

Data Submitted (UTC 11): 1/29/2021 7:00:00 AM

First name: Dick

Last name: Artley

Organization:

Title:

Comments: Dear Ranger Hecker and specialists on the IDT,

I have never said this before but everyone on the IDT and you Ranger Hecker should be jailed for felony assault of the land owned by 320 million Americans. Your South Otter timber sale will log 42.7 square miles. None of you can comprehend 42.7 square miles of resource plunder caused by this. Each of you has made it possible for the purchaser to create conditions similar to the photos in Attachments #12.

Never have I encountered a group of USFS employees so enthusiastic about serving their corporate masters that they all turn belly-up to please the timber company that will purchase these trees. How are you rewarded for this?

In late February I suggest you all read the Helena Independent Record, the Missoulian and the Missoula independent newspapers. My LTEs will generate more than enough comments to keep you busy.

When the non-timber resource specialists on this IDT graduated from college they knew logging and road construction (especially temporary) harmed the resource(s) they learned to conserve and protect. Some of them chose to work for the USFS because they wanted to use their knowledge to care for and safe guard their resource(s) so national forest visitors could enjoy them. Beginning on their first day on the job the USFS began programming these people to accept short-term damage and accept USFS dogma that logging and road construction "restore" forest resources. After reading the ridiculous, untrue Purpose & Need for this timber sale it's clear to me each IDT member was programmed to reject what they learned in college and embrace the USFS way of doing things without question. The agency brainwashing scheme is so effective and advanced most are unaware they were being programmed. A few know they were manipulated but keep quiet to avoid risking their high paying jobs. Most of you reject this Idea without thinking. A few of you are intelligent enough to explore all possibilities. Ask yourself why most line-officers think volume is so important. Is it a coincidence that commercial timber sales always generate profit for natural resource extraction corporations?

Someday the kids of Montana will need a place to experience solitude and Nature sounds. They will soon learn that they won't find it in the Ashland RD currently guided by your mismanagement Ranger Hecker. 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 the plunder.

It's clear to me the employees who populate IDTs on the Ashland district need remedial training in how healthy forest resources function. Sadly, they cannot understand trees killed by chainsaws are just as dead as those

killed by fire, insects and disease. The difference? Fire, insects and disease are beneficial natural disturbance events that kill trees. A healthy forest needs a few fires. A healthy forest needs a few conifer trees killed by these beneficial natural disturbances. You see, a few USFS employees know when trees die in the forest and are left there to serve their purpose and not hauled to the mill its not a tragic waste.

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 that weigh between 6 and 9 tons with spinning wheels and tracks will devastate some non-timber forest resources. No intelligent human being would believe a commercial timber sale restores anything but the purchaser's bottom line. Opposing Views Science Attachments #1 and #4 contain quotes by many expert scientists describing the resource damage caused by logging and roading. Why do you reject this science? Never again fancy yourselves as public servants.

Healthy populations of any living thing have a mixture of live, dead and dying individuals. This includes trees. Read this to educate yourselves.

#### DEAD AND DYING TREES: ESSENTIAL FOR LIFE IN THE FOREST

By 3 Pacific Northwest Research Station scientists USDA Forest Service

Published in Science Findings, issue twenty, November 1999

<http://www.fs.fed.us/pnw/sciencef/scifi20.pdf>

Here is what an independent scientist with no affiliation with the USFS has to say:

<http://www.friendsoftheclearwater.org/praise-the-dead-the-ecological-values-of-dead-trees-by-george-wuerthner/>

You have been programmed to believe neat, tidy "parklike" stands with little or no understory or brush should be a goal of some timber harvest prescriptions. These are not real, biodiverse forests.

The USFS uses medical terms when referring to logging (i.e. prognosis, prescription, treatment, forest health etc.)? They are trying to convince the public and their gullible employees that all forests are sick and logging is needed to make them healthy again.

Ranger Hecker, after reading your scoping package for the proposed South Otter 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 knows their jobs depend on assuring that you get the maximum volume from this sale.. The "get-out-the-cut" bias in the scoping document they prepared tells me when they write the NEPA document they will 1) ignore the public comments, and 2) throw their professional standing to the wind to please you. These people are either clueless or hopelessly and unknowingly brainwashed by the USFS.

My guess is their minds have been professionally manipulated to reject common-sense solutions and independent science not written by a USFS employee. Since this sale will build a secret number of miles of road and log 47.2 square miles of forest I will introduce your IDT members to real science that clearly shows USFS claims are false in Opposing Views Science Attachments #1 and #4. Of course to maintain their "team player" status the IDT members will reject the science quotes in the attachments before they read them.

The USFS mind manipulation machine causes its employees to have Confirmation Bias.

I'm sorry for most of the IDT members. Their thoughts and beliefs are clearly skewed by Confirmation Bias. Here's how Science Daily defines this condition:

"Confirmation bias is a type of cognitive bias and represents an error of inductive inference toward confirmation of the hypothesis under study.

Confirmation bias is a phenomenon wherein decision makers have been shown to actively seek out and assign more weight to evidence that confirms their hypothesis, and ignore or underweigh evidence that could disconfirm their hypothesis.

As such, it can be thought of as a form of selection bias in collecting evidence.

[https://www.sciencedaily.com/terms/confirmation\\_bias.htm](https://www.sciencedaily.com/terms/confirmation_bias.htm)

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USFS employees should be aware of the truth

Please read The Economic Case Against NATIONAL FOREST LOGGING. The paper is dated but the content is more relevant today. Here are 3 quotes from the Executive Summary:

"While lumber and wood products are readily available from the 80% of forested land in the United States outside National Forests, clean water, recreation, wildlife and other public uses and values of immense economic benefit generally are not. The small share of the forested land base included in our National Forest system must shoulder nearly 100% of the burden of providing these uses and values."

"Recreation, hunting and fishing on our National Forests contribute at least \$111 billion to the gross domestic product and generate 2.9 million jobs each year. These uses contribute 31.4 times more value to GDP and generate 38.1 times more jobs than the timber sale program."

"For instance, national forest timber supports less than 5% of annual wood products consumption in the U.S. The remainder is supplied from other sources, including state and private lands.' (pg 11)

Indeed, logging in national forests could end tomorrow and the "other sources" of logs would easily make up the 5% difference.

Each National Forest should have this book in the library:

[https://www.worldcat.org/title/economic-case-against-national-forest-logging/oclc/48656693&referer=brief\\_results](https://www.worldcat.org/title/economic-case-against-national-forest-logging/oclc/48656693&referer=brief_results)

Destructive federal timber sale program loses nearly \$2 billion a year

By Dr. John Talberth

Published by the Center for Sustainable Economy, May 2019

Excerpt

"In a new report released today, the Center for Sustainable Economy has documented taxpayer losses of nearly \$2 billion a year associated with the federal logging program carried out on national forest and Bureau of Land Management lands."

According to Dr. John Talberth, Senior Economist from the Center for Sustainable Economy, "Federal forests

represent the last remaining islands in a sea of forestlands degraded by industrial logging activities on state and privately owned lands. Our federal forests are far more valuable as carbon sinks, recreation destinations, wildlife habitat and natural water filters than they are for timber production. As such, the economic damage from these logging subsidies is twofold: taxpayers lose money and local economies lose opportunities to diversify and use the land for much more valuable purposes."

Link:

<https://sustainable-economy.org/destructive-federal-timber-sale-program-loses-nearly-2-billion-a-year/>

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You people use all the USFS tricks & lies  
to justify logging a healthy, fully functioning  
forest to generate volume. Never again fancy  
yourselves as public servants. Face the fact you  
use our tax dollars to trash our precious national  
forests to serve your corporate masters.

In 2009 the USFS came up with another ridiculous, laughable excuse to log and road-up our forests. You obediently use it here in your scoping Purpose & Need:

I knew it was coming. One of your corporate-friendly purposes listed in the P&N at page 1 for this timber sale is:

\* "Provide wood products to contribute to employment and industry in local communities and help support the sustainable supply of timber from National Forest System lands."

Your actions come straight from the USFS public deception manual. The vast majority of timber sales use this lie. 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 reject the feelings of 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 also 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 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=wcn1&utm\\_medium=email](https://www.hcn.org/issues/50.8/recreation-recreation-is-redefining-the-value-of-western-public-lands?utm_source=wcn1&utm_medium=email)

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The desired conditions dictated by your Forest Plan

which relate to the South Otter project landscape

are so out of date and devoid of

"best science" its laughable

It provides direction for you to carry out your

witless quest for volume.

Your Forest Plan is unique and unprecedented. None of the other 153 national forests would have gifted the natural resource extraction corporations by codifying the direction in their Forest Plan. Perhaps there are employees receiving a copy of these comments that don't know the direction to serve the Custer-Gallatin corporate masters is in the Forest Plan. The key wording is highlighted in red.

FW-DC-TIM-01

Lands identified as suitable for timber production support a regularly scheduled timber harvest program that provides for jobs and income while also sustaining ecological integrity.

FW-DC-TIM-02

Lands suitable for timber production are resistant to natural disturbances, thereby minimizing the economic loss of the timber resource compared to lands designated as unsuitable for timber production.

FW-DC-TIM-03

Timber production and harvest contribute to ecological sustainability and ecological integrity while contributing to economic sustainability, providing jobs, and income to local economies.

FW-DC-TIM-04

Timber harvest supports maintaining regional timber harvesting and processing infrastructure.

The Custer Gallatin NF conveniently missed Associate Chief Sally Collins' wise guidance:

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

from a speech by Forest Service Associate Chief Sally Collins

"Changing Public Land Uses: A Tale of Two Debates"

Outdoor Writers Association of America, 76th Annual Conference

Columbia, MO-June 17, 2003

<https://www.fs.usda.gov/speeches/changing-public-land-uses-tale-two-debates>

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

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

Forest Service Associate Chief Sally Collins

"The Future of Partnering with the Forest Service"

A speech presented at the Annual Meeting of the

National Association of Conservation Districts

Atlanta, GA-February 8, 2005

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

Professional USFS line-officers would amend their FP to rid it of this garbage immediately and be guided by Associate Chief Sally Collins.

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An explanation of the Opposing Views

Science Attachments attached to these comments

I am giving you and your IDT members the opportunity to become familiar with the natural resource research conclusions of independent scientists not associated with the USFS in the Opposing Views Science Attachments. Each Opposing Views Attachment contains multiple quotes authored by Ph.D. scientists who are experts in their fields. Each quote is clearly labeled with an electronic link to the source of the quote.

These attachments will make you all uncomfortable because they contain a wealth of independent science conclusions that are inconsistent (many times in total conflict) with the so-called USFS science your IDT members used to craft your Proposed Action. An intelligent person would not reject the quotes by Ph.D. experts in their fields contained in the Opposing Views Science Attachments out of hand as your IDT members will do here. An intelligent, unbiased natural resource specialist would be cautious and try to understand why USFS science conclusions and independent science conclusions are so different.

The USFS claims commercial logging and roading "restores" the forest. If this were true, then why do independent scientists repeatedly describe why and how logging inflicts massive damage to the fragile forest natural resources? You are all aware of this disparity yet you choose to reject independent, unbiased science and instead embrace the flimsy, baseless USFS science. Opposing Views Science Attachment #1 and #4 will refresh your memories. After you read each quote ask yourself how the USFS would justify this timber sale. Ask yourself if the USFS used "best science" to develop this sale as your agency claims. Please see Opposing Views Science Attachment #15 to learn which USFS leaders said "best science" would be used. Finally, ask yourself of the Baldy timber sale is based on "best science."

I suggest you all read 40 CFR 1502.9(b). After you read the science quotes in the Opposing Views Science Attachments you will have a little more work to do than you thought. Read this.

"(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."

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You Propose to Log 42.7 Square Miles of Forest

Knowing the Vast Majority of the People who Visit

their National Forests do so Seeking Naturally

Appearing Undeveloped (emphasis added)

Recreation Opportunities.

Table 2 at page 8 shows you will commercially log 27,315 acres.

Your January 13 2021 "Dear Interested Party" letter fails miserably to convince me the natural resources in and downstream from the sale area will benefit from logging and roading.

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

If you were normal, caring, intelligent human beings you would be overcome by guilt each time you see the harmful after-effects of what your logging will cause. The public is no longer clueless. They know volume motivates USFS employees. The quotes in Opposing Views Science Attachment #1 and the photos in Opposing Views Science Attachment #29 show why the public feels the way they do about logging.

Your claim that you serve the public is laughable.

Comment #1 for which I'd like a meaningful response in the Response to Comments section in the draft NEPA document: Statistically significant nationwide surveys clearly indicate the vast majority of the Americans do not want their national forests logged anywhere for any reason.

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

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

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

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

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

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

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

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

Link to survey:

<https://www.fs.usda.gov/treesearch/pubs/4817>

Ranger Hecker you ignore the wishes of the public for personal gratification don't you? You know in the USFS line-officer promotion opportunities are based on one's skill to generate volume.

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You Propose to Construct a Secret Number of Miles of

New Temporary Road. You should know Road

Construction Causes more Long-Term harm to

Aquatic Resource Health (especially so-called

temporary roads) than any other Human

Activity in the Forest.

You hide the expected miles of temporary road you will construct. Why? You don't want the public to know there will be hundreds of miles of these linear sediment producing atrocities. You will learn something when you read Opposing Views Science Attachment #4

At page 10 you also say:

"Temporary roads for access to vegetation treatment units would be constructed for access to treatment units, then decommissioned following completion of project activities."

Competent USFS line-officers always obliterate temporary roads when they are no longer needed. Proper road obliteration, returns the road bed and fill slope to the contours of the land before the road was constructed and replaces culverts with natural stream channels, offers the best opportunity to restore health to our heavily roaded watersheds and the fisheries they support. An obliterated road has no running surface.

On spite of what the agency hammers into your heads, a temporary road is a road. A reasonably intelligent person would reject this USFS "temporary" road dogma. Your so-called "temporary" roads will be used many times in the future. Intelligent, professional, competent USFS employees build system roads with gravel surfacing and a ditch when they will be used in the future. Saving money by building temporary roads is unacceptable and unprofessional.

Comment #2 for which I'd like a meaningful response in the Response to Comments section in the draft NEPA document: A report authored by Gerald Coghlan, WO Acting Director of Engineering in 1998 indicated there are 372,956 miles of national forest system road (page 5). The agency currently constructs 2,170 miles of system road per year. At this rate there are 420,000 miles now. In addition to that, there are about 3,000 miles of unsurfaced, sediment producing, outsloped, temporary roads built each year. The average distance to the moon (it varies) is 384,403 miles [hellip] and you propose more? None of you can comprehend a road system that stretches to the moon and back [hellip] and you propose to increase it. Does this please you?

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

Comment #3 for which I'd like a meaningful response in the Response to Comments section in the draft NEPA document: Opposing Views Science Attachment #4 contains the statements of scores of Ph.D. scientists and engineers (including Chief Dombek) who discuss the tragic natural resource damage caused by temporary road

construction. You know USFS so-called temporary roads are not temporary because the running surface exists for future logging after your ineffective decommissioning

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

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

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

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

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

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

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

Comment #4 for which I'd like a meaningful response in the Response to Comments section in the draft NEPA document: Chief Dombeck knew there was nothing more damaging to forest resources than road construction.

Chief Dombeck's statement to USFS employees is quoted below. Knowing this why do you call your timber sale a "restoration" project? Why do you lie to the people you claim to serve? Please include this quote in a conspicuous location in your draft NEPA document.

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

Dr. Mike Dombeck, Chief, US Forest Service

Remarks to Forest Service employees

and retirees at the University of Montana

February 1998

Link to total article online: <https://www.hcn.org/issues/129/4106>

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

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

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

Published by the NY Times, January 14, 1998

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

Comment #5 for which I'd like a meaningful response in the Response to Comments section in the draft NEPA document: In spite of the fact the volume will be reduced, please analyze an Action alternative in detail that eliminates all (emphasis added) new road construction. This will eliminate the natural resource damage inflicted by new roads. This will serve future generations of kids. A real professional would not be frightened to jeopardize

some volume. A competent USFS line-officer would honestly analyze a no new roads alternative and display the road construction natural resource impacts that will not occur.

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You Fail to Understand the Scoping Process

Comment #6 for which I'd like a meaningful response in the Response to Comments section in the draft NEPA document: I was surprised and disappointed to see that your scoping package for the proposed South Otter timber sale limits the time you will accept scoping comments to 30-days.

Public feedback on projects that affect their land is the essence of NEPA. Congress recognized this when they passed the following laws that you are violating.

40 CFR [sect]1500.2 Policy.

Federal agencies shall to the fullest extent possible:

(d) Encourage and facilitate public involvement in decisions which affect the quality of the human environment.

40 CFR [sect]1506.6 Public involvement.

Agencies shall:

(a) Make diligent efforts to involve the public in preparing and implementing their NEPA procedures.

Of course scoping comments are more effective if they are submitted early in the NEPA process, but they must be accepted by the Responsible Official up to and including the day the DN or ROD is signed. Some USFS Responsible Officials understand the public involvement laws and act accordingly. Please see how they address their scoping comments timeline below.

Excerpt from an undated Gifford Pinchot NF scoping brochure

"While scoping comments may be considered at any time, comments will be most useful if submitted by July 3, 2020."

Link:

[https://www.fs.usda.gov/nfs/11558/www/nepa/113808\\_FSPLT3\\_5301512.pdf](https://www.fs.usda.gov/nfs/11558/www/nepa/113808_FSPLT3_5301512.pdf)

If you find a law or USFS policy that allows you to shorten the timeframe for scoping please send it to me. Of course I know none exists.

If this does not happen, this issue will become one of my objection points. An honest, unbiased Objection Deciding Officer will direct you to re-scope the proposed South Otter timber sale again unless this is done.

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Ranger Hecker, you already know what the selected alternative that will be described in the ROD or DN will

be. When was the last time your scoping Proposed

Action was different from the Preferred Alternative

disclosed in the DN or ROD?

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

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

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

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Your IDT members have been programmed to

Embrace the USFS corporate-friendly timber agenda.

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

1) most forests are sick and will become healthy again after they are commercially logging and roaded.

2) an "unmanaged" forest is an "unlogged" forest. For over 100 years the USFS has done what the natural resource extraction corporations wanted [hellip] regardless of the other resource damage that the USFS conveniently fails to acknowledge. Do you really think logging is a synonym of management?

3) commercial logging and roading "restores" the forest. Even kids that have taken a high school science course know logging damages and sometimes renders some important natural resources incapable of functioning properly.

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You will risk the lives of your neighbors

who live in the WUI to generate precious

volume for personal gain.

At page 2 you say:

"In addition, a substantial portion of this project area falls within the Powder River County and Rosebud County Community Wildfire Protection Plans. These plans encourage the USFS staff to consider potential effects on the Wildland-Urban Interface (WUI) in their fuel reduction programs, and to use county values at risk in considering project locations. This project would be designed to protect values at risk on National Forest System lands and within the WUI, as identified in the Powder River Wildfire Protection Plan (PRWPP, 2016). Refer to the Proposed Actions Map for portions of the project area included in the WUI.

Comment #7 for which I'd like a meaningful response in the Response to Comments section in the draft NEPA

document: Dr. Jack Cohen's is a retired fire physicist who spent his career working for the USFS. His research resulted in his fine fuels removal methods which reduce the risk of fire damage should a wildfire occur. In his paper "Objectives and Considerations for Wildland Fuel Treatment in Forested Ecosystems of the Interior Western United States" (page 10) he says:

"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).

Dr. Cohen is an expert. What incentive would he have to not be guided by his research findings? You can read his entire paper below:

Please pay special attention to Dr. Cohen's statements highlighted in red.

Objectives and considerations for wildland fuel treatment in forested ecosystems of the interior western United States (page 10)

By: Dr. Jack Cohen et al (a retired USFS fire physicist)

Published in Forest Ecology and Management, issue 256, 2008

[https://www.fs.fed.us/rm/pubs\\_other/rmrs\\_2008\\_reinhardt\\_e001.pdf](https://www.fs.fed.us/rm/pubs_other/rmrs_2008_reinhardt_e001.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)

Here are more of Dr. Cohen's research conclusions

Reducing the Wildland Fire Threat to Homes: Where and How Much?

By Dr. Jack Cohen

Presented as the Fire Economics Symposium in San Diego, California on April 12, 1999.

USDA Forest Service Gen.Tech.Rep. PSW-GTR-173

[http://www.fs.fed.us/rm/pubs\\_other/rmrs\\_1999\\_cohen\\_j001.pdf](http://www.fs.fed.us/rm/pubs_other/rmrs_1999_cohen_j001.pdf)

Excerpts:

"As stated, the evidence indicates that home ignitions depend on the home materials and design and only those flammables within a few tens of meters of the home (home ignitability). The wildland fuel characteristics beyond the home site have little if any significance to WUI home fire losses." (Pg. 193)

"Extensive wildland vegetation management does not effectively change home ignitability." (Pg. 193)

"Home ignitability also dictates that effective mitigating actions focus on the home and its immediate surroundings rather than on extensive wildland fuel management." (Pg. 193)

Community destruction during extreme wildfires is a home ignition problem

By Dr. Jack Cohen and Dave Strohmaier

Published online by The Missoulian, August 9, 2020

[https://www.reddit.com/r/chaparral/comments/i6p1qq/community\\_destruction\\_during\\_extreme\\_wildfires\\_is/](https://www.reddit.com/r/chaparral/comments/i6p1qq/community_destruction_during_extreme_wildfires_is/)

Excerpts:

"To make this shift, land managers, elected officials, and members of the public must question some of our most deeply ingrained assumptions regarding fire. For the sake of fiscal responsibility, scientific integrity, and effective outcomes, it's high time we abandon the tired and disingenuous policies of our century-old all-out war on wildfire and fuel treatments conducted under the guise of protecting communities. Instead, let's focus on mitigating WU fire risk where ignitions are determined - within the home ignition zone."

This 2014 High Country News article describes the effectiveness Dr. Cohen's fine fuels removal methods:  
<http://www.hcn.org/articles/the-loss-of-homes-to-wildfire-is-as-much-a-sociopolitical-problem-as-it-is-a-physical>

Other scientists' research also reach the same conclusions as Dr. Cohen's.

The Forest Service Not Only Loses Money Logging, It Makes Fires Worse

Quotes by Dr. Philip Higuera, associate professor of fire ecology, University of Montana

Published by Counterpunch, September 25, 2020

<https://www.counterpunch.org/2020/09/25/the-forest-service-not-only-loses-money-logging-it-makes-fires-worse/>

Excerpts:

"Not only does national forest commercial logging lose money, it increases the threat of big wildfires. Dr. Higuera noted: "However, research studies have shown logged areas and young forest plantation projects have little beneficial effect on wildfire spread and can actually aggravate fire growth in some cases."

In the largest wildfire analysis ever done, in 2016 scientists found that forests with the most logging and the fewest environmental protections actually had the highest levels of fire intensity. Why? Because logging opens up the forest allowing more sunlight and wind which dries out forests and makes them more flammable."

Open Letter to Decision Makers Concerning Wildfires in the West

Signed by more than 200 preeminent scientists

Published by The GEOS Institute, August 27, 2018

<https://naturalresources.house.gov/imo/media/doc/Letter%20From%202015%20Environmental%20Scientists%20Opposing%20Farm%20Bill%20Aug.%2027%202018.pdf>

Excerpts:

"Thinning is most often proposed to reduce fire risk and lower fire intensity[hellip]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." (pg 2)

"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." (pg 2)

Ranger Hecker, my letter to the editor to the Helena Independent Record, the Missoulian and the Missoula independent newspapers describing how you are putting your neighbors who live in the WUI at risk by ignoring the most effective treatment to reduce/eliminate fire damage and injury will get people's attention.

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I would be embarrassed to send the January 13, 2021

"Dear Interested Party" letter describing the South

Otter timber sale to the public.

You have Read this Far, how do you Feel?

None of you are indifferent.

You fit into one of the following two categories. Ask yourself which one.

1) you are angry wondering "who is this rabid enviro trying to tell me how to do my job."

2) you have admitted to yourself that the issues I discuss above have crossed your mind in the past and you were frightened to let anyone know.

The people on category 1 should seek other employment. To those of you lucky enough to be in category 2, please be guided by your feelings at work. You can say "no." Your peers will admire you.

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Intelligent Resource Specialists would

understand the Wisdom of these People

and let it Guide them. The public

expects you to do this.

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

Theodore Roosevelt

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

John Muir

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

Cree Indian proverb

"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

"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)

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Sincerely,

Dick Artley [retired forest planner from the Nez Perce National Forest, Idaho, duties were 1) NEPA legal compliance reviewer, 2) forest NEPA coordinator, and 3) forest appeals/litigation coordinator. Education: BS in forestry from the University of Washington and MS in logging engineering from Oregon State University]

CC: selected forest staff

P.S. I have included 7 well marked comments.