Link:

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

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

Published by: Grist, September 25, 2009

Link:

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

Article Title: GMO Science Deniers: Monsanto and the USDA

Published by: Huffington Post, March 20, 2015

Link:

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

Article Title: USDA Forces 'Whole Foods' To Accept Monsanto

Published by: Humans are Free, Feb 6, 2012

Link:

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

Article Title: USDA and Monsanto "Biotech" Industry Collusion

Published by: TRUTH WIKI, 2015

Link:

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

Article Title: USDA Admits Exterminating Birds, Crops, and Bees

Published by: World Truth TV, 2019

Link:

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

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

Published by: change.org, 2020

Link:

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

Article Title: STOP the Corrupt FDA and USDA Madness Once and For All!

Published by: change.org, 2020

Link:

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

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

Published by: Carbonet,

Link:

[http://www.carbonproduct.net/Health\\_and\\_Fitness/Are\\_you\\_aware\\_that\\_the\\_USDA\\_is\\_attempting\\_to\\_corrupt\\_organic\\_standards/\\_17096](http://www.carbonproduct.net/Health_and_Fitness/Are_you_aware_that_the_USDA_is_attempting_to_corrupt_organic_standards/_17096)

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

Published by: Maui Causes, April 17, 2015

Link:

<http://mauicauses.org/new-scandal-for-usda-monsanto-whistle-blowers-at-usda-say-monsanto-influences-agency-suppression-of-critical-science/>

Article Title: USDA moves to let Monsanto perform its own environmental impact studies on GMOs

Published by: Axis of Logic, April 24, 2011

Link:

[http://axisoflogic.com/artman/publish/Article\\_62860.shtml](http://axisoflogic.com/artman/publish/Article_62860.shtml)

Article Title: USDA Approves Toxic Herbicide Amidst Great Public Outcry

Published by: Health Impact News, September 29, 2014

Link:

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

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

Published by: Sustainable Pulse, January 3, 2014

Link:

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

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

Published by: Natural News, January 9, 2015

Link:

[http://www.naturalnews.com/048237\\_glyphosate\\_contamination\\_USDA.html](http://www.naturalnews.com/048237_glyphosate_contamination_USDA.html)

Article Title: Herbicide Use To Increase Dramatically

Published by: ENN, August 15, 2014

Link:

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

Article Title: USDA Approval of Second-Generation of GMOs

Published by: Underground Health Reporter,

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/>

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 the NEPA document that approves the spewing a chemical that causes cancer in the Olympic National Forest. Normal people wouldn't think of doing such a thing ... even if their employer expected them to. This Sunday in church please ask yourself what He would want you to do. I know of a USFS specialists who resigned from the IDT over this issue and kept her job.

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 other industrialized nations in the world combined.

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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 #1

On March 27, 2019 a San Francisco jury said 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."

Here are a 4 of the many links to the case:

Monsanto trial: cancer patient says he used herbicide for three decades

<https://www.theguardian.com/us-news/2019/mar/05/monsanto-roundup-trial-cancer-weed-killer>

Second Jury Trial Implicates Roundup in Lymphatic Cancer

<https://articles.mercola.com/sites/articles/archive/2019/04/03/roundup-guilty-non-hodgkin-lymphoma.aspx>

Jury Awards Edwin Hardeman \$80.2 Million in Roundup Cancer Lawsuit

<https://www.lawyersandsettlements.com/legal-news/monsanto-facing-lawsuits-over-alleged-roundup-cancer/jury-awards-edward-hardeman-80-2-million-in-roundup-cancer-lawsu-23071.html>

Did weed killer Roundup cause cancer in Sonoma County resident Edwin Hardeman?

<https://www.pressdemocrat.com/news/9363655-181/did-weed-killer-roundup-cause>

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](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

In 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/FMfcgvxBxtJCGsfZgnVKVKfStZmxqSM>

### 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>

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

Article Title: Glyphosate-Based Herbicides Trigger Loss of Biodiversity - New Study

Excerpts:

"One of the world's most widely used glyphosate-based herbicides, Roundup, can trigger loss of biodiversity, making ecosystems more vulnerable to pollution and climate change, say researchers from McGill University in



Canada."

"To test how freshwater ecosystems respond to environmental contamination by glyphosate, researchers used experimental ponds to expose phytoplankton communities (algae) to the herbicide. "These tiny species at the bottom of the food chain play an important role in the balance of a lake's ecosystem and are a key source of food for microscopic animals. Our experiments allow us to observe, in real time, how algae can acquire resistance to glyphosate in freshwater ecosystems," says post-doctoral researcher Vincent Fugère."

Published by: Sustainable Pulse, March 3, 2020

Link to article:

[https://sustainablepulse.com/2020/03/03/glyphosate-based-herbicides-trigger-loss-of-biodiversity-new-study/?utm\\_source=newsletter&utm\\_medium=email&utm\\_campaign=glyphosate\\_gmos\\_and\\_pesticides\\_weekly\\_global\\_news\\_bulletin&utm\\_term=2020-03-06#.XmJ8y3JKi1s](https://sustainablepulse.com/2020/03/03/glyphosate-based-herbicides-trigger-loss-of-biodiversity-new-study/?utm_source=newsletter&utm_medium=email&utm_campaign=glyphosate_gmos_and_pesticides_weekly_global_news_bulletin&utm_term=2020-03-06#.XmJ8y3JKi1s)

Article Title: Bayer Chairman Quits as Roundup Settlement Talks Progress

Excerpts:

"Bayer shares have plunged about a quarter in value since August 2018, when the company lost the first U.S. lawsuit claiming weedkiller Roundup - acquired via the takeover of Monsanto - causes cancer.

"We have made and continue to make progress in handling the legal issues in the U.S. That's why now is a good time to hand over to my successor," the 73-year-old Wenning said in a statement."

Article Title: Fraud in German Laboratory Casts Doubt on 2017 EU Re-Approval of Glyphosate

Excerpts:

"A new study has revealed Laboratory of Pharmacology and Toxicology (LPT) Hamburg was found to commit fraud in a series of regulatory tests, several of which had been carried out as part of the glyphosate re-approval process in 2017. Even though "Good Laboratory Practice" (GLP) certification is required for such studies, at least 14% of such glyphosate regulatory studies came from LPT Hamburg. The laboratory was caught manipulating GLP toxicity studies by replacing dead animals with living ones, changing tumour data to "inflammations" and generally distorting the data to please its clients. It is highly concerning that GLP studies are still considered the golden scientific standard by regulatory authorities who seem to believe that cheating under GLP is impossible."

Published by: Sustainable Pulse, February 11, 2020

Link to article:

[https://sustainablepulse.com/2020/02/11/fraud-in-german-laboratory-casts-doubt-on-eu-re-approval-of-glyphosate/?utm\\_source=newsletter&utm\\_medium=email&utm\\_campaign=glyphosate\\_gmos\\_and\\_pesticides\\_weekly\\_global\\_news\\_bulletin&utm\\_term=2020-02-14#.XkbiYTJKi1s](https://sustainablepulse.com/2020/02/11/fraud-in-german-laboratory-casts-doubt-on-eu-re-approval-of-glyphosate/?utm_source=newsletter&utm_medium=email&utm_campaign=glyphosate_gmos_and_pesticides_weekly_global_news_bulletin&utm_term=2020-02-14#.XkbiYTJKi1s)

Article Title: Critics: Trump EPA's Formal Assertion Glyphosate Poses No to Human Health Indication of 'Troubling Allegiance' With Bayer/Monsanto Risk

Excerpts:

"As Reuters reported:

The conclusion reaffirms the agency's stance on glyphosate, the key ingredient in Bayer AG's Roundup, despite judgments by U.S. juries that have found that use of the weedkiller was responsible for plaintiffs' cancer in some trials."

"The EPA's pesticide office is clearly willing to bend over backwards, including disregarding its own guidelines for evaluating cancer risks, to give the industry what it wants," said Burd.

As Common Dreams has reported, Trump's EPA has been criticized by advocates for years for its closeness to Bayer/AG and its treatment of glyphosate."

Published by: Common Dream, January 30, 2020

Link to article:

[https://www.commondreams.org/news/2020/01/30/critics-trump-epas-formal-assertion-glyphosate-poses-no-risk-human-health-indication?cd-origin=rss&utm\\_term=AO&utm\\_campaign=Daily%20Newsletter&utm\\_content=email&utm\\_source=Daily%20Newsletter&utm\\_medium=Email](https://www.commondreams.org/news/2020/01/30/critics-trump-epas-formal-assertion-glyphosate-poses-no-risk-human-health-indication?cd-origin=rss&utm_term=AO&utm_campaign=Daily%20Newsletter&utm_content=email&utm_source=Daily%20Newsletter&utm_medium=Email)

Article Title: EWG Applauds Kellogg's for Pledge To End Pre-Harvest Use of Weedkiller Glyphosate

Excerpts:

" "We applaud Kellogg's for working with their suppliers to address the risks posed by glyphosate," said EWG President Ken Cook. "It's no surprise that consumers don't want a controversial weedkiller in their cereal. Now it's time for General Mills and Quaker to listen to their customers and fall in behind Kellogg's leadership and do the same - end this use of this notorious weedkiller."

In 2018 and 2019, EWG commissioned three rounds of laboratory tests of cereals and other foods sold by Kellogg's, General Mills and Quaker, and found glyphosate in virtually every sample analyzed. Many of the samples contained levels of glyphosate far above the benchmark of 160 parts per billion that EWG scientists say is safe for children."

Published by: The Environmental Working Group, January 27, 2020

Link to article:

<https://www.ewg.org/release/ewg-applauds-kellogg-pledge-end-pre-harvest-use-weedkiller-glyphosate>

Article Title: Trump's EPA Goes to Bat for Bayer as Company Fights \$25 Million Verdict in Roundup Cancer Case

Excerpt:

"President Donald Trump's Environmental Protection Agency-already accused of being "pesticide cheerleader"-threw its weight behind chemical company Bayer AG on Friday when the agency asked a federal appeals court to reverse a lower court's ruling in favor of a man who said the company's Roundup weedkiller was responsible for his cancer."

Published by: Global Research, December 23, 2019

Link to article:

<https://www.globalresearch.ca/trump-epa-goes-bat-bayer-company-fights-25-million-verdict-roundup-cancer-case/5698772>

Article Title: Is glyphosate causing chronic diseases?

Excerpt:

"According to Seneff, the increase in glyphosate usage in the U.S., as well as in Canada, is extremely well correlated with the concurrent increase in the incidence of multiple diseases, including breast cancer, pancreatic cancer, kidney cancer, thyroid cancer, liver cancer, bladder cancer and myeloid leukemia."

Published by: Mercola, August 4, 2019

Link to article:

<https://articles.mercola.com/sites/articles/archive/2019/08/04/glyphosate-health-risks.aspx>

Article Title: Costa Rica Bans Glyphosate in All Protected Wild Areas

Excerpts:

"Costa Rica's National System of Conservation Areas (SINAC) has banned the use of glyphosate herbicides in all protected wild areas in the country as well as on all SINAC owned land.

SINAC released a statement Tuesday, which read; "It is important to consider that this ban is carried out in line with Article 50 of Costa Rica's constitution, which stipulates that: 'the state must ensure the greatest possible well-being to all the inhabitants of the country, guarantee and preserve the right of people to a healthy and ecologically balanced environment, promoting development in harmony with this'."

Published by: Sustainable Pulse, Dec 5 2019

Link to article:

[https://sustainablepulse.com/2019/12/05/costa-rica-bans-glyphosate-in-all-protected-wild-areas/?utm\\_source=newsletter&utm\\_medium=email&utm\\_campaign=glyphosate\\_gmos\\_and\\_pesticides\\_weekly\\_global\\_news\\_bulletin&utm\\_term=2019-12-06#.XepinpNKi1s](https://sustainablepulse.com/2019/12/05/costa-rica-bans-glyphosate-in-all-protected-wild-areas/?utm_source=newsletter&utm_medium=email&utm_campaign=glyphosate_gmos_and_pesticides_weekly_global_news_bulletin&utm_term=2019-12-06#.XepinpNKi1s)

Article Title: Don't Look, Don't See: Time for Honest Media Reporting on Impacts of Pesticides

Excerpts:

"Following the article, environmentalist Dr Rosemary Mason put together a 20-page report on glyphosate and has sent it out to key public health officials and media outlets, including The Independent's editor. In her report, she states that the European Chemicals Agency classifies glyphosate as a substance that causes serious eye damage and is toxic to aquatic life with long lasting effects. But she claims that the media still remains silent on the matter. Even in UK towns and cities, glyphosate-based Roundup herbicide is still being sprayed on weeds and super-weeds which have become Roundup-resistant."

"Never in history has a chemical been used so pervasively. Glyphosate is in our air, water, plants, animals, grains, vegetables and meats. It's in beer and wine, children's breakfast cereal and snack bars and mother's breast milk. It's even in our vaccines."

Published by: Counterpunch, Dec 5 2019

Link to article:

<https://www.counterpunch.org/2019/12/05/dont-look-dont-see-time-for-honest-media-reporting-on-impacts-of-pesticides/>

Article Title: Canadian Lawyers Launch \$500M Class-Action Lawsuit against Roundup Makers

Excerpts:

"Diamond & Diamond, a national personal injury law firm in Canada, is spearheading a \$500 million class-action lawsuit against various Roundup makers, including pharmaceutical company Bayer, the owner of Roundup maker Monsanto, CBC reported Thursday.

"There have been many lawsuits filed across North America alleging that glyphosate can cause health problems including non-Hodgkin's lymphoma, a rare type of cancer that affects the lymphatic system.

In the United States alone, there have been about 42,000 lawsuits filed against the makers of Roundup."

Published by: Sustainable Pulse. Nov 22 2019

Link to article:

[https://sustainablepulse.com/2019/11/22/canadian-lawyers-launch-500m-class-actionllawsuit-against-roundup-makers/?utm\\_source=newsletter&utm\\_medium=email&utm\\_campaign=glyphosate\\_gmos\\_and\\_pesticides\\_weekly\\_global\\_news\\_bulletin&utm\\_term=2019-11-22#.XdlsX5NKi1s](https://sustainablepulse.com/2019/11/22/canadian-lawyers-launch-500m-class-actionllawsuit-against-roundup-makers/?utm_source=newsletter&utm_medium=email&utm_campaign=glyphosate_gmos_and_pesticides_weekly_global_news_bulletin&utm_term=2019-11-22#.XdlsX5NKi1s)

Article Title: Glyphosate can Trigger Aggressive Breast Cancer when Combined with another Risk Factor

Excerpts:

"The new study shows that a very low concentration of glyphosate (in the parts per trillion range and thus environmentally relevant for everyone) can trigger breast cancer when combined with another risk factor.

Published by Organic Consumers Assn. October 1, 2019

Link to article:

[https://www.organicconsumers.org/news/glyphosate-can-trigger-aggressive-breast-cancer-when-combined-another-risk-factor?utm\\_medium=email&utm\\_source=engagingnetworks&utm\\_campaign=OB+637&utm\\_content=OB+637](https://www.organicconsumers.org/news/glyphosate-can-trigger-aggressive-breast-cancer-when-combined-another-risk-factor?utm_medium=email&utm_source=engagingnetworks&utm_campaign=OB+637&utm_content=OB+637)

Article Title: Thanks a lot, Grandma: Negative effects of Roundup chemical doesn't surface for generations, WSU researcher says

Excerpts:

"Washington State University Biology Professor Michael Skinner studied the effects of glyphosate in rats. Commonly found in Roundup, Skinner will be the first to say direct exposure to the chemical has not been found to be harmful.

Skinner exposed pregnant rats to glyphosate. The mothers had no harmful side effects. The rats' children were unharmed. The grandchildren? Also fine. But when the study reached the great-grandchildren, more than than 90% of the animals developed one or more diseases."

Published by Spokesman Review newspaper, September 9, 2019

Link to article:

<https://www.spokesman.com/stories/2019/apr/26/thanks-a-lot-grandma-negative-affects-of-roundup-c/>

Article Title: Because 'A World Without Insects Is Not Worth Living In,' Germany Announces Plan to Ban Glyphosate

Excerpts:

"The German government announced Wednesday it had agreed on a plan to phase out the use of glyphosate-the key chemical in the weed killer Roundup-with a total ban set to begin by the end of 2023."

"Glyphosate is no longer exclusive to Monsanto's Roundup, as it "is now off-patent and marketed worldwide by dozens of other chemical groups including Dow Agrosiences and Germany's BASF," as Reuters noted."

"That's despite the World Health Organization's International Agency for Research on Cancer's 2015 designation of glyphosate as a "probable carcinogen," increasing concerns over its health effects, and mounting legal woes for Bayer, which acquired Monsanto last year, as multiple juries have found Roundup to have been a factor in plaintiffs' cancers."

Published by Common Dreams, September 4, 2019

Link to article: [https://www.commondreams.org/news/2019/09/04/because-world-without-insects-not-worth-living-germany-announces-plan-ban-glyphosate?cd-origin=rss&utm\\_term=AO&utm\\_campaign=Daily%20Newsletter&utm\\_content=email&utm\\_source=Daily%20Newsletter&utm\\_medium=Email](https://www.commondreams.org/news/2019/09/04/because-world-without-insects-not-worth-living-germany-announces-plan-ban-glyphosate?cd-origin=rss&utm_term=AO&utm_campaign=Daily%20Newsletter&utm_content=email&utm_source=Daily%20Newsletter&utm_medium=Email)

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 weed killer 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](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)

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Section #3 -- Law firms are now frequently 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](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](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](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](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](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](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](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=f2058d93dd24196d73b4d0ad5f144d1c](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=f2058d93dd24196d73b4d0ad5f144d1c)

#### 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/>

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Section #4 -- Your local public will be warned to avoid the Olympic National Forest.

Unless you convince me otherwise I'll be sending a letter to the editor the Olympian and Seattle Times soon. Ranger Lau, my letter will inform the public that you propose to spray a known carcinogen at various locations in the Hood Canal Ranger District on the Olympic 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?

Comment for which I'd like a meaningful response in the Response to Comments section: Ranger Lau, I ask you and your IDT members to have the courage to read the science conclusions of independent scientists not affiliated with the USFS in the Glyphosate kills attachment. You already know the USDA ignores the independent science that shows glyphosate causes cancer. You also know you are not required to apply herbicides that contain glyphosate.

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Section #5 -- 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 (including IDT members) could be called to testify.

Reading these comments establishes the fact that you knew the consequences of your actions. The plaintiff's attorney will ask why you ignored the science in the Glyphosate kills Attachment and did not use an alternative to Roundup.

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Section #6 - Some 3rd world countries ban the use of herbicides that contain glyphosate. Why not the United States? Monsanto is based in St Louis, MO.

Africa: Malawi

Asia: Thailand, Vietnam, and Sri Lanka

Middle Eastern countries: Saudi Arabia, Kuwait, Qatar, Bahrain, Oman, Kuwait and United Arab Emirates

Central America: Bermuda, Costa Rica, St Vincent, and Grenadines

Europe: Belgium, Netherlands, Austria, Italy, Italy Czech Republic, France Greece, Germany, Denmark and Luxembourg:

India:

Canada

Brazil:

Australia

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

<https://www.ecowatch.com/european-parliament-ban-glyphosate-2500863218.html>

<https://sustainablepulse.com/2019/05/28/glyphosate-herbicides-now-banned-or-restricted-in-17-countries-worldwide-sustainable-pulse-research/#.XfAP-avTm1s>

<https://www.healthnutnews.com/france-to-ban-glyphosate-weedkiller-by-2022/>  
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Section #7 --Concluding Glyphosate Comments

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



No intelligent human being would risk another person's life if there is a tiny doubt about the danger of an action to be taken. As you can see above, the USDA's claim that Roundup is not toxic enough to be dangerous is inconsistent with the vast majority of research conclusions authored by independent scientists.

If, after reading the science above you still plan to apply a herbicide containing the chemical glyphosate (knowing there are effective alternatives that will accomplish your goal) each morning you will wonder if someone is dying because of you.

Each IDT member is culpable and partially responsible for the effects of implementing this timber sales action 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. Mr. Senger, Ms. Krier, Mr. McHenry, Mr. Flanagan, Mr. Urresti, Ms. Butler, Ms. Bartlett, Ms. Crider, Ms. Kill, Ms. Howell, Ms. Keene, Ms. LaGioia, Ms. Hauge, Ms. Cornell, Mr. Shelmerdine, Ms. Henriquez, Mr. Messerschmidt and Ms. Hanson, 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 Lau, 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 refused.

You are the ones that must live with yourselves 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. The science is compelling in the Glyphosate kills Attachment. This is a case where you all must stop your efforts to be a USFS "team player" by ignoring the truth.

Ranger Lau, please read more of what independent scientists say about glyphosate safety in the Glyphosate kills Attachment. Most people who read hundreds of science experiment conclusions saying glyphosate causes cancer will reject a single safety study sanctioned by the corporation (Monsanto) that profits financially from selling the poison.

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 90,000 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.

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A biodiverse, healthy forest contains a

mixture of 1) vigorous trees, 2) slow growing defective trees and 3) trees that are dying. Favoring vigorous trees to increase corporate profit creates an unnatural, unhealthy forest.

At page 50 you say:

"This could result in negative impacts to stand health (as discussed in the Silviculture section), rather than development of vigorous and structurally complex stands."

At page 70 you say:

"In fact, forest stands are being retained and thinned to maintain a vigorous condition that supports enhanced tree growth and productivity, thus contributing to long-term carbon uptake and storage."

One would think professional line-officers and the specialists on the Olympic NF would understand the characteristics of a healthy forest.

All healthy populations of living things have dead and dying individuals. This includes conifer trees. There are many wildlife species dependent on dead and dying conifer tree species. Creating areas where most of the trees are vigorous trees will 1) eliminate the all-important biodiversity and 2) drive the wildlife to acceptable habitat.

The USFS spends our tax dollars to create vigorous trees for one reason and one reason only. When vigorous trees are milled the lumber is worth more. Would the public want their tax dollars used to enrich corporate America?

Your attempt to create vigorous trees has nothing to do with a healthy forest. You know the purchaser of the next timber sale in this area will generate maximum profit if the trees are vigorous. Admit you and your IDT members are obediently serving your corporate masters.

Request for changes to be made to the final NEPA document: Assure the final NEPA document tells the public 1) why spending their tax money to take action to create fast growing, vigorous trees is more important than letting the trees grow at their own rate which provides biodiversity, 2) the names of the flora and fauna in the sale area that thrive in decadent slow-growing trees and 3). why biodiversity is not important in the project area.

Ignoring my request will violate:

40 CFR 1500.1(c), 40 CFR 1500.1(c) and 40 CFR 1500.2(f) because the proposed logging will not "protect, restore, and enhance the quality of the human environment."

40 CFR § 1500.1(b) because actions were not taken to protect, restore, and enhance the environment, and

40 CFR 1500.2(f) because actions were not taken to avoid or minimize any possible adverse effects to the quality of the human environment.

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

At page 28 you display your inadequate info on migratory bird species:

### "Neotropical Migratory Birds

The Olympic National Forest falls within the Northern Pacific Rainforest delineation of Bird Conservation Regions (BCR 5) identified by the North American Bird Conservation Initiative (Partners in Flight 1998). High priority breeding forest birds in this conservation region include the spotted owl, marbled murrelet, northern goshawk (*Accipiter gentilis*), chestnut-backed chickadee (*Poecile rufescens*), red-breasted sapsucker (*Sphyrapicus ruber*), and hermit warbler (*Dendroica occidentalis*). Birds of Conservation Concern for BCR 5 include the northern goshawk, olive-sided flycatcher (*Contopus cooperi*), rufous hummingbird (*Selasphorus rufus*), and purple finch (*Haemorhous purpureus*). Effects to seasonal habitat are assessed for neotropical migratory birds. For most species, critical breeding periods last from early spring through late summer.

The Wynoochee project area provides important neotropical bird habitat including hardwood stands, particularly those associated with riparian areas, which are a key habitat for some breeding neotropical and winter resident songbirds and can be an important predictor of bird species richness (Hagar et al., 1996). There are small pockets of hardwood stands and mixed hardwood/conifer stands scattered throughout the proposed project stands of the Wynoochee project area, as well as in habitat connecting the stands. Although there have been no surveys conducted specifically for forest landbirds relative to this project, a variety of species likely occupy the area."

Comment for which I'd like a meaningful response in the Response to Comments section: Ranger Lau, it is not only possible but highly likely that your logging and slash/RX burning will harm the habitat and/or kill individual birds protected by the MBTA. This is especially true of young birds that cannot flee the danger. The Treaty requires the NEPA document to include information showing why the following damage will not occur. The plaintiffs' attorney will expect the NEPA document to contain specific action that you will take to prevent:

"harm the birds with logging-related pollution",

"detrimentally alter the bird's habitat",

"environmentally degrade the area surrounding the bird's habitat", and

"kill bird chicks by destroying their nests or eggs".

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

The Wynoochee draft EA doesn't come close to complying with the Act. It does not even mention "migratory bird." I suggest before you form another IDT you consider adding a wildlife biologist.

As you can see at the link below, the Migratory Bird Treaty Act is a major issue with the Audubon Society.  
[https://www.biologicaldiversity.org/news/press\\_releases/2018/migratory-birds-05-24-2018.php](https://www.biologicaldiversity.org/news/press_releases/2018/migratory-birds-05-24-2018.php)

On May 24, 2018 the Audubon Society filed *Audubon v. DOI*. If your final NEPA document does not clearly comply with the requirements of the Act, this comment concerning the MBTA and instructions on how to access your final EA and draft decision will be sent to the Audubon Society in Washington DC. Ranger Lau you might become infamous. There's a good chance you will be responsible for *Audubon v. USDA*.

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

Failure to do so will violate the Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-712; Ch. 128; July 13, 1918; 40 Stat. 755) as amended by: Chapter 634; June 20, 1936; 49 Stat. 1556; P.L. 86-732; September 8, 1960; 74 Stat. 866; P.L. 90-578; October 17, 1968; 82 Stat. 1118; P.L. 91-135; December 5, 1969; 83 Stat. 282; P.L. 93-300;

June 1, 1974; 88 Stat. 190; P.L. 95-616; November 8, 1978; 92 Stat. 3111; P.L. 99-645; November 10, 1986; 100 Stat. 3590 and P.L. 105-312; October 30, 1998; 112 Stat. 2956)

Violating an international Treaty isn't trivial.

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

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

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

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

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

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Violating an international Treaty isn't trivial.

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Increases in national forest logging do not stabilize or enhance the economy of small communities located near the forest.

I knew it was coming. One of your corporate-friendly purposes listed in the P&N at page 3 for this timber sale is:

"Contribute to the economic viability of local communities."

You parrot the USFS untrue claims perfectly. You have assumed the corporate lap-dog role just like the USFS programmed you to do.

You must know by pushing logging where it's not needed for cooked-up reasons you simultaneously backhand the vast majority of the American public who don't want their forests logged at any location for any reason.

You and your IDT members reject/ignore the literature available discussing the fact that most national forest visitors are seeking recreational opportunities. Camping, fishing, hiking and wildlife watching are a few. They avoid "managed" (aka logged-over) land. Here's a High Country News article the USFS does not want its employees to see:

Here is a 2018 High Country News article that should guide your actions:

Article Title: Recreation is redefining the value of Western public lands

Excerpts:

"Once, the West's public lands were valued primarily for the timber, minerals and fossil fuels they held, which were extracted and then sold around the world. In the 1970s, more than two dozen Western counties relied on timber for at least a fifth of their revenue, while energy companies expanded onto public lands for coal and natural gas. Small communities swelled with loggers and miners and the businesses that supported them, providing an economy that helped preserve the West's rural feel. Today, though, natural resource economies are waning, and many of those towns are struggling. Public lands are increasingly used for fun and leisure, and the West has joined the Northeast as the two most urbanized regions in the country, according to U.S. Census data analyzed by Headwaters Economics."

"More than 290 million people visited Western public lands in 2017. Despite increasing visits to public lands and the billions of dollars in consumer spending on outdoor recreation that often takes place there, the percent of the federal budget allocated to manage these places has shrunk."

[https://www.hcn.org/issues/50.8/recreation-recreation-is-redefining-the-value-of-western-public-lands?utm\\_source=wc1&utm\\_medium=email](https://www.hcn.org/issues/50.8/recreation-recreation-is-redefining-the-value-of-western-public-lands?utm_source=wc1&utm_medium=email)

Only an idiot would read the article above and still claim logging (which drives away people who visit their national forest to pursue recreation opportunities enhances the economies of local communities near the forest.

Comment for which I'd like a meaningful response in the Response to Comments section: Ranger Lau, I suggest you allow the truth to guide your actions if you really want to enhance the economy of the local community. Logging is the last way to do it. This Outdoor News story titled "Study: Recreation Generates Billions of Dollars" can be read at the following link:

<https://www.outdoornews.com/2018/10/03/study-recreation-on-u-s-land-generates-billions-for-western-states/>

Here's a quote from the article:

"The Post Register newspaper in Idaho Falls reported the study found wildlife-related recreation on the land in 12 western states generated more than \$3 billion in economic activity. That figure includes about 26,500 jobs, \$1 billion in salaries and wages, and \$421 million in federal, state and local tax revenue."

Please explain why you don't spend our tax dollars on recreation-related projects that will really generate jobs and income to the local communities.

Comment for which I'd like a meaningful response in the Response to Comments section: Consider the following excerpts from a research paper that examined community stability vs. increased logging. The study was done on small communities near national forests in Washington State:

"Often it is suggested that increased harvests from National Forests will economically support the communities adjacent to the forests. The implicit assumption is that locally harvested federal trees will flow to local mills. That often is not the case. In general the Forest Service is required to sell its trees to the highest bidder. The National Forest timber that is harvested at one location can be shipped hundreds of miles, out-of-state and, through

displacement, even overseas."

"Even within relatively isolated areas, such as the northeastern tier of counties, there was considerable economic vitality despite the declines in federal timber harvests."

"The relatively high unemployment rates in many of the eastern Washington counties adjacent to National Forests cannot be attributed to the decline in federal harvests. Those counties had even higher unemployment rates at the time of peak harvests in the late 1980s."

From Linking Federal Timber Harvests to the Local Economy: Why Has the Historical Link Been So Weak?  
by Thomas Michael Power, Ph.D., Professor of Economics, University of Montana, June 13, 2000.  
<http://www.kettlerange.org/power/Ch3.htm>

If you really wanted to help the mills in local communities you would offer this sale under Small Business Authority (SBA)? Ranger Lau, please describe why Dr. Power's research does not apply to the Olympic National Forest.

ECONorthwest reached conclusions similar to those of Dr. Power quoted above:

Excerpts:

"(1) Despite years of rhetoric and misinformation, national and regional economies are not dependent on logging National Forests. The most often cited misconception is that the regional economy of the Pacific Northwest declined after a court injunction and related events reduced National Forest logging. In fact, instead of collapsing, the region's economy expanded and the Pacific Northwest weathered virtually unscathed the national economic recession that occurred at the same time as the court injunction.

(2) National Forests now produce goods and services that are much more significant than the value of logging.

(3) The Forest Service logging program has caused devastating impacts in the ability of the National Forests to provide economically valuable goods and services. Reversing the damage caused by logging will be costly but ignoring the need to restore damaged forests will cost even more."

Seeing Forests for their Green: Economic Benefits of Forest Protection, Recreation, and Restoration"  
Published in EcoNorthwest, August 13, 2000  
<http://econw.com/our-work/publications/seeing-forests-for-their-green-economic-benefits-of-forest-protection-recre/>

When the recreating public bypasses and avoids communities with timber driven economies surrounded by "managed" national forest land these communities lose out on their share of the recreation-generated financial community stability benefits reported in 2006 shown below. In the last 13 years these benefits have increased. The level of the 10 year increase in recreation benefits exceeds the total jobs & revenues created by national forest "management" (a.k.a. logging).

Forest recreation:

- \* Contributes \$730 billion annually to the U.S. economy
- \* Supports nearly 6.5 million jobs across the U.S.
- \* Generates \$88 billion in annual state and national tax revenue
- \* Provides sustainable growth in rural communities

\* Generates \$289 billion annually in retail sales and services across the U.S.

\* Touches over 8 percent of America's personal consumption expenditures-more than 1 in every 12 dollars circulating in the economy

Source of these statistics: <http://outdoorindustry.org/images/researchfiles/RecEconomypublic.pdf?26>

Ranger Lau recreation revenue is significantly more than logging revenue on national forests. People will drive long distances to avoid camping, hiking and fishing near cutting units.

Please tell the public why you feel the conclusions of the 7 following articles are incorrect.

"Recreation has replaced logging as the golden egg of the national forest system. While the extensive logging practices lose \$1 billion a year, recreation based in national forests provides \$111 billion per year to the country's gross domestic product. And that's according to the U.S. Forest Service's own study, which also declares only 3% of jobs in rural communities are linked to logging on public land, while 75% of jobs in rural communities come from recreation based on public lands. Recreation contributes 30 times more income to the nation's economy and creates 38 times more jobs than logging. Yet current Forest Service policy still favors logging over recreation."

From: "Logging vs. Recreation"

By Graham Averill

Published by Blue Ridge Outdoors, July 2008

<https://www.blueridgeoutdoors.com/magazine/july-2008/logging-vs-recreation/>

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"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

By Ernie Niemi (president of Natural Resource Economics, Inc.) and John Kober (executive director of the Pacific Rivers Council)

Published by 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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"Local harvests do not necessarily flow to local mills because logs are often hauled hundreds of miles to the mills that win the timber sale bids. As a result, any employment impact may well not be local."

From: Linking Federal Timber Harvests to the Local Economy: Why Has the Historical Link Been So Weak?

<http://www.kettlerange.org/power/Ch3.htm>

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"The USFS top managers have revealed that outdoor recreation and general ecology uses of National Forests are now of much greater economic value than timber harvest."

From: Forest Recreation's Growing Impact

By Paul McHugh, Chronicle Staff Writer

Published by SFGATE, September 19, 1996

<https://www.sfgate.com/sports/article/FOREST-RECREATION-S-GROWING-IMPACT-2965645.php>

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"The USFS top managers have revealed that outdoor recreation and general ecology uses of National Forests are now of much greater economic value than timber harvest."

From: Forest Recreation's Growing Impact  
Published by National Trails Training Partnership  
<http://www.americantrails.org/resources/economics/EconForestRec.html>  
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"Earlier this year, OIA released its national Outdoor Recreation Economy Report, which found that the outdoor recreation economy generates \$887 billion in consumer spending annually and directly sustains 7.6 million American jobs. The state report released today offers a deeper look into a thriving sector that's helping to create healthier economies and healthier communities.

"No matter your political affiliation, where you live or your walk of life, the outdoors brings us together," said Amy Roberts, OIA executive director. "From Maine to California, consumers are spending more on outdoor recreation as millions of Americans depend on it for their livelihoods. Outdoor recreation is a powerful economic engine that contributes to businesses and healthy communities in each and every state and is a vital and sustainable sector that relies on investing in and protecting America's public lands and waters." "

From: Outdoor Industry Association Releases State-By-State Outdoor Recreation Economy Report  
Published by The Outdoor Industry Assn. News  
<https://outdoorindustry.org/article/outdoor-industry-association-releases-state-by-state-outdoor-recreation-economy-report/#oia-press-room>  
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"Outdoor activities generate more than \$16 billion annually in Oregon, according to an industry study released to the public on Wednesday."

"According to the association's report on Oregon, the state's spending on outdoor recreation - a sprawling category that the organization uses to include everything from the cost of new bikes or skis, to travel costs associated with outdoor recreation trips - has grown by more than 28 percent since the last iteration of the study was released in 2013.

In addition, the number of people employed in the industry increased from 141,000 to 172,000, a jump of nearly 22 percent. According to the study, 69 percent of Oregonians surveyed said they participate in outdoor recreation each year, up from 60 percent during the previous survey."

From: Outdoor activities generate more than \$16 billion in state, according to study  
Published by the Bend Bulletin newspaper, July 26, 2017  
<http://www.bendbulletin.com/localstate/5472143-151/oregon-sees-big-jump-in-outdoor-recreation-spending?referrer=home&referrer=top>

Ask yourself why the USFS encourages line-officers to pursue actions that scores of unbiased independent scientists describe as pernicious and likely to destroy the proper functioning of important natural resources. If you have a conscience you know this is not a trivial issue. You know no amount of salary justifies casting away your land values and ethics.

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Ranger Lau, you reject the research conclusions of 241 Ph.D. scientists quoted in Opposing Views Science Attachment #1 who demonstrate how logging-related harm (and in a few cases destruction) is inflicted on multiple natural resources in and near the sale area. Incredibly, you rely on the advice of 3 or 4 USFS timber employees financially motivated to sell timber. You know the log for community stability P&N statement appears in at least 80% of all timber sale NEPA documents. This has become the commonly used excuse by



USFS line-officers to sell unneeded timber sales and you use it here.

I have presented you with verified information showing outdoor recreation generates 790 billion dollars and 65 million jobs annually. Most of this benefits local economies. The fact is, the Wynoochee timber sale will harm the economy of the communities near it. People seek out areas that have not been logged for their recreation. I hope you get the chance to tell the judge this isn't true.

The US Department of Commerce released a report showing the Outdoor recreation contribution to the GDP is larger than that of oil and gas extraction.

Excerpts:

"That information can be useful when advocating for conservation or trying to change policy, Cottingham said."

"The federal report will be a useful advocacy tool, said Katherine Hollis the conservation and advocacy director for the Mountaineers."

Reported in the March 2, 2018 issue of the Spokane Washington Spokesman Review newspaper.  
[http://montanauntamed.com/get-outside/article\\_b8da11ba-97fe-5e1e-8d18-c9d994dc5148.html](http://montanauntamed.com/get-outside/article_b8da11ba-97fe-5e1e-8d18-c9d994dc5148.html)

Request for changes to be made to the final NEPA document: Offer the sale as an SBA sale and say so in the final NEPA document.

Failure to do so will violate 40 CFR 1500.1(b) because "environmental information is not available to public officials and citizens before decisions are made." You also violate 40 CFR 1502.13 because producing logs from this sale cannot possibly maintain the stability of local and regional economies as I have shown above. You all know this is a P&N that is in NEPA documents for 98 % of proposed timber sales in America. You have done no analysis of local and regional mills to determine if they have a log supply problem.

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If you care about maintaining aquatic species' health you will indicate in the final EA that all newly constructed temporary roads will be obliterated or decommissioned according to law (see below) after use

Comment for which I'd like a meaningful response in the Response to Comments section: At page 17 you say:

"Approximately 14 miles of temporary roads (107 segments) are proposed to provide access for thinning operations. This includes about 5 miles of new temporary road construction and about 9 miles of reconstruction of unclassified road alignments."

I have never heard of an old temporary road called an "unclassified road alignment" before. Ranger Lau, your attempt to trick the public isn't professional is it?

At page 50 you say:

"Existing compacted skid trails, landings, and unclassified temporary roads would not be used and would remain in a detrimental condition."

You admit your old temporary roads are in a "detrimental condition." How many years did you allow the 9 miles of "unclassified road alignment" in a "detrimental condition" to exist? Surely you know old temp roads pump sediment into the streams? At page 30 you say:

"Temporary road rehabilitation will occur between June 1 and October 31"

Why should the public believe you will "rehabilitate" the 5 miles of new temp road since you admit to having "unclassified road alignment" that exist that were not "rehabilitated"?

You indicate you will construct 14 miles of temporary road.

Comment for which I'd like a meaningful response in the Response to Comments section: At page 31 you say:

"Temporary roads will be decompacted as necessary to improve water infiltration and restore soil productivity. Available logging slash will be placed across the decompacted surface. Motorized access will be blocked."

Professional USFS line-officers always obliterate temporary roads after use. An obliterated road 1) has no running surface to decompact, 2) has no running surface to place slash on and 3) has no running surface to block.

I expect your treatment of temporary roads after use to be consistent with 36 CFR 212.5(b)(2). Pay special attention to the requirement that you "completely eliminate the roadbed by restoring natural contours and slopes."

Here's the text of 36 CFR 212.5(b)(2)

"(2) Identification of unneeded roads. Responsible officials must review the road system on each National Forest and Grassland and identify the roads on lands under Forest Service jurisdiction that are no longer needed to meet forest resource management objectives and that, therefore, should be decommissioned or considered for other uses, such as for trails. Decommissioning roads involves restoring roads to a more natural state. Activities used to decommission a road include, but are not limited to, the following: reestablishing former drainage patterns, stabilizing slopes, restoring vegetation, blocking the entrance to the road, installing water bars, removing culverts, reestablishing drainage ways, removing unstable fills, pulling back road shoulders, scattering slash on the roadbed, completely eliminating the roadbed by restoring natural contours and slopes, or other methods designed to meet the specific conditions associated with the unneeded road. Forest officials should give priority to decommissioning those unneeded roads that pose the greatest risk to public safety or to environmental degradation."

We have all walked short sections of "temporary" roads that were constructed and located by employees working for the purchaser. Their goal was to minimize cost ... not reduce aquatic damage by eliminating the possibility that sediment might enter streams. Your IDT hydrologist and fisheries biologist should know temporary roads are outsloped, thus they are linear sediment generators each time it rains and when the snow melts in the spring.

Whatever they call it (obliterate or rehabilitate) professional, knowledgeable USFS line-officers, hydrologists and fisheries biologists always propose to completely eliminate the roadbed by restoring natural contours and slopes."

Here is some obliteration information that you and your IDT members should already know:

#### "Obliteration

Obliteration can be the most effective treatment for both aquatic and terrestrial species. In full obliteration, culverts are removed, road surfaces are ripped and slopes are recontoured (see below for explanations of these treatments). In simple decommissioning, sites (such as stream crossings) are treated, but the segments (such as the roadbed between two stream crossings, or between water bars) are left intact. In obliteration, all sites and segments are treated. Subsurface water flow is no longer interrupted, allowing water to flow normally throughout the system and therefore aiding with vegetative recovery and reconnecting fragmented habitat. Recovering the

original topsoil may also aid in revegetative success and limit the spread of non-native species on the site. Road obliteration, therefore, addresses both the aquatic/hydrologic and terrestrial problems caused by roads."

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

By Bethanie Walder and Scott Bagley

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

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

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

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

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

A Swan View Coalition publication by Keith Hammer, 1994

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

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

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

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

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

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

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

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

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

Published by North Coast Redwoods District California State Parks

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

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"The latest attempt by the Forest Service to make logging palatable is "temporary" roads. A lot of research has found that logging roads are among the biggest impacts to forest ecosystems. (For a good review of road impacts see Trombulak and Frissell.) The Forest Service has at least 400,000 miles of roads on the lands it administers and these roads are a major environmental impact associated with logging.

Even the Forest Service has had to admit that logging roads have many unacceptable impacts to the forest ecosystem, so they have to come up with a new term and idea to make logging acceptable-temporary roads. Temporary roads only have temporary impacts-or so we are led to believe. And some conservationists have

jumped on the "temporary" road band wagon just as some readers of the National Inquirer are quick to accept the hype of the latest fad promoting say the low fat ice cream diet."

#### Permanent Damage From Temporary Logging Roads

By George Wuerthner

Published by Counterpunch, March 19, 2009

Link:

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

Ask yourself why the USFS encourages line-officers to pursue actions that scores of unbiased independent scientists describe as pernicious and likely to destroy the proper functioning of important natural resources. If you have a conscience you know this is not a trivial issue. You know no amount of salary justifies casting away your land values and ethics.

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Please see Opposing Views Science Attachment #4 to learn more about road damage to forest resources.

Request for changes to be made to the final NEPA document: Clearly tell the public that you will obliterate (or decommission according to law) all temporary roads after use.

Failure to do so will violate:

40 CFR 1500.1(c) because your lack of action will not "protect, restore, and enhance" the aquatic environment.

40 CFR 1500.2(e) and (f) because the Proposed Action will not "avoid or minimize adverse effects of these actions upon the quality of the human environment" and will not "restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment."

36 CFR 212.5(b)(2) because you did not completely eliminate the roadbed by restoring natural contours and slopes after the road is no longer needed.

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The Purpose & Need is written so narrowly that it excludes all reasonable alternatives to the Proposed Action that do not include logging. Such a narrow Purpose & Need allows you to reject all non-harvest alternatives by claiming they would not satisfy the P&N. I invite you to read the court precedent below.

The Purpose & Need section for this timber sale NEPA document is intended to trick and deceive the public. The P&N includes a need to log the area. Of course this is not a need. There are other ways to satisfy your objective.

Writing a P&N that renders all action alternatives other than the Proposed Action nonresponsive to the P&N is also inconsistent with court precedent:

In *National Parks & Conservation Association v. Bureau of Land Management*, 606 F.3d 1058 (9th Cir. 2010).

Opinion Excerpt:

"The BLM did not, however, consider these options in any detail because each of these alternatives failed to meet the narrowly drawn project objectives, which required that Kaiser's private needs be met."

"The BLM adopted Kaiser's interests as its own to craft a purpose and need statement so narrowly drawn as to foreordain approval of the land exchange. The BLM may not circumvent this proscription by adopting private interests to draft a narrow purpose and need statement that excludes alternatives that fail to meet specific private objectives, yet that was the result of the process here."

Friends of Southeast's Future v. Morrison, 153 F.3d 1059, 1066 (9th Cir.1998).

Opinion Excerpt:

Agencies enjoy "considerable discretion" to define the purpose and need of a project.

"An agency may not define the objectives of its action in terms so unreasonably narrow that only one alternative from among the environmentally benign ones in the agency's power would accomplish the goals of the agency's action, and the EIS would become a foreordained formality."

Davis v. Mineta, 302 F.3d 1104, 1119 (10th Cir. 2002)

Opinion Excerpt:

"While it is true that defendants could reject alternatives that did not meet the purpose and need of the project, Boomer Lake, 4 F.3d at 1550, they could not define the project so narrowly that it foreclosed a reasonable consideration of alternatives. Colo. Env't. Coalition v. Dombeck, 185 F.3d 1162, 1174-75 (10th Cir. 1999); Simmons v. United States Army Corps of Eng'rs, 120 F.3d 664, 669 (7th Cir. 1997)."

City of Carmel-By-The-Sea v. U.S. Dept. of Transportation, 123 F.3d 1142, 1155 (9th Cir. 1997)

Opinion Excerpt:

"Project alternatives derive from an Environmental Impact Statement's "Purpose and Need" section, which briefly defines "the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action." 40 C.F.R. s 1502.13. The stated goal of a project necessarily dictates the range of "reasonable" alternatives and an agency cannot define its objectives in unreasonably narrow terms. See Citizens Against Burlington, 938 F.2d at 196."

"Specifically, Carmel argues that the Federal Highway Administration and Caltrans unjustifiably narrowed its statement of "Purpose and Need" from the Draft Environmental Impact Statement/Report to Final Environmental Impact Statement/Report by including a requirement of Level of Service C."

Citizens Committee to Save Our Canyons v. U.S. Forest Service, 297 F.3d 1012, 1018 (10th Cir. 2002) (citing Davis v. Mineta, 302 F.3d 1104.

Opinion Excerpt:

"courts will not allow an agency to define the objectives so narrowly as to preclude a reasonable consideration of alternatives"

Citizens Against Burlington, Inc., et al v. James B. Busey IV 938 F.2d at 196 (District of Columbia Circuit, 1991)

Opinion Excerpt:

"an agency may not define the objectives of its actions in terms so unreasonably narrow that only one alternative from among the environmentally benign ones in the agency's power would accomplish the goals of the agency's action, and the EIS would become a foreordained formality."

Simmons v. United States Army Corps of Engrs., 120 F.3d 664, 669 (7th Cir. 1997)

Opinion Excerpt:

"One obvious way for an agency to slip past the strictures of NEPA is to contrive a purpose so slender as to define competing "reasonable alternatives" out of consideration (and even out of existence). The federal courts cannot condone an agency's frustration of Congressional will. "If the agency constricts the definition of the project's purpose and thereby excludes what truly are reasonable alternatives, the EIS cannot fulfill its role. Nor can the agency satisfy the Act. Nor can the agency satisfy the Act. 42 U.S.C. § 4332(2)(E)."

Sierra Club v. U.S. Dep't of Transp., 310 F.Supp.2d 1168, 1192 (D. Nev. 2004) (citing City of Carmel-By-The-Sea v. U.S. Dep't of Transp., 123 F.3d 1142, 1155 (9th Cir. 1997)).

Opinion Excerpt:

"While it is true that defendants could reject alternatives that did not meet the purpose and need of the project, they could not define the project so narrowly that it foreclosed a reasonable consideration of alternatives."

Request for changes to be made to the final NEPA document: Include a new (expanded) Purpose & Need that allows reasonable alternatives to the Proposed Action to be analyzed in detail. This Purpose & Need must describe goals that can be achieved at different levels by different actions ... specifically actions that don't include timber harvest.

Failure to do so will violate 40 CFR 1500.2(d) and (e) and 40 CFR 1506.6(a)

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

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

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

Comment for which I'd like a meaningful response in the Response to Comments section: The public does not want natural resources in their public land that will be inherited by future generations to be destroyed in order to provide corporate profit opportunities. Opposing Views Science Attachment #10 gives you the results of 16 statistically significant nationwide polls revealing the public's feelings about national forest logging. Depending on the poll between 63% and 81% didn't want logging. You propose to log 8.3 square miles. How can you justify calling yourself a public servant? In reality you are serving your corporate masters.

Request for changes to be made to the final NEPA document: Include some source documents from the Opposing Views Science Attachment #1 in the References/Literature Cited section, and also cite the applicable specific quotes presented in the Opposing Views Science Attachment #1 in the text.

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

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Ranger Lau few USFS line-officers choose to hide important project-related information from the public.

You used public tax dollars to create the public information you conceal as hardcopies at the District. You should be ashamed. If the information you have hidden away were professionally done and truthful you would be glad to share it with the public who owns it. Your behavior borders on being criminal. The judge will also wonder what you were up to.

Comment for which I'd like a meaningful response in the Response to Comments section: 40 CFR 1502.21 allows you to incorporate material by reference. It also says:

"No material may be incorporated by reference unless it is reasonably available for inspection by potentially interested persons within the time allowed for comment."

You tell the public they must drive or fly to Quilcene to inspect the hardcopy material in the project record. This is not "reasonably available for inspection by potentially interested persons" is it?

Most of the documents you hide away as hardcopies on the district were created on your computer. Even a child has the computer skills to post electronic documents online. If the document was not created on the computer these children would know how to scan them and create a PDF file that could be posted online. Obviously, you do not want the public to read these documents. Why? Either they don't exist or they aren't truthful and support this project with lies.

You and your IDT members will do anything to prevent the public from submitting critical comments as you have your way with the Olympic National Forest owned by 323 million Americans. These Americans want to provide you with informed, meaningful comments based on all the information available about the proposed project ... which you go out of your way to keep them from reading. Practice your talking points, because if your final EA hides information in the project record you will have the opportunity to discuss this issue with one of Senator Murray's aides. All members of Congress have staff who specialize in helping constituents with difficult/uncooperative federal agencies.

Comment for which I'd like a meaningful response in the Response to Comments section: Important information that would help the public understand the proposed project analysis disclosed in your draft EA is hidden away hardcopy in the project record. It's sad you use this illegal and unethical scheme to keep information from the public you claim to serve.

You know they can be easily posted online. Do you really expect a member of the public to drive (or fly) thousands of miles to view this public information? The information belongs to the public. Will you pay for the trip? Will you accept the liability if someone has an accident? Who are you?

This is what you hide hardcopy at your district:

"Coho Campground treatment was prescribed by Forest Service Health Protection specialists (report available in the project record)." (pg 16)

"Fuel load transects that quantify size classes of fuels on the forest floor, were recorded within identified thinning units in the project area (data available in the project record)." (pg 29)

"A silviculture report was completed for this analysis and is located in the project record." (pg 36)

"A wildlife report was prepared as part of this analysis and is located in the project record." (pg 39)

"A botanical and invasive species report was prepared for this project and is located in the project record." (pg 47)

"A Soil and Slope Stability Resource report that compares existing conditions with the anticipated effects from the proposed actions including commercial thinning, associated log haul on temporary and Forest system roads, and road decommissioning/closures on soil properties. was completed for this analysis and is located in the project record." (pg 50)

"Table 3-4 contains a summary of timber output, project value, project cost, net present value (NPV), and benefit-to-cost ratio for Alternative A (no action) and two implementation scenarios of the action alternatives. The full set of worksheets is available in the Project Record." (pg 60)

"Costs were calculated using maintenance costs per mile estimated in the 2015 Travel Analysis Report (data worksheets available in the project record)." (pg 62)

Public disclosure is the basis for NEPA documents. What will the judge say?

Clearly, Olympic NF employees haven't come to grips with the fact the public reads NEPA documents from cover to cover and wants to understand the EA or EIS without flying long distances. How many times have you read a novel where the last chapter was available hardcopy where the author lives and you had to travel to read it?

This was not an oversight by IDT members. They knowingly hid this information from the public. During my 30 year USFS career I saw this scheme occur for 2 reasons. Each time, they suppressed information because it:

- 1) did not exist in the project record, or
- 2) the IDT members are so ashamed of their work they choose to hide it from the public.

I suggest you start reading the Portland Oregonian. If your final NEPA document still hides public information Regional Forester Casamassa will find out. How will he respond to the public calls of outrage he receives? Is this what you want?

Request for changes to be made to the final NEPA document: Make ALL the documents that currently reside in the Project Record available as 1) online Appendices to the NEPA document, or 2) electronically attach them to the online EA EIS.

This legal violation is not trivial. Don't respond to this issue by telling me it's not required that you display all project-related information online. If you do it clearly means you don't understand the basics of NEPA ... public disclosure.

Failure to do so will violate 40 CFR 1502.21, 40 CFR 1500.2(b), 40 CFR 1501.2(a) and (b), 40 CFR 1500.2 (d), and 40 CFR 1506.6 (a) and (b)

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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 for which I'd like a meaningful response in the Response to Comments section: 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>

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

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

from detailed study" section. They were obedient.

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

You knew before you started scoping you would reject all alternatives suggested by American citizens who own the Olympic National Forest didn't you? Here are the reasonable alternatives that the public asked you to analyze in detail. You rejected them all because since you chose the Proposed Action before scoping started you knew it would be a waste of time and money analyzing the citizens' alternatives in detail knowing they would never be selected. Here they are:

Comment about potential loss of access to timber revenue by decommissioning roads

Suggested Action to Use Designation by Prescription

Suggestions to alter project for recreational use and logging operations

Suggested action to expand ground-based operations beyond typical slope limitations and consider tethered logging systems

Suggestion to expand seasonal operating restrictions

Suggested actions to minimize Temporary road upgrades and rehabilitation for cost savings

Comments suggested that the EA should describe how aquatic risks would be reduced with the proposed action, including maintenance plans for roads proposed to stay open but are considered a high aquatic risk.

Suggested alternative that eliminates or minimizes temporary road construction

Suggested action to keep 2270400 as road from junction with 2270000 road to trailhead

Suggestions of no change to roads (concern about general loss of access)

Suggested Action of spur roads for dispersed camping and/or temporary roads and parking

Suggested action maintain access on 2270560

Suggestion to use volunteers and external funding opportunities

Suggestion to convert temporary thinning roads to trails on Coho Campground side of Wynoochee Lake

Lau, you should be ashamed.

Ranger Lau, I suggest you start your future scoping package with this statement:

"NEPA requires me to request scoping comments from the public. I have no intention of reading them."

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

Failure to do so will clearly violate 40 CFR 1503.4.

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The Fish specialist on the IDT ignore and reject best science. For decades agency leaders have told the public USFS projects are grounded in and guided by best science. Why not here?

Ms. Krier, Mr. McHenry and Ms. Butler, at page 3 you say this sale will::

"Improve Riparian Reserve (RR) conditions to meet Aquatic Conservation Strategy (ACS) objectives."

The scientist experts quoted below all agree logging and roading the undeveloped forest does not benefit aquatic habitat. Why do you lie to the public you claim to serve?

"In addition to the direct effects of habitat loss and fragmentation, logging typically reduces ecosystem health by:

a) damaging aquatic habitats through siltation, reduction in stream complexity and increased water temperatures."

McIntosh, B.A., J.R. Sedell, J.E. Smith, R.C. Wissmar  
S.E. Clarke, G.H. Reeves, and L.A. Brown  
"Management history of eastside ecosystems: changes in  
fish habitat over 50 years, 1935-1992." 1994  
USFS Pacific Northwest Research Station, GTR-321 93-181  
[http://www.fs.fed.us/pnw/publications/pnw\\_gtr321/](http://www.fs.fed.us/pnw/publications/pnw_gtr321/)

"Logging practices can indirectly result in changes in the biological components of a stream, and can have direct and indirect on the physical environment in streams.

The primary environmental changes of concern are the effects of siltation, logging debris, gravel scouring, destruction of developing embryos and alevins, blockage of streamflow, decrease in surface and intragravel dissolved oxygen, increase in maximum and diel water temperatures, changes in pool/riffle ratios and cover, redistribution of fishes, reduction in fish numbers, and reduction in total biomass."

Moring, John R. Ph.D. 1975. "The Alsea Watershed Study: Effects of Logging on the Aquatic Resources of Three Headwater Streams of the Alsea River, Oregon - Part III." Fishery Report Number 9  
Oregon Department of Fish and Wildlife.  
[http://www.for.gov.bc.ca/hfd/library/ffip/Moring\\_JR1975b.pdf](http://www.for.gov.bc.ca/hfd/library/ffip/Moring_JR1975b.pdf)

"Forest roads deform range, cutting surface and subsurface water flow, reduced vegetation cover, causing soil compaction and erosion and finally cause sediment production in the watershed areas (Tague and Band 2001). Soil erosion is the most significant contributor of off-site ground water pollution on a global scale with most of the contaminants originating within an anthropogenic setting (Marsh and Grossa 1996). Forest road sediment production causing erosion and soil loss, which creates maintenance and repair costs are causing pollution of water resources in forest streams and negative effects on breathing and generation aquatics and finally accumulation behind the dams and reduce its effective life (USDA 2000, Akay et al. 2008, Khalilpoor et al. 2010)." (pgs 3 and 4)

"The total soil erosion on the Soil cutslope was 13 and 270 times higher than those from the roadbed and the natural forest, respectively. The results can help forest managers to know that cutslopes can be considered the

main source of sediments on the forest roads and to employ suitable methods to reduce sediment production."

Measuring Runoff and Sediment Production from Forest Roads

Published by Research Gate, April 2013

[https://www.researchgate.net/publication/253328114\\_Measuring\\_Runoff\\_and\\_Sediment\\_Production\\_from\\_Forest\\_Roads](https://www.researchgate.net/publication/253328114_Measuring_Runoff_and_Sediment_Production_from_Forest_Roads)

Request for changes to be made to the final NEPA document: Eliminate the untrue P&N statement that tells the public the Wynoochee timber sale will:

"Improve Riparian Reserve (RR) conditions to meet Aquatic Conservation Strategy (ACS) objectives."

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The USFS Objection process is rigged to please  
the USFS's corporate masters

Intelligent, unbiased, USFS employees who were able to withstand the USFS brainwashing machine understand that the Objection Deciding Officer (ODO) must be an unbiased 3rd party with no interest in whether a project is implemented or not. The USFS rigged the Objection process against concerned members of the public to assure that the Objection Deciding Officer (ODO) is a USFS employee.

As the NEPA coordinator for the Nez Perce NF I spent time the RO in Missoula reviewing appeals that had been filed against a national forest in Region 1. They organized 3-person appeals teams using people from the forests familiar with NEPA. The panels would spend 2 weeks reading NEPA documents and appeals filed against them. Our job was to recommend to the ODO whether to support the appellant or the Responsible Official.

Our instructions were clear and corporate-friendly. For appeals filed by regular citizens we were told to reject their appeal regardless of the validity of the issue. When we were dealing with appeals filed by environmental groups that have a history of taking the USFS to court we were told to review them closely so the Responsible Official would not be embarrassed if the ODO's ruling supporting the Responsible Official is overturned by a District Court judge.

I expect my objection to be rejected by the ODO because I don't have the money to hire an attorney. Some roguish, unethical "Responsible" Officials will take this as a sign to ignore my comments which allege violations of law. Therefore I will use the court of public opinion that's often more effective than a Federal District Court to force the USFS to obey the law. My letters to the editor describing how the Olympic National Forest is being illegally plundered will motivate caring members of the public to act.

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

Even a hopelessly biased Objection Deciding Officer would ask you to rewrite this EA in a professional, legal manner. You have a choice. Either be directed to do the re-write or do it voluntarily like a responsible adult would do.

Ranger Lau, you have given the American public the back of your hand to more effectively serve your corporate masters. You ignore the fact that future generations of kids will want a fully functional, undeveloped forest to escape the insanity of modern life. They will want solitude and a place to hear nature sounds. Do you really think they would want you to eliminate the opportunity for them to enjoy this experience so a corporation could reap short-term profit now?

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## Concluding Remarks

My comments have been frank, honest and more than justified. Yes, I have been hard on you and your IDT ... for good reason. You are clearly harming MY land for corporate benefit.

As the population in America increases at a staggering rate, kids in the year 2100 will desperately need a place to unwind and regain their sanity. If properly managed, the national forests will serve this purpose. To really serve the American public now and in the future, please emphasize conserving and protecting the amenity resources in the forest. You must understand planning and implementing projects that inflict even short-term harm to these amenity resources is unacceptable'

If someone were to ask forest visitors in the year 2100 what they would have wanted done 80 years ago ... protect the countless natural resources in the forest, or take action to provide short-term corporate profit you know what their answer would be. The USFS claims the public can have both ... which of course is a lie.

A retired Forest Supervisor and Deputy Chief echoes my concerns. I invite you all to read Mr. Jim Furnish's August 11, 2019 plea to all USFS employees to do the right things for future generations.

Here are a few excerpts from "Forester calls Trump's proposed rollback of logging rules 'reckless' "

"I was the supervisor of Oregon's Siuslaw National Forest in 1996 when a huge landslide caused by shoddy road construction sent tons of mud and debris into a critical salmon stream. I felt terrible ? and personally responsible. In the rush to build logging roads along treacherously steep hillsides, we mismanaged forests for decades and pushed salmon and spotted owls to the brink of extinction."

"Federal agencies that authorize logging, mining and drilling on public land should aspire to accountability, transparency, trustworthiness and scientific rigor. So when the Forest Service claims that sweeping changes to its NEPA rules will "increase efficiency," I measure its proposal against those bedrock principles.

"The Forest Service wants us to believe that it will okay logging, mining, road building and other projects on public lands, but that nothing bad will happen. Unfortunately, the agency doesn't have the track record to make that claim."

Link:

<https://www.washingtonpost.com/opinions/2019/08/11/this-trump-administration-proposal-roll-back-logging-rules-is-reckless/>

Of course the DRF will reject my objection before he/she reads it. There are groups who work your area with attorneys that routinely litigate the USFS and win. It's your choice isn't it?

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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)  
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