Data Submitted (UTC 11): 7/24/2020 3:13:29 AM
First name: Dick
Last name: Artley
Organization:
Title:
Comments: Dear Supervisor Bail and selected IDT members/staff,

As is the case here, proposals to change FP standards and guides on other national forests nearly always relax the standards such that more logging can occur and still not violate the FP. Most USFS line-officers generate adequate volume while still complying with their Forest Plan standards.

For an agency with an all-encompassing timber agenda and culture this isn't surprising. During the 31 years I worked for the USFS I learned volume generation was more important than anything else. IDT members who were not timber sale enablers were passed over for promotions, QSIs and cash awards. Nearly all had cast away their land values and ethics they had when they graduated from college. They went to work for the USFS because they wanted to preserve and protect the natural resources that future generations will inherit. It didn't take long for them to determine what drives the agency. They weren't happy but stayed on the job. After all they had kids in school and bills to pay.

During my 31 year career with the USFS I was aware of too many attempts to amend the Plan to save OG by logging it. Most were overturned in court as your will be.

Practice your talking points because I guarantee you I will contact the groups that will invite you and a few of your staff specialists to Federal District Court to justify your proposal to the plaintiff's attorneys and the judge.

I don't use this word often but I will here. Your proposals to amend the FP to allow more logging (and of course volume) are pathetic. Never again skip home after work thinking you gave the public (who provides money for your salaries) what they wanted and deserve,

It's obvious you and your IDT members believe the unwritten reason for having a Forest Plan is to comply with the FP standards to maintain forest health unless the Responsible Official needs to violate a standard to get-out-the-cut. Who do you people who so cavalierly cast your land values and ethics to the wind?

The Forest Plans told the public how their forest would be administered and the types of actions that would occur and not occur. Congress assumed that USFS Responsible Officials would be honest with the public when explaining why an amendment is needed. This includes project-specific, non-significant amendments. Supervisor Bail you have failed to demonstrate there are changed conditions. Telling the public the Old-Growth will burn up unless it logged is not a changed condition and you know it.

Here is some science you either didn't know or conveniently omit:

Recent Australian wildfires made worse by logging and associated forest management
Published in Nature Ecology & Evolution, May 5, 2020
By David B. Lindenmayer, Ph.D., Robert M. Kooyman, Ph.D., Chris Taylor, Michelle Ward Ph.D Candidate, and James E. M. Watson, Ph.D.

Link: https://www.nature.com/articles/s41559-020-1195-5.epdf?sharing_token=MXWy7FffK8Uxs2ByibQGlNRgN0jAjWel9jnR3ZoTv0M-z7YvjyeqJX6OoSVUN4CTwKkALYBXZLlt-CxwxoH_D-m5MALeIWQmWUUSB9zD69kWUfRyiMRK-uWxx9O92Z8KTBdjcg1XpLggQ3WAXNan1M0vmWnqOVLvlSzLfIHJTEQE-sJ18Zmgx0UHezMb8yAcC5NlrelhAyQXf6IZMl9zUNWl9Pgps9ad2qSmL-JCZ5z6wKXPZuelHU-

Tm4fhp7WXeoujYRXlCO4ydPjUjtsElvPVRY0XGVwW4VZ4Ymmo6Luh6sGXaKTFQgCZ86cNkJDVTkrLr6wP1dCHUrfe44fwyZUo6Ng1Ziw-HA6ZeJduR4MEzGoed-OM17DYEL8CxJ1OU1d8mHZSenXQl7TbMmP2LDQNwsLskdw5L4GQF67JFgDK4Huazq5I8mwI0zJ8g1xiO5HN_BH0PdfI_KcZpv1-Tnt5pUW7NjvIFiQj0bdCIJU67yNBskHYH13T5ZyfQp9PkMnbyG0zB05EjpOnUaJEmg%3D%3D&tracking_referrer=www.treehugger.com

Excerpts:

"Policy makers must additionally recognize that land management such as logging operations also has profound effects on fire severity, fire frequency and other key aspects of fire regimes."

"Beyond the direct and immediate impacts on biodiversity of disturbance and proximity to disturbed forest, there is compelling evidence that Australia's historical and contemporary logging regimes have made many Australian forests more fire prone and contributed to increased fire severity11 and flammability12."

Harvesting dead trees is bad for forests
Published in the Spokesman Review newspaper, February 8, 2018
By George Wuerthner, forest ecologist and author of 38 books
Link: http://www.spokesman.com/stories/2018/feb/08/george-wuerthner-harvesting-dead-trees-is-bad-for-/

Excerpts:

"Colville forest Supervisor Rodney Smoldon was quoted as suggesting that removal of trees would expand "forest restoration work necessary to reduce the risk of wildfire in northeast Washington."

Apparently, Supervisor Smoldon and his staff are not well-versed in fire ecology. They are selling "snake oil."

Numerous studies have shown large wildfires are driven by climate/weather, not fuels. When you have severe drought, low humidity, high temperatures and high winds, nothing works to halt a blaze. And since all large fires occur under extreme fire weather, this suggests that "fuels reduction projects" are a waste of money.

For instance, a study published last year concludes: "However, the effectiveness of this approach (fuel reductions) at broad scales is limited. Mechanical fuels treatments on US federal lands over the last 15 y (2001-2015) totaled almost 7million (hectares), but the annual area burned has continued to set records. Regionally, the area treated has little relationship to trends in the area burned, which is influenced primarily by patterns of drought and warming."

"Another study found "fuel treatments … cannot realistically be expected to eliminate large area burned in severe fire weather years."

Fuels reduction is the USFS's primary excuse for commercial timber sales. If you wish to read the truths please examine Opposing Views Science Attachment #3 and the science quotes below.

"Healthy Forests" and Wildfire Control: Accumulating Scientific Evidence
By Dr. Thomas Power, Research Professor and Professor Emeritus, Department of Economics and Chair, Department of Economics 1968-1977, University of Montana.
A Montana Public Radio Commentary, December 11, 2006
Link: http://forestcouncil.org/so-called-healthy-forests-and-wildfire-control/

Excerpts:

"But the Bush Administration and some of the leadership of the Forest Service want to use logging techniques in places far removed from homes and communities to reduce the threat of wildfire. The basic idea is that most of our forests are far too dense. There are way too many trees per acre. This, we are told, not only makes them "unhealthy" but also reduces their productivity for wood production and makes them prone to frequent and severe wildfires that damage the forests even further. Cutting down many or most of those trees is the proposed solution."

"Most of the dense forests that the Bush Administration and some in the Forest Service want to thin to return them to "health" are not unhealthy at all. Forest scientists have been studying the fire histories of our forested landscapes in more and more detail to try to understand their densities and fire behaviors in the centuries before we began grazing cows, harvesting trees, and suppressing fires in them. What they are finding is that a significant part of the forest landscape regularly had very dense stands of trees that every few centuries burned in large natural conflagrations. It was only the lower elevation forests that featured park-like mixes of large, almost inflammable, trees and open grasslands."

"This is not a pessimistic story. It means that we need to focus our forest fire protection where our homes, communities, and lives are threatened. We do not have to spend tens of billions of dollars trying to save our forests from themselves. The forests do not need it, thank you, and those billion dollar efforts would not work anyway. If we are careful where and how we live in forests and learn to accept fire as a natural part of a healthy forested landscape, both prescribed fire and natural fires, we can both protect ourselves and enjoy the benefits of diverse natural forests."

Fuel reductions ineffective; mandate fire-wise protections
Published in the Missoulian newspaper, September 5, 2017
By George Wuerthner, forest ecologist and author
Link: http://missoulian.com/opinion/columnists/fuel-reductions-ineffective-mandate-fire-wise-protections/article_64841590-c42e-5fd0-80ae-b8a025f94bbe.html

Excerpts:

"Recently, Secretary of the Interior Ryan Zinke, along with Agriculture Secretary Sonny Perdue, U.S. Sen. Steve Daines and U.S. Rep. Greg Gianforte, visited the Lolo fire near Missoula. All proclaimed that more forest "management" (logging) would preclude large fires like Montana and other states have experienced in recent years."

"The problem is the knowledge of forest ecology of most politicians as well as far too many agency personnel is about as sophisticated as the medical profession of a hundred years ago when the most comment treatment for the disease was to bleed the bad blood from a patient."

"In fact, the science, suggests that forest management tends to increase fire severity.

The real issue is climate change. Large wildfires, like large hurricanes, are a direct consequence of warming climate. Just as you can't engineer your way to reducing large hurricanes as long as the climate continues to warm, the same is true of wildfire."

Fires necessary to sustain ecological integrity
Published in the Missoulian newspaper, August 16, 2017
By Dr. Richard Hutto, professor emeritus of biology and wildlife biology with the Division of Biological Sciences at the University of Montana
Link: http://missoulian.com/opinion/columnists/fires-necessary-to-sustain-ecological-integrity/article_648a3bf0-

dfc7-51e9-984c-ebf66f9f36c4.html

Excerpts:

"Finally, Racicot is mistaken if he believes that "there's something we can do to minimize, and in many instances even eliminate… the wholesale destruction of natural resources critically important to all of us." Sorry, Racicot, a large volume of fire research shows, unequivocally, that timber harvest does little to minimize or stop the wind-driven fires during the hot, dry years that typically burn most of our forest lands periodically. Just walk through the old Plum Creek land that burned to a crisp during the 2007 Jocko Lakes fire near Seeley Lake to see for yourself how those fires burned through even the most heavily harvested lands.

Even if we could mitigate or prevent severe fire, would really we want to do that anywhere but in or immediately adjacent to our developed communities? The only person who would say that wildfires cause the "wholesale destruction of natural resources" is one who has absolutely no ecological literacy. We need more informed leadership if we are to adopt forest management practices and working forests that are truly conservation-oriented."

Commercial Logging Causes Forest Fires
Published in FOREST CONSERVATION NEWS TODAY, July 20, 2002
OVERVIEW & COMMENTARY by Forests.org
Link: http://wgbis.ces.iisc.ernet.in/envis/doc1999ahtml/biodcomi220928.html

Excerpts:

"It is well known scientifically that "commercial logging actually increases fire severity by removing large, fire-resistant trees and leaving behind very small trees and flammable "slash debris"--branches, twigs and needles from felled trees. The removal of mature trees also decreases the forest canopy, creating hotter, drier conditions on the ground. The additional sun exposure encourages the growth of flammable brush and weeds. Reduction of flammable underbrush can reduce fire severity, and environmental groups have encouraged such projects. However, the Bush administration has grossly misused the funds that Congress appropriated for brush reduction near homes. In Sierra Nevada national forests last year, more than 90% of these funds were instead earmarked for preparation of large timber sales focused on the removal of mature and old-growth trees miles from the nearest town."

"The Forest Service, Bush administration and anti-environmental members of Congress are spreading a great deal of misinformation about wildfire, hoping to capitalize on public fire hysteria and minimize public opposition to increased logging and roadbuilding in our national forests," said Jake Kreilick of the National Forest Protection Alliance based in Missoula, Montana. "With virtually all new timber sales couched in terms of 'reducing fuels' or 'restoring forest health,' fire hysteria has emerged as the driving force behind the Forest Service's logging program and the administration's efforts to 'streamline' our nation's environmental laws," Kreilick said."

A Report to the President in Response to the Wildfires of 2000
By Lyle Laverty USDA Forest Service and Tim Hartzell U.S. Department of the Interior, September 8, 2000
Link: http://frames.nacse.org/6000/6269.html

Excerpts:

"Most of the trees that should be removed to reduce accumulated fuels are small in diameter and have little or no commercial value."

"Mechanically removing fuels (through commercial timber harvesting and other means) can also have adverse

effects on wildlife habitat and water quality in many areas. Officials told GAO that, because of these effects, a large-scale expansion of commercial timber harvesting alone for removing materials would not be feasible. However, because the Forest Service relies on the timber program for funding many of its activities (including reducing fuels) it has often used this program to address the wildfire problem. The difficulty with such an approach, however, is that the lands with commercially valuable timber are often not those with the greatest wildfire hazards."

Fight Fire With Logging?
Forestry experts have long known that commercial logging increases the risk of forest fire. So why, critics are asking, does the Bush administration's new fire prevention plan ignore that fact?
By Dan Okoand Ilan Kayatsky
Published by Mother Jones magazine, Wed Jul. 31, 2002
Source: http://www.motherjones.com/politics/2002/08/fight-fire-logging

Excerpts:

"Still, forestry experts warned in the 2000 plan that logging should be used carefully and rarely; in fact, the original draft states plainly that the "removal of large merchantable trees from forests does not reduce fire risk and may, in fact, increase such risk." "

"Now, critics charge that the Bush administration is ignoring that warning. Neil Lawrence, a policy analyst with the Natural Resource Defense Council, claims that Washington has taken a far more aggressive approach to incorporating commercial logging in its wildfire prevention plans. As a result, Lawrence and other critics say, the National Fire Plan is becoming a feeding ground for logging companies. Moreover, critics claim the administration's strategy, far from protecting the lives and homes of those most at risk, could actually increase the likelihood of wildfires."

Testimony to the Agriculture, Nutrition and Forestry Committee United State Senate. Hearing to Review Healthy Forests Restoration Act, HR 1904 on June 26, 2003
By:, Arthur Partridge Ph.D., Professor Emeritus, University of Idaho
Link: http://www.saveamericasforests.org/congress/Fire/PartridgeSenate03.htm

Excerpt:

"The current focus on 'fuels' is, in itself, misguided because almost anything in a forest will burn, given the right conditions. Any fire specialist will tell you that the principal factors affecting fire are temperature and moisture, not fuels. No legislation will prevent or even reduce fires in the vast areas of the national forests and to pretend so is fraudulent."

The Relative Importance of Fuels and Weather on Fire Behavior in Subalpine Forests
By Bessie, W. C. Ph.D. and ¬E. A. Johnson Ph.D.
Published in Ecology, Vol. 76, No. 3 (Apr., 1995) pp. 747-762.
http://www.jstor.org/pss/1939341

Excerpt:

"During extreme weather conditions, the relative importance of fuels diminishes since all stands achieve the threshold required to permit crown fire development. This is important since most of the area burned in subalpine forests has historically occurred during very extreme weather (i.e., drought coupled to high winds). The fire behavior relationships predicted in the models support the concept that forest fire behavior is determined primarily by weather variation among years rather than fuel variation associated with stand age."

Western National Forests: A Cohesive Strategy is Needed to Address Catastrophic Wildfire Threats
A Report to the Subcommittee on Forests and Forest Health, Committee on Resources, House of Representatives, April 1999
Published by the Government Accounting Office, GAO/RCED-99-65
http://www.gao.gov/archive/1999/rc99065.pdf

Excerpts:

"The notion that commercial logging can prevent wildfires has its believers and loud proponents, but this belief does not match up with the scientific evidence or history of federal management practices. In fact, it is widely recognized that past commercial logging, road-building, livestock grazing and aggressive firefighting are the sources for "forest health" problems such as increased insect infestations, disease outbreaks, and severe wildfires."

"How can the sources of these problems also be their solution? This internal contradiction needs more than propaganda to be resolved. It is time for the timber industry and their supporters to heed the facts, not fantasies, and develop forest management policies based on science, not politics."

Firewise USA-Residents Reducing Wildfire Risks

Excerpt: Video

http://www.firewise.org/Information/Research-and-Guidance/WUI-Home-Ignition-Research/~/media/Firewise/Files/Pdfs/Research/CohenFuelTreatment.pdf
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GETTING BURNED BY LOGGING: Logging Industry Misrepresents Environmentalists' Role in Forest Fires
By René Voss
Published by The Baltimore Chronicle and The Sentinel, 2003
http://www.baltimorechronicle.com/firelies_jul02.shtml

Excerpts:

"Unfortunately, there are number of massive logging proposals, disguised as hazardous fuels treatments, that have put environmentalists at odds with the Forest Service. Nearly all of these proposals focus primarily on the removal of mature and old-growth trees. These proposals continue even with overwhelming evidence that commercial logging is more of a problem than a solution. There's simply a cognitive disconnect between the Forest Service's scientists and its timber sale planners, whose budgets are dependent upon selling valuable mature trees.

Ironically, this very type of logging, experts inform us, is likely to increase, not decrease, the frequency and severity of wildland fires."

The Myth That Logging Prevents Forest Fires
By George Wuerthner
Published by Counterpunch, April 19, 2016
https://www.counterpunch.org/2016/04/19/the-myth-that-logging-prevents-forest-fires/

Excerpts:

Here's a small sample of conclusions that cast doubt upon Forest Service policies.

"fuel treatments … cannot realistically be expected to eliminate large area burned in severe fire weather years." Source: Gedalof, Z., D.L. Peterson and N.J. Mantua (2005). Atmospheric, climatic and ecological controls on extreme wildfire years in the northwestern United States. Ecological Applications 15: 154-174.

"We cannot halt large fires through fuel treatments. The best way to save homes is not by logging more of the forest, but by implementing fire-wise policies in communities that reduces the flammability of homes.

I suspect many in the Forest Service, and especially firefighters, know this, but the agency is continuously under attack from politicians, rural communities, and the timber industry to increase the amount of subsidized timber from federal lands. Fire prevention is the excuse used to justify these sales."

Could Logging Reduce Wildfires?
Published by Outside, September 28, 2017
https://www.outsideonline.com/2244376/could-logging-reduce-wildfires

Excerpt:

"Interior Secretary Ryan Zinke, whose seat Gianforte filled, has written a memo advocating for "aggressive and scientific fuels reduction management"-longhand for getting the cut out."

The Big Lie: Logging and Forest Fires
By Dr. Chad Hanson
http://yeoldeconsciousnessshoppe.com/art6.html

Excerpts:

"The fact is, commercial logging doesn't prevent catastrophic fires; it causes them. In the latter part of the 19th century, this was common knowledge. Relentless clearing of forests in the Great Lakes region left huge areas largely devoid of the cooling shade of trees, replacing moist natural forest microclimates with the hotter, drier conditions characterized by stump fields. Flammable logging "slash debris" covered the landscape.

It was in this setting that a massive, cataclysmic fire started near Peshtigo, Wisconsin in 1871. More than 1,200 people were killed. Similar blazes erupted in subsequent years."

Logging isn't the solution to our wildfire problems
By Pepper Train
Published by High Country News, January 3, 2018
https://www.hcn.org/articles/opinion-drastic-changes-in-forest-management-arent-the-answer-to-wildfire

Excerpt:

"We are kidding ourselves if we think we can find a "solution" to wildlands fire and the smoke that comes with it. Such thinking denies fire its place as a natural and inevitable part of this environment where we have chosen to live. Our forests need fire, and there is no way we can exclude it. Instead of trying to log our way out of fire danger, we need to adapt ourselves to the reality of living in this fire-adapted landscape. We can, and should, practice "fireproof" landscaping around our homes, and carry out larger fuels-reduction projects in high-risk areas like the wildland-urban interface at the edge of our towns."

Scientists Say Logging Forests Won't Reduce Wildfire Risk
By Annette Mcgee Rasch

Published by Popular Resistance, September 22, 2018
popularresistance.org/scientists-say-logging-forests-wont-reduce-wildfire-risk/

Excerpts:

"A group of environmental scientists have written a letter to Congress advising that efforts to control wildfires should focus on reducing fire hazards near communities, homes and roads and not on logging larger, fire-resistant trees deeper in the forest.

More than 200 scientists with backgrounds in areas such as wildfire ecology and natural resource management recently sent the letter to Congress urging the removal of pro-logging amendments to the 2018 Farm Bill.

"It's hard for most policymakers to ignore science from so many experts when they explain why the logging provisions would harm forests and worsen wildfire conditions in the West while doing nothing to protect communities," said Dominick DellaSala, chief scientist with Geos Institute, which focuses on climate change and other environmental issues."

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217 scientists sign letter opposing logging as a response to wildfires
Published in Wildfire Today, September 22, 2018
https://wildfiretoday.com/2018/09/22/217-scientists-sign-letter-opposing-logging-as-a-response-to-wildfires/

Excerpt:

Thinning large trees, including overstory trees in a stand, can increase the rate of fire spread by opening up the forest to increased wind velocity, damage soils, introduce invasive species that increase flammable understory vegetation, and impact wildlife habitat. Thinning also requires an extensive and expensive roads network that degrades water quality by altering hydrological functions, including chronic sediment loads."

Harvesting dead trees is bad for forests
Published in the Spokesman Review newspaper, February 8, 2018
By George Wuerthner, forest ecologist and author of 38 books
http://www.spokesman.com/stories/2018/feb/08/george-wuerthner-harvesting-dead-trees-is-bad-for-/

Excerpts:

"Colville forest Supervisor Rodney Smoldon was quoted as suggesting that removal of trees would expand "forest restoration work necessary to reduce the risk of wildfire in northeast Washington."

Apparently, Supervisor Smoldon and his staff are not well-versed in fire ecology. They are selling "snake oil."

Numerous studies have shown large wildfires are driven by climate/weather, not fuels. When you have severe drought, low humidity, high temperatures and high winds, nothing works to halt a blaze. And since all large fires occur under extreme fire weather, this suggests that so-called "fuel reduction projects" are a waste of money.

For instance, a study published last year concludes: "However, the effectiveness of this approach (fuel reductions) at broad scales is limited. Mechanical fuels treatments on US federal lands over the last 15 y (2001-2015) totaled almost 7million (hectares), but the annual area burned has continued to set records. Regionally, the area treated has little relationship to trends in the area burned, which is influenced primarily by patterns of drought and warming."

Another study found "fuel treatments … cannot realistically be expected to eliminate large area burned in severe

fire weather years."

Conflicting Reports Shade Forest Fire Debate
Published in ENS Newswire
By Cat Lazaroff
http://www.ens-newswire.com/ens/jul2002/2002-07-11-06.asp

Excerpts:

"When conservation groups do challenge fuels reduction projects, they often win their appeals. An analysis by the Center for Biological Diversity shows that about 50 percent of the appeals and 40 percent of the lawsuits against these projects are successful, for a total success rate of 70 percent - suggesting that the challenged projects are indeed flawed."

"The logging proposed on the Baca timber sale is the exact opposite of what the Forest Service needs to be doing to reduce fire danger and protect communities within our National Forests," said Brian Segee of the Center for Biological Diversity. "Instead of thinning small, fire prone trees, the Forest Service would take out what little remains of the large, fire resistant trees. They couldn't keep their hands out of the cookie jar."

"Most of the area burned by the Rodeo-Chediski fires had already been logged, suggesting that thinning of mature trees does not reduce fire risk. The Center says that much of the land within the Baca timber sale area has been logged within the last five years by the separate Jersey Horse timber sale - yet, the fire swept through that area."

Fuel reductions ineffective; mandate fire-wise protections
Published in the Missoulian newspaper, September 5, 2017
By George Wuerthner, forest ecologist and author
http://missoulian.com/opinion/columnists/fuel-reductions-ineffective-mandate-fire-wise-protections/article_64841590-c42e-5fd0-80ae-b8a025f94bbe.html

Excerpts:

"Recently, Secretary of the Interior Ryan Zinke, along with Agriculture Secretary Sonny Perdue, U.S. Sen. Steve Daines and U.S. Rep. Greg Gianforte, visited the Lolo fire near Missoula. All proclaimed that more forest "management" (logging) would preclude large fires like Montana and other states have experienced in recent years."

"The problem is the knowledge of forest ecology of most politicians as well as far too many agency personnel is about as sophisticated as the medical profession of a hundred years ago when the most comment treatment for the disease was to bleed the bad blood from a patient."

"In fact, the science, suggests that forest management tends to increase fire severity.

The real issue is climate change. Large wildfires, like large hurricanes, are a direct consequence of warming climate. Just as you can't engineer your way to reducing large hurricanes as long as the climate continues to warm, the same is true of wildfire."

Fires necessary to sustain ecological integrity
Published in the Missoulian newspaper, August 16, 2017
By Richard Hutto, professor emeritus of biology and wildlife biology with the Division of Biological Sciences at the University of Montana

http://missoulian.com/opinion/columnists/fires-necessary-to-sustain-ecological-integrity/article_648a3bf0-dfc7-51e9-984c-ebf66f9f36c4.html

Excerpts:

"Finally, Racicot is mistaken if he believes that "there's something we can do to minimize, and in many instances even eliminate… the wholesale destruction of natural resources critically important to all of us." Sorry, Racicot, a large volume of fire research shows, unequivocally, that timber harvest does little to minimize or stop the wind-driven fires during the hot, dry years that typically burn most of our forest lands periodically. Just walk through the old Plum Creek land that burned to a crisp during the 2007 Jocko Lakes fire near Seeley Lake to see for yourself how those fires burned through even the most heavily harvested lands.

Even if we could mitigate or prevent severe fire, would really we want to do that anywhere but in or immediately adjacent to our developed communities? The only person who would say that wildfires cause the "wholesale destruction of natural resources" is one who has absolutely no ecological literacy. We need more informed leadership if we are to adopt forest management practices and working forests that are truly conservation-oriented."

Objectives and considerations for wildland fuel treatment in forested ecosystems of the interior western United States (page 10)
By: Dr. Jack Cohen (a retired USFS fire physicist)
Published in Forest Ecology and Management, issue 256, 2008
http://www.firewise.org/Information/Research-and-Guidance/WUI-Home-Ignition-Research/~/media/Firewise/Files/Pdfs/Research/CohenFuelTreatment.pdf

Excerpts:

"Treating fuels to reduce fire occurrence, fire size, or amount of burned area is ultimately both futile and counter-productive." (Pg.1999)

"Some viable fuel treatments may actually result in an increased rate of spread under many conditions (Lertzman et al., 1998; Agee et al., 2000). For example, thinning to reduce crown fire potential can result in surface litter becoming drier and more exposed to wind. It can also result in increased growth of grasses and understory shrubs which can foster a rapidly moving surface fire." (Pg.2000)

Will More Logging Save Western Forests From Wildfires?
By: Kirk Siegler
Seen on NPR, All things Considered, August 29, 2018
https://www.npr.org/2018/08/29/642955787/will-more-logging-save-western-forests-from-wildfires

Excerpts:

"In response to California's deadly wildfires, the Trump administration is calling for more 'active' logging in western forests. They want to open up more public lands to the timber industry, to reduce the fire risk but also revive rural, natural-resource dependent economies.

This is a decades-old debate in the West and by no means a new GOP talking point. But out on the ground, foresters and even some timber industry leaders say what's really needed to mitigate the wildfire threat is a lot more involved - and expensive."

Could Logging Reduce Wildfires?

By: Abe Streep
Published by Outside, September 26, 2017
https://www.outsideonline.com/2244376/could-logging-reduce-wildfires

Excerpt:

"This strategy is unsurprising-politicians tend to think in electoral rather than ecological cycles. But they don't seem to be aware that cutting won't solve the problem. Much of the area consumed by the Rice Ridge Fire had previously been logged. "It's not really a complicated issue," says Mark Finney, a 55-year-old research ecologist at the renowned Fire Lab, which is run by the Forest Service. "The solution to the fire question is more fire. It's more fire of a different kind." "

A Burning Issue: Helping Loggers, Hurting Forests
By Chad Hanson, Ph.D.
Published on Monday, July 15, 2002 in the Los Angeles Times
Source: http://www.commondreams.org/views02/0715-04.htm

Excerpts:

Scores of scientists and the federal government's own national fire plan have concluded that the removal of mature trees from forests increases the severity of forest fires. Why then would the Bush administration use the threat of fires to try to increase logging of mature and old-growth trees in our national forests?

That is clearly the administration's intention, as outlined in two recent memos on revising the Northwest Forest Plan and the "Sierra Nevada Framework" plan to allow logging companies increased access to ancient forests on public lands. The move is being led by Mark Rey, a former timber industry lobbyist and a President Bush appointee who oversees the Forest Service.

Fire/Logging Myths
By George Wuerthner
Published by The Wildlife News, October 19, 2019
http://www.thewildlifenews.com/2019/10/23/fire-logging-myths/'

Excerpts:

"In a 2017 letter to Congress, more than 250 scientists opined that logging and thinning were ineffective. To quote from their message: "Thinning is most often proposed to reduce fire risk and lower fire intensity…However, as the climate changes, most of our fires will occur during extreme fire-weather (high winds and temperatures, low humidity, low vegetation moisture). These fires, like the ones burning in the West this summer, will affect large landscapes, regardless of thinning, and, in some cases, burn hundreds or thousands of acres in just a few days[7].'"

The idea that fuel reduction from logging/thinning or even prescribed burning is effective is questioned by many researchers. This is a representative sample from scientists at the Missoula Fire Lab. "Extreme environmental conditions overwhelmed most fuel treatment effects. . . This included almost all treatment methods, including prescribed burning and thinning. . .. Suppression efforts had little benefit from fuel modifications."[8]"

There is more in Opposing Views Science Attachments #3 and #15

Your proposal to log thermal cover that protects deer in winter is insane. You say:

"Cover levels prescribed by the Forest Plan are no longer supported by accepted science, which recognizes that adequate levels of quality forage in the spring, summer, and late fall are more critical for deer to survive winter than the Forest Plan's prescribed levels of thermal cover."

Even a child knows forage availability is important for the survival of wild ungulates. You fail to show your science references that explain why deer forage is more important for deer to survive the winter than thermal cover. Even if it is that's no reason to log the thermal cover.

You know your pending FP amendments are not biologically justified. Using a CE for a major action such as this shows me you will violate any law to serve your corporate masters. You want this to be quick and dirty.

You all need to take beginners NEPA training. 36 CFR§ 219.13(b) would be a good place to start.

The plaintiff's attorney will ask you to explain why you think:

1) You are "not required to take a close look at the environmental impacts of the project."

2) Amending your Plan will "not have a significant effect on the human environment, either individually or cumulatively."

3) There are no extraordinary circumstances related to the proposed action (eg "federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species;."

4) in the entire Okanogan NF there are no: "Flood plains, wetlands, or municipal watersheds; Congressionally designated areas, such as wilderness, wilderness study areas, or national recreation areas; Inventoried roadless areas or potential wilderness areas; Research natural areas; American Indians and Alaska Native religious or cultural sites, and Archaeological sites, or historic properties or areas."

5) the "impacts of all past, present, and reasonably foreseeable future actions in the project area do not raise uncertainty about the significance of the "cumulative impacts" of this project. The Forest is required to examine the impacts of all past, present, and reasonably foreseeable future actions in the project area, regardless of what agency or entity is undertaking those actions, and determine the potential for cumulative impacts."

So, what should you do? Forget about amending your FP and get on with the business of serving the public.

Sincerely,