

Data Submitted (UTC 11): 1/25/2024 8:00:00 AM

First name: Randall

Last name: Morris

Organization:

Title:

Comments: 25 January 2024

Regional Forester (Reviewing Officer) Northern (R1) Regional Office

Attn: Nez Perce-Clearwater Forest Plan Objection 26 Fort Missoula Road

Missoula, Montana 59804

Subject: Nez Perce-Clearwater National Forests Plan Revision #44089 Objection

Dear Madam or Sir:

Objector's name and address:

Randall E. Morris

Plan revision being objected to:

Nez Perce-Clearwater National Forests Plan Revision #44089

Name and title responsible Official:

Cheryl Probert Forest Supervisor/Nez Perce-Clearwater National Forests

Statement of issues:

My letter dated on or about April 19, 2020, which was received in a timely manner and assigned letter #17354 in

your inventory, provided substantive comments on the Nez Perce-Clearwater National Forests Plan Revision Draft Environmental Impact Statement (DEIS).

1. Fundamental Forest Service failures in law, regulation, or process:

1. 40 CFR 1502.7 specifically states the text of final environmental impact statements (paragraphs (a)(4) through (6) of [sect] 1502.10 shall be 150 pages or fewer and, for proposals of unusual scope or complexity, shall be 300 pages or fewer unless a senior agency official of the lead agency approves in writing a statement to exceed 300 pages and establishes a new page limit.

The present Nez Perce-Clearwater National Forests Plan (NP-CNFP) FEIS and DROD is over 2000 pages long! Please note my additional comments below.

40 CFR 1502.12 states each EIS shall have a summary, and "The summary normally will not exceed 15 pages."

1.

1. The NP-CNFP DEIS, FEIS and DROD fails to mention MITIGATION for any of the deleterious effects of the several Alternatives. This is a huge failure! The obvious REMEDY would be to withdraw the FEIS and DROD until mitigation is considered in the DEIS.

2. New issues that have arisen since the release of the Clearwater Forest DEIS:

1. The DEIS must be amended to include management options for the North American Wolverine (*Gula gulo luscus*) which species was listed as a threatened species in November 2023, after the presentation date of the Clearwater Forest DEIS. Only after the wolverine is evaluated in the DEIS can a FEIS and DROD be issued.

Wolverine require one of the largest home ranges of any North American mammals:

"Home ranges of adult wolverines range from less than 100 square kilometers (km²) to over 900 km² (38.5 square miles (mi²) to 348 mi²) (Banci 1994). Home range sizes are large relative to the body size of wolverines, and may indicate that wolverines occupy a relatively unproductive niche in which they must forage over large areas to consume the amount of calories needed to meet their life-history requirements." (Inman et al. 2007a, p. II; ECOS U.S. Fish and Wildlife Service)

With a home range approaching 250 square miles, listing of the wolverine has profound implications for management of the NP-CNF. This new issue must be examined in detail in the NP-CNFP DEIS, and submitted to

Public Comment before the FEIS and DROD can move forward.

1.

1. The DEIS must be amended to include management changes necessitated under Executive Order 14072 (dated April 22, 2022) which directs Federal agencies to manage federal lands to restore and conserve the Nation's mature (old growth) forests.

With this in mind, the DEIS fails to examine the effect of the Proposed Plan on Pacific yew.

I have observed the Pacific or western yew growing in the upper Little North Fork Clearwater drainage, and it is reasonable to conclude it grows elsewhere in mature forests within the Clearwater Forest. The Pacific or Western Yew (*Taxus brevifolia*) "is extremely slow growing... [and] Often severely damaged by succession of the forest." I have read that it takes up to 175 years to even appear in undisturbed forest.

I have a special fondness for yew because my late wife was afflicted by breast cancer. She suffered so from the surgery and treatment. Fortunately, her treatment included tamoxifen

(Taxol) which did not hurt at all. Tamoxifen is one of several brands of chemotherapeutic drugs derived from the yew. The yew helped cure her and more importantly kept her cancer free and we had many more wonderful years together. I bless the yew by all that is good and worthy!

Chemo drugs derived from yew were the first chemo drug to be found effective for ovarian cancer, and,

"The chemotherapy drug paclitaxel (Taxol), used in breast, ovarian, and lung cancer treatment, can be derived from *Taxus brevifolia* and other species of yew. As it was already becoming scarce when its chemotherapeutic potential was realized around the 1990s, the Pacific yew was never commercially harvested from its habitat at a large scale;"

I point out, tragically, that yew was never commercially harvested in the Northwest, because by the time its healing properties were known to Western medicine, the Forest Service had allowed it to become almost extinct by clearcutting the old growth Pacific forest!

I remember well when the therapeutic and curative properties of paclitaxel literally exploded onto the world stage in the 1980s, and a veritable "gold rush" for yew surged across the US. Pacific Northwest (the Great Northwest yew rush?). An eyewitness reported to me: "There were hippies everywhere cutting yew to sell!"

Unfortunately, most of the old growth in the Northwest USA had been nearly universally clearcut during the prior two decades. Yew had been destroyed by the clearcuts, and it had become very scarce. The federal government had to step in and declare yew harvesting areas, limit the harvest, and issue permits or the yew would have become extinct.

It is worth noting that clearcuts and urban expansion have already extirpated yew from much of its range.

Quoted passages are from: Arno, Stephen F.; Hammerly, Ramona P. (2020)

[1977]. Northwest Trees: Identifying & Understanding the Region's Native Trees (field guide ed.). Seattle: Mountaineers Books. pp.181-

186. ISBN 978-1-68051-329-5. OCLC I 141235469; as reported by Wikipedia.

How many other life-saving plants have already become extinct in the "Big-Tree Woods" due to our ignorance of the medical properties of species within old growth forests? I wish to point out that the medical properties of yew were known to indigenous Tribes long before the late arriving Americans made it nearly extinct.

I do not see how the current proposed DROD can move forward because at this point in time, no one has completed an evaluation of the effects of the proposed Nez Perce-Clearwater Forest DEIS on the management of the threatened wolverine, or mature and old growth forests.

A REMEDY would be to stay the implementation of the FEIS and DROD on the Nez Perce-

Clearwater Forest. The DEIS must evaluate the wolverine and mature and old growth forest under all existing Jaw-and reopen the comment period on the DEIS to the public. Only then can a new FEIS and DROD be issued.

1. Issues I raised in my DEIS comment letter of 19 April 2020, that were never addressed by the Forest Service:

mycological impacts; cumulative impacts; fossil forests.

Therefore, I have no idea what the Proposed Alternative might be planning in relation to these issues (whatever the Proposed Alternative is, or will be-I have no idea from the present DEIS and FEIS documents). Each of these issues are fundamental to any discussion of Idaho Forest ecosystems. How can the Forest Service be so audacious as to issue a DROD when these fundamental issues have not been addressed?

1. Mycological relationships, for example, have in recent years been shown to play essential-even astonishing roles in maintaining the health of trees and their entire ecosystems. Clearcutting hundreds-or thousands-of acres at a time may very well destroy an ecology that has been evolving in situ since the current interglacial began in Idaho, to the detriment of all stakeholders.

Fungi are known to have therapeutic values (penicillin and other fungal-derived antibiotics are good examples). Very many modern drugs are grown in fungus within generation tanks because fungi do that easily. Certain mushrooms have demonstrated therapeutic value. Perusing any good text on mushrooms (I can recommend the National Audubon Society Field Guide to North American Mushrooms, prepared under Gary H. Lincoff, President North American Mycological Association), quickly makes apparent how little we really know about the different fungus species in the Northwest USA, including their ranges and how extremely-ecosystem specific many species are.

Large clearcuts-as proposed of 200 acres-dry the forest, likely killing mycelium that could be millennial old. This could explain why some clearcuts never do grow back with their pre-cut diversity. Cumulative impacts of checkerboard forests-as noted below-could be devastating the disjunct Pacific species within the Clearwater Forest. Prove me wrong.

1. Cumulative impacts, for another example, are not addressed in any of the Alternatives. We do know that forest-wide, and nation-wide, and world-wide the planet is changing and losing species, especially forest-dependent species-at Great Extinction Event rates.
2. Likewise the Forest Service failed to address my concerns about the Clearwater Forest being an Ice Age remnant, or "fossil forest," as I have called them for decades. [had observed that forest groves within Idaho failed to regenerate well in the southern part of the state, decades before "climate change" became a popular catchphrase.

I believe the same climate change factors that, for example:

1) are reducing rainfall on the edges of Amazonia;

1. are presently preventing the proper functioning of the Panama Canal due to unprecedented drought-in the tropics for goodness sake!
2. that have reduced the annual median depth of great Lake Nicaragua-that I observed by living on its shore for nearly a decade and a half;
3. that have rendered Lake Powell and Lake Mead dangerously close to "dead pool;"
4. that are presently drying the Great Salt Lake to extinction- unprecedented in written history

-and now threatening the population of the Wasatch Front with blowing dust containing a century and a half of industrial, toxic, radioactive, and human waste;

likely apply also to the Clearwater Forest. Cut it and lose it; at least lose the diversity and biome density.

A REMEDY would be to address these several issues in the DEIS. The FEIS and DROD is premature at this time.

1. Objections to other issues that I raised during the comment period that remain unresolved after the premature release of the FEIS and DROD:

1. How do I state this more clearly than I did nearly four years ago?

I specifically requested a hard copy-printed paper-in my opening comments about the Draft EIS in my letter dated 19 April 2020. I never received a copy of the DEIS in any form nor any further communication from the Forest Service, period!

REMEDY: If the Clearwater Forest is currently hacking down about 40 Million Board-Feet of trees and plans to raise that to more than 240 MBF, it seems reasonable that I should receive a few measly ounces of cellulose paper from a tiny fraction of one little ol' tree.

Give me paper when I beg for it. I have used all sorts of emphasized-type in this OBJECTION, in an attempt to get the Forest Service to listen and respond to my requests on this issue and other issues. It is embarrassing to splash electronic ink like this but it is not embarrassing on me.

1.

1. The Nez Perce-Clearwater National Forests Plan Revision #44089 is an abomination in layout and navigability in electronic form. This is an obvious reason why I requested a paper copy.

1. At more than two thousand pages, with some internal links but not enough, does the Forest Service realize that many people in the region-especially rural and elderly-do not have high speed internet access? I have spent far more time navigating the documents than reading and contemplating the proposed FEIS and DROD. I have downloaded much of the document, but it was not easy and at times very slow, and the document remains

difficult to read, search, and cross-search.

Furthermore, a person must continually scroll dozens-even tens of dozens of pages-between links within the document, rendering it nearly impossible to jump from a flagged issue to any sort of background study, before a person forgets what the heck the question was. If a person wishes to refer back to a table, a paragraph, or perhaps a single sentence, forget it! There goes twenty minutes lost in searching or re-searching for-that page.

Again, the REMEDY is a paper copy.

1.

1.

1. The Objection process requires that commenters state the reasons for the objections based on the Forest Service response in the FEIS and DROD. The Forest Service created a document number for each commenter and then attempts to lump similar comments from every commenter together by issue. This is not only a monumental task for the Forest Service, it is inherently prone to error, and a burden on the public:

The commenter must second guess what the FS called the personal comment;

The commenter must search for a lumped group of comments that resemble the one they submitted, and hope the FS included the personal comment in the group;

There is no reasonably easy way to confirm that the FS even responded to the comment. I am not sure if the Forest Service responded to all my comments. That certainly is an injury.

My suggested REMEDY would be to cross-link or back-link FS response back to the comment letters; that is, a commenter could easily determine if, firstly, the FS addressed their personal comment; and secondly, what the response was. Perhaps this is impractical for reasons not apparent to me, but staff has already identified issues within each letter, and that represented most of the work linking issues to FS response.

The FEIS, Appendix M, states the FS received about 1700 unique letters (1329 unique, plus another 372 "form plus" and "master form," plus about 15,000 form letters). This is a finite number of unique letters, and because the long-suffering staff had to read about 1700 letters, anyway, it seems to me a back-link could have been established from the FS response back to[shy] at least-the unique commenter's letters.

For example, I find the FEIS failed to include my comments on the lack of a Preferred Alternative in the DEIS. This was stated in my missing letter #17,354.

1.

1. The present Nez Perce-Clearwater National Forests Plan FEIS and the ROD is more footnote than text; more vacant fluff than relevant content.

1. The principal issue before the public is: what has the Forest Service decided to do, and what are the consequences? What are the standards and guidelines as required under 36CFR219?

Those concerns of the public could be stated succinctly. The rest of the FEIS and DROD is, and should be footnote to defend those decisions, standards, and guidelines. In the current form that FEIS and DROD is frustrating and time wasting.

A person is required to search many scores-perhaps hundreds of pages-to discover and learn what the Forest Service had decided to do about any issue.

A REMEDY, might be the use of more summary charts and graphs. This might fulfill this need for clarity in a succinct FEIS but you folks should be more skilled at that than I.

Please understand, my objection is not the length of the document (although, I do have many questions of relevance about significant amounts of material within the FEIS). Length is good if necessary to more fully explain a complex issue. My objection is the lack of a quickly navigable summary. Some charts within the document demonstrate the Forest Service can summarize very well.

1.

1.

1. The FEIS is mostly "foam packing peanuts" without relevant content within the box. More graphically, there is no pony beneath the pile of manure.

Beginning about page 109 of the FEIS there are only six paragraphs about Old Growth. IN MANY WAYS THE MAINTENANCE OF OLD-GROWTH FORESTS AND THE REESTABLISHMENT OF HEALTH ECOSYSTEMS IS-AND SHOULD BE-THE VERY ESSENCE OF THE NEZ-PERCE-CLEARWATER FOREST PLAN.

I assert the entire documents are designed to bury the public under piles of manure and divert and obscure the reality from the public that the DROD is simply a maneuver to increase logging profits for the benefit of the few, rather than preserve the precarious watersheds, ecosystems, and species-known and unknown.

For example, knowledge about the mycorrhizal relationships between the forest trees and other plants within the NP-CNF are largely unknown and certainly not will described within the FEIS.

About one-fourth of the combined forest is Old Growth and mature forests. All the contrived statements about reestablishing healthy mechanical manipulation are simply cover for more roads and more logging. The Forest Service has not made the case even through overwhelming, irrelevant wordiness.

A reasonable person can easily predict-based on available scientific evidence-that before the end of this forest plan, problems with the health of the forest due to changing climate will far exceed any value of logging, Please note my comments on item J, Climate Change below.

I assert the industries based on Wild and Scenic Rivers and Wilderness, will generate more wealth over the life of the plan than will logging the remaining old growth.

Some multiple uses seem to weigh heavier in the FS decision than do maintaining and reestablishing healthy ecosystems.

1.

1. The Forest Service (FS) failed to inform the public, including most specifically, me, about public hearings and availability of the Final EIS as required under the National

Environmental Policy Act, [sect]102(2)(C).

On page 1 of my comments on the DEIS, dated 19 January 2020, I specifically requested a copy of the FEIS and requested "to be placed on the mailing list for any announcements relating to implementation of actions under a FEIS," (emphasis added).

I never received notice of ANYTHING from the Forest Service after filing my letter. I would not now know a FEIS and DROD had been issued had not I learned of it by word of mouth.

SPECIFICALLY, I PRONOUNCE FAILURE ON THE PART OF THE FOREST SERVICE TO INFORM ME AS I REQUESTED AND AS REQUIRED BY NEPA.

Furthermore, I have been told some sort of "public involvement" about the EIS occurred in Boise, the largest population center in the immediate four-state region, and also residence for nearly half of the population of the state of Idaho. I have no idea what that "public involvement" might have been because the FS never informed me.

Where and what is the history of the FS's public involvement?

According to page 2, Appendix M of the FEIS, the FS received only fifty-eight carrier-delivered ("hard copy") comments on the DEIS. I do not believe informing one person-me-or even all of the fifty eight would have been an undue hardship upon the Forest Service.

Furthermore, I have been injured. Due to the slow passage of information by word of mouth, I have, as of this writing, less than half the allotted time to read the FEIS, mentally digest the contents, gather information from other sources, and write this objection, which objection may well suffer as a result.

Obviously, the best REMEDY would be to provide me more time to comment, but the only fair and legal way to do that would be to extend the Objection period for everyone.

I HEREBY REQUEST THAT THE FOREST SERVICE REOPEN AND EXTEND THE OBJECTION PERIOD.

1.

1. Fundamental procedural flaws in the Draft and Final EIS: Here I quote from my comments on the DEIS:

"The DEIS does not evaluate a Preferred Alternative (PA) (emphasis added). Sections 1502.14(C)(i) and (iii) of the Act clearly indicate that "the environmental impacts of the proposed action" and "alternatives to the proposed action" must be evaluated in environmental documents prepared under the Act.

Delaying the presentation of the Preferred Alternative until the DROD deprives all the

stakeholders of their legal right to comment on the Preferred Alternative during the DEIS process. The failure of the DEIS to present and evaluate a PA causes me to wonder who was minding the store, or asleep at the wheel, or who willfully violated the law." End quote.

40 CFR [sect] 1502 require that the DEIS "present the environmental impacts of the proposal Preferred Alternative and alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options."

Section 1502.14 states " ... the environmental impacts of the proposal and the alternatives be presented in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision makers and the public," [emphasis added].

Section 1502.13, 1502.14(b), Section 1502.14(e), Section 1502.14(f), and Section 1502.16 all clearly state that a proposed action must be presented vis-A-vis other alternatives [emphasis added].

Quoting page 2-15 of the DEIS (fseprd687166.pdf):

"Alternatives considered but eliminated from detailed study include the following:

2014 Proposed Action. As a result of input from scoping comments, the proposed action will not be brought forward or analyzed in the draft environmental impact statement in detail. Many elements of the proposed action will be carried forward into other alternatives. All elements of the proposed action that were not brought forward into another action alternative represent an alternative considered."

What, does that paragraph even mean? It appears to mean that the required Preferred Action is fragmented among a number of Alternatives, which are obscured from all other stakeholders.

What gave Clearwater National Forest decision makers the right to violate the National Environmental Policy Act

as established by the Federal Congress?

It is physically impossible for non-governmental organizations, let alone individuals, to evaluate a 2000+ page, shotgun DEIS prepared with the great resources of the U.S. Federal government, within a framework of sixty or ninety days, when no focus on a Preferred Alternative existed in the DEIS.

If the Forest Service was not yet prepared to present a Preferred Alternative at the time of the release of the DEIS, the DEIS should have been delayed until more evaluation had been conducted and the ducks were in a row.

Quoting page 3 of the DEIS (fseprd687166.pdf):

"A preferred alternative is not identified in the DEIS. Any individual component of any alternative analyzed in the DEIS may be combined into a preferred alternative. A

preferred alternative will be identified with the release of the Final Environmental Impact Statement and Draft Record of Decision in 2021."

And now the Draft Record of Decision, "springs forth from the brow of Zeus fully formed."

I assert this is a capricious disregard of NEPA and the CPR that precluded public input and is therefore in violation of the Act and the CFR.

The obvious REMEDY would be to go back and re-issue the DEIS-with a Preferred Alternative stated in plain sight-in order to provide the stakeholders the opportunity to consider it and comment before-and separate-from the DROD, rather than receive it as a dictatorial decree!

1.

1. Inadequate Range of Alternatives under the DEIS:

NEPA40 CPR Section 1500. I(c) clearly states, "... the NEPA process is intended to help public officials make decisions that are based on understanding environmental consequences, and take actions that protect, restore and enhance the environment." The Revised Forest Plan and FEIS must clearly meet these Congressional and regulatory directives.

Where is the Enhance Environmental Alternative required under NEPA? All of the Alternatives in the DEIS increase logging above existing levels in the Nez-Perce and Clearwater Forest Plans. Alternatives W and Alternatives X increase logging 500%! For the love of Mike! Enough already!

I assert the FEIS does not include a REASONABLE range of alternatives, but in all cases is a justification for more logging for forests that have already suffered grievously from logging.

Had the forest been managed properly, the Forest Service would not now be trying to produce a more desirable range of "natural variation" by logging the hell out of what is left!

1.

1. The proposed actions are prima facie evidence of Forest Service mismanagement. I quote from my comments on the DEIS:

"For most of fifty years-as long as I have been paying serious attention-I have heard representatives of the Forest Service pronounce more or less: 'we made mistakes in the past, but now we know better' (not necessarily an exact quote), only to observe egregious errors later. The FS has not learned well enough."

Now the Nez-Perce-Clearwater Forest is proposing more of the same mismanagement.

The very fact that the FS is advocating the opening of more old growth forest to logging is prima facie evidence that the FS has not managed the forests in a sustainable manner.

The FS would not now be struggling to justify the clearing of more mature and old growth forest in order to maintain local jobs, if the forest had been harvested in a sustainable manner.

Sawmills have closed all over Idaho and all over the western United States due to a long and continuing history of unsustainable logging, blessed, planned, and conducted by the Forest Service.

Again I quote from my comments on the DEIS:

"Most of the Nez-Perce Forest and much of the Clearwater Forest have already been excessively and tragically logged to the detriment of soils, waters, anadromous fish spawning beds, and struggling animal species (I now mention in passing long-term destruction I have seen--or am aware of--within the Kaniksu, Payette, Boise, and St. Joe Forests). The taxpayers have had to pay billions of dollars for mostly marginally successful mitigation and recovery of fisheries and threatened species [emphasis added].

Looks like some took the profits and ran, and the taxpayers are stuck paying for the damages, as usual.

I. Every Alternative increases motorized and mechanical recreational use over existing plans. Snowmobile use will increase in three of the four Alternatives. Current plans restrict snowmobile use over parts of the Forest, and for good reason. Sufficient science demonstrates the deleterious effects of snowmobiles on wolverine, lynx, and other sensitive species including elk. The Forest Service must not bow to the snow machine lobby.

I noted the DEIS reported the reduction of mountain goat populations in the eastern "[mid]Black Snow unit" and the increased snowmobile traffic in the area. Unfortunately, I have failed to find this map again after a reasonably diligent search. If I recall this map correctly, I once knew portions of this region well. I would assert the reduction in mountain goat populations may be due to logging on the adjacent St. Joe Forest in the upper drainage, as well as, the increase motorized traffic due to the opening of motorized access in the St. Joe Forest due to new logging roads.

In the winter snow, road closures mean nothing to snowmobiles. Snowmobiles can fly over snow-covered backcountry roads at fifty miles per hour or more--two or three times faster than these same dry-earth, potholed and washboard-roads can be driven by a pickup!

Incidentally, I witnessed with disgust, huge acreages of St. Joe Forest mud sliding down the mountainside into the creeks in the incomparable upper Little North Fork of the Clearwater watershed in the adjacent St. Joe Forest. There oughta be a law! Oh, yes, I must have forgot. There is if you can enforce it.

J. Climate Change:

Here I will simply quote from my comments on the DEIS. I believe my arguments still stand:

"The FS concludes that the DEIS would have a negligible effect on Climate Change. That attitude is the reason

the earth is warming, the oceans are acidifying, and species face climate induced extinction (emphasis added).

God save the picas! The Forest Service does not seem to desire to do so. Each of us has a responsibility to reduce our footprint on the planet. A little destruction here, a little destruction there equals massive destruction everywhere.

You don't have to be a rocket scientist--or, climate scientist--to understand the biological surface area of a tree available for carbon dioxide sequestration (that is the surface area of leaves or needles involved in photosynthesis) more closely increases by the cube of the height of the tree rather than the square. It is simple math."

I erred in my comments on the DEIS by using the more familiar formulas for the volume and area of a sphere ($\frac{4}{3}\pi r^3$ and $4\pi r^2$) to make my point about tree photosynthesis, rather than the less familiar formulas for the volume and areas of right cones. So here I correct for a right cone volume and area: $\frac{1}{3}\pi r^2 h$ vs. $\pi r(r+k)$.

Regardless, more or less, a 150 foot tree has perhaps 40 times the- needle area of a 15 foot tree. Stated another way, a mature forest represents perhaps forty times-or more--the photosynthetic capacity of a newly planted forest; that is .forty-or more--times the carbon sequestration capacity of a newly planted forest. This has vast significance for a planet facing climate catastrophe.

Again, I quote from my comment letter:

"As much of the world works to rein in fossil fuel consumption in favor of renewable energy sources, and as responsible scientists have pointed out that the world could negate fossil fuel consumption CO₂ by planting 100 billion trees, is not it common sense to leave existing trees to grow?"

I ask once more: "Does Idaho have to try to out-compete Brazil in mowing down its (ancient] forests?"

K. Manipulation of forest vegetation: Quoting page 119 from the ROD:

"Wildland fire is expected to be the primary agent of change North Fork Clearwater River drainage. However, vegetative conditions, fuels accumulation, and climatic factors on many north and east facing slopes may preclude the effective use of fire as a management tool in ecological restoration. Many of these sites are within the eligible river corridor and other tributary drainages. In these areas, mechanical

treatments, including timber harvest and silvicultural practices may be the most effective method to address departed ecological conditions or to protect high value resources.

Mechanical treatments also ensure reforestation with more resilient species, something that is not guaranteed

with wildfire."

Waoh! Stop the presses!! The Forest Service is telling the public that best way to "protect" the forest and "high value resources" is to road the "eligible river corridor and other tributary drainages."!!!!

We have to destroy the river to save it!!!!

So, bulldozing roads through the river corridors is the best way to restore river corridors and drainages??? I call bullshit! I have already seen millions of cubic meters of hillsides slide into rivers-and they continue to slide toward rivers-due to bulldozed roads degrading the stability of the landscape, and concentrating water runoff in the wrong places causing landslides.

BIG UNANSWERED QUESTIONS in the FEIS and DROD:

1. How will the manipulation be done? More roads? More phony logging to improve the hell out of things? More landslides, slumps and ruined hillsides within the creeks, and river drainages?
2. What does the FEIS mean by planting more "resilient species?" What species? What varieties? Does that mean more taxpayer planted, disease-risky monoculture? Does that mean more taxpayer planted trees succumbing to the next new insect or disease infection, and failing?
3. Does that mean millions more taxpayer dollars spent for unsuccessful boondoggles?

The Forest Service has never demonstrated it can improve on several billion years of evolution and the wisdom of Mother Nature.

L. I reserve the right to comment on:

1. FS failure to propose closing unused grazing allotments,
2. failure to close critical areas to mineral exploration,
3. and several other issues,

because I have run out of time to comment on issues I raised to the DEIS. The Forest Service did not see fit to give me the courtesy of proper notice. I believe others will raise these issues more eloquently than I, and I believe we will be revisiting this entire matter, and possibly rewriting substantial portions of the Plan, and that will require new comment periods.

Closing comments:

Please note that I do recognize the documents under review are evidence of a vast amount of work by the Forest Service and others. I commend that heartily and also the good stewards who remain out there.

I remember as a youngster being proud of the Forest Service but I have not been proud of the Service in perhaps forty to fifty years_, ever since the scourge of roads and vast clearcuts began to decimate the National Forest, and the salmon and steelhead all but disappeared.

I realize that is not all the fault of the Forest Service but it does bear a lot of responsibility.

I have seen decades of Forest Service management resulting in landslides, anadromous spawning beds lost for decades-if not centuries-under mud; insect-ridden and diseased logs being trucked through healthy forests; hundreds of good hunting areas and animal refugia destroyed for a human lifetime... but you get the idea.

I am very upset that I was ignored in the public outreach duties of the Forest Service, and that I was very lucky to have even learned a FEIS and DROD had been issued.

I assert that the FEIS and DROD are impossible to navigate by mere mortals. Portions are rich in data, but the majority of the document is irrelevant. There are no standards and guidelines. There are no guardrails to the rape-and-run mentality of the exploitative juggernaut careening down the mountainside.

Any errors of fact in these comments on the FEIS and DROD I attribute to the impossibility of navigating the FEIS and DROD electronically. I beg once more for a paper copy.

In cases of disputed logic or disagreement about the facts, I stand by my statements regarding the DEIS, FEIS, and DROD.

My hope is that the environment might--even in my lifetime--take precedence over profits within the Forest Service, but I have vey little hope that I will live to see that. So little -wild country remains. The ecosystems are dying. It does not bode well for my children, the planet, our nation, or humanity.

Very truly your,

Randall E. Morris