

Data Submitted (UTC 11): 8/27/2020 12:12:39 AM

First name: Dick

Last name: Artley

Organization:

Title:

Comments: Dear Ranger Yonce and selected IDT members,

"Only people who lack wisdom would say that a project should be pursued even if it leads to wanton destruction of forests."

Sreenivasan

Clearly, the George Washington and Jefferson NFs are unique among all 154 national forests. Its line-officers' assaults on the proper functioning of land owned by 330 million Americans is unprecedented. Your proposed Sandy Ridge commercial timber sale is a good example.

Before I retired from the USFS I heard rumors there were national forests that had line-officers who would stop at nothing to pave the way for volume generation at any cost to the proper functioning of the forest ecosystem. Ranger Yonce, after reading your July 27, 2020 "Dear Interested Party" letter and Scoping Attachment it's clear to me that at least 1 line-officer on the George Washington and Jefferson fits this description.

I cannot understand why Supervisor Timm would look the other way with full knowledge of your floundering, misguided effort to treat land owned by 330 million Americans in such a way. The IDT members know what you are doing and remain silent to assure rapid career advancement. For sure, when DRF Morris receives a copy of these comments she and her staff will be aware of your clear lack of land ethics and values and your propensity to place corporate profit above the needs of the recreating public.

The people in your area who enjoy the George Washington and Jefferson NFs need to learn about your mismanagement. After my LTEs are published in the Roanoke Times and the Atlanta Journal Constitution they will contact you wanting answers.

The IDT members who choose to read these scoping comments know you will expect them to ignore my comments as they write the final NEPA document. They will find it comical that a member of the public actually takes the time to write critical comments about logging activities. They don't critically examine their role as an IDT member. If they had the courage to do so and accept reality they would admit the USFS has a timber agenda/culture and as IDT members they are expected to be timber sale enablers.

Competent natural resource specialists would understand my point and try to convince you to either 1) drop the temp roads and accept longer skidding distances & slightly less volume, or 2) refuse to allow their names to appear in the List of Preparers section.

You propose to construct 5 miles of sediment-generating temporary road.

When you allow a person working for the purchaser to locate and constrict temporary roads you might end up with a situation like the one shown in Opposing Views Science Attachment #7. These people building the roads have 1 thing guiding them ... reduce the cost.

The attachment shows photos of completed recently constructed temporary roads.

You should know the ecological impacts of roads in an undeveloped forest but you don't care do you? To you, any (emphasis added) adverse impact is acceptable of its needed to extract your precious volume.

You propose to commercially log 5 square miles of properly functioning forest.

None of you have ever had the curiosity to ask yourself the obvious question. Why does the USFS use medical terms to describe logging (treatment, diagnosis, prescription)? The answer is simple. Your agency claims to serve the public yet they hide the fact they spend tax dollars to serve their corporate masters. How many USFS projects do not result in corporate profit?

The USFS knew long-ago that most members of the public did not want their undeveloped forests to be logged. They came up with what they thought was a reasonable justification for logging ... the forest was sick and trees were dying. The USFS told the public the forest was unhealthy and needed to be "restored." Without exception their "restoration" method is commercial logging. The agency knew the public would agree that its better to kill the trees with a chainsaw rather than allow them to die from natural causes (disease and insects).

You have all been tricked by your agency. All healthy populations contain live, dead and dying individuals. This includes tree populations. Your agency tells the public commercial logging will reduce the competition for water, thus the remaining trees will be "vigorous." A real unhealthy forest would have mostly "vigorous" trees. You hope the public does not understand how important dead and dying trees are to birds, fish and other wildlife.

You were all Manipulated

So, why are you doing this? The USFS has programmed your minds to actually believe the ridiculous dogma and disinformation it spews to the public. The untrue statements contained in the August 12, 2020 "Dear Interested and Affected Individuals" letter clearly show the IDT will write anything attempting to please you Ranger Yonce by justifying this commercial timber sale.

Ranger Yonce, your IDT members know USFS line-officers who cannot "get out the cut" are passed over for promotions. Indeed, line-officers' performance ratings are heavily dependent on the ability to generate precious volume. Whether they agree with it or not, the IDT members understand your crazed need for volume.

Ranger Yonce, you propose to apply a carcinogen to public land knowing there are alternatives.

At page 6 you say you will use chemicals to control NNIP

Incredibly, you withhold the herbicide brand name and formulation from the public. I suspect you know glyphosate exposure causes cancer. What type of person would do such a thing? I hope you will have the opportunity to explain your reasoning to a Federal District Court judge when someone 1) is diagnosed with blood cancer, 2) knows when and where you applied a herbicide containing glyphosate and 3) they can prove they were in that they were on your forest in that location soon after the poison was sprayed. Prepare yourself by reading about the court cases summarized below.

Here are summaries of 3 recent court cases where Monsanto was ordered to pay the plaintiffs \$2,479,200,000 on damages.

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.

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>

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.

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>

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.

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>

Do not apply herbicides that contain glyphosate unless you want to visit Federal District Court.

Future generations depend on you to sever your ties with Corporate America.

In about 60 years when the population of the United States reaches 415 million the citizens of California will need a place to experience solitude and Nature sounds. They will soon learn that they won't find it in the Mendocino NF, Grindstone RD guided by your mismanagement Ranger Hill. They will wonder why you felt it was more important to provide short-term corporate profit opportunities than it was to assure the forest remained intact and the resources functioned properly. They will wonder why the specialists paid to protect these resources from harm turned belly up and supported your proposed plunder.

Before I retired from the USFS I worked with some extraordinary other resource specialists as we prepared USFS NEPA documents. They would go the extra mile to assure their resources were not harmed in any way ... even short-term harm was unacceptable to them. They made sure the P&N was accurate and not an excuse to generate volume. Their Chapter 3 effects analysis disclosures were accurate and honest. They were not afraid to describe how No Action would result in less resource damage than the Proposed Action. They did not contrive and fabricate positive effects of Proposed Action implementation based on how well it achieved untrue, ridiculous P&N goals.

After reading the scoping letter and attachment it's obvious, most IDT members were afraid to face reality. They were comfortable living in the fairy-tale world the USFS programmed them to believe is reality. I invite the IDT risk takers to have the courage to read "best science" authored by experts in Opposing Views Science Attachments #1 and #4 While doing so understand the USFS tells the public their projects are grounded in "best science." Only a fool would think the USFS manuals and handbooks contain "best science" when you can see they contain information that is contrary to and totally inconsistent with the quotes by experts contained in Opposing Views Science Attachments #1 and #4

During my career I heard about non-timber resource specialists who cared more about pleasing their Ranger and Supervisor than they did about assuring their resources functioned properly. I never encountered any ... until now. Even children would know the Salt timber sale's Purpose & Need described in the scoping letter and attachment is pathetic copy and paste job.

Ranger Hill, after reading your scoping letter and attachment for the proposed Salt timber sale its clear you are pathologically obsessed by the need to accumulate volume regardless of how it destroys the integrity of a forested ecosystem owned by 330 million Americans.

Your swarm of so-called specialists on the IDT know their jobs depend on assuring you get the volume. They know you must spend every penny of your NFTM funding this FY. The "get-out-the-cut" bias in the scoping letter and attachment they prepared tells me when they write the NEPA document they will 1) write a cut & paste, laughable P&N that always requires tree removal, and 2) populate their Chapter 3 effects analysis with unsubstantiated statements intended to convince the public that the Proposed Action is wonderful and choosing No Action would be a tragic mistake.

A professional resource specialist would not be involved with this.

Intelligent resource specialists would
understand the wisdom of these people
and let it guide them.

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

Theodore Roosevelt

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

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

John Muir

"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

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

Henrik Tikkanen

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

Frank Lloyd Wright

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

Michel de Montaigne

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

Aldo Leopold, from A Sand County Almanac

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

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

Chief Edward Moody

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

Paul Brooks, from The Pursuit of Wilderness, 1971

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

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

You must respond to all the quotes
contained in the Opposing Views
Science Attachments

40 CFR 1502.9(b) says:

"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."

This is not ambiguous or difficult to understand. The judge will know.

Sincerely,

Dick Artley (retired forest planner, NEPA legal compliance reviewer, forest NEPA coordinator, and forest appeals/litigation coordinator --- Nez Perce National Forest, Idaho)
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CC: other selected staff on the forest and a BC to RO employees who must learn of your proposed corporate-friendly forest resource destruction

PS: Ranger Yonce, please do what the American people pay you to do. Stop being a corporate puppet. Your non-timber resource specialist will admire you. Opposing Views Science Attachment #10 will tell you something about the American public you claim to serve that you should already know or perhaps you do know and believe supporting the USFS's need to serve-up volume to their corporate masters is more important.