

Data Submitted (UTC 11): 8/17/2024 8:38:23 PM

First name: Deil

Last name: Auly

Organization:

Title:

Comments:

Please accept and consider these comments on the proposed Bonanza project pre decisional EA and read them with an open mind. They are based on best science and the experience I gained after working for 31 years with the USFS. Your pre-decisional EA does not read as if you used best science to develop the project. As you will see in Opposing Views Attachment #10 agency leaders assured the public best science will drive projects. Had you done so, many of your silly claims would not have been made. I hope you know the public does not want your type of national forest management that exclusively benefits the natural resource extraction corporations. I guess you continue to backhand the public with such mismanagement because you have gotten away with it in the past.

During my USFS employment I learned there were 2 things that force the USFS Responsible Officials to take special care to not harm the national forest resources:

- 1) The threat of court action when the USFS Responsible Official knows the plaintiff has more than enough to convict.
- 2) The threat to use the media to expose the USFS Responsible Official and their witless proposed actions and how the actions will devastate the proper functioning of important natural resources in the forest.

Ranger Smith I suggest you meet with your OGC attorneys to discuss your strategy and talking points. Remember, a USFS Ranger or Supervisor who loses in Federal District Court is big news. The AP will carry it nationwide.

Comment: I have never understood how a USFS line-officer benefits from consciously allowing natural resource extraction corporations to inflict damage to the priceless national forest natural resources. Why is it so important to them to provide these natural resource extraction corporations with opportunities to reap major profits at the expense of the public? Perhaps you are getting financial kickbacks?

Please have the courage to read the 2 books identified below that explain the situation better than I can. You need to learn the truth. The public is onto you.

A Conspiracy of Optimism by Paul Hirt, an assistant professor of western history at Washington State University.
https://books.google.com/books/about/A_Conspiracy_of_Optimism.html?id=JlwYvzNKjQ8C

Excerpt:

"The once highly regarded U.S. Forest Service has come under fire for its mismanagement of the national forests, particularly for timber-cutting and road-building, and its failure to protect ecosystems. Hirt, who teaches history at Washington State University, probes the economics and politics of the agency during the last 50 years. Despite the official policy of multiple use-lumbering, grazing, recreation, wildlife-the Forest Service has focused almost exclusively on timber production. Hirt finds this is due partly to its professional bias of silviculturists and road engineers and to a lopsided budget assigned by Congress-resource conservation is viewed as expense, timber sales as revenue. The author follows the slow turnaround in public perceptions and policy changes in recent years, noting that the agency cannot be separated from the larger political, social and economic context."

Getting Out the Cut: Politics and National Forest Timber Harvests, 1960-1995 by Miles Burnett and Charles Davis

Administration & Society V34 (May, 2002), pp. 202-228.
<https://www.des.ucdavis.edu/faculty/lubell/Teaching/CharlesDavis.pdf>

Excerpt:

"Since the Forest Service began managing the national forests in the early 1900s under the charismatic leadership of Gifford Pinchot, it has been guided by a professional ethos and a statutory framework that established timber production as the dominant use of national forest resources (Clary, 1986; Dana and Fairfax, 1980). As the first Chief of the U.S. Forest Service, Pinchot shaped an organizational culture within the agency that enshrined sustainable timber production as its *raison d'être*. This view went unchallenged for several decades while the country's wood needs were primarily supplied by privately owned timberlands. With annual cuts of only 1 billion board feet (bbf), the Forest Service was mainly playing a custodial management role on its roughly 190 million acres until the post World War II era. A pro-commodity development bias was supported by members of Congress serving on the Agricultural Committees in both chambers as well as the forest program subcommittees within the House and Senate Appropriations Committees. For legislators representing rural forested areas, timber sales to lumber, paper and related industries were favored as a source of jobs for their constituents (Clary, 1986). Accordingly, Congress enacted laws which highlighted the importance of timber harvesting as a dominant use with national forest management decisions."

It's clear I'm dealing with an IDT that is clueless about the obvious link between the proposed treatments and the resource damage they cause. Perhaps they understand the damage this commercial timber sale will cause and don't care.

My comments contain attachments with quotes authored by expert scientists ... many with Ph.D.s. They describe resource damage caused by some treatments commonly used by the USFS that you are proposing as part of this project. Most of the IDT members know the treatments will inflict long-term harm to the amenity resources. Knowing this, what are they thinking when they tell the public the treatments will "restore the forest back to health." They must assume members of the public are idiots.

Your agency claims to serve the public yet you deceive these same people to clear the way for volume accumulation. My letter to the editor in the Helena Independent Record will inform the public of your mismanagement. You know how to prevent this Smith. Will you? Why is it so difficult to do the right thing? Your motivation should come from knowing future generations will be grateful when you do this.

As a retired NEPA coordinator I can remember how disgusting it was to watch the so called IDT resource specialists' excitement as they prepared a NEPA document to please the Responsible Official not knowing they were all timber sale enablers. Successful performance in their timber sale enabler role required them all to cast away their land ethics and values. Even after finishing their tragic, illegal NEPA documents they still were clueless enough to believe they were serving the public. Their agency mind manipulation had been successful.

These IDT resource specialists were also unable to think independently outside the USFS timber agenda box. It's sad. These same IDT members skipped home after work believing they served the public by making it possible for the agency to implement a treatment the recreating public does not want. An intelligent IDT member would know this and take appropriate action. This never happens.

It's time USFS Responsible Officials and their IDT members are held accountable for their sloppy work. They must never knowingly write untrue, illegal information in the NEPA document they prepare like this one.

Too many IDT members refuse to face up to the fact that their agency routinely harms the natural resources in and downstream from the project area by providing resource extraction corporations with the opportunity to reap large \$\$\$\$ profit by removing trees from the national forests owned by 336 million Americans. They all

obediently parrot agency propaganda that they hope will soften the public to the clear resource destruction caused by logging and road construction treatments. For intelligent people to behave this way indicates they were subject to a sophisticated mind manipulation strategy early in their career in spite of the clear evidence otherwise. They were made to believe the USFS could do no wrong and would do nothing that might harm the proper functioning of the forest.

Their motivation for being an IDT member is clear. Thus, I have no reason to believe anything they write. It will be amusing to watch them try to defend this in court.

Ranger Smith, your duplicity is unprecedented.

It's time to start holding the Responsible Official and their IDT members accountable for knowingly writing untrue, illegal information as is the case here.

A few IDT members know what motivates the agency to sell timber sales ... to generate volume. The public thinks you all put natural resource health as your top priority. Unfortunately, you all put job security, money and power ahead of what the public pays you to do. Ranger Smith I have no reason to believe there are any resource specialists on your IDT who will write the truth. You are all being controlled. They are all in the timber sale enabler role and don't know it.

Please consider this quote below authored by the man who was almost appointed to become the 1st Chief of the USFS. Please keep the quote in mind as you finish planning this timber sale ... or hopefully drop it.

"Any fool can destroy trees. They cannot run away ... God has
cared for these trees, saved them from draught, disease,
and avalanches ... but he cannot save them from fools"
John Muir
from "Save the redwoods", 1900

John Muir was a prophet. Over 100 years ago he was able to predict what an agency led by a person trained in industrial forestry in France (Gifford Pinchot) would emphasize in 188,336,179 acres of national forest land ... timber production.

Even if it were consistent with all of the United States environmental laws (which it isn't), your pre-decisional EA is the most poorly written I have ever encountered. I know what a good one looks like. I retired from the USFS after 31 years as the forest NEPA coordinator.

My time with the USFS taught me some of the employees masquerading as resource specialists who serve on IDTs for timber sale DEISs and pre-decisional EAs will write anything (true or not) to please the Responsible Official. They know they want volume desperately.

Sadly, they believe that the USFS would never propose a project that might harm one of the countless important forest resources. How were they fooled? They are unaware the USFS has a well structured mind-manipulation scheme that works on people without their knowledge. It started on their first day on the job. The things they were told by their peers and the "official" things they read convinced them the USFS is a wonderful agency dedicated to maintaining properly functioning natural resources in the forest. It didn't take long for them to believe the USFS could do no wrong.

My Daughter's Family does not Appreciate
your Unprofessional Behavior

You see my daughter and her family live in Lincoln. They enjoy the Helena National Forest very much.

They feel that developing this area will ruin their fishing, wildlife viewing, camping and hiking opportunities. They own the Helena National Forest. Since I am retired from the USFS my daughter called me and asked if there was anything she could do to convince you to leave the proposed timber sale area undeveloped. She wanted to know what she must do to gain standing to take court action. I told her she needs to comment on the draft NEPA document and submit an objection and that when the Objection Deciding Officer's response to her objection is unacceptable she would have standing to take court action. I told her she must show the court she will be harmed by the decision. Ranger Smith people like you must be held accountable. Clearly you are serving your corporate masters and backhanding the public.

Your tragic pre-decisional EA that was prepared for the Bonanza timber sale reads as if it were prepared by children. I taught the 1900-1 beginning NEPA course in R-1. On the first day of class my untrained students could have easily been able to list the problems with this pre-decisional EA.

Each of your IDT members will react to my comments differently. Some of them will be angry and in denial and wonder "who is this guy." Most of them will ignore my comments and say to themselves "Oh well, NEPA gives him the right to comment." He's obviously a rabid enviro who should be ignored because he wants to stop logging." A few of them will agree with what I have to say but will keep it to themselves because they are frightened to think their peers will think you are not a "team player." I'm sorry for you all. After you retire your guilt will be overwhelming.

Best Science

The USFS has been telling the public that its projects are based on "best science" for decades. Opposing Views Attachment #10 validates this claim. Of course the agency has ignored science and has allowed the following to guide their vegetation management treatments (a.k.a. logging) for a long time:

- *the need to spend all the NFTM money in the same FY it was received
- *the need to provide the natural resource extraction corporations with opportunities to reap handsome profits
- *the need to meet or exceed the volume expectations of higher level agency line-officers

Of course these 3 real reasons for timber sales will never appear in the Purpose and Need. It makes me laugh to read the ridiculous, untrue, copy & paste cooked-up reasons for USFS timber sales in the P&Ns written now.

The court of public opinion is often more effective than a court of law. Most people read the newspaper.

As you can tell, I know how the game is played. As is the case here, the vast majority of USFS line-officers with NEPA decision-making authority are clueless about the science related to the treatments they are about to approve. The IDT members who know the science will say nothing if it might reduce the sale's volume output.

Some USFS employees cannot deal with comments suggesting the agency has a timber agenda that is more important to support than the health of the natural resources in the forest. Please don't let your GOP politics have anything to do with your decisions. Understand you can select the No Action alternative if it will eliminate any harm caused by implementing the Proposed Action ... but of course you won't.

Ranger Smith please have the courage to read and comply with the science in the following attachments. You will learn things most of your IDT members have known since their 1st day with the USFS.

Forest Resource Damage caused by Timber Harvest Treatments

Opposing Views Attachment #1

Post-Fire Harvest Resource Damage
Opposing Views Attachment #2

Roads often Destroy the Proper Ecological Functioning of the Aquatic Habitat in a Forest
Opposing Views Attachment #4

The Natural Resources in the Forest Benefit from Fire
Opposing Views Attachment #8

Most Dead and Dying Trees should not be Removed from the forest
Opposing Views Attachment #14

Timber Harvest Restores Nothing in a Forested Ecosystem
Opposing Views Attachment #21

Ranger Smith, an intelligent, caring national forest line-officer would significantly modify or drop the proposed Bonanza timber sale based on this science. Please do not fall-back to your beliefs you picked up after years of USFS mind-manipulation. My letter to the editor pointing out your mismanagement will enrage the recreating public in your area. They will likely write to Chief Moore and Senator Tester expressing their outrage.

I helped prepare pre-decisional EAs and DEISs during the 7 years I was a forest planner. I now comment on NEPA documents for projects that have a high probability of causing resource damage like this one. This tragic pre-decisional EA that was prepared for the Bonanza timber sale reads as if it were prepared by children. I taught the 1900-1 beginning NEPA course in R-1. On the first day of class my untrained students could have easily been able to list the problems with this pre-decisional EA.

Each IDT member will react to my comments differently. Some of them will be angry and in denial and wonder "who is this guy." Most of them will ignore my comments and say to themselves "Oh well, NEPA gives him the right to comment. He's obviously a rabid enviro who should be ignored because he wants to stop national forest logging." A few of them will agree with what I have to say but will keep it to themselves because they are frightened to think their peers and supervisor will think you are not "team players." I'm sorry for you all.

Clearly, your recommendations and conclusions in the Bonanza pre-decisional EA are the antithesis of "best science." Please read the science below. Especially important sections are shown in bold, red font.

A Citizens' Guide to National Forest Planning (link below):
https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd509144.pdf

Excerpts:

"The 2012 Planning Rule requires the use of the best available scientific information to inform planning and plan decisions. There is a lot to consider when thinking about how science and scientific information are used in forest planning."

At a minimum, scientific information needs to be available, accurate, reliable, and relevant. "Available" means that the Forest Service does not need to create new scientific information and conduct new research, but simply should use information that currently exists.

Finally, one of the fundamentals to effective use of scientific information is transparency in how it is used. The

2012 Planning Rule requires the Forest Service to document and summarize how the universe of best available scientific information was identified and how it informed the planning process." (pg 15)

36 CFR 219.3 Role of science in planning.
<https://www.law.cornell.edu/cfr/text/36/219.3>

Excerpts:

"The responsible official shall use the best available scientific information to inform the planning process required by this subpart. In doing so, the responsible official shall determine what information is the most accurate, reliable, and relevant to the issues being considered. The responsible official shall document how the best available scientific information was used to inform the assessment, the plan decision, and the monitoring program as required in §§ 219.6(a)(3) and 219.14(a)(4). Such documentation must: Identify what information was determined to be the best available scientific information, explain the basis for that determination, and explain how the information was applied to the issues considered."

Feb 27 2015 News Release from Senator Hoeven
<http://www.hoeven.senate.gov/public/index.cfm/2015/2/hoeven-presses-forest-service-chief-to-address-north-dakota-concerns-with-update-to-grasslands-management-plan>

Excerpts:

"Senator Hoeven also pressed Tidwell to rely on the best science available when issuing the final update. The draft environmental assessment for more than 62,000 acres in McKenzie County and 22 grazing allotments was issued in January."

Statement by USFS Chief Tom Tidwell
From an interview with Rob Chaney of the Missoulian, June 19, 2009
<http://westinstenv.org/sosf/2009/06/19/tidwell-interviewed-by-the-missoulian/>

Excerpts:

"We have some of the best science, and we need to make sure we're applying that, using that and sharing that as we move forward. I think we have a key leadership role, not only in the application of science but to help inform and educate our community and the folks we work with."

You are required to comply with 36 CFR 219.3. Your Regional Office will say you don't need to but a judge can read. Chances are the DRF will rebuff and shun my daughter's objection. She has the money and this will motivate her to invite you to Federal District Court. OGC simply cannot successfully defend your mismanagement of the Helena National Forest. How does Region 1 deal with line-officers who loose in court which generates bad press?

Request for changes to be made to the final NEPA document: Include the source documents for the applicable science quotes in Opposing Views Science Attachment #1, #4, #20 and #21 in the References section for your EA and cite them in the text.

Failure to do this will violate:

36 CFR 219.3 because you do not document how the best available scientific information was used in the development of the pre-decisional EA, and because the Responsible Official did not explain how the information

was applied to the issues being considered.

President Bidens January 2021 Memorandum on Restoring Trust in Government through Scientific Integrity and Evidence-Based Policymaking because you do not use best available science and data in your decision-making.

Before the IDT members spend any more time working in this pre-decisional EA allow me to describe some important, meaningful things that apply to them.

*None of you were hired for your resource knowledge. The USFS knew it must populate IDTs with a variety of specialists. This allowed the agency to claim the IDT is interdisciplinary and complies with 40 CFR 1502.6. How many times have your IDT's Chapter 3 effects for Proposed Action implementation disclosed a resource in the forest will not function properly and you selected the Proposed Action anyway without consulting the IDT member who wrote it? As you all know, in most cases reducing the volume to minimize adverse effects to other resources is unacceptable in the USFS. The public expects each IDT member to stand up for their resource in all cases.

*You all know Ranger Smith expects you to describe the effects of selecting No Action as calamitous and deplorable in spite of the fact the situation is the same it has been for a long time without anyone being concerned before. Ranger Smith relies on IDT lies to justify rejecting No Action?

*The Purpose & Need in your NEPA document appears to have been copied and pasted from past timber sale NEPA documents that had different conditions than this timber sale. This violates the NEPA in several ways. This says something about the IDT members.

*The Purpose & Need contains goals that could not possibly be satisfied by a commercial timber sale. Of course commercial timber sale activities will exacerbate the resource damage the Purpose & Need claims to correct.

*The Purpose & Need contains goals that are not needed.

*Your NEPA document will claim most problems (real or perceived) in the forest can be corrected by commercial logging, road construction and herbicide application. Some resource specialists know this is not true yet they are afraid to voice their opinion for obvious reasons.

*When the public submits science authored by experts that contradicts USFS claims, you will ignore the science without explanation in the response to comments section in the final NEPA document.

*During my 31 years with the USFS I saw the Responsible Official reprimand some resource specialists in front of their peers for writing the truth.

After reading this pre-decisional EA several times it's clear it violates NEPA and quite possibly the ESA. You and your IDT members are all a part of it and will be held accountable for developing it. Your reputations, character, reliability and professionalism are on the line. A few specialists on the IDT know the truth about their agency yet they choose to conveniently forget when they enter the office each day.

I will state from the beginning I don't expect the Proposed Action to be changed to eliminate resource damage because of my comments.

You see, I spent too many years with the USFS not to know what motivates its employees. You are all more concerned about not jeopardizing your precious, high paying jobs than you are assuring this sale does not disrupt the proper functioning of the natural resources in the sale area you are paid to protect. You know Ranger Smith wants volume desperately and you won't rock the boat.

If you people were doing your job this proposed timber sale would have been eliminated before the scoping process started. When you exit your denial mode you will all agree what I say is true.

I spent 31 years with the USFS ... the last 7 as the Forest Planner for a national forest in Idaho. Part of my job was to assist IDTs as they took proposed projects through the NEPA process. This was difficult. They wanted to take shortcuts that would not fully comply with the NEPA analysis process as is being done here. They knew they were expected to be timber sale enablers. They knew it has been decades since a USFS Responsible Official 1) selected No Action and 2) the IDT developed a realistic 2nd action alternative in detail.

Instead, they:

- *developed a ridiculous Purpose and Need. The P&N goals were unsubstantiated with no supporting data. It was not surprising that cutting and removing trees (a.k.a. logging) was the only way the P&N goals could be satisfied.

- *wrote watered-down Chapter 3 environmental effects predictions for implementing the Proposed Action. Their Chapter 3 environmental effects predictions for No Action described tragic effects if it wasn't logged.

- *selected the same Proposed Action for implementation that was presented in the Scoping document, thus they ignored most of the public scoping comments that were against the Proposed Action.

- *expected the IDT to skew the analysis to favor the Proposed Action.

Comment Requirements

Project Name Bonanza Project

Responsible Official and Title Helen Smith, District Ranger

District & Forest where it will be implemented White Sulphur Springs Ranger District, Helena-Lewis and Clark National Forest

Come on people, please have the courage and motivation to remove your mind from the USFS box. You are all capable of critical, independent thinking. You learned in college what should and should not be done to assure your resource will remain unharmed and healthy. You learned what an unhealthy forest looks like. Please read what hundreds of expert Ph.D. scientists say about logging and climate change in Opposing Views attachment 20.

After reading the pre-decisional EA several times it's clear it violates the law. You and your IDT members are all a part of it and accountable for developing it. Your reputations, character, reliability and professionalism are on the line. Most of you on the IDT know the truth about your agency yet you choose to conveniently forget when you enter the office each day. Why? Your jobs pay too well.

Why must a member of the public point out basic natural resource science in the Opposing Views Attachments to resource professionals on the Helena-Lewis and Clark National Forest? You should all be embarrassed. This science has been available for many years. After you read it ask yourself why you behave the way you do. Please understand your behavior is worse than unacceptable. Do the right thing. Sever your ties to this tragic project immediately.

You Failed to take a "hard look" at how your Pending Timber Sale Decision will Affect the Natural Resources in and Downstream from the Sale Area. By not allowing all the facts (including IDT environmental

effects predictions in Chapter 3) to bear on the decision you have not taken a "hard look."
This is not a trivial error.

You ignore the predicted resource damage your IDT members have written in Chapter 3 and selected the Proposed Action anyway without explanation. It's tragic you are willing to accept such damage. Here, you will learn something.

NEPA's Scientific and Information Standards-Taking the Harder Look

By Murray D. Feldman and Kristin A. Nichols HOLLAND & HART LLP Boise, Idaho and Greenwood Village, Colorado

https://www.hollandhart.com/files/66008_RMMLF-NEPA_s-Scientific-and-Information-Standards--Taking.pdf

Excerpts:

"NEPA's twin goals are: (1) to foster informed decision making by "ensur[ing] that the agency, in reaching its decision, will have available, and will carefully consider, detailed information concerning significant environmental impacts," and (2) to promote informed public participation by requiring full disclosure of and opportunities for the public to participate in governmental decisions affecting environmental quality.¹¹ To that end, agencies must disclose the scientific information and analyses on which they rely in their environmental effects analyses and decision-making processes." (pg 6-3)

"While NEPA does not require a particular substantive outcome, it does require "agencies to take a 'hard look' at how the choices before them affect the environment, and then to place their data and conclusions before the public."¹⁶ (pg 6-3)

"A reviewing court at best must struggle to comprehend the agencies' assessments and conclusions regarding environmental effects and to judge their compliance with NEPA in light of the rule of reason, hard look, and arbitrary or capricious formulations of the standard of review." (pg 6-25)

"As the law of NEPA continues to evolve, and agency reliance upon more complex and technical scientific methodologies and information in natural resource management and decision making continues to grow, federal agencies, NEPA practitioners, and stakeholders must recognize and adapt to the shifting standards for scientific information and analysis under NEPA."

Unfortunately, most of you suffer from the mental illness "confirmation bias."

There is no amount of science that would convince you to examine it with an open mind ... if the science described errors in your analysis. Here, become familiar with "confirmation bias."

"Confirmation bias is a psychological term for the human tendency to only seek out information that supports one position or idea. This causes you to have a bias towards your original position because if you only seek out information that supports one idea, you will only find information that supports that idea."

The Psychology of Confirmation Bias

<https://psychcentral.com/blog/the-psychology-of-confirmation-bias>

What is Confirmation Bias?

<https://www.tranceformpsychology.com/mental-health-psychology/confirmation-bias.html>

<https://www.psychologytoday.com/us/blog/science-of-choice/201504/what-is-confirmation-bias>

<https://www.linkedin.com/pulse/confirmation-bias-mindshelp-gk2ze>

Please have the courage to read the science below. Important text is highlighted in red.

Don't be fooled by the latest Smokescreen for Logging Forests

By Chad Hanson, PhD

Published by Counterpunch, September 9, 2016

<https://www.counterpunch.org/2016/09/09/dont-be-fooled-by-the-latest-smokescreen-for-logging-forests/>

Excerpt

"U.S. Senator Ron Wyden (D-OR) and Maria Cantwell (D-WA) have joined with several Republican senators, who are among the logging industries biggest advocates in Congress, to propose legislation, the "Wildfire Budgeting, Response, and Forest Management Act of 2016", that would severely weaken environmental laws to facilitate a large increase in commercial logging on our national forests and other federal public lands. Specifically, the bill would eliminate most environmental impacts-disclosure and analysis requirements for logging projects on federal lands, and would severely curtail public participation in public forest management decisions."

"We need to focus our resources on genuinely protecting communities, while recognizing the important ecological work that large mixed-intensity fires are accomplishing in remote forests. The legislation proposed by Senate Republicans and Democrat Senators Wyden and Cantwell would, with a wink and nod, gut environmental laws and raid taxpayers' pockets to promote a logging industry agenda that hides behind creative euphemisms in order to promote the same old logging of the past."

Western Region Audit Report: Forest Service National Fire Plan Implementation

By Richard D. Long, U.S. Department of Agriculture Office of Inspector General

Report No. 08601-26-SF, November 2001.

<https://www.usda.gov/sites/default/files/08601-26-SF.pdf>

Excerpt

"We concluded that commercial timber sales do not meet the criteria for forest restoration." (bottom of pg. 11)

Scientists Seek Logging Ban on U.S.-Owned Land

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

Published in the New York Times, April 16, 2002

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

Excerpt

"The letter, a project of the Sierra Club and signed by Dr. Edward O. Wilson, Dr. Anne Ehrlich and other prominent scientists, primarily biologists, asserted that the American taxpayer not only subsidizes logging directly, but also indirectly, because logging reduces the economic value of the forest for other uses.

"It is now widely recognized that commercial logging has damaged ecosystem health, clean water, and recreational opportunities," the letter reads. "Annually, timber produces roughly \$4 billion per year (from national forests), while recreation, fish and wildlife, clean water and unroaded areas provide a combined total of \$224 billion to the American economy each year." "

Four years after logging, the Hogback sale in the Ocoee district is still a barren wasteland

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

Published by Tennessee Heartwood in the New York Times, April 16, 2002

<https://www.tennesseeheartwood.org/restoration-logging-at-hogback-the-monitoring-continues1.html>

Excerpt

"Such is the effects of "restoration logging". Since the 1990's the Forest Service has switched from a stated "get the cut out" philosophy to a more subtle, but still damaging one of logging for "forest health and restoration", with claims ranging from a need to log to mimic supposed historic fire regimes to restoring parklike woodland habitats. While we acknowledge that there is a historic role of limited fire in some habitats in the East and that certain forest communities may be underrepresented in places, we are concerned that the Forest Service has reduced the complexity of Eastern forests into a justification for plain old logging and burning.

Our monitoring of the Hogback sale in the Ocoee district in Polk County is meant to observe the extended effects of heavy logging for "forest health and restoration". It is a typical sale for the Cherokee, with heavy shelterwood (reducing the basal area to less than 30 - roughly 6-10 trees per acre) and seedtree (even more logging, and the "seed trees" are removed later) logging to provide "advanced oak regeneration" and to increase the presence of shortleaf pine.

We first visited several logging sites at the sale right after the cutting began in February 2013. We returned in April 2013, then June 2014, July 2014, February 2015, December 2015, and October 2016. What is notable is not only the erosion/runoff effects, but how there are spots that still are virtually bare, down to the chert, as what thin topsoil that was there has washed away. At a couple of sites where shortleaf pine had been replanted, most had unsurprisingly not made it. Our continued documentation of this sale is important to show how this kind of land management can not only be ineffective, but damaging to the land. See the slide show below.

The Forest Service acknowledged significant damage to the site. One site required turf grass to be planted to stabilize erosion. A Freedom of Information Act request of agency documents show that over \$100,000 has been spent to revegetate just this single 30 acre site. Several other sites remain significantly affected. The agency has looked into the long-term effects of logging on similar sites, and there are a number of other timber sales that also show some degree of land degradation."

The bottom of column 1 and top column 2 at page 24786 of Vol. 81 of the Federal Register, April 27, 2016 states: <https://www.govinfo.gov/content/pkg/FR-2016-04-27/pdf/2016-09750.pdf>

Excerpt

"For example, hazardous fuels reduction to reduce wildfire risk to communities may require a silvicultural treatment that is not restoration."

"Ecological restoration typically focuses on recreating ecosystem conditions that were present prior to European influences."

Since you use commercial logging to remove hazardous fuels you must remove all references to "restore" and "restoration" from the pre-decisional EA

Comment: I invite you to examine the photos in the following attachment and ask yourself what natural resource was "restored" by timber harvest, where and how and include this in your final EA.

I obtained the photos in Photos attachment #15 from an environmental group who took the photos of national

forest land in Region 6. They show the post-harvest conditions of USFS projects that were labeled "restoration projects." Indeed, USFS line-officers will say anything to justify a commercial timber sale.

Ranger Smith, you and the IDT members are all being used. You know to maintain your promotion potential in the agency you must 1) reject all independent science conclusions that are inconsistent with USFS ways of doing things, 2) never question what the USFS tells you, and 3) believe the welfare and well-being of the agency is more important than reducing/eliminating natural resource damage.

Some of your IDT members agree with the information I present above but their salary is too high to jeopardize by speaking out.

Commercially Logging and Roding-up Forested
Land at any Location for any Reason "Restores"
nothing but the Purchaser's Financial Bottom Line
and Maintains the Responsible Official's Promotion
Potential by Generating Precious Volume.

Its clear USFS employees do not know the definition of "restoration." Please have the courage to read independent science definitions of "restoration." It's easy just search on the word "restoration." Ask yourself why the science conclusions of the independent experts are the antithesis of what the USFS tells its employees should be done to assure a healthy forest? They can't both be right can they?

Ranger Smith, please provide a meaningful response to each of my 37 comments below in the Response to Comments section in the pending final NEPA document. I will remind you of 40 CFR § 1503.4. Your pre-decisional EA at page 4 says this project will restore "ecological integrity, diversity, function, and resiliency."

I hope the IDT members understand the experts quoted below are describing how commercial timber sales (like Bonanza) will inflict massive damage to the resources in and downstream from the sale area. This will not be "short term" damage the USFS so often uses to justify such abuse. Logging and roading restore nothing!!!! What do they do to get USFS professionals to believe such nonsense?

Quote below is from Logging without Limits isn't a Solution to Wildfires
By Timothy Ingalsbee Ph.D.
Published in the Portland Oregonian, August 6, 2002
<http://www.klamathforestalliance.org/Documents/loggingwithoutlimits.html>

Quote:

"Since the 'New Perspectives' program of the early 1990s, the agency has tried to dodge public opposition to commercial logging by using various euphemisms, such as this gem from the Siskiyou National Forest: Clearcuts are called 'minimum green tree retention units.' Accordingly, Forest Service managers have believed that if they simply refer to logging as 'thinning,' or add the phrases 'fuels reduction' or 'forest restoration' to the title of their timber sale plans, then the public will accept these projects at face value, and business-as-usual commercial logging can proceed. In the face of multiple scandals and widespread public skepticism of the Forest Service's credibility, it seems that only Congress is buying the agency's labeling scheme."

Comment #1: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Dr. Ingalsbee say "the agency has tried to dodge public opposition to commercial logging by using various euphemisms?"

Quote below is from Getting it Right: Environmentalism for the 21st Century

By Patrick Moore Ph.D.

Published online by Berkely Rausser, College of Natural Resources, October 01, 1999
<https://nature.berkeley.edu/events/2017/06/getting-it-right-environmentalism-21st-century>

Quote:

"This gives rise to the obvious concern that if the trees are cut down the habitats or homes will be lost and the species that live in them will die. Indeed, in 1996 the World Wildlife Fund, at a media conference in Geneva, announced that 50,000 species are going extinct each year due to human activity. And the main cause of these 50,000 extinctions, they said, is commercial logging. The story was carried around the world by Associated Press and other media and hundreds of millions of people came to believe that forestry is the main cause of species extinction."

Comment #2 : Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Dr. Moore say:

"50,000 species are going extinct each year due to human activity. And the main cause of these 50,000 extinctions, they said, is commercial logging?"

Quote below is from Are Wildfire Mitigation and Restoration of Historic Forest Structure Compatible? A Spatial Modeling Assessment

By Rutherford V. Platt Ph.D., Thomas T. Veblen Ph.D., and Rosemary L. Sherriff

Published Online: by the Association of American Geographers. Sep. 8, 2006

<http://www.ingentaconnect.com/content/routledg/anna/2006/00000096/00000003/art00001>

Quote:

Is Fuels Reduction Logging Effective? - "We question the validity of thinning as a means both to reduce the threat of wildfire and to restore historic forest structure in the absence of site-specific data collection on past and present landscape conditions."

Comment #3 : Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would these 3 experts say "We question the validity of thinning as a means both to reduce the threat of wildfire and to restore historic forest structure in the absence of site-specific data collection on past and present landscape conditions?"

Quote below is from Fanning the Flames! The U.S. Forest Service: A Fire-Dependent Bureaucracy

By Timothy Ingalsbee Ph.D.

Published in the Missoula Independent. Vol. 14 No. 24, June 2003

<http://www.klamathforestalliance.org/Documents/fanningtheflames.html>

Quote:

"In the face of growing public scrutiny and criticism of the agency's logging policies and practices, the Forest Service and their enablers in Congress have learned to mask timber sales as so-called 'fuels reduction' and 'forest restoration' projects. Yet, the net effect of these logging projects is to actually increase fire risks and fuel hazards."

"Decades of encouraging private logging companies to take the biggest, oldest, most fire-resistant trees from public lands, while leaving behind a volatile fuel load of small trees, brush, weeds, stumps and slash has vastly increased the flammability of forestlands."

"In addition to post-fire salvage logging, the Forest Service and timber industry advocates in Congress have been pushing pre-fire timber sales, often falsely billed as hazardous fuels reduction or 'thinning' projects, to lower the risk or hazard of future wildfires. In too many cases, these so-called thinning projects are logging thick-diameter fire-resistant overstory trees instead of or in addition to cutting thin-sized fire-susceptible understory trees. The resulting logging slash and the increased solar and wind exposure can paradoxically increase the fuel hazards and fire risks."

Comment #4 : Ranger Smith why would Dr. Ingalsbee say logging "increases fire risks and fuel hazards" if as you say logging and road construction restores ecological integrity?

Only a person with a serious case of Confirmation Bias would believe a treatment that is harmful to a variety of forest species and interferes with the natural process of ecosystem recovery "restores" the forest landscape.

Quote below is from Soil and Root Damage in Forestry, 200 pages

By Iwan Wasterlund, Ph.D.

Published by Elsevier, 26 August 2020

<https://www.readonbooks.net/pdf/soil-and-root-damage-in-forestry/>

Quote:

"Agroforestry has significantly impacted our forests, but an often-overlooked issue is the effect of harvesting on soils and root systems. Soil and Root Damage in Forestry explains how soil and roots might be damaged through logging activities or silvicultural activities, how resulting root diseases impact the root and soil systems, and the impacts of chemical applications on the soil and root system. This book goes beyond the 'why' to also provide methods to reduce the impacts of machines on soils and offers solutions to minimize the impacts of machines on soils. Soil and Root Damage in Forestry serves as a valuable resource not only for those already working in soil science and forest ecology, but also provides insights for advanced students seeking an entrance to the "hidden half" of the planet. Combines damages to soil and roots in one volume for the first time Includes calculations related to soil strength providing soil scientists and ecologists with methods to estimate root damage Provides suggestions on how to reduce the impact of harvesting on soil and root systems."

Comment #5 : Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Dr. Wasterlund say "soil and roots might be damaged through logging activities or silvicultural activities."

Quote below is from How and How Much, Do Harvesting Activities Affect Forest Soil, Regeneration and Stands?

By Rodolfo Picchio Ph.D., Piotr S. Mederski Ph.D. and Farzam Tavankar Ph.D.

Published in Current Forestry Reports volume 6, pages 115-128 (2020)

<https://link.springer.com/article/10.1007/s40725-020-00113-8>

Quote:

"There are a large number of publications tackling forest harvesting, but most of them do not give a comprehensive framework and they mainly focus on one or very few aspects of forest damage. In order to improve general knowledge of the impact of forest operations, it was proposed that the scope of recent findings should be examined and a compilation of the available results from different regions should be presented in one paper."

"The physical, chemical and biological properties of the forest soil change as a result of harvesting operations, and this is commonly referred to as soil disturbance.

Detrimental soil disturbance associated with ground-based extraction often includes compaction, rutting, lateral soil displacement, topsoil mixing and the formation of puddles."

Comment #6: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Dr. Picchio, Dr. Mederski and Dr. Tavankar say "ground-based extraction often includes compaction, rutting, lateral soil displacement, topsoil mixing and the formation of puddles?"

Quote below is from Are Wildfire Mitigation and Restoration of Historic Forest Structure Compatible? A Spatial Modeling Assessment"

By Rutherford V. Platt Ph.D., Thomas T. Veblen Ph.D., and Rosemary L. Sherriff

Published Online: by the Association of American Geographers. Sep. 1, 2006

<http://www.ingentaconnect.com/content/routledg/anna/2006/00000096/00000003/art00001>

Quote:

"We question the validity of thinning as a means both to reduce the threat of wildfire and to restore historic forest structure in the absence of site-specific data collection on past and present landscape conditions."

Comment #7: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Dr. Platt, Dr. Veblen and Ms. Sherriff say "We question the validity of thinning as a means both to reduce the threat of wildfire and to restore historic forest structure?"

Quote below from Excerpt from a letter to Chief Dale Bosworth and 5 members of congress, 2002

By Emily B. Roberson Ph.D., Senior Policy Analyst, California Native Plant Society

https://www.biologicaldiversity.org/campaigns/protecting_native_plants/pdfs/Fire-letter-CNPS-8-02.pdf

Quote:

"It is well established that logging and roadbuilding often increase both fuel loading and fire risk. For example, the Sierra Nevada Ecosystem Project (SNEP) Science Team (1996) concluded that "timber harvest.... has increased fire severity more than any other recent human activity" in the Sierra Nevada. Timber harvest may increase fire hazard by drying of microclimate associated with canopy opening and with roads, by increases in fuel loading by generation of activity fuels, by increases in ignition sources associated with machinery and roads, by changes in species composition due to opening of stands, by the spread of highly flammable non native weeds, insects and disease, and by decreases in forest health associated with damage to soil and residual trees (DellaSala and Frost, 2001; Graham et al., 2001; Weatherspoon et al., 1992; SNEP Science Team, 1996). Indeed a recent literature review reported that some studies have found a positive correlation between the occurrence of past logging and present fire hazard in some forest types in the Interior Columbia Basin (DellaSala and Frost, 2001)."

Comment #8 : Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Dr. Robertson say timber harvest.... has increased fire severity more than any other recent human activity?

Quote below from Logging in disguise: How forest thinning is making wildfires worse

By Chad Hanson, Ph.D.

Published by Grist Magazine, Aug 24, 2021

<https://grist.org/fix/forest-thinning-logging-makes-wildfires-worse/>

Quotes:

"The U.S. Forest Service clears trees from public lands in the name of fire prevention, but it doesn't work. There are better strategies to protect communities, but don't expect to hear about them from the logging industry."

"Fire has always been a concern for communities like Greenville in the northern Sierra Nevada mountains. And, for decades, the USFS and the timber industry told the townspeople that logging tens of thousands of acres - under the guise of "thinning" - would create "fuel breaks" to slow or even stop wildfires and prevent flames from reaching Main Street."

"Forest thinning is gaining more media attention and is heavily promoted by some land management agencies and logging interests, but science suggests the technique more often makes fires burn hotter and faster."

Comment #9: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency, why would Dr. Hanson say forest thinning makes fires burn hotter and faster?

Quote below from Logging in disguise: How forest thinning is making wildfires worse

By Chad Hanson Ph.D.

Published by Grist, Aug 24, 2021

Quote:

"The U.S. Forest Service clears trees from public lands in the name of fire prevention, but it doesn't work. There are better strategies to protect communities, but don't expect to hear about them from the logging industry."

Comment #10: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Dr. Hanson say clearing trees to prevent fire doesn't work?

Quote below from Dead trees aren't a wildfire threat, but overlogging them will ruin our forest ecosystems

By Chad Hanson, Ph.D., research ecologist

Published in the LA Times, June 27, 2016

<http://www.latimes.com/opinion/op-ed/la-oe-hanson-dead-trees-fires-vilsack-20160627-snap-story.html>

Quote:

"Trees larger than just a few inches in diameter are not consumed in fires - only the outer bark layer and the needles actually burn up - so the great majority of the dead trees in the forest do not significantly influence fire behavior, even if they are dry. Besides, once trees die, the combustible oils in the needles quickly begin to dissipate and the needles fall, making it more - not less - difficult for flames to spread through the forest canopy."

"Secretary Vilsack is well aware of this research, but it does not fit with his political and economic objectives. On June 22, he argued that large-scale "tree die-offs" put "property and lives at risk," and urged Congress to act. Specifically, he recommended passage of a bill backed by the timber industry that would fund a large expansion of the federal wildland fire suppression program, and increase commercial logging on federal public lands - all in the name of removing supposedly dangerous dead trees."

Comment #11 : Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Dr. Hanson say the great majority of the dead trees in the forest do not significantly influence fire behavior

Quote below from Using wildfires as an excuse to plunder forests

By Chad Hanson, Ph.D.

Published by Idaho State Journal, September 16, 2018

https://www.idahostatejournal.com/opinion/columns/using-wildfires-as-an-excuse-to-plunder-forests/article_6d34ccb1-8c5e-58be-8cb7-88b7fd67d0cd.html

Quote:

"The danger from wildfires is real, but cutting down more trees is not the solution. By far the most effective way to prevent damage is to focus on basic fire-safety measures for at-risk houses.

These include installing fire-resistant roofing, ember-proof exterior vents and guards to prevent wind-borne embers from igniting dry leaves and pine needles in rain gutters and creating "defensible space" by reducing combustible grasses, shrubs and small trees within 100 feet of homes. Research shows these steps can have a major impact on whether houses survive wildfires."

"On the contrary, increased logging can make fires burn more intensely. Logging, including many projects deceptively promoted as forest "thinning," removes fire-resistant trees, reduces the cooling shade of the forest canopy and leaves behind highly combustible twigs and branches."

Comment #12 : Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Dr. Hanson say increased logging can make fires burn more intensely

Quote below is from A Report to the President in Response to the Wildfires of 2000.

By Lyle Lavery USDA Forest Service and Tim Hartzell U.S. Department of the Interior, September 8, 2000

<https://www.doi.gov/sites/doi.gov/files/migrated/pmb/owf/upload/2000-Report-to-the-President.pdf>

Note the quote below is authored by a USFS scientist.

Quote:

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

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

Comment #13: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would USDA Forest Service employee Lyle Lavery say Mechanically removing fuels (through commercial timber harvesting and other means) can also have adverse effects on water quality in many areas?

Quote below is from Salvage Logging and its Ecological Consequences (246 pages)

By professor David B. Lindenmayer Ph.D., professor Phillip J. Burton Ph.D., and Professor Jerry Franklin Ph.D.

Published by Island Press, July 2012

<https://islandpress.org/books/salvag%20Consequencese-logging-and-its-ecological-consequences>

Quote:

"Salvage logging-removing trees from a forested area in the wake of a catastrophic event such as a wildfire or hurricane-is highly controversial. Policymakers and those with an economic interest in harvesting trees typically argue that damaged areas should be logged so as to avoid "wasting" resources, while many forest ecologists contend that removing trees following a disturbance is harmful to a variety of forest species and can interfere with the natural process of ecosystem recovery."

Comment #14: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would professor Lindenmayer, professor Burton and Professor Franklin say salvage logging is harmful to a variety of forest species and can interfere with the natural process of ecosystem recovery

Quote below is from: Diversion Potential at Road-Stream Crossings

By professor Furniss, Michael J. Ph.D. Michael Love Ph.D. and Sam A. Flanagan Ph.D

USDA Forest Service. 9777 1814-SDTDC. December 1997

https://www.fs.usda.gov/t-d/pubs/html/wr_p/97771814/97771814.htm#:~:text=regardless%20of%20capacity,-

Note the quote below is authored by a USFS scientist.

Quotes:

"Rarely can roads be designed and built that have no negative impacts on streams. Roads modify natural drainage patterns and can increase hillslope erosion and downstream sedimentation. Sediments from road failures at stream crossings are deposited directly into stream habitats and can have both on-site and off-site effects. These include alterations of the channel pattern or morphology, increased bank erosion and changes in channel width, substrate composition, and stability of slopes adjacent to the channels."

"All of these changes result in important biological consequences that can affect the entire stream ecosystem. One specific example involves anadromous salmonids, such as salmon and steelhead, that have complex life histories and require suitable stream habitat to support both juvenile and adult life stages."

"A healthy fishery requires access to suitable habitat that provides food, shelter, spawning gravel, suitable water quality, and access for upstream and downstream migration. Road-stream crossing failures have direct impacts on all of these components."

Comment #15: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would professor Furniss, professor Love and Dr. Flanagan say Rarely can roads be designed and built that have no negative impacts on streams. Roads modify natural drainage patterns and can increase hillslope erosion and downstream sedimentation?

Quote below is from: Minimizing the impacts of the forest road system."

By Johnny M. Grace III Ph.D. 2003 Research Engineer Forest Operations Research, Southern Research Station
USDA Forest Service

In: Proceedings of the conference 34 international erosion control association; ISSN 1092-2806 2003

International Erosion Control Association: 301-310.

http://www.srs.fs.usda.gov/pubs/ja/ja_grace011.pdf

Note the quote below is authored by a USFS scientist.

Quote:

"Roads and skid trails have been identified as a major contributor to increased turbidity of water draining logging areas resulting in increases from 4 to 93 parts per million (Hoover, 1952). Forest roads have been found to have

erosion rates from one to three orders of magnitude greater than similar undisturbed areas (Megahan, 1974) and perhaps account for as much as 90 percent of all forest erosion (Megahan, 1972). Forest roads can also cause soil erosion and stream sedimentation, which adversely impact on the nation's water quality (Authur et al., 1998).

Comment #16: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Dr. Grace III (a USFS employee) say: Forest roads have been found to have erosion rates from one to three orders of magnitude greater than similar undisturbed areas

Quote below is from: "Road Development, Housing Growth, and Landscape Fragmentation In Northern Wisconsin: 1937-1999"

By Hawbaker, Todd J. Ph.D., Volker C. Radeloff Ph.D., Murray K. Clayton Ph.D., Roger B. Hammer Ph.D., and Charlotte E. Gonzalez-Abraham Ph.D.

Published in Ecological Applications: Vol. 16, No. 3, pp. 1222-1237.

[https://esajournals.onlinelibrary.wiley.com/doi/full/10.1890/1051-](https://esajournals.onlinelibrary.wiley.com/doi/full/10.1890/1051-0761%282006%29016%5B1222%3ARDHGAL%5D2.0.CO%3B2)

[0761%282006%29016%5B1222%3ARDHGAL%5D2.0.CO%3B2](https://esajournals.onlinelibrary.wiley.com/doi/full/10.1890/1051-0761%282006%29016%5B1222%3ARDHGAL%5D2.0.CO%3B2)" \ "accessDenialLayout

Quote:

"Roads remove habitat, alter adjacent areas, and interrupt and redirect ecological flows. They subdivide wildlife populations, foster invasive species spread, change the hydrologic network, and increase human use of adjacent areas." (abstract)

Comment #17: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Dr. Hawbaker, Dr. Volker, Dr. Clayton, Dr. Hammer, and Dr. Gonzalez-Abraham say " Roads remove habitat, alter adjacent areas, and interrupt and redirect ecological flows. They subdivide wildlife populations, foster invasive species spread, change the hydrologic network, and increase human use of adjacent areas

Quote below is from: Restoring Forest Roads

By Kimberly Lowe Ph.D.

A Northern Arizona University Ecological Restoration Institute publication

Working Paper 12. June, 2005.

http://openknowledge.nau.edu/id/eprint/1305/7/Lowe_2005_ERIWorkingPaper12_RestoringForestRoads.pdf

Quote:

"Physical disturbances caused by road construction and vehicle use create ideal conditions for colonization by invasive exotic plant species. The use of roads by vehicles, machinery, or humans often aids the spread of exotic plant seeds. Once established, they can have long-term impacts on surrounding ecosystems and can be difficult to remove."

"Roads are known to cause habitat fragmentation. Many create ecological 'edges' with different plant species, light levels, and hiding cover, all of which may alter animal survival, reproductive success, and movement patterns. The introduction of exotic plants can disrupt the availability of native vegetation used by wildlife for food and shelter (Trombulak and Frissell 1999)."

"Forest roads often develop a water-repellent soil layer caused by lack of vegetative cover and changes in soil composition. This can substantially influence how runoff is processed. Erosion, the formation of water channels beside the road, and increased sediment loads in nearby streams are common results of this process (Baker 2003)."

"Because they provide easier access to many forest tracts, forest roads often allow more human-caused fires to be ignited."

Comment #18: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Dr. Lowe say Because forest roads provide easier access to many forest tracts, forest roads often allow more human-caused fires to be ignited?

Quote below is from: Hydrological processes and pathways affected by forest roads: what do we still need to learn?

By Luce, Charles H. Ph.D., USFS Rocky Mountain Research Station

Hydrologic Processes: 16, 2901-2904, September 27, 2002

<http://www.fs.fed.us/rm/boise/teams/soils/Publications/Luce%202002%20HP.pdf>

Note the quote below is authored by a USFS scientist.

Quotes:

"Almost everywhere people live and work they build and use unimproved roads, and wherever the roads go, a range of environmental issues follows."

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

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

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

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

Comment #19: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would USDA Forest Service employee Charles Luce say Among the environmental effects of unimproved roads, those on water quality and aquatic ecology are some of the most critical. Increased chronic sedimentation, in particular, can dramatically change the food web in affected streams and lakes?

Quote below is from: Sediment Plume Development from Forest Roads: How are they related to Filter Strip Recommendations?

By J. McFero Grace III, Research Engineer, US Forest Service, G.W. Andrews Forestry Sciences Lab

An ASAE/CSAE Meeting Presentation, Paper Number: 045015, August 1-4, 2004.

http://www.srs.fs.usda.gov/pubs/ja/ja_grace017.pdf

Note the quote below is authored by a USFS scientist.

Quote:

"Research has shown that roads can have adverse impacts on the water quality on the forest landscape (Authur et al. 1998; Binkley and Brown 1993; Megahan et al. 1991). The forest road system has been identified by previous research as the major source of soil erosion on forestlands (Anderson et. al 1976; Patric 1976; Swift

1984; Van Lear et al. 1997). Furthermore, roads are cited as the dominant source of sediment that reaches stream channels (Packer 1967; Trimble and Sartz 1957; Haupt 1959)."

Comment #20: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Mr. Grace and Mr. Andrews (both USFS employees) say roads are cited as the dominant source of sediment that reaches stream channels?

Quote below is from: Predicting Road Surface Erosion from Forest Roads in Washington State
By Walter F. Megahan, Ph.D.
from a presentation presented at the 2003 Geological Society of America meeting.
http://gsa.confex.com/gsa/2003AM/finalprogram/abstract_67686.htm

Quote:

"Erosion from forest roads can be a large source of sediment in watersheds managed for timber production."

Comment #21: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Dr. Megahan say Erosion from forest roads can be a large source of sediment in watersheds managed for timber production?

Quote below is from: Statements at a Press Conference with Senator Robert Torricelli, April 28, 1998
By David Montgomery Ph.D., about S. 977 and HR 1376), the Act to Save America's Forests
Dr. Montgomery is an Associate Professor for the Department of Geological Sciences at the University of Washington.
<http://www.saveamericasforests.org/news/ScientistsStatement.htm>

Quote:

"Today, addressing the adverse impacts of forest roads is consistently identified as one of the highest watershed restoration priorities in U.S. forests-in many forested watersheds in the western United States there is a greater road density than stream density. It is simply irrational to spend millions of dollars subsidizing further forest road construction when we are simultaneously spending millions of dollars to offset detrimental effects associated with similar actions in the past."

Comment #22: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Dr. Montgomery say It is simply irrational to spend millions of dollars subsidizing further forest road construction when we are simultaneously spending millions of dollars to offset detrimental effects associated with similar actions in the past?

Quote below is from: Statements at a Press Conference with Senator Robert Torricelli, April 28, 1998
By Seth Reice Ph.D., about S. 977 and HR 1376), the Act to Save America's Forests
Dr. Reice is Associate Professor of Biology in the Department of Biology and Curriculum in Ecology, University of North Carolina
<http://www.saveamericasforests.org/news/ScientistsStatement.htm>

quote:

"Clearcutting, along with the vast network of logging roads, result in sedimentation and soil erosion into our national forest's rivers and streams. Sedimentation degrades the water quality, impairs the habitat for fish and macroinvertebrates, and limits the ecosystem functions and services of streams.

The Act to Save America's forests bans clearcutting, restores damaged areas by allowing regeneration of native species, and reduces road building by prohibiting further road construction in core areas of biodiversity. These are necessary steps, to prevent further erosion and will help rehabilitate our forests our streams, and protect our wildlife.

Comment #23: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Dr. Reice say banning clearcutting will prevent further erosion and will help rehabilitate our forests our streams, and protect our wildlife?

Quote below is from: Review of Ecological Effects of Roads on Terrestrial and Aquatic Communities
By Christopher Frissell Frissell Ph.D and Stephen Trombulak Ph.D
Published by Conservation Biology, December 24, 2001
<https://conbio.onlinelibrary.wiley.com/doi/full/10.1046/j.1523-1739.2000.99084>

Quote:

"We reviewed the scientific literature on the ecological effects of roads and found support for the general conclusion that they are associated with negative effects on biotic integrity in both terrestrial and aquatic ecosystems."

"Not all species and ecosystems are equally affected by roads, but overall the presence of roads is highly correlated with changes in species composition, population sizes, and hydrologic and geomorphic processes that shape aquatic and riparian systems."

Comment #24: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would these 2 experts say roads are associated with negative effects on biotic integrity in both terrestrial and aquatic ecosystems?

Quote below is from: Sediment Production from Forest Road Surfaces
By Reid, L. M. Ph.D. and T. Dunne
Published by WATER RESOURCES RESEARCH, VOL. 20, NO. 11, PAGES 1753-1761, NOVEMBER 1984
https://www.fs.fed.us/psw/publications/reid/psw_1984_reid001.pdf

Quote:

"Erosion on roads is an important source of fine-grained sediment in streams draining logged basins of the Pacific Northwest. Runoff rates and sediment concentrations from 10 road segments subject to a variety of traffic levels were monitored to produce sediment rating curves and unit hydrographs for different use levels and types of surfaces. These relationships are combined with a continuous rainfall record to calculate mean annual sediment yields from road segments of each use level. A heavily used road segment in the field area contributes 130 times as much sediment as an abandoned road. A paved road segment, along which cut slopes and ditches are the only sources of sediment, yields less than 1% as much sediment as a heavily used road with a gravel surface."

Comment #25: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Dr. Reid say A heavily used road segment contributes 130 times as much sediment as an abandoned road

Quote below is from: Sediment Plume Development from Forest Roads: How are they related to Filter Strip Recommendations?
By J. McFero Grace III, Research Engineer, US Forest Service, G.W. Andrews Forestry Sciences Lab

An ASAE/CSAE Meeting Presentation, Paper Number: 045015, August 1-4, 2004.
http://www.srs.fs.usda.gov/pubs/ja/ja_grace017.pdf

Note the quote below is authored by a USFS scientist.

Quote:

"Research has shown that roads can have adverse impacts on the water quality on the forest landscape (Authur et al. 1998; Binkley and Brown 1993; Megahan et al. 1991). The forest road system has been identified by previous research as the major source of soil erosion on forestlands (Anderson et. al 1976; Patric 1976; Swift 1984; Van Lear et al. 1997). Furthermore, roads are cited as the dominant source of sediment that reaches stream channels (Packer 1967; Trimble and Sartz 1957; Haupt 1959)."

Comment #26: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Mr. Grace say roads are cited as the dominant source of sediment that reaches stream channels?

Quote below is from: Cumulative effects of roads and logging on landscape structure in the San Juan Mountains, Colorado (USA)

By Kevin McGarigal Ph.D., William H. Romme Ph.D., Michele Crist Ph.D. and Ed Roworth Ph.D.

Published in Landscape Ecology, Volume 16, Number 4 / May, 2001

<https://www.umass.edu/landeco/pubs/mcgarigal.et.al.2001.pdf>

Quote:

"Overall, roads had a greater impact on landscape structure than logging in our study area. Indeed, the 3-fold increase in road density between 1950-1993 accounted for most of the changes in landscape configuration associated with mean patch size, edge density, and core area."

Comment #27: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Dr. McGarigal, Dr. Romme, Dr. Crist and Dr. Roworth say "roads had a greater impact on landscape structure than logging?"

Quote below is from: Forest Roads: A Synthesis of Scientific Information

By Gucinski, Hermann Ph.D., Michael J. Furniss, Robert R. Ziemer Ph.D. and Martha H. Brookes, Editors. 2001

USDA Forest Service, General Technical Report PNW-GTR-509, 2001

<http://www.fs.fed.us/pnw/pubs/gtr509.pdf>

Note the quote below is authored by USFS scientists.

Quotes:

"Roads have well-documented, short- and long-term effects on the environment that have become highly controversial, because of the value society now places on unroaded wildlands and because of wilderness conflicts with resource extraction."

"(Road) consequences include adverse effects on hydrology and geomorphic features (such as debris slides and sedimentation), habitat fragmentation, predation, road kill, invasion by exotic species, dispersal of pathogens, degraded water quality and chemical contamination, degraded aquatic habitat, use conflicts, destructive human actions (for example, trash dumping, illegal hunting, fires), lost solitude, depressed local economies, loss of soil

productivity, and decline in biodiversity."

Comment #28: Ranger Smith if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Dr. Gucinski, Mr. Furniss, Dr. Zierner and Ms. Brookes say Road consequences include adverse effects on hydrology and geomorphic features (such as debris slides and sedimentation), habitat fragmentation, predation, road kill, invasion by exotic species, dispersal of pathogens, degraded water quality and chemical contamination, degraded aquatic habitat, use conflicts, destructive human actions, lost solitude, depressed local economies, loss of soil productivity, and decline in biodiversity?

Quote below is from: Forest Fragmentation and Roads
Published by Eastern Forest Environmental Threat Assessment Center
U.S. Forest Service - Southern Research Station, February, 2023
<http://www.forestthreats.org/publications/su-srs-018/fragmentation>

Note the quote below is authored by a USFS scientist.

Quote:

"Fragmentation caused by roads is of special interest because the effects of roads extend tens to hundreds of yards from the roads themselves, altering habitats and water drainage patterns, disrupting wildlife movement, introducing exotic plant species, and increasing noise levels. The land development that follows roads out into rural areas usually leads to more roads, an expansion process that only ends at natural or legislated barriers."

Comment #29: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would the U.S. Forest Service - Southern Research Station employees say the effects of roads extend tens to hundreds of yards from the roads themselves, altering habitats and water drainage patterns, disrupting wildlife movement, introducing exotic plant species, and increasing noise levels?

Quote below is from: Watershed's Response to Logging and Roads: South Fork of Caspar Creek, California, 1967-1976
By Raymond M. Rice Ph.D., Forest B. Tilley and Patricia A. Datzman.
USDA Forest Service, Research Paper PSW-146, 1979
<http://www.fs.fed.us/psw/publications/rice/Rice79.pdf>

Quote:

"Disturbances from roadbuilding and logging changed the sediment/discharge relationship of the South Fork from one which was supply dependent to one which was stream power dependent, resulting in substantial increases in suspended sediment discharges."

"Road construction and logging appear to have resulted in increases in average turbidity levels (as inferred from suspended sediment increases) above those permitted by Regional Water Quality Regulations."

Comment #30: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Dr. Rice, Mr. Tilley and Ms. Datzman say road construction and logging appear to have resulted in increases in average turbidity levels above those permitted by Regional Water Quality Regulations?

Quote below is from: Forest Road Erosion, Sediment Transport and Model Validation in the Southern Appalachians
By Mark S. Riedel Ph.D. and James M. Vose Ph.D.

USDA Forest Service, Southern Research Station, Coweeta Hydrologic Laboratory
Presented at the Second Federal Interagency Hydrologic
Modeling Conference, July 28 - August 1, 2002.
http://www.srs.fs.usda.gov/pubs/ja/ja_riedel002.pdf

Note the quote below is authored by 2 USFS scientists.

Quote:

"Sediment eroded from gravel roads can be a major component of the sediment budget in streams in this region (Van Lear, et al, 1995)."

Comment #31: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Dr. Riedel and Dr. Vose (both USFS employees) say Sediment eroded from gravel roads can be a major component of the sediment budget in streams in this region?

Quote below is from: Predicting Road Surface Erosion from Forest Roads in Washington State
By Walter F. Megahan, Ph.D.
from a presentation presented at the 2003 Geological Society of America meeting.
http://gsa.confex.com/gsa/2003AM/finalprogram/abstract_67686.htm

Quote:

"Erosion from forest roads can be a large source of sediment in watersheds managed for timber production."

Comment #32: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Dr. Megahan say Erosion from forest roads can be a large source of sediment in watersheds managed for timber production?

Quote below is from: Statements at a Press Conference with Senator Robert Torricelli, April 28, 1998
By David Montgomery Ph.D., about S. 977 and HR 1376), the Act to Save America's Forests
Dr. Montgomery is an Associate Professor for the Department of Geological Sciences at the University of Washington.
<http://www.saveamericasforests.org/news/ScientistsStatement.htm>

Quote:

"Today, addressing the adverse impacts of forest roads is consistently identified as one of the highest watershed restoration priorities in U.S. forests-in many forested watersheds in the western United States there is a greater road density than stream density. It is simply irrational to spend millions of dollars subsidizing further forest road construction when we are simultaneously spending millions of dollars to offset detrimental effects associated with similar actions in the past."

Comment #33: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would professor Montgomery says we are simultaneously spending millions of dollars to offset detrimental effects associated with roads?

Quote below is from: Statements at a Press Conference with Senator Robert Torricelli, April 28, 1998
By Seth Reice Ph.D., about S. 977 and HR 1376), the Act to Save America's Forests
Dr. Reice is Associate Professor of Biology in the Department of Biology and Curriculum in Ecology, University of North Carolina

<http://www.saveamericasforests.org/news/ScientistsStatement.htm>

Quote:

"Clearcutting, along with the vast network of logging roads, result in sedimentation and soil erosion into our national forest's rivers and streams. Sedimentation degrades the water quality, impairs the habitat for fish and macroinvertebrates, and limits the ecosystem functions and services of streams.

The Act to Save America's forests bans clearcutting, restores damaged areas by allowing regeneration of native species, and reduces road building by prohibiting further road construction in core areas of biodiversity. These are necessary steps, to prevent further erosion and will help rehabilitate our forests our streams, and protect our wildlife.

Comment #34: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Dr. Reice say Clearcutting, along with the vast network of logging roads, result in sedimentation and soil erosion into our national forest's rivers and streams?

Quote below is from: Hydrological processes and pathways affected by forest roads: what do we still need to learn?

By Luce, Charles H. Ph.D., USFS Rocky Mountain Research Station

Published in Treesearch USFS, 2002

<https://www.fs.usda.gov/research/treesearch/23954>

Note the quote below is authored by a USFS scientist.

Quote:

"Almost everywhere people live and work they build and use unimproved roads, and wherever the roads go, a range of environmental issues follows."

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

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

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

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

Comment #35: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Dr. Luce say among the environmental effects of unimproved roads, those on water quality and aquatic ecology are some of the most critical?

Quote below is from: Erosion on logging roads in northwestern California: How much is avoidable?

By John McCashion and Raymond Rice Ph.D.

Published by the Journal of Forestry, January 1983

<https://www.fs.usda.gov/research/treesearch/3445>

Quote:

"A study was made on 344 miles of logging roads in northwestern California to assess sources of erosion and the extent to which road-related erosion is avoidable. At most, about 24 percent of the erosion measured on the logging roads could have been prevented by conventional engineering methods. The remaining 76 percent was caused by site conditions and choice of alignment. On 30,300 acres of commercial timberland, an estimated 40 percent of the total erosion associated with management of the area was found to have been derived from the road system."

Comment #36: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency the why would Dr. Rice and Mr. McCashion say an estimated 40 percent of the total erosion associated with management of the area was found to have been derived from the road system?

Quote below is from: Road Development, Housing Growth, and Landscape Fragmentation In Northern Wisconsin: 1937-1999

By Hawbaker, Todd J. Ph.D., Volker C. Radeloff Ph.D., Murray K. Clayton Ph.D., Roger B. Hammer Ph.D., and Charlotte E. Gonzalez-Abraham Ph.D.

Published in Ecological Applications, 01 June 2006

[https://esajournals.onlinelibrary.wiley.com/doi/abs/10.1890/1051-0761\(2006\)016%5B1222:RDHGAL%5D2.0.CO%3B2](https://esajournals.onlinelibrary.wiley.com/doi/abs/10.1890/1051-0761(2006)016%5B1222:RDHGAL%5D2.0.CO%3B2)

Quote:

"Roads remove habitat, alter adjacent areas, and interrupt and redirect ecological flows. They subdivide wildlife populations, foster invasive species spread, change the hydrologic network, and increase human use of adjacent areas." (abstract)

Comment #37: Ranger Smith, if as you say logging and road construction restores ecological integrity, diversity, function, and resiliency why would Dr. Hawbaker, Dr. Radeloff, Dr. Murray, Dr. Clayton, and Dr. Gonzalez-Abraham say Roads remove habitat, alter adjacent areas, and interrupt and redirect ecological flows?

Request for changes to be made to the final NEPA document: Indicate:

- 1) which resources will be restored by commercial timber harvest,
- 2) why the resources need restoration,
- 3) the natural resources in the area that could be harmed by the timber sale treatments,
- 4) specific independent science that shows logging and roading the sale area will achieve natural resource restoration as you say, and
- 5) why the statements by expert scientists in Opposing Views Science Attachment #21 do not apply to the Helena National Forest

;;, You have failed Ranger Smith. You support the USFS's tragic euphemism "restoration project" they dreamed up to replace "timber sale." I'm sorry you cannot think for yourself and be honest with the people you claim to serve.

Road Construction and Reconstruction
cause Significant Ecological Harm. You know this
yet you Consider Resource Destruction caused by
Roads Acceptable Collateral Damage to
Removing your Precious Volume. Please Analyze an

Action Alternative that uses only Existing Roads
and Accept the Reduced Volume.

You propose to construct 24.9 miles of temporary road.

Please don't claim the No Action alternative satisfies this request to not construct any new roads. This project has a few beneficial actions that won't occur if No Action is selected. I just ask you to analyze an action alternative using only existing roads. Eliminating the clear resource damage caused by temporary road construction that is orders of magnitude more important than the loss of a little volume isn't it? Consider requiring longer skidding distances.

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

Request for changes to be made to the final NEPA document: Analyze a no road construction (including temp roads) action (emphasis added) alternative in detail and assure the environmental effects disclosures are accurate which means you will tell the public the resource damage will be significantly reduced without road construction. Don't tell me you will be unable to implement your Proposed Action without new roads. If you do, you are clearly choosing resource destruction and volume over a healthy, proper functioning forest.

Failure to analyze a no new road construction alternative will violate the following laws. Your OGC attorneys won't get you out of this one.

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

NEPA Sec. 101(b)(2) because you did not "use all practicable means, consistent with other essential considerations of national policy" to avoid environmental degradation, preserve historic, cultural, and natural resources, and "promote the widest range of beneficial uses of the environment.

Few People would knowingly take action that
might kill someone else.

Your pre-decisional EA at pages 15-17 discuss the need to apply a herbicides to control the spread of noxious weeds. The science on the next 20 pages would convince any reasonable, intelligent person to not apply Roundup or any other herbicide that contains the chemical glyphosate.

When the authorities find out you are trying to justify spraying a carcinogen on vegetation growing on land where families recreate it will be a career-ending event for you Ranger Smith.

Read the obituaries. Most people died from cancer. According to cancer researchers from Tulane University "cancer is the second highest killer of people in the US after heart disease. This year alone, the American Cancer Society estimates that 2 million new cases will be diagnosed and 611,720 people will die. The obituaries do not indicate how the dead person got cancer. If the public knew about the clear scientific tie between Roundup and cancer that the EPA and USDA refuse to acknowledge there would be major problems for certain employees.

You will wake up each morning wondering whether a human or wildlife species is dying a slow death because of your ignorance.

Monsanto can hire the best attorneys money can buy.

If Monsanto is a reputable, trustworthy corporation why would the judge order Monsanto to pay the plaintiffs over \$12 billion based on 5 jury trials: 1 in 2018, 2 in 2019, 1 in 2020 and 1 in 2021? Another trial is scheduled for April 2022.

Monsanto's Court Loss --- August 2018

"In July 2018, Dewayne Johnson (a former school groundskeeper) was diagnosed with non-Hodgkin's lymphoma. He sued Monsanto alleging the chemical glyphosate (an ingredient in Roundup) caused his cancer. Mr. Johnson used Roundup as part of his job. On August 10, 2018 a jury in San Francisco delivered a verdict in Mr. Johnson's favor. The judge ordered Monsanto to pay Mr. Johnson \$289 million in total damages."

Here's a link to the verdict:

<https://www.cbsnews.com/news/dewayne-johnson-monsanto-roundup-weed-killer-jury-award-today-2018-08-10/>

Monsanto's Court Loss --- March 2019

"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."

Here's a link to the verdict:

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

Monsanto's Court Loss --- May 2019

"On May 13, 2019 a jury in Alameda County California ruled that the couple, Alva and Alberta Pilliod of Livermore, Calif., both contracted non-Hodgkin's lymphoma because of their use of a glyphosate-based herbicide. They were each awarded \$1 billion in punitive damages and an additional \$55 million in collective compensatory damages."

Here's a link to the verdict:

<https://www.npr.org/2019/05/13/723056453/california-jury-awards-2-billion-to-couple-in-roundup-weed-killer-cancer-trial>

Monsanto's Court Loss --- June 2020

"On June 24, 2020 BayerAG was ordered to pay more than \$10 billion to end tens of thousands of lawsuits filed over its Roundup weedkiller.

The settlement calls for Bayer to pay from \$8.8 billion to \$9.6 billion to resolve current Roundup lawsuits. The company will also set aside \$1.25 billion to fund payouts for potential claims in the future."

Here's a link to the verdict:

<https://www.npr.org/2020/06/24/882949098/bayer-to-pay-more-than-10-billion-to-resolve-roundup-cancer-lawsuits>

Monsanto Agrees to Plead Guilty --- December 2021

"Monsanto admitted in a plea agreement filed today that it committed 30 misdemeanor crimes related to the use of a glufosinate ammonium-based product sold under the brand name Forfeit 280. After using the product in

2020 on corn fields on Oahu, Monsanto allowed workers to enter the fields during a six-day "restricted-entry interval" (REI) after the product was applied.

The plea agreement calls for Monsanto to serve three years of probation, pay a total of \$12 million and continue for another three years a comprehensive environmental compliance program that includes third-party auditor."

Here's a link to the plea agreement:

<http://www.hawaiiifreepress.com/Articles-Main/ID/29742/Monsanto-Agrees-to-Plead-Guilty-to-Illegally-Using-Pesticide-at-Corn-Growing-Fields-in-Hawaii>

Court Orders Health Canada To Reassess Safety of Roundup ---- February 11, 2022

"Canadian regulators must conduct a new review of the safety of Roundup weed killer products, following a court's decision that they did not follow their own rules in granting the glyphosate-based herbicide approval."

"In response to the growing concerns over the safety of Roundup, new restrictions and bans have been imposed in many countries, and a number of regulators are reassessing the popular weed killer. It has also led to activists pushing for agencies to take a much harder look at the underlying data about the potential side effects of exposure to glyphosate, the active ingredient."

Here's a link to the information:

<https://www.aboutlawsuits.com/roundup-safety-review-canada/>

Monsanto seeks "emergency" delay for St. Louis trial, March 24, 2022

"Monsanto on Thursday asked a St. Louis judge to delay the start of a trial over claims brought by three men alleging exposure to Monsanto's glyphosate-based herbicides, such as the popular Roundup brand, caused them to develop non-Hodgkin lymphoma.

Here's a link to the information:

<https://careygillam.substack.com/p/monsanto-cites-emergency-in-seeking>

Court rejects Trump-era EPA finding that weed killer is safe, June 17, 2022

"A federal appeals court has rejected a Trump administration finding that the active ingredient in the weed killer Roundup does not pose a serious health risk and is "not likely" to cause cancer in humans."

"The California-based 9th U.S. Circuit Court of Appeals ordered the Environmental Protection Agency to reexamine its 2020 finding that glyphosate did not pose a risk for people exposed to it by any means - on farms, yards or roadsides or as residue left on food crops."

Here's a link to the information:

<https://abcnews.go.com/Business/wireStory/court-rejects-trump-era-epa-finding-weed-killer-85474509>

U.S. Supreme Court rejects Bayer bid to nix Roundup weedkiller suits, June 21, 2022

"WASHINGTON, June 21 (Reuters) - The U.S. Supreme Court on Tuesday rejected Bayer AG's bid to dismiss legal claims by customers who contend its Roundup weedkiller causes cancer as the German company seeks to avoid potentially billions of dollars in damages.

The justices turned away a Bayer appeal and left in place a lower court decision that upheld \$25 million in

damages awarded to California resident Edwin Hardeman, a Roundup user who blamed his cancer on the pharmaceutical and chemical giant's glyphosate-based weedkillers."

Here's a link to the information:

<https://www.reuters.com/legal/government/us-supreme-court-rejects-bayer-bid-nix-roundup-weedkiller-suits-2022-06-21/>

Expert US Groups Launch Legal Action in Attempt to Ban Glyphosate Herbicides, December 18, 2023

"A groundbreaking legal action launched Wednesday calls on the U.S. Environmental Protection Agency (EPA) to immediately suspend and cancel the dangerous herbicide glyphosate, the main ingredient in Monsanto's Roundup."

Here's a link to the information:

https://sustainablepulse.com/2023/12/18/expert-groups-launch-legal-action-to-force-epa-to-ban-glyphosate-herbicides/?utm_source=newsletter&utm_medium=email&utm_campaign=glyphosate_gmos_and_pesticides_weekly_global_news_bulletin&utm_term=2024-02-13

Bayer faces billions in Roundup claims as legal strategy falls short, January 31, 2024

Bayer AG faces mounting pressure to come up with a new plan for handling its Roundup weedkiller litigation after getting hammered by U.S. jury verdicts totaling almost \$4 billion over the last three months.

"The German conglomerate's latest courtroom loss was its biggest since Roundup cases started going to trial five and a half years ago, with a Pennsylvania jury awarding \$2.25 billion to a former Roundup user who blamed his cancer diagnosis on long-term exposure to the herbicide.

That prompted a fresh slump in Bayer's shares, as investors worried about the more than 50,000 Roundup claims outstanding in the U.S. that accuse the company's Monsanto unit of hiding the product's cancer risks. After last week's award, they're beginning to worry about whether the company has the financial resources to keep fighting these cases for years to come."

Here's a link to the information:

<https://www.japantimes.co.jp/business/2024/01/31/companies/bayer-billions-roundup-legal-strategy/>

This just in

Important text is highlighted in red.

Make Your State the First to Ban Monsanto's Roundup Weedkiller!

Published by Organic Consumers Assn.2024

https://advocacy.organicconsumers.org/page/15280/action/1?utm_medium=email&utm_source=engagingnetworks&utm_campaign=OB+862&utm_content=OB+862&ea.url.id=2770037

Excerpt:

"Since 2015, when the World Health Organization confirmed that glyphosate, the main ingredient in Monsanto's Roundup weedkiller, is a probable human carcinogen, 140,000 glyphosate cancer victims suffering from non-Hodgkins lymphoma have filed lawsuits against Bayer which now owns Monsanto.

Bayer settled most Roundup claims against it in 2020 for up to \$10.9 billion, but still faces close to 40,000 Roundup-related cases.

Non-Hodgkins lymphoma is just one cancer caused by glyphosate contamination.

The Global Glyphosate Study has found that the most widely used weed killer in the world is likely to be a major cause in the rapid rise in childhood leukemia.

This follows findings from the UC Berkeley School of Public Health that showed that childhood exposure to glyphosate is linked to liver inflammation and metabolic disorder in early adulthood, which could lead to liver cancer, diabetes and cardiovascular disease later in life."

Scientists link numerous pesticides to a range of cancer types

Published by Beyond Pesticides, August 13, 2024

Link:

<https://beyondpesticides.org/dailynewsblog/2024/08/scientists-link-numerous-pesticides-to-a-range-of-cancer-types/?emci=f19d7d02-5b5a-ef11-991a-6045bddbfc4b&emdi=db4fd69a-735a-ef11-991a-6045bddbfc4b&ceid=16262>

Excerpt:

"In terms of threats to health, cancer remains top of the mind for most people. Globally, about ten million people die of cancer each year. And while treatments for cancer and survival times have burgeoned over the years, many cancers-particularly colorectal and breast cancer-, and the increase is most dramatic among people between 55 and 64. At the same time, the evidence of pesticides' role in cancer incidence is also increasing.

Pesticides have been linked to numerous diseases, including Parkinson's, dementia, allergies and diabetes, as well as many cancers. But the science behind pesticide-cancer associations is contested turf, with much resistance being mounted by the pesticide industry and skepticism being expressed by regulatory scientists. For example, in 2022 Beyond Pesticides discussed evidence that EPA colluded with Monsanto in 2017 to downplay the carcinogenic effects of glyphosate, even after the International Agency for Research on Cancer had made the connection in 2015."

Bayer's Monsanto Withdraws Legal Challenge to Mexico's Ban on Glyphosate and GMOs

Published by Sustainable Pulse, July 15, 2024

Link:

https://sustainablepulse.com/2024/07/15/bayers-monsanto-withdraws-legal-challenge-to-mexicos-ban-on-glyphosate-and-gmos/?utm_source=newsletter&utm_medium=email&utm_campaign=glyphosate_gmos_and_pesticides_weekly_global_news_bulletin&utm_term=2024-08-06

Excerpt:

"In what is being called a significant victory for Mexico, Monsanto has withdrawn its legal challenge against the 2020 presidential decree aimed at banning glyphosate and genetically modified (GM) corn for human consumption, Mexico News Daily reported. The Mexican government's National Council of Humanities, Sciences and Technologies (Conahcyt) heralded the decision as a national "triumph for life, death and food sovereignty." "

"The battle included over 30 amparo (judicial protective order) suits aiming to declare the decree unconstitutional. In July 2022, for example, Bayer, which acquired Monsanto six years ago, obtained a court order against the application of the decree.

However, the majority of the cases concluded with rulings unfavorable to the corporations involved. Conahcyt provided scientific and legal defenses, presenting more than 250 pieces of evidence to support the decree."

Bulgaria Bans Glyphosate for Multiple Uses after Successful Agrolink Campaign

Published by Sustainable Pulse, July 15, 2024

Link:

https://sustainablepulse.com/2024/07/15/bulgaria-bans-glyphosate-for-multiple-uses-after-successful-agrolink-campaign/?utm_source=newsletter&utm_medium=email&utm_campaign=glyphosate_gmos_and_pesticides_weekly_global_news_bulletin&utm_term=2024-07-18

Excerpt:

"The campaign of the AGROLINK Association to ban glyphosate-based herbicides in Bulgaria, started 7 years ago, has ended successfully. The use of glyphosate is now banned in areas used by the general public or by vulnerable groups: public parks and gardens, sports and recreation grounds, school and children's playgrounds, as well as near health and educational facilities."

Presence of Weed Killer Glyphosate in Human Sperm Elevates Debate on Pesticide Threats to Human Survival

Published by Beyond Pesticides, June 4, 2024

Link:

<https://beyondpesticides.org/dailynewsblog/2024/06/presence-of-weed-killer-glyphosate-in-human-sperm-elevates-debate-on-pesticide-threats-to-human-survival/>

Excerpt:

"Glyphosate (GLY) was detected in the seminal plasma of the participants, with concentrations that were four times higher than those observed in blood plasma. In contrast, its main metabolite, amino-methyl-phosphonic acid (AMPA), was not detectable. There was a strong positive correlation between the concentrations of glyphosate in blood plasma and seminal plasma and the levels of 8-hydroxy-2'-deoxyguanosine (8-OHdG), a marker of DNA damage due to oxidative stress. The study observed higher concentrations of Total Oxidant Status (TOS), Oxidative Stress Index (OSI) (which is the ratio of TOS to Total Antioxidant Status (TAS)), and malondialdehyde (MDA) in both blood and seminal plasma of men with detectable levels of glyphosate. The Total Antioxidant Status (TAS) in both blood and seminal plasma was similar in men with or without detectable levels of glyphosate, suggesting that the antioxidant capacity remained constant regardless of glyphosate exposure."

High Levels of Weedkiller Found in More than Half of Sperm Samples, Study Finds

Published by Sustainable Pulse, May 23, 2024

Link:

https://sustainablepulse.com/2024/05/23/high-levels-of-weedkiller-found-in-more-than-half-of-sperm-samples-study-finds/?utm_source=newsletter&utm_medium=email&utm_campaign=glyphosate_gmos_and_pesticides_weekly_global_news_bulletin&utm_term=2024-05-28

Excerpt:

"More than 55% of sperm samples from a French infertility clinic contained high levels of glyphosate, the world's most common weedkiller, raising further questions about the chemical's impact on reproductive health and overall safety, a new study found."

"The paper comes as researchers look for answers to why global fertility rates, and many suspect exposure to toxic chemicals like glyphosate is a significant driver of the decline."

"The study's authors wrote it "would be wise for regulators to apply a precautionary principle" in regulation, which means erring on the side of caution to protect human health until further research can be done to confirm the problems identified in the study."

Beating Back the Toxic Onslaught

Published by Organic Consumers Assn., May 19, 2024

Link:

<https://organicconsumers.org/together-we-are-making-waves/>

Excerpt:

"Since we launched Millions Against Monsanto in the late 1990s, the Organic Consumers Association has been on the forefront of the international movement to ban the world's worst toxins, starting with Monsanto's carcinogenic glyphosate-based Roundup herbicide and Bayer's bee-killing neonicotinoid insecticides. Bayer-Monsanto is resorting to dirty tricks, trying to pass laws to keep pesticide-exposed cancer victims from suing and stop states from banning their toxins, because they know, if democracy prevails, they'll lose!"

Sick Because of Roundup? These Bills Could Make Suing Impossible.

By Nick Tabor

Published by The New Republic, March 12, 2024

Link:

<https://newrepublic.com/article/179653/roundup-cancer-monsanto-pesticides>

Excerpt:

"Six years ago, the multinational corporation Bayer made one of the worst purchases in American business history: It bought Monsanto, the maker of Roundup, for \$63 billion. Monsanto was already by a school groundskeeper in the Bay Area who said his exposure to the weedkiller had given him non-Hodgkin's lymphoma. Two months after the merger, a jury awarded the groundskeeper \$289 million. Since then, Bayer has been pummeled with lawsuits, and between, it has been required to pay out more than \$14 billion to plaintiffs. Its stock has 70 percent of its value.

"Since January, bills to shield pesticide manufacturers from lawsuits have been filed in three states where Bayer has a major corporate presence: Missouri (where Monsanto is headquartered), Idaho (where it has a phosphate mine), and Iowa (where it has a manufacturing plant). Daniel Hinkle, an attorney with the American Association for Justice, who works with trial lawyer associations throughout the country, predicted that if these bills succeed, Bayer will push similar legislation in a number of other states next year."

SIGN NOW: Tell Bayer-Monsanto to STOP selling toxic Roundup immediately!

Published by Friends of the Earth, March 2024

Link:

<https://action.foe.org/page/65548/action/1?ea.tracking.id=Email&ea.url.id=2426815>

Excerpt:

"Milkweed is disappearing - and monarch butterflies along with it.

Toxic pesticides are wiping out baby monarchs' only food source. We can't let these precious pollinators disappear.

Bayer-Monsanto has spent years?lying, denying, and distracting?from the fact that its products are contributing to the pollinator crisis and harming people. It has manipulated science and invested in disinformation campaigns to trick the public into thinking products like Roundup are safe.?But Bayer-Monsanto's pesticide products are NOT SAFE.

It's past time Bayer-Monsanto stops lying and stops selling pollinator-toxic pesticides."

EPA Taking Public Comment on Scientific Integrity Amid Criticism by Inspector General and Whistleblowers
Published by Beyond Pesticides, February 10, 2024

Link:

<https://mail.google.com/mail/u/0/#inbox/FMfcgzGxRfBSjPVdFjGFlxhXWtGCglSD>

Excerpt:

"As a result of . . . litigation [associated with health effects of glyphosate/Roundup], Monsanto is forced to turn over millions of pages of internal reports, documents, emails, memos, and different studies. When you look at those along with documents that I and my colleagues at U.S. Right to Know have obtained through the Freedom of Information Act from EPA, the U.S. Department of Agriculture (USDA), the Food and Drug Administration (FDA), and various state universities, it's a pretty incredible picture of collusion, deception, and deceit.

The documents show all of these different things: ghost-written research papers that assert glyphosate's safety for publication and regulatory review; alternative assessments provided for studies that indicate harm. So if a regulator is looking at a study and says, "Gosh, this looks like it causes cancer," Monsanto will then give them the rationale for how to interpret the data in a different way. They have networks of European and U.S. scientists that push the safety message to lawmakers and regulators. They appear to be independent, so they appear to be more authoritative and authentic. But behind the scenes we see documents that show that Monsanto is helping them or telling them what to say, or assigning them a task.

New York OAG Forces Bayer and Monsanto to Pay \$6.9 M over False Claims on Roundup Safety
Published by Sustainable Pulse, Jun 23 2023

Link:

https://sustainablepulse.com/2023/06/23/new-york-oag-forces-bayer-and-monsanto-to-pay-6-9-m-over-false-claims-on-roundup-safety/?utm_source=newsletter&utm_medium=email&utm_campaign=glyphosate_gmos_and_pesticides_weekly_global_news_bulletin&utm_term=2023-07-14

Excerpt:

"Bayer and Monsanto repeatedly claimed in advertising that Roundup® consumer products containing the active ingredient glyphosate were safe and non-toxic without adequate substantiation. These claims violated state laws against false and misleading advertising, and also breached a previous settlement the Office of the Attorney General (OAG) reached with Monsanto in 1996, in which Monsanto committed to stop making unsubstantiated claims regarding the safety of Roundup® products that contained glyphosate."

'Outrageous': Research Shows Pesticide Giants Withheld Brain Toxicity Studies From EU

By Jake Johnson

Published by Common Dreams, June 1, 2023

Link:

<https://www.commondreams.org/news/research-pesticides-eu>

Excerpt:

"The journal Environmental Health found that pesticide companies did not disclose to European Union regulators at least nine studies examining the brain toxicity of their chemical products-a finding that experts said is a scandal that must spur reforms.

"The researchers said their findings demonstrate that "non-disclosure of DNT studies to E.U. authorities, in spite of clear legal requirements, seems to be a recurring phenomenon." Last year, the same researchers found that an industry-sponsored DNT study on glyphosate found impacts on "neurobehavioural function, motor activity, in rat offspring"-findings that were not shared with E.U. officials.

Check Your Wine - These 30 Brands Have High Levels of Cancer-Causing Arsenic & Glyphosate

Published by Organic Consumers Assn., June 2023

Link:

https://organicconsumers.org/check-your-wine-these-30-brands-have-high-levels-of-cancer-causing-arsenic-glyphosate/?utm_medium=email&utm_source=engagingnetworks&utm_campaign=OB+805&utm_content=OB+805

Excerpt:

"Were you aware that in 2013, out of the 57,000 pounds of glyphosate/Roundup used in Napa County, a staggering 50,000 pounds were utilized in vineyards? Curiously, Napa, Sonoma, and Mendocino counties exhibit higher breast cancer rates than the national average. Research conducted in Germany indicates that even .1 ppb of glyphosate has the potential to eradicate beneficial gut bacteria, and as little as .1 part per trillion of glyphosate can spur the growth of breast cancer cells."

New Study Shows Dangers of Childhood Exposure to Weed Killer

Published by The Legal Examiner, May, 2023

Link:

<https://www.legalexaminer.com/environment/roundup-lawsuits/new-study-shows-dangers-of-childhood-exposure-to-weed-killer/>

Excerpt:

"The research focused on the use of glyphosate near the duo's homes while the mother was pregnant and, in the children, up to the age of 5 years. Researchers also measured the levels of glyphosate and AMPA in urine. Urine was collected from mothers during pregnancy and children at the ages of 5,14, and 18. The researchers then followed up with liver and metabolic health in those children when they reached 18 years old.

Findings from the study identified that higher levels of glyphosate residue and AMPA were associated with a higher risk of liver inflammation and metabolic disorders in young adulthood. The study also reported that diet was a source of exposure. Children who ate more cereal, fruits, vegetables, and bread had high levels of

glyphosate residue. This is the first time researchers have examined the potential connection between early life exposure to glyphosate and metabolic and liver disease.

Glyphosate is an herbicide used to control weeds and grasses and is an active ingredient in products like Roundup. Commonly used in agriculture, glyphosate is also utilized in public spaces like parks, playgrounds, and golf courses to prevent the growth of weeds and unwanted plants. The potential impact of glyphosate on human health is controversial and continues to be widely debated."

The Science-based Evidence to Ban Glyphosate and GMOs

By Andre Leu

Published by Regeneration International, February 19 2023

Link:

https://regenerationinternational.org/2023/02/19/the-science-based-evidence-to-ban-glyphosate-and-gmos/?utm_medium=email&utm_source=engagingnetworks&utm_campaign=OB+794&utm_content=OB+794

Excerpts:

"Mexico announced that it was phasing out the use of glyphosate herbicides, the cultivation of GMO corn, and the import of GMO corn for human consumption and livestock feed by the end of 2024. The reasons for the decree given by Mexican president Andrés Manuel López Obrador are to protect the health of Mexico's consumers and small-scale farmers, the environment, and the purity of Mexico's native corn varieties.

The GMO/pesticide cartels fearing that Mexico will set a precedent for other countries to enact similar restrictions, are puppeteering agencies and officials within the U.S. government to pressure Mexico to abandon its plans. This is not the first time the German-based Bayer-Monsanto has used its captured U.S. government officials and agencies to act on its behalf. In 2019, the corporation succeeded in using U.S. officials to pressure Thailand into reversing its ban on glyphosate."

"A study conducted by Flower et al. examined the levels of cancer in the children of people who sprayed glyphosate for weed control. They found that their children had increased levels of all childhood cancers, including all lymphomas such as non-Hodgkin's lymphoma.

A case-controlled study by Swedish scientists Lennart Hardell and Mikael Eriksson also linked non-Hodgkin's lymphoma to exposure to various pesticides and herbicides, including glyphosate. The link between glyphosate and non-Hodgkin lymphoma has resulted in major court cases, most of which Bayer-Monsanto has lost. Millions of dollars were awarded to the victims."

New US Research Finds "Worrying" Evidence Linking Monsanto Weedkiller to Cancer

Published by Sustainable Pulse, Jan 24, 2023

Link:

https://sustainablepulse.com/2023/01/24/new-us-research-finds-worrying-evidence-linking-monsanto-weedkiller-to-cancer/?utm_source=newsletter&utm_medium=email&utm_campaign=glyphosate_gmos_and_pesticides_weekly_global_news_bulletin&utm_term=2023-02-24#.Y_kEmK_MK1s

Excerpts:

"New research by top US government scientists has found that people exposed to the widely used weed killing

chemical glyphosate have biomarkers in their urine linked to the development of cancer and other diseases.

"Notably, in the new paper, the NIH and CDC scientists said that while their study focused on farmers who were exposed to glyphosate when they sprayed it on fields, they saw similar results in "non-farmers." "

"The NIH study is the "largest investigation to date of the relationship between glyphosate exposure and oxidative stress markers," said Jonathan Hofmann, an author of the study from the NIH's National Cancer Institute.

Contaminated Wildflower Nectar and Pollen Puts Bees and Humans at Risk - New Irish Study Slams Pre-Harvest Glyphosate Use

Published by Sustainable Pulse, Jan 19, 2023

Link:

<https://sustainablepulse.com/author/henry/>

Excerpts:

"This is the first time glyphosate has been reported in unsprayed wildflowers under conventional farming conditions and while more research is needed to find how much higher glyphosate concentrations would be in directly sprayed plants, the researchers stated that wild bees and honeybees will visit the contaminated wildflowers to collect pollen and nectar. They will thus be exposed to glyphosate and that could impact their health and the critical pollination service they provide."

MERCHANTS OF POISON How Monsanto Sold the World on a Toxic Pesticide

by Stacy Malkan with Kendra Klein, PhD and Anna Lappé

Published by US Right to Know, October 2022

Link:

https://usrtk.org/wp-content/uploads/2022/12/Merchants_of_Poison_Report_final_120522.pdf

Excerpt:

"Pulling from these documents - as well as investigative journalism that has exposed elements of this subterfuge - this report showcases the breadth of Monsanto's deception on glyphosate and adds to the growing literature about how corporations deny science and manufacture doubt about the harm of their products. This report reveals key tactics in the pesticide industry's disinformation playbook, showing how, like Big Oil and Big Tobacco, they rely on deceptive PR strategies to maintain their "freedom to operate" without meaningful limits - with dangerous consequences for public health and the environment.

The PR effort has been so forceful - especially Monsanto's efforts to discredit the WHO's researchers - that some observers have described it as a particularly harsh and aggressive effort to undermine cancer research and prevention.

This report builds on previous reporting I and my colleagues have done on pesticide industry disinformation. This includes a 2015 report, *Spinning Food*, that documents how food and pesticide industry front groups use covert communication tactics to shape the narrative about industrial agriculture and organic and sustainable food production.

Thanks to a long history of writing and research, from Rachel Carson's *Silent Spring* (1962) to Robert van den Bosch's *Pesticide Conspiracy* (1989) to David Michael's *The Triumph of Doubt* (2020); Carey Gillam's reporting

on Monsanto's herbicide business and the Roundup cancer trials and her two books, *Whitewash* (2017) and *The Monsanto Papers* (2021); the seminal research by Naomi Oreskes and Erik Conway in their book *Merchants of Doubt* (2010), and other investigative journalists and nonprofits working for transparency, there is growing awareness about industry spin and its harms to people and planet. We hope this report - by taking a deep dive into one company's decades-long disinformation campaign to protect its herbicide, and the sector in general, from regulation - can add to this awareness of industry tactics and convey the urgency of action to address it." (pg 7)

The link below has many glyphosate articles describing risks to health.

<https://www.beyondpesticides.org/resources/pesticide-gateway?pesticideid=37>

Ranger Smith, I ask you and your IDT members to have the courage to read the science conclusions in Opposing Views Attachment #9. Glyphosate is a carcinogen.

If glyphosate is safe why would herbicides that contain this chemical be banned Denmark, England, Italy, El Salvador, Sri Lanka, France, Holland, Austria, Bulgaria, Germany, Greece, Hungary, Ireland, Japan, Chile, South Africa, Luxembourg, Madeira, Cameroon, New Zealand, Peru, South Australia, Russia, France, Switzerland, Columbia, and Costa Rica?

<https://biodx.co/28-countries-ban-the-use-of-glyphosate-key-ingredient-in-roundup/>

Comment: Ranger Smith, I have submitted comments by hundreds of independent Ph.D. scientists (many chemists and medical doctors). Without exception they present evidence that even casual exposure to herbicides that contain the chemical glyphosate causes cancer. I ask you to use an alternative to Roundup. There are many that will satisfy your goals.

After Reading the Information Below any
Caring Human Being would use Mechanical
and Biological Methods and forget Glyphosate
Application. I hope you and your
IDT Members stop using Roundup at Home.

Research Reveals Roundup Weed Killing Formulations are More Toxic than Glyphosate Alone
<https://naturalsociety.com/monsantos-roundup-poison-125-times-dangerous-regulators-admit/>

The research conclusions of hundreds of independent scientists show glyphosate exposure causes Non-Hodgkin's lymphoma (a type of cancer that begins in the lymphatic system), Birth Defects, Miscarriage, DNA damage, Kidney and Liver Damage, cell death disorder.

The USFS Regional Invasive plant coordinator for R-1 is either not aware of ... or rejects best science conclusions not generated by USDA-approved scientists. They know the USDA has been sleeping with the pesticide/herbicide manufacturers (including Monsanto) for decades. Thus, in order to not jeopardize their jobs they obediently feed forest employees, untrue, fabricated, cooked up information showing glyphosate exposure is nothing to be concerned about.

Comment: Ranger Smith, you propose to take action that ignores the research of hundreds of independent scientists not affiliated with the USDA that clearly indicates exposure to glyphosate causes kidney and liver damage. A few examples of the available independent science are shown below:

From Sustainable Pulse, Aug 26, 2015 at:

<http://sustainablepulse.com/2015/08/26/unique-roundup-study-shows-massive-kidney-and-liver-gene-function->

alterations/#.Vd8p0Zbn_IX

From Environmental Health News, September 1, 2015

<http://www.environmentalhealthnews.org/ehs/news/2015/aug/monsanto-roundup-glyphosate-pesticide-kidney-liver-toxic-gmo>

from Truthout, July 10, 2014

<http://www.truth-out.org/news/item/24876-monsantos-herbicide-linked-to-fatal-kidney-disease-epidemic-will-ckdu-topple-monsanto>

Other sites also discuss glyphosate and kidney failures:

<http://www.truth-out.org/news/item/32585-more-evidence-of-roundup-s-link-to-kidney-liver-damage>

<http://www.democraticunderground.com/10027132287>

<http://www.chemwatch.net/185836/more-evidence-of-roundups-link-to-kidney-liver-damage>

<http://gmwatch.org/news/latest-news/16377-more-evidence-of-roundup-s-link-to-kidney-liver-damage>

<http://gmwatch.org/news/latest-news/16377-more-evidence-of-roundup-s-link-to-kidney-liver-damage>

<http://www.infowars.com/evidence-mounts-on-roundups-link-to-liver-and-kidney-damage/>

The 2011 SERA glyphosate safety report states:

"Signs of kidney toxicity, which might be expected based on observations from human suicide attempts (Appendix 2, Table 6), have not been reported consistently and are not severe (e.g., MRIDs 00130406 and 00150564; NTP 1992)." (pages 38 and 39)

As discussed by U.S. EPA/OPP (1993b), the multi-generation study in rats by Reyna (1985) failed to note any adverse kidney effects at a dose of 500 mg/kg bw/day, which is about 17 times greater than the presumed LOAEL of 30 mg/kg bw/day in study by Schroeder and Hogan (1981).

Consequently, U.S. EPA/OPP (1993b) concurred with the assessment by Schroeder and Hogan (1981) and considers the finding of kidney tubule dilation a spurious effect." (page 104)

By the end of the 65-day exposure period, there was no apparent inhibition of liver esterase (Li and Kole 2004, Table II)." (page 142)

This would be more than enough to discredit and invalidate the 2011 SERA "Glyphosate -Human Health and Ecological Risk Assessment Final Report" in the minds of reasonably intelligent, thinking people who would not kill other human beings just because a questionable document said it was OK. Ask yourself how a District Court judge would rule given the evidence above.

Ask yourself how the court of public opinion would rule when I write my letters to the editor summarizing the information above.

Ranger Smith I ask you and your IDT members to have the courage to read the science conclusions in Opposing Views Attachment #9. Glyphosate is a carcinogen.

If glyphosate is safe why would herbicides that contain this chemical be banned Denmark, England, Italy, El Salvador, Sri Lanka, France, Holland, Austria, Bulgaria, Germany, Greece, Hungary, Ireland, Japan, Chile, South Africa, Luxembourg, Madeira, Cameroon, New Zealand, Peru, South Australia, Russia, France, Switzerland, Columbia, and Costa Rica?

<https://biodx.co/28-countries-ban-the-use-of-glyphosate-key-ingredient-in-roundup/>

Comment: Ranger Smith, I have submitted comments by hundreds of independent Ph.D. scientists (many chemists and medical doctors). Without exception they present evidence that even casual exposure to herbicides that contain the chemical glyphosate causes cancer. I ask you to use an alternative to Roundup. There are many that will satisfy your goals.

Please open Opposing Views Attachment #9. You will find 91 quotes authored and/or cosigned by well respected scientists (43 with Ph.D.s). Their quotes were released in the following publications:

Why would legal firms spend the money to buy
ads on radio and TV offering to represent people
who had been diagnosed with cancer after
using Roundup?

Please have the courage to read them all.

Tosi Law

Link:

https://roundup.tosifirm.com/roundup-lawsuit?utm_source=za%2Einvesting%2Ecom+-+b1_triplelift+-+520232&utm_medium=native&utm_campaign=roundup+-+38586683&utm_content=54217225+-+149284109&utm_term=z1149284109b1_triplelift__za%2Einvesting%2Ecom1z&postbackid=63815_726e91b7-dfdd-11ee-953c-08e6e3c91a3c&_z1_adgid=54217225&_z1_caid=149284109&_z1_msid=b1_triplelift&_z1_pub=za%2Einvesting%2Ecom&zpbid=63815_726e91b7-dfdd-11ee-953c-08e6e3c91a3c

James Harris Law

Link:

https://www.recallsuit.com/roundup-lawsuit-b/?msclkid=5be7029551971de0ec305fab2abdbbd2&utm_source=bing&utm_medium=cpc&utm_campaign=Roundup&utm_term=lymphoma%20lawsuits&utm_content=Lymphoma%20Lawsuit

Sokolove Law

Link:

https://roundup.sokolovelaw.com/?src=bing_webppc_328577675_%2Bmonsanto%20%2Blawsuit_%7Bcontent%7D_b_o_lymphoma%20lawsuits%20against%20monsanto&numberToReplace&campaignId&ringPoolId&jpow=aa_328577675_bb_1233652168336312_cc_%2Bmonsanto%20%2Blawsuit_dd_b_ee_o_ff_%7Bbadposition%7D_gg_c_hh_%7Bdevicemodel%7D_ii_jj_110194_kk__ll_%7Bplacement%7D_mm_%7Btarget%7D_nn_kwd-77103363003058%3Aloc-190_oo_%7Bcreative%7D_pp_%7Bbrandom%7D_qq_%7Bacid%7D_rr_77103314975124_ss_77103363003058

Class Claims LLC

Link:

<https://www.class.claims/round-up-lawsuit>

Trustwell Law Group

Link:

https://www.trustwelllaw.com/environmental/roundup/lawsuit?utm_source=bing-ads&utm_medium=paid-search&utm_campaign=roundup&msclkid=7aa5b3c82ae01c32cf94eef65692be31&utm_term=monsanto%20lymphoma%20lawsuit&utm_content=Monsanto%20Lymphoma%20Lawsuit%20%7C%20Exact

ROUNDUPCANCER ATTORNEYS.COM

Link:

https://roundupcancerattorneys.com/roundup-lawsuit?msclkid=b0a975edf092161d3c4628d372a24497&utm_source=bing&utm_medium=cpc&utm_campaign=RoundUp%20Cancer&utm_term=roundup%20lawsuit&utm_content=Lawsuit%20roundup

Carlson Law Firm

Link:

<https://www.carlsonattorneys.com/news-and-update/roundup-2019/>

A Case for Women

Link:

https://www.acaseforwomen.com/adv/roundup-lawsuit/?utm_campaign=369081443&utm_source=bing&utm_medium=cpc&utm_content=79439809871843&utm_term=roundup%20lawsuit&adgroupid=1271035841951610&msclkid=f2058d93dd24196d73b4d0ad5f144d1c

Saiontz & Kirk

Link:

<https://www.youhavealawyer.com/roundup/cancer-settlements-faq/>

Greenberg & Bederman, LLC

Link:

<https://www.gblawyers.com/roundup-lawsuits/>

Rosen Injury Lawyers

Link:

<https://roseninjurylawyers.com/roundup-lawsuits/>

Garber Law Offices

Link:

<https://www.garber.law/glyphosate-roundup/>

Please open Opposing Views Attachment #9. You will find 91 quotes authored and/or cosigned by well

respected scientists (43 with Ph.D.s). Their quotes were released in the following publications:

- *Environmental Toxicology and Chemistry
- *Environmental Health News
- *University of Washington News
- *The Guardian
- *Journal of Toxicology
- *University of Pittsburgh News
- *Pesticide Action Network North America
- *
- *British Columbia Ministry of Environment, Wildlife Report No. R-28
- *Science in Society
- *International Federation of Gynecology and Obstetrics
- *Colin Campbell Center for Nutrition Studies
- *The Defender - Children's Health Defense®
- *The Financial Times, UK
- *Institute for Responsible Technology
- *Common Dreams
- *Pesticide Action Network Asia and the Pacific
- *Permaculture Research Institute
- *Science in Society
- *chemicalWATCH Factsheet
- *Reuters
- *The Organic and Non-GMO Report
- *Beyond Pesticides
- *Institute of Science in Society
- *Ecological Applications
- *Organic Gardening
- *Chemical. Research in Toxicology
- *Toxicology
- *Weston A. Price Foundation
- *National Library of Medicine
- *Organic Producers Association of Queensland
- *Truthout
- *Foodconsumer
- *The Progressive
- *Project Censored
- *Grist
- *Rachel's Environment and Health News
- *EPA-738-F-93-011
- *Journal of Pesticide Reform
- *The Sun (Malaysia)
- *Wild Ones Journal
- *Genetic Concern
- *Journal of Pesticide Reform
- *RACHEL'S HAZARDOUS WASTE NEWS
- *HEALTH-ARGENTINA
- *Portland independent media center,
- *GroundTruth
- *Natural Society
- *US Right to Know

Request for changes to be made to the final NEPA document: Assure the final says "no herbicides will be applied anywhere at anytime as part of this project that contain the chemical glyphosate."

If this is not done, the following laws have been violated

40 CFR §1508.27(b)(2) because the FONSI intensity discussion did not discuss the degree to which the proposed action affects public health or safety.

40 CFR 1500.2(e) because the Proposed Action did not "avoid or minimize adverse effects of these actions upon the quality of the human environment."

40 CFR 1500.2(f) because the Proposed Action did not "use all practicable means, consistent with the requirements of the Act and other essential considerations of national policy, to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment"

NEPA Sec. 101(b)(2) because the Proposed Action did not "assure for all Americans safe, healthful, productive and esthetically and culturally pleasing surroundings;"

NEPA Sec. 101(c) because the Proposed Action did not assure that "each person should enjoy a healthful environment."

Willful Reckless Endangerment.

"Reckless endangerment is a crime consisting of acts that create a substantial risk of serious physical injury to another person. The accused person isn't required to intend the resulting or potential harm, but must have acted in a way that showed a disregard for the foreseeable consequences of the actions. The charge may occur in various contexts, such as, among others, domestic cases, car accidents, construction site accidents, testing sites, domestic/child abuse situations, and hospital abuse."

Ex. Ord. No. 13045, Apr. 23, 1997 because the Proposed Action did not assure the "Protection of Children from Environmental Health Risks and Safety Risks."

Intelligent (emphasis added), Caring People are
Guided by the Precautionary Principle to Avoid
taking Actions that Might Adversely Affect
Human Health or Harm the Environment.
Obviously, you don't Care.

People with the authority and responsibility to take action that science shows is likely to harm human health and/or wildlife who ignore the Precautionary Principle because they already know where it will lead them must never entertain the notion that they are professionals.

A few USFS line-officers have the foresight and courage to apply the Precautionary Principle to their timber sales and risk not accumulating as much volume.

Here is the essence of the Precautionary Principle

"When an activity raises threats of harm to human health or the environment, precautionary measures should be

taken even if some cause and effect relationships are not fully established scientifically. In this context the proponent of an activity, rather than the public, should bear the burden of proof. The process of applying the precautionary principle must be open, informed and democratic and must include potentially affected parties. It must also involve an examination of the full range of alternatives, including no action."

Link:

<https://pubmed.ncbi.nlm.nih.gov/15968832/>

Here is more information:

NEPA's Scientific and Information Standards-Taking the Harder Look

By Murray D. Feldman and Kristin A. Nichols HOLLAND & HART LLP Boise, Idaho and Greenwood Village, Colorado

https://www.hollandhart.com/files/66008_RMMLF-NEPA_s-Scientific-and-Information-Standards--Taking.pdf

Excerpt:

"In *Natural Resources Defense Council, Inc. v. Pritzker*, for instance, the court characterized the agency's decision not to use the precautionary principle as "a policy choice" and "not a scientific determination."¹⁶⁰ The court then overturned the agency's policy choice as inconsistent with the substantive statute at issue, while at the same time implying that if it had been a "scientific determination," then the court may have deferred to the agency." ¹⁶¹

Request for changes to be made to the final NEPA document: Clearly indicate "herbicides that contain glyphosate will not be used anywhere, at any time, for any reason as part of this project."

Failure to do so will mean you are guilty of willful Reckless Endangerment.

"Reckless endangerment is a crime consisting of acts that create a substantial risk of serious physical injury to another person. The accused person isn't required to intend the resulting or potential harm, but must have acted in a way that showed a disregard for the foreseeable consequences of the actions. The charge may occur in various contexts, such as, among others, domestic cases, car accidents, construction site accidents, testing sites, domestic/child abuse situations, and hospital abuse."

Here is a High Country News article about a USFS burn boss who was arrested for letting an RX fire burn into private land which risked people's lives:

USFS burn boss arrested after prescribed fire burns private land

Link:

https://www.hcn.org/articles/north-wildfire-usfs-burn-boss-arrested-after-prescribed-fire-burns-private-land?utm_source=wc1&utm_medium=email&utm_campaign=2022-10-21-Newsletter

Failure to tell the public this chemical will not be applied to vegetation in your forest leaves the door open for you to apply glyphosate. This violates:

40 CFR 1501.2 (b)(2) because you did not "Identify environmental effects and values in adequate detail so the decision maker can appropriately consider such effects and values alongside economic and technical analyses."

Executive Order 13112: because you did not "prevent the introduction of invasive species, provide for their control, and minimize the economic, ecological, and human health impacts that invasive species cause."

40 CFR 1502.16(a) and (b) because the you did not include the environmental impacts of the proposed action in Chapter 3 which would have caused any caring person to develop reasonable alternatives to the proposed action that would eliminate the possible harm to the public and wildlife.

Apr. 21, 1997 Executive Order No. 13045 because you did not protect children from health and safety risks. Children are especially susceptible to glyphosate exposure risks because their neurological, immunological, digestive, and other bodily systems are still developing;

40 CFR §1508.27(b)(2) because the EA's intensity discussion will not discuss the degree to which the proposed action affects public health or safety.

I want the people who visit your national forest to enjoy the outdoors and not be diagnosed with cancer at a later date. Therefore, unless I am alerted that the Proposed Action will disclose that herbicides will not contain lethal glyphosate it will be necessary to warn the public who might visit the George Washington and Jefferson NF. Indeed, the court of public opinion is often more effective than a court of law. My letter to the editor will be submitted to the Helena Independent Record. It will include links to glyphosate science that are contained in my comments above.

Ranger Smith, you
Backhand and Abuse the American Public who
Abhor Seeing large Treeless Openings (except for
meadows) in their National Forest

The proposed Bonanza will use the regeneration RX on many square miles of forest. Table B-1 shows there will be many openings created. Ranger Smith, you use the old USFS trick to avoid writing "clearcut." Most people know there are 3 types of regeneration cuts. There is a reason you did not show the acreage for each. You sicken me Smith. Do you enjoy tricking the people you claim to serve?

Please view the photos of created openings in Photos attachments #7 and ask yourself why you will be doing the same thing. Is it for the recreating public or a resource extraction corporation? An honest answer will give you good reason to resign from the USFS or do the job we pay you to do.

The pre-decisional EA shows you propose to create openings that violate agency maximum of 40 acres without providing us with a believable reason for doing so. Your real, unwritten reason for doing this is of course to generate maximum volume isn't it? Your trumped-up reasons for doing so are not believable.

You can learn from what I show you below.

The US Forest Service Northern Region and its obsession with supersized clearcuts
By Katie Bilodeau and Jeff Juel
Published by Friends of the Clearwater, August 2021
https://www.friendsoftheclearwater.org/wp-content/uploads/2021/08/The-Clearcut-Kings_USFS-Northern-Region-and-Obsession-w-Supersized-Clearcuts-2021.pdf

Excerpts

"Executive Summary

Clearcutting is an environmentally destructive but economically profitable way to log forests. Clearcutting and its related types of logging-i.e., seed tree and shelterwood cuts- remove most of the trees in an area and create what the Forest Service calls "openings." This type of intensive logging emits carbon, eliminates carbon storage

and carbon sequestration, and heats up our future. Clearcutting also fragments and impairs habitat for many wildlife, including sensitive species like fisher and wolverine, and threatened species like lynx. In sum, clearcutting primarily benefits the logging industry. While the science on clearcutting has evolved over the past four decades, the Forest Service's culture for clearcutting and the policy intending to limit it has not.

Congress, through the National Forest Management Act of 1976 (NFMA), directed the US Forest Service to limit the acres opened from such intensive logging. The Forest Service set regulatory acreage limits depending upon region and tree species. For many places, including the Northern Region and national forests of Montana and northern Idaho, clearcut and related logging is limited to 40 acres per logging unit. NFMA allows exceptions to exceed this opening size, however. For example, a national forest manager may request that the regional office review and authorize logging-unit openings that will exceed NFMA's limit. For ease of reference, this report calls these larger openings "supersized clearcuts."

Friends of the Clearwater (FOC) investigated how often the Forest Service invoked this particular exception. Through a Freedom of Information Act request, FOC asked four regional offices (Regions 1, 3, 4, and 6) for requests received from 2013 until March of 2021 (the date of our FOIA request) where national forest managers requested that the regional office grant exceptions for supersized clearcuts. FOC also asked for the regional office's response. Regions 3, 4, and 6 disclosed that they could not find supersized clearcut requests from national forests within their jurisdiction during this time period and thus did not authorize exceptions. Region 1, the Northern Region, stood out remarkably.

Between January of 2013 and March of 2021, the Northern Region disclosed that it received 87 requests from managers of national forests in its jurisdiction for permission to authorize supersized clearcuts. Out of the 87 requests, the Northern Region approved 79. The other eight requests were pending at the regional office at the time of the FOIA request. Notably, the Northern Region did not deny one single request for any supersized clearcut during that time period. Supersized clearcuts were sometimes approved for inventoried roadless areas and old growth, and projects approved with minimal environmental analyses.

This ceremonial, pro forma request-and-approve routine has impacted national forests of the Northern Region on a large scale. From 2013 until March of 2021, the Northern Region has approved 93,056 acres of supersized clearcuts, about twice the size of the District of Columbia. If the acres were arranged contiguously in a square, a person with an average walking speed of three miles per hour would have to walk two full eight-hour days just to traverse its perimeter.

This acreage only represents supersized clearcuts; because many of the same projects planned openings under 40 acres, the landscape impacts from clearcutting and related logging is greater than the acreage presented here. Managers of the Idaho Panhandle National Forests and the Nez Perce-Clearwater National Forests in Idaho requested over half of this acreage, at 33,625 and 23,095 aggregate acres. The Kootenai, the Lolo, and the Flathead national forests followed, in that order, for supersized clearcuts requested, which the Northern Region subsequently approved.

Alarming, the national forests managers' requests for supersized clearcuts and the Northern Region's rubber-stamp approvals have increased in recent years. From 2013 until 2017, the Northern Region granted requests that totaled between 5,500 and 9,430 acres. From 2018 through 2020, however, supersized requests and approvals in the Northern Region jumped to a new range, between 13,631 and 24,032 acres per year. More timber projects with supersized clearcuts and more supersized clearcuts per project likely accounted for the overall increase.

While the Forest Service has touted that its review process for supersized clearcuts involves the public, public engagement is neither logistically straightforward nor meaningful. Public notice-required for requesting a supersized clearcut-is broken up amongst several public comment periods, the later periods commonly restricting

those who may participate and what they may say. Even if a comment is successfully made, it is received by the national forest managers who made the request, not to the higher-level officials reviewing it. This amounts to a "comments welcome" box for public involvement that is effectively a trash bin. Instead, the public's only recourse to try limiting excessive, supersized clearcuts is with lawsuits brought under environmental laws that might offer a check on such intensive and large-scale logging.

National forest managers' requests to exceed NFMA limits contained little meaningful justification as to why supersized clearcuts were necessary. We sampled justifications supporting supersized-clearcut requests during this period, justifications were indistinguishable from the general rationale underlying those timber projects. Requests from different projects across various forests often shared the same rationale. The common agency position was that natural disturbances are quite large, so clearcut disturbances should be as well. While convenient for large-scale logging, this is unsound logic.

No natural ecological disturbance exists in the Northern Region where dead trees disappear from the forest. Science demonstrates that biodiversity depends upon standing "snag forests" of dead trees as well as fallen dead trees. These trees provide structural habitat for wildlife-dens and nests-and dead trees are consumed by organisms that become food sources for other organisms. Clearcut trees hauled away, on the other hand, provide none of these ecological services. Also, the location or the genetics of a tree can contribute to survival during a large-scale ecological disturbance and a better, more heterogenous regeneration after a disturbance. While natural ecological disturbances can selectively remove vulnerable trees, clearcuts remove all trees, including those that might have otherwise survived. So, natural ecological disturbances renew forests better than the Forest Service's clearcut disturbances do.

Despite common belief, there is no effective regulatory limit for clearcuts on the national forests in the US Forest Service's Northern Region. Our investigation revealed a Forest Service region where especially large clearcuts are no longer the exception-they are the rule. The NFMA limit on supersized clearcuts, once meant to safeguard against on-the-ground misjudgments or excesses of zeal, is so routinely circumvented in the Northern Region that it no longer appears to accomplish either function. We anticipate that this overzealous and now routine circumvention will continue in the Northern Region, and supersized clearcuts will likely continue expanding in the national forests there until the national Forest Service leadership, the Biden Administration, or Congress intervenes."

Of course the USFS 40-acre opening limit is a joke to you Ranger Smith. You tell the public their input on large created openings will be considered. The Forest Service claims that its review process for large created openings involves the public. As you know the RO rubber-stamps all requests to exceed 40 acres regardless of the reason before they read the public comments. Of course the reason in most cases is to increase volume. The following attachment shows what you could get. If after looking at the photos in Photo Attachment #7 you still plan to create an opening larger than 40 acres please seek other employment. You have no business making decisions that might potentially affect 318,000,000 Americans. I hear McDonalds is hiring but you are not qualified.

Please have the courage to view the photos in the PHOTOS Attachment #7 and determine the areas that have been restored and brought back to health for each photo.

Request for changes to be made to the final NEPA document:
Eliminate ALL treatments that will create openings that exceed 40 acres.

Failure to do this will violate:

40 CFR 1500.2(e) and (f) because you did not choose to avoid or minimize adverse effects of the project upon

the quality of the human environment without complete knowledge of all likely adverse effects.

NEPA Sec. 101(b) because you did not "ensure that relevant environmental information is identified and considered early in the process in order to ensure informed decision."

Driving Machines Weighing 20 Tons across the Fragile
Forest Floor Restores Nothing.

Before I retired from the USFS I worked with honest IDT resource specialists who were not afraid to describe the tragic effects of implementing the timber sale Proposed Action as described in Chapter 3 of the DEIS or Pre-decisional EA. Most of them knew allowing machinery weighing 42,400 pounds with spinning wheels and tracks to operate on the fragile forest floor would eliminate the proper functioning of some important resource in and downstream from the sale area. Please view the photos in Photo attachment #15. Then ask yourself what will be "restored" by these monsters.

Jerry Franklin, Ph.D., David Perry Ph.D., Reed
Noss Ph.D., Christopher Frissell Ph.D., David
Montgomery Ph.D. Anne Ehrlich, Ph.D., David
Foster Ph.D. Peter Raven Ph.D., and
Charles Luce, Ph.D. all have Impeccable
Credentials.

A truly Professional USFS Responsible Official would
Respect their Wisdom quoted below
and let it Guide them.

Important text is highlighted in red.

Simplified Forest Management to Achieve Watershed and Forest Health: A Critique
By Franklin, Jerry Ph.D., David Perry Ph.D., Reed Noss Ph.D., David
Montgomery Ph.D. and Christopher Frissell Ph.D
Published by the National Wildlife Federation, 2000
<https://www.irmforestry.com/downloads/pdf1.pdf>

Excerpts:

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

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

Scientists Seek Logging Ban on U.S.-Owned Land
By Anne Ehrlich Ph.D., David Foster Ph.D. and Peter Raven Ph.D.
Published in the New York Times, April 16, 2002
<http://www.nytimes.com/2002/04/16/us/scientists-seek-logging-ban-on-us-owned-land.html>

Excerpts:

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

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

Hydrological processes and pathways affected by forest roads: what do we still need to learn?

By Luce, Charles H. Ph.D.

Published by USFS, Rocky Mountain Research Station , 2002

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

Excerpts:

"Almost everywhere people live and work they build and use unimproved roads, and wherever the roads go, a range of environmental issues follows."

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

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

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

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

National Forest System Road Management

Signed by USFS Chief Mike Dombeck Ph.D on February 25, 2000

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

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

Excerpts:

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

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

increased frequency of human-caused fires."

Healthy Populations of any Living Thing have
a mixture of Live, Dead and Dying Individuals.
This includes trees!!!

Too many USFS line-officers are clinically obsessed by the need to generate volume. Many should seek professional help.

They thrill at the sight of a dead or dying tree in the forest. They know they can justify killing trees with chainsaws if they can show the forest is sick. USFS line-officers that see a few dead trees and conclude the stand is sick are idiots. They simply do not understand what a healthy forest is.

"Forests live out of the deaths of toppled giants across the decades, as well as the incessant dying of microscopic beings. Without death, the forest would die. Ultimately, it is only the removal of trees that can deplete the forest. Both fallen giants and fallen leaves collaborate with the bacteria of decay to produce the fertile soil from which new growth comes. By itself no single organism can long survive. The forest is its own memorial, the conclusion of its own conversation. You can lift a log, the corpse of a fallen tree, and find a whole community at the rotting face where it touches the moist ground."

Mary Catherine Bateson

Please read the science below written by your own agency. Perhaps it will cause you to question what the USFS claims. Important text is highlighted in red.

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

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

Excerpts:

"More than 80 species of birds, mammals, reptiles, and amphibians use living trees with decay, trees with brooms (most commonly dwarf mistletoe), hollow trees, snags or standing dead trees, and logs in the interior Columbia River basin, the researchers note in their report. These structures are used for foraging, nesting, denning, roosting, and resting, often serving multiple squatters simultaneously.

Bull notes that although we have learned to recognize snags and logs as important to wildlife, we have more recently recognized the value of two more categories of deadwood: living trees containing decay and hollow trees."

Praise the Dead: The Ecological Values of Dead Trees
By George Wuerthner, ecologist, author and ecological projects director for the Foundation for Deep Ecology
Published by Friends of the Clearwater, 2021

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

Excerpts:

"We bring these pejorative perspectives to our thinking about forests. In particular, some tend to view dead trees as a missed opportunity to make lumber. But this really represents an economic value, not a biological value. From an ecological perspective dead trees are the biological capital critical to the long-term health of the forest ecosystem. It may seem counter-intuitive, but in many ways the health of a forest is measured more by its dead trees than live ones. Dead trees are a necessary component of present forests and an investment in the future forest."

"Dead trees are the biological capital for the forest. Just as floods rejuvenate the river floodplain's plant communities with periodic deposits of sediment, episodic events like major beetle kill and wildfire are the only way a forest can recruit the massive amounts of dead wood required for a healthy forest ecosystem. Such infrequent, but periodic events may provide the bulk of a forest's dead wood for a hundred years or more."

"So when you see fire-blackened trees or the red needles associated with a beetle kill, try to view these events in a different light - praise the dead: the forests, the wildlife, the fish- all will be pleased by your change of heart."

Dead Trees as Resources for Forest Wildlife

By Melissa J. Santiago and Amanda D. Rodewald, Ph.D.
An Ohio State University Extension Fact Sheet

Link:

<https://woodlandstewards.osu.edu/sites/woodlands/files/imce/0018.pdf>

Excerpts:

"Birds are the most obvious benefactors of dead trees. They use snags, limbs, and logs for perching, foraging, and nesting. In some forests, 30 to 45 percent of the bird species are cavity nesters. In North America alone, 55 avian species nest in cavities. Cavity-nesting birds are classified as primary excavators (who can excavate hard wood), weak excavators (who can excavate soft, dead wood), or secondary cavity-users (who can utilize existing cavities). In Ohio, eastern bluebirds, American kestrels, and wood ducks are examples of species that rely on cavities in dead wood for successful reproduction. Other birds, such as ruffed grouse, will use logs for drumming and courtship displays.

However, birds are not the only creatures that benefit from dead wood. Mammals, amphibians, reptiles, and invertebrates seek refuge in natural cavities and dens. For example, salamanders rely on the security and dampness of soil found beneath a rotting log. Small mammals find cover and relief from the hot midday sun in dead limbs and downed wood, while spiders, beetles, worms, and microbes move and feed within the decaying matter. Additionally, fungi and mushrooms flourish on and around logs, breaking down the organic matter to release important nutrients back into the forest ecosystem.

Logs provide other important ecological functions as well. Decaying logs retain moisture and nutrients that aid in new plant growth. Young trees may sprout from a single downed limb known as a nurse log. The soft wood tissue of a nurse log offers an ideal substrate for many young trees during their initial growth and development. Logs also store energy and fix nitrogen. Furthermore, dead wood serves as a ground cover, lessening soil erosion and preventing animals such as deer from over-browsing plant seedlings."

Please read Opposing Views Attachment #14

Clearcutting the land owned by 322 million
Americans directly Assaults them and Future
Generations.

Ranger Smith, you hide the fact you will be clearcutting the Helena NF.

Please learn what the experts say about clearcutting in Opposing Views Science Attachment #19.

Survey after survey shows the public does not want their land clearcut. You know this, yet you allow your silviculturist to tell you what you will do.

In college they learned to create a fast growing industrial tree farm devoid of biodiversity. Can you even comprehend the public's hatred of clearcuts? Perhaps you do but don't care. If this is the case, you have no business making decisions that involve the land communally owned by 322 million Americans.

Here's a tiny sample of the many articles discussing the public opinion about clearcutting that are available now. How can you say you serve the public when you spend their tax dollars doing what they don't want on their land? This is not a trivial issue.

Important text is highlighted in red.

A clear-cut controversy---Some logging halted after outcry over Mass. forestry mistakes.

By Beth Daley

Published in Boston Globe, March 4, 2010

Link:

http://www.boston.com/news/science/articles/2010/03/04/a_clear_cut_controversy/

Excerpts:

"These are largely the handiwork of state foresters who, in the past five years, dramatically changed the way they manage trees on many public lands. After a decade of little logging, the state began using clear-cuts to weed out diseased and aging timber.

While some clear-cutting is allowed, forestry officials now acknowledge that, in the process, they sometimes violated their own rules."

The perceived scenic effects of clearcutting in the White Mountains of New Hampshire, USA

By James Palmer

Published in Journal of Environmental Management on ScienceDirect, November 2008

Link:

<https://www.sciencedirect.com/journal/journal-of-environmental-management> \o "Go to Journal of Environmental Management on ScienceDirect

Excerpts:

"The scenic effects of clearcutting have been a volatile issue for the American public for much of the past century. A better understanding of the scenic perceptions associated with the cumulative visible effects of clearcutting should contribute to better decisions about its use."

"A random sample of local citizens, four groups of opinion leaders, and US Forest Service employees evaluated these alternatives."

"All groups indicated a statistically significant decrease in visual quality as the intensity of harvesting increases."

Big National Forest Clearcuts continue Despite Biological Impacts

By Mike Garrity

Published on Missoula Current, May 26, 2021

Link:

<https://missoulacurrent.com/opinion-clearcuts-continue/>

Excerpt:

"Case in point, the Custer Gallatin National Forest just approved - then pulled - the South Plateau logging project on the border of Yellowstone National Park that called for clearcutting 5,551 acres. As if 8.6 square miles of clearcuts in grizzly bear and lynx habitat aren't bad enough, the project will also require bulldozing in 56.8 miles of new logging roads.

The Forest Service says they pulled the decision because the Fish and Wildlife Service was too busy to sign off on the project's effects on grizzly bears and lynx. And get this, since the project violates the Custer-Gallatin Forest Plan, which requires 30% of the forests around Yellowstone to be old growth for grizzly security, the agency intends to issue a new Forest Plan that will allow the massive clearcuts and impacts because the old growth standard will be eliminated. Adding fiscal insult to ecological injury, the Forest Service estimates taxpayers will lose \$3.2 million subsidizing this deforestation."

Public Perceptions of Clearcutting

By JC Bliss

Published in Journal of Forestry, December 2000

Link:

https://www.researchgate.net/publication/233573102_Public_Perceptions_of_Clearcutting

Excerpt:

"Despite widespread opposition to clearcutting, even among forestland owners, some foresters continue to think that lack of understanding is the source of public disapproval. To American citizens today, the forest is not just a fiber factory, to be manipulated to produce wood products for human consumption in an efficient and rational way, and trees are not just a crop. Now that the forest is no longer the exclusive domain of professional foresters, forest practices will not be acceptable unless they are compatible with prevailing beliefs and values and until public trust in forestry is restored."

Clearcutting in the South: Issues, Status, and Trends

By Jacek Siry and Frederick Cabbage (both USFS employees)

Published in General Technical Report (GTR), 2005

Link:

<https://www.fs.usda.gov/treesearch/pubs/14384>

Excerpt:

"Clearcutting has been the most controversial and enduring forest management issue since its widespread adoption on public land in the 1960s. Public opinion generally opposes clearcutting, but foresters and forestry firms have adopted it widely. Despite the controversy, we have little data about the extent of clearcutting by region in the South. Forest Inventory and Analysis (FIA) data indicate 5.2 million acres are harvested annually in

the South, with 39 percent being clearcut. This includes 1.67 million acres in the Southeast (85 percent clearcut), and 3.52 million acres in the South Central (17 percent clearcut). Measurement discrepancies among these regions may account for some of these differences. Including seed tree and salvage cuts, about half the timber harvests in the South are made by clearcutting. The large clearcut area, especially in the more populous Southeastern States, will continue to evoke concern about harvest practices and forest management. This issue must be addressed by careful logging and attention to public concerns, safety, and esthetic considerations in forest harvesting."

The Debate Over Clear-Cutting

By Steve Nix

Published by ThoughtCo, October 20, 2019

Link:

<https://www.thoughtco.com/clearcutting-the-debate-over-clearcutting-1343027>

Excerpt:

"Aesthetics, water quality, and forest diversity are the main sources of public objection to clear-cutting. Unfortunately, an often disinterested public and casual viewers of forestry activities have overwhelmingly decided that clear-cutting is not an acceptable social practice simply by looking at the practice from their car windows. Negative terms such as "deforestation," "plantation forestry," "environmental degradation," and "excess and exploitation" are closely associated with "clear-cutting." "

CONTROVERSY OVER CLEARCUTTING

By Gerald Williams, Ph.D.

Published by USDA Forest History Society,

Link:

<https://foresthstory.org/research-explore/us-forest-service-history/policy-and-law/forest-management/controversy-over-clearcutting/>

Excerpt:

"Clearcutting, that is falling and removing all the trees from a specific area, has been a long standing tree harvesting technique used extensively in the U.S. and other countries. During the late 1800s and continuing through today, clearcutting triggered intensive discussions about the proper methods to harvest and grow trees for wood products. Many individuals who saw pictures of clearcuts or experienced them first hand were horrified. This led to broad public opinion against clearcutting techniques and logging in general."

Opinion: California's clear-cutting project in the Rim fire area is setting up the region for another tragedy

By Chad Hanson Ph.D.

Published by Los Angeles Times, Oct. 14, 2019

Link:

<https://www.latimes.com/opinion/story/2019-10-14/newsom-clear-cutting-rim-fire-california>

Excerpts:

"Newsom has an important choice to make: He can continue to partner with Trump in a project that exacerbates the global climate crisis and the risk of severe fire to rural communities. Or he can halt this misguided scheme and redirect the remainder of his HUD grant to help Paradise rebuild and adapt in a fire-safe way.

The Rim fire clear-cutting project is bad for our forests, bad for communities and bad for our climate. California's reputation as a climate leader hangs in the balance."

When is clearcutting the right choice?

Published by Oregon Forest Resources Institute, 2022

Link:

<https://oregonforests.org/clearcutting>

Excerpts:

Clearcutting cons:

They look bad. Until the newly planted trees "green up" a hillside, a clearcut is not considered appealing to the general public.

Habitat disturbance. Clearcutting alters the habitat where trees once stood, and forest wildlife is displaced into new areas.

Increased stream flow. Clearcuts allow more water to enter a stream system through underground aquifers, because water is not being taken up and released by trees in a process called "evapotranspiration." Increased stream flows can lead to increased riparian erosion during high-water occurrences.

THE CLEARCUT KINGS: The US Forest Service Northern Region and its obsession with supersized clearcuts
By Katie Bilodeau and Jeff Juel

Published by Friends of the Clearwater, August 2021

Link:

https://www.friendsoftheclearwater.org/wp-content/uploads/2021/08/The-Clearcut-Kings_USFS-Northern-Region-and-Obsession-w-Supersized-Clearcuts-2021.pdf

Excerpts:

"From 2013 until March of 2021, the Northern Region has approved 93,056 acres of supersized clearcuts, about twice the size of the District of Columbia. If the acres were arranged contiguously in a square, a person with an average walking speed of three miles per hour would have to walk two full eight-hour days just to traverse its perimeter."

Silviculture is the science of planting and tending trees to maturity in order to maximize the revenue when the timber is sold. Colleges that teach silviculture prepare the student for a career managing the trees growing in private industrial tree farms. Unfortunately, when the USFS hires silviculturists their line-officer supervisors do not teach them that the goals of national forest land and private industrial tree farms are not the same. Without this counseling, USFS silviculturists believe it's their job to maximize volume and profit from each national forest timber sale. They think the trees on "suitable" land must be treated like those that grow on tree farms ... money on the stump that are all eventually hauled to the mill. They are practicing what they were trained to do.

Since the agency has no formal training for entry-level silviculturists, their line-officers are expected to do it. Many USFS line-officers have more important things to do.

Many USFS line-officers would never approve clearcuts even if clearcutting was the optimum regeneration method. They have the sense to compromise. They knew their job was not to grow large trees as quickly as

possible, but to serve the public. They had the maturity to tell their silviculturists "NO." It didn't take long for the silviculturists to learn what their supervisor wanted. These silviculturists didn't dictate prescriptions. They proposed prescription options to the line-officer and explained the pros and cons for each.

Please examine the cutting unit in Photos attachment #12 and find where you would pitch your tent. Now rethink your proposal to include clearcut units in this sale.

You must Respond to the Opposing Views Quotes in the Attachments I have Provided

I will remind you of 40 CFR §1502.9(b):

"Final environmental impact statements shall respond to comments as required in part 1503 of this chapter. The agency shall discuss at appropriate points in the final statement any responsible opposing view which was not adequately discussed in the draft statement and shall indicate the agency's response to the issues raised.

Request for changes to be made to the final NEPA document: Create a response that describes why you believe the science quotes in my Opposing Views Attachments are not responsible ... or accept the fact that they are responsible and respond with meaningful responses. The attachment quotes describe how the Bonanza timber sale will inflict appalling, calamitous damage to the natural resources the public pays you to protect and take care of.

The Pre-Decisional EA does not Discuss how
the Timber Sale's Logging and Slash/RX Burning
Activities will be Mitigated to Assure Protected
Migratory Bird Species' Individuals and their Habitat
are not Harmed in any way.

The pre-decisional EA does not mention migratorybirds.

It is not only possible but highly likely that that logging and slash/RX burning will harm the habitat and/or kill individual birds. This is especially true of young birds that cannot flee the danger: The Treaty requires the NEPA document to include specific information showing what will be done to assure the following damage will not occur.

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

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

The plaintiffs' attorney will expect the NEPA document to contain this information.

You do not do this.

Your pre-decisional EA doesn't come close to complying with the Act.

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

Failure to do this will violate the Migratory Bird Treaty Act of 1918

Ranger Smith, you
Ignore Dr. Cohen's Findings that have been Proven
many Times to Significantly Reduce the Chances
a Home will be destroyed should a
Wildfire Burn into the WUI.

At page 14 you say:

"The Bonanza Project is within the wildland-urban interface (WUI) defined by Healthy Forests Restoration Act (HFRA) and the 2023 Meagher County Community Wildfire Protection Plan (CWPP). The Bonanza Project area overlaps the WUI areas and recognizes the need for hazardous fuel treatment to reduce the risk of wildfire to private property and structures. A total of 1,844 acres of treatment units are in the WUI."

Dr. Cohen's research resulted in him publishing his fine fuels removal methods which reduce the risk of fire damage should a wildfire occur. Dr. Cohen was a USFS employee before he retired. His methods are used worldwide. He has a Ph.D. in fire physics. Of course you know about his methods and their effectiveness and refuse to apply them. By not applying this effective fire damage reduction process you increase the risk that buildings on the WUI will burn. The citizens who live in the WUI must learn about your mismanagement. This is criminal. I shake my head when I think of a USFS line-officer who believes volume is more important than another person's life and home.

Your pre-decisional EA does
not even Mention the Word "Cohen."

My letter to the editor submitted to the Missoulian newspaper will describe Dr. Cohen's methods (with WEB links), which describe how easy it is to apply them to private property and indicate you refused to address them.

You had better hope a fire never damages homes in this WUI. If it does you might be liable since you know this information I am presenting to you. You can't claim you did not know because the plaintiff's attorney will enter these comments (which you are reading) as evidence.

You conveniently omit Dr. Cohen's research findings. Here are some quotes from the literature he authored that you ignore. The links will be included in my LTE. I highlight the key content of the quotes in red.

from Structure Ignition Assessment Model (SIAM)¹

By Dr. Jack Cohen

Presented at the Biswell Symposium: Fire Issues and Solutions in Urban Interface and Wildland Ecosystems,
1994

Link:

<https://www.fs.fed.us/psw/publications/documents/gtr-158/gtr-158-cover.pdf>

Excerpts:

"These results suggest that to reduce ignitions, the distances from a structure for managing vegetation are much smaller than the lofting distances for firebrands. Thus, beyond some relatively short distance from the structure (depending on the vegetation and topography), vegetation management has no significant benefit for reducing flame generated ignitions. Vegetation management, on the other hand, cannot be extensive enough, in a

practical sense, to significantly reduce firebrand ignitions. Therefore, the structure and its immediate surroundings should be the focus for activities intended for improving ignition risk." (pg 92)

from 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 and republished by Reddit

Link:

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 and community destruction 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 WUI fire risk where ignitions are determined - within the home ignition zone."

from 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

Link:

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)

from Built to Burn

By Dr. Jack Cohen

Presented at a fire conference in front of people from the Forest Service and state fire agencies, 1999

Link:

<https://99percentinvisible.org/episode/built-to-burn>

Excerpts:

"Cohen thought he had come up with a way to save houses and to let fires burn naturally - he thought it was a win-win. And so in 1999, he presented a paper about his findings at a fire conference in front of people from the Forest Service and state fire agencies. These were people who were in a position to change policies. But Cohen says they were totally uninterested. Cohen's research implied that basically everything about how the Forest Service dealt with wildfires was wrong.

The 10 AM rule had left us with a huge fire fighting infrastructure, so the Forest Service was spending hundreds of millions of dollars on planes and fire crews, and was approving massive logging projects on the grounds that thinning out the forest would help reduce the intensity of wildfires and save homes. Cohen was saying: actually, it would be way more effective if you just encouraged homeowners to maintain and retrofit their properties."

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

By: Elizabeth D. Reinhardt*, Robert E. Keane, David E. Calkin Ph.D., and Jack D. Cohen Ph.D.

*USDA Forest Service, Rocky Mountain Research Station, Fire Sciences Laboratory, 5775 Highway 10 West, Missoula, MT 59808, United States

Published in Forest Ecology and Management, issue 256, 2008

Link:

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)

Some Rangers and Supervisors on other national forests do everything they can to protect people living on the WUI.

Here's what they do:

offer to remove fine fuels near homes in the WUI owned by handicapped and/or elderly residents using USFS employees with written permission from the landowner.

distribute handouts to WUI residents describing Dr. Cohen's fine fuels removal methods so they can do the work themselves.

contact the people living in the WUI and announce fine fuels removal workshops will be held to answer questions. These workshops will present Dr. Cohen's research conclusions that prove commercial hazardous fuels logging farther than 100 yards from the WUI is ineffective.

This 2014 High Country News article at the link below describes the effectiveness of Dr. Cohen's fine fuels removal methods.

Link:

<http://www.hcn.org/articles/the-loss-of-homes-to-wildfire-is-as-much-a-sociopolitical-problem-as-it-is-a-physical>

Only a fool would reject Dr. Cohen's research conclusions. Read this to learn more about Dr. Cohen:

<https://www.firelab.org/profile/cohen-jack>

If you do not make major changes between draft & final you and the IDT members will risk people's lives. There are severe civil penalties for federal officials convicted of knowingly putting the public at risk.

Indeed, there is a reason people use fine fuels (i.e. kindling) to start a fire in the fireplace. Can you understand this? If so, you will know why commercially logging the merchantable timber you claim are hazardous fuels is an underhanded way to deceive the public to believe things that are not true. Shouldn't you treat the people who provide the tax dollars for your salary with a little respect?

Clearly you are taking action that is inconsistent with best science for personal gain. You want to assure you remain high on the list for promotions to USFS jobs with more power and a higher salary by generating volume.

One of the needs for this project (P&N at page 4) is reduce fuels so structures in the WUI won't burn. Reducing fuels is not a Purpose or Need. It's one of the many ways that might accomplish the real P&N I mentioned earlier. By limiting this to 1 action of the others available you increase the chances people might be burned to death and homes will be destroyed. Why do you not understand this simple fact? It must have been because you were so overcome by the need to generate volume you created a senseless P&N statement.

Request for changes to be made to the final NEPA document: Assure the Purpose & Need states this: "reduce the chance that homes will burn in the WUI should a wildfire start in the area" rather than "reduce fuels". After all, this is the real purpose isn't it? This new P&N would really serve the public and open the door to applying the Cohen fine fuels removal method and other treatments that do not involve logging. The final NEPA document will include an action alternative that proposes to use Dr Cohen's fine fuels removal method.

Failure to do this will violate:

NEPA Sec. 101(b)(2) because you do not "assure for all Americans safe, healthful, productive, and esthetically and culturally pleasing surroundings;"

NEPA Sec. 101(c) because "The Congress recognizes that each person should enjoy a healthful environment and that each person has a responsibility to contribute to the preservation and enhancement of the environment."

Ex. Ord. No. 13045, Apr. 21, 1997 [section 1-101(a)] because you do not "make it a high priority to identify and assess environmental health risks and safety risks that may disproportionately affect children."

40 CFR §1508.27(b)(2) because you will not write an honest FONSI, because the intensity category does not discuss "The degree to which the proposed action affects public health or safety."

As I show below, Independent Scientists (not
Affiliated with and Biased by the USDA) Agree that
Wildfire Intensity and Rate of Spread do not Change
when the Fire Burns through a Logged-Over Area.

Your pre-decisional EA says you need to reduce hazardous fuels.

Mark Rey began working for the timber and paper industry in 1976 and was vice president of the American Forest and Paper Association (a timber industry lobbying corporation) before joining the Senate Energy and Natural Resources Committee in 1995.

Mr. Rey was sworn in as the Undersecretary for Natural Resources and Environment by the Agriculture Secretary, by Ann_M._Veneman on 2 October 2001.

Undersecretary of Agriculture Mark Rey was one of the first people to emphasize the need for fuels reduction in the national forests. The following Congressional testimony points this out. Mr. Rey said if hazardous fuels had been removed before the Rodeo-Chediski fire started there would not have been as much damage. What he didn't tell the public was the Baca timber sale logged most of the Rodeo-Chediski fire area before the fire started. See:

FOREST SERVICE MISSED OPPORTUNITY TO THIN FOREST WITHIN RODEO-CHEDISKI Fire

Published by the Center for Biological Diversity in a News Release, June 28, 2002

Link:

https://www.biologicaldiversity.org/news/press_releases/baca6-28-02.html

Mark Rey's need to get the message across can be seen on the following Congressional testimony.

Statement of Mark Rey Under Secretary Natural Resources and the Environment United States Department of Agriculture and Rebecca Watson Assistant Secretary Land and Minerals Management Department of the Interior Before the United States House of Representatives Committee on Resources Concerning Containing the Threat of Wildland Fire to the Environment and Communities Flagstaff, Arizona March 7, 2003

Link:

https://www.fs.usda.gov/sites/default/files/legacy_files/media/types/testimony/HNRC_03-07-2003_Testimony.pdf

"In May 2002, working with the Western Governors' Association and a broad cross-section of interests including county commissioners, state foresters, tribal officials and other stakeholders, we reached consensus on a 10-Year Comprehensive Strategy and Implementation Plan to reduce fire risks to communities and the environment. The plan sets forth the blueprint for making communities and the environment safer from destructive wildfires. The plan calls for active forest management focusing on hazardous fuels reduction both in the wildland-urban interface and across the broader landscape. Active forest management includes: thinning trees from over-dense stands that produce commercial or pre-commercial products, biomass removal and utilization, and prescribed fire and other fuels reduction tools. We want to thank you, Chairman Pombo, Chairman McInnis, and the members of the House of Representatives, for initiating and passing House Concurrent Resolution 352 endorsing the Collaborative 10-Year Strategy." (pg 6)

Your minds have been programmed to believe that commercial fuels logging will reduce Wildfire Intensity and Rate of Spread in spite of the science that proves this isn't true. Indeed, it does provide a believable reason to accumulate volume. This isn't the only laughable excuse created by the USFS to justify more commercial logging.

I have spent too long trying to convince USFS Responsible Officials to eliminate the need for hazardous fuels removal from their timber sale NEPA document's Purpose and Need. The information below authored by experts with Ph.D.s contains irrefutable scientific evidence explaining that when a fire encounters logged over areas the intensity and rate of spread do not change ... and sometimes increase.

Here is the science you all reject: Once again the particularly relevant text is highlighted on red.

Fight Fire With Logging?

Published by Mother Jones magazine, August 1, 2002

Link:

<http://www.motherjones.com/politics/2002/08/fight-fire-logging>

Excerpt:

"Forestry experts have long known that commercial logging increases the risk of forest fire. So why, critics are asking, does the Bush administration's new fire prevention plan ignore that fact?"

More Logging Won't Stop Wildfires

By Chad Hanson Ph.D. and Dominick DellaSala Ph.D.

Published in the New York Times on July 23, 2015

Link:

http://www.nytimes.com/2015/07/23/opinion/more-logging-wont-stop-wildfires.html?_r=0

Excerpt:

"In the case of the Rim Fire, our research found that protected forest areas with no history of logging burned least intensely. There was a similar pattern in other large fires in recent years. Logging removes the mature, thick-barked, fire-resistant trees. The small trees planted in their place and the debris left behind by loggers act as kindling; in effect, the logged areas become combustible tree plantations that are poor wildlife habitat."

Wildfire trends outpace mitigation measures

By Tom Kuglin

Published in the Helena Independent Record, March 27, 2022

Link:

https://helenair.com/news/state-and-regional/govt-and-politics/wildfire-trends-outpace-mitigation-measures/article_1c0ceca2-bfd0-54c6-ba2b-895477f328ba.html?utm_campaign=Rockies%20Today&utm_medium=email&utm_source=Revue%20newsletter

Excerpt:

"When it comes to mitigation, Mark Finney, a U.S. Forest Service research forester with the Missoula Fire Sciences Laboratory, told the council that logging or thinning alone has not been shown to prevent large fires burning under extreme conditions. He detailed several fires in which logged areas burned alongside unlogged areas. The key mitigation found to be successful at mitigating fire was previous fire, he said."

Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western United States?

By Curt Bradley Ph.D., Chad Hanson Ph.D. and Dr. Dominick Della Sala Ph.D.

Published in Ecosphere October 26, 2016

Link:

<http://onlinelibrary.wiley.com/doi/10.1002/ecs2.1492/full>

Excerpt:

"We investigated the relationship between protected status and fire severity using the Random Forests algorithm applied to 1500 fires affecting 9.5 million hectares between 1984 and 2014 in pine (*Pinus ponderosa*, *Pinus jeffreyi*) and mixed-conifer forests of western United States, accounting for key topographic and climate variables.

We found forests with higher levels of protection had lower severity values even though they are generally identified as having the highest overall levels of biomass and fuel loading. Our results suggest a need to reconsider current overly simplistic assumptions about the relationship between forest protection and fire severity in fire management and policy."

Fanning the Flames! The U.S. Forest Service: A Fire-Dependent Bureaucracy

By Timothy Ingalsbee Ph.D.

Published in the Missoula Independent. Vol. 14 No. 24, June 2003

Link:

<http://www.klamathforestalliance.org/Documents/fanningtheflames.html>

Excerpt:

"In the face of growing public scrutiny and criticism of the agency's logging policies and practices, the Forest Service and their enablers in Congress have learned to mask timber sales as so-called 'fuels reduction' and 'forest restoration' projects. Yet, the net effect of these logging projects is to actually increase fire risks and fuel hazards."

"Decades of encouraging private logging companies to take the biggest, oldest, most fire-resistant trees from public lands, while leaving behind a volatile fuel load of small trees, brush, weeds, stumps and slash has vastly increased the flammability of forestlands."

"In addition to post-fire salvage logging, the Forest Service and timber industry advocates in Congress have been pushing pre-fire timber sales, often falsely billed as hazardous fuels reduction or 'thinning' projects, to lower the risk or hazard of future wildfires. In too many cases, these so-called thinning projects are logging thick-diameter fire-resistant overstory trees instead of or in addition to cutting thin-sized fire-susceptible understory trees. The resulting logging slash and the increased solar and wind exposure can paradoxically increase the fuel hazards and fire risks."

A USFS scientist comments on logging and fire behavior

By Tom Kuglin, writing about Dr. Mark Finney's research

Mark Finney, Ph.D., is a research forester with the U.S. Forest Service Fire Lab in Missoula.

Published in the Helena Independent Record newspaper, June 17, 2015

Link:

http://helenair.com/news/local/researcher-finds-need-for-more-prescribed-burning/article_4a58c3c3-a7bb-5905-a505-4567e8107600.html

Excerpt:

"Finney presented his research on fire behavior in landscapes of varying levels of logging and prescribed burning at last week's "Fire on the Landscape" lecture series in Helena. While logging or thinning is often touted as a means to mitigate fire, he has found it does little to stop a wildfire."

"There's a confusion that if you do timber management you're doing fuel management -- you're not," Finney said. "We're not going to cut our way out of the problem, but there are ways to do this strategically, get the benefits and have a sustainable fire management approach."

"Finney found that fire "ripped through logged areas," and only units where prescribed fire was introduced showed effectiveness in stopping or mitigating wildfire spread."

Logging without Limits isn't a Solution to Wildfires

By Timothy Ingalsbee Ph.D.

Published in the Portland Oregonian, August 6, 2002

Link:

<http://www.klamathforestalliance.org/Documents/loggingwithoutlimits.html>

Excerpt:

"Since the 'New Perspectives' program of the early 1990s, the agency has tried to dodge public opposition to commercial logging by using various euphemisms, such as this gem from the Siskiyou National Forest: Clearcuts are called 'minimum green tree retention units.' Accordingly, Forest Service managers have believed that if they simply refer to logging as 'thinning,' or add the phrases 'fuels reduction' or 'forest restoration' to the title of their timber sale plans, then the public will accept these projects at face value, and business-as-usual commercial logging can proceed. In the face of multiple scandals and widespread public skepticism of the Forest Service's credibility, it seems that only Congress is buying the agency's labeling scheme."

Thinning not enough to prevent wildfires

By Alex Syphard, Ph.D.

Published by Conservation Biology Institute, September 11, 2019

Link:

<https://consbio.org/newsroom/news/forest-thinning-wont-stop-cas-fires>

Excerpt:

"I find that fuel is one of the least important factors when it comes to protecting the home."

A Cohesive Strategy is Needed to Address Catastrophic Wildfire Threats

GAO/RCED-99-65 Catastrophic Wildfire Threats

Link:

<https://www.gao.gov/assets/rced-99-65.pdf>

Excerpt:

"Most of the trees that should be removed to reduce accumulated fuels are small in diameter and have little or no commercial value." (pg 44)

Ranger Smith if you don't respond like an adult to this science you will likely be discussing it in a court of law.

The plaintiff's attorney will ask you to produce experts not affiliated with the USFS who think merchantable-sized trees increase fire severity.

Request for changes to be made to the final NEPA document: Eliminate all text that states or infers commercial logging of merchantable sized trees will reduce fire intensity and rate of spread.

Failure to do this will violate:

18 USC 1519 because you knowingly altered and covered up the science that shows Dr. Cohen's fine-fuels removal methods applied within several hundred feet of a home is far superior at reducing the risk of fire damage

than commercially removing merchantable sized fuels much farther away.

18 USC 1001 (a)(3) because you knowingly and willfully stated your intentions to remove merchantable-sized hazardous fuels to reduce the chances homes will burn which is inconsistent with the best science I have included above which is a materially false statement.

Federal officials who violate these laws shall be fined under this title and imprisoned not more than 5 years.

Link:

<https://www.law.cornell.edu/uscode/text/18/1001>

40 CFR 1500.2(e) and (f) because you did not choose to avoid or minimize adverse effects of this timber sale which would make it impossible to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of your actions upon the quality of the human environment."

5 CFR 2635.101(b)(1) because you do not put ethical principles above private gain.

5 CFR 2635.101(b)(7) because you took action for private gain.....volume.

Temporary Roads become Linear Sediment
Sources if they are not Fully Obliterated after Use.

Blocking temp roads, planting grass or scattering brush on the running surface or waterbarring temp roads will not stop sediment from leaving the road and entering streams during precipitation events. They are outsloped, have no ditch or gravel surfacing. This causes aquatic damage. Why do you not grasp this simple cause and effect relationship?

The USFS Inventory and Monitoring manual identifies full obliteration which includes recontouring and restoring natural slopes as one of the USFS approved road decommissioning methods (see below).

Guidelines for Storing and Decommissioning Roads
1677-1804P-NTDP Transportation Management, June 2018

Link:

https://www.fs.usda.gov/t-d/pubs/pdfpubs/pdf16771804P/1677-1804P_GuideStoreDecomRoads_Sec508_07-02-18a_400dpi.pdf

Excerpt:

"The primary reasons to undertake road decommissioning and road storage treatments are to:

Restore disturbed lands to a more natural state

Facilitate vegetation regrowth

Reduce landslide potential

Reduce erosion

Restore aquatic and terrestrial habitat

Reduce or eliminate maintenance costs" (pg 1)

"Decommissioning and storing roads requires a change in road management objectives and maintenance prescriptions. The management objective is no longer to keep the road open and maintained for motorized uses but to minimize impacts to natural resources. To meet this objective, the road is treated to prevent motor vehicle

use, restore hydrological functions, reduce environmental impacts, and reduce or eliminate the need for road maintenance." (pg 6)

Low-Volume Roads Engineering, Best Management Practices Field Guide, July 2003

By Gordon Keller, PE Geotechnical Engineer USDA, Forest Service Plumas National Forest and James Sherar, PE Logging Engineer USDA, Forest Service National Forests of North Carolina.

Link:

https://pdf.usaid.gov/pdf_docs/PNADB595.pdf

Excerpt:

"RECOMMENDED PRACTICES

Obliterate unneeded roads whenever possible and where cost-effective to provide the highest degree of road removal and land reclamation." (pg 35)

Infiltration, erosion, and vegetation recovery following road obliteration, 2007

Authors: R. B. Foltz, H. Rhee, K. A. Yanosek

USFS Rocky Mountain Research Station; Source: Transactions of ASABE. 50(6): 1937-1943.

Link:

<https://www.fs.usda.gov/research/treesearch/32032>

Excerpt:

"Forest roads are obliterated to lower the risks of surface erosion and mass failures. One purpose of the road obliteration is to return the compacted forest roads to productive pre-road conditions, i.e., a forest floor with high infiltration capacity, low interrill erodibility, and high vegetation ground cover. It is important to know how these characteristics recover following road obliteration. Infiltration capacity, interrill erodibility, and vegetation ground cover are essential parameters for modeling erosion from obliterated roads for erosion prediction models such as the Water Erosion Prediction Project (WEPP). We chose three sites located on the Payette National Forest, Idaho. Rainfall simulations were conducted on 1 x 1 m plots with three replications in two consecutive years. Three 30 min storm events with an intensity of 89 mm h⁻¹ were applied to each plot. Photos were taken to determine vegetation ground cover. Infiltration capacity and interrill erodibility in this study were determined as 9.0 mm h⁻¹ for saturated hydraulic conductivity and 3.2 x 10⁶ kg*s m⁻⁴ for interrill erodibility. This study postulated a history of saturated hydraulic conductivity on a forest road from prior to road building to years after obliteration. The low elevation (1400 m) site had vegetation ground cover of 27% after three years following road obliteration, while the other high elevation (1800 m and 2200 m) sites had 8% after four years. We conclude that four years was not sufficient time for obliterated roads to return to the pre-road (forest floor) conditions, especially for infiltration capacity."

Here are 3 quotes authored by experts that describe resource devastation caused by temporary roads:

Permanent Damage from Temporary Logging Roads

By George Wuerthner, ecologist, author and ecological projects director for the Foundation for Deep Ecology

Published by Counterpunch, March 19, 2009

Link:

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

excerpt:

"The latest attempt by the Forest Service to make logging palatable is "temporary" roads. A lot of research has found that logging roads are among the biggest impacts to forest ecosystems.

The Forest Service has at least 400,000 miles of roads on the lands it administers and these roads are a major environmental collateral impact associated with logging and other resource exploitation."

"To fully reclaim a road is more than putting up a gate to block vehicle travel. It requires ripping up the road bed to remove the compacted soil layers. The side slope soil has to be put back on the site, and reshaped so sub surface and surface water flow is restored. Culverts need to be removed, and stream channels fully restructured and reconstituted. Vegetation needs to be planted-and grass seed is not enough-especially if the area once supported forest. And logs, rocks, and other natural structures need to be put back on the slope. And even if all these things are done, an old road does not magically disappear overnight. It continues to have impacts for years until the vegetation has grown sufficiently to more or less emulate the pre-road condition."

What is a "temporary" road?

Published by Applegate Neighborhood Network, July 22, 2019

Link:

<https://applegateneighborhood.network/what-is-a-temporary-road/>

excerpts:

"We often hear federal land management agencies (BLM & Forest Service) speak of "temporary roads," but what does that mean? Temporary roads are often proposed and constructed during logging projects on public land as a way to provide access into logging units. After the logging is completed the so-called temporary road is supposed to be decommissioned and the area restored. The agencies tout temporary roads as a less ecologically damaging alternative to permanent roads; however, temporary roads have long-lasting ecological impacts that are far from temporary."

"Temporary roads can also create long-term impacts to soils, ranging from compaction to increased soil erosion, and even catastrophic slope failure. When located near streams they can be a significant source of sedimentation and become chronic impacts to water quality and fisheries."

Temporary' roads cause more than temporary damage

By George Wuertner, ecologist, author and ecological projects director for the Foundation for Deep Ecology

Published by The Spokesman-Review, May 18, 2020

Link:

<https://www.spokesman.com/stories/2020/may/16/temporary-roads-cause-more-than-temporary-damage/>

excerpts:

"It is increasingly common for the Forest Service, timber industry and even some conservation groups to assert to the public that temporary roads used to access logging/thinning projects on national forest lands are ecologically neutral.

Temporary roads, however, are nearly as destructive and in some cases even more damaging to wildlife and wildlands than a permanent road."

"The idea that an elk or bear displaced by a temporary road can go someplace else assumes there is someplace else to go. If the habitat is suitable for any species, it will already be occupied. In effect, roads reduce habitat quality and quantity for affected species."

"The impacts go well beyond the effect on habitat security for elk and grizzlies. I have seldom seen restored roads that were fully converted back to the original condition. In most cases, the road lens is not restored, and the road cut allows subsurface water to collect on the road pathway, often contributing to increased erosion. The steep side slope of a road cut is one of the reasons why roads are a chronic source of sedimentation in streams, negatively impacting aquatic ecosystems."

"Road surfaces become compacted soil that can last for decades, and thus shed water instead of allowing it to soak in, again contributing to more gullying and erosion."

"Anyone who asserts that thinning or logging is OK because there are "only" temporary roads" is demonstrating overall ignorance."

Comment: At page 29 you say:

"Under the proposed action, the Forest Service would construct approximately 13.6 miles of new temporary roads (i.e., not on existing templates)" Ranger Smith, Professional USFS line-officers always obliterate temporary roads when they are no longer needed.

Comment: At page 29 you say:

"The Forest Service would also construct 11.3 miles of temporary roads on existing templates. After implementation is complete, these roads would be decommissioned and returned to their existing condition and existing maintenance schedule."

You people should never be allowed to dabble in things you know nothing about. All temporary roads must be obliterated after use. There is no running surface to maintain on roads that have been returned to their existing condition.

Comment: At page 29 you say:

"Because temporary roads are not part of the transportation system, there would be no impacts on transportation from their construction, use, or decommissioning."

You people are idiots. Of course temporary roads are part of the transportation system. They are a temporary part of the transportation system. If they were not part of the transportation system they would not be called roads would they?

Request for changes to be made to the final NEPA document: Please assure the EA says "all temporary roads will be fully obliterated after use ... this includes drainage structures removed, pulling the fill material onto the running surface, and reshaping to match the original contour."

If this not done, you will have violated:

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

NEPA Sec. 101(b)(2) and (c) because the environmentally destructive temporary roads do not assure

"esthetically and culturally pleasing surroundings" and did not "Use all practicable means, consistent with the requirements of the Act and other essential considerations of national policy, to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment."

Increases in National Forest Logging do not
Stabilize or Enhance the Economy/Employment of
Small Communities Located near the Forest.

Especially pertinent text is highlighted in red.

One of your corporate-friendly timber sale purposes listed in the P&N at page 3 that you copied and pasted from a past timber sale is:

"Harvest trees to provide forest products to the local timber industry, contributing to short-term products and providing for long-term sustainability of timber on National Forest System lands. Proposed forest management would contribute to community stability and employment."

If you read the following literature authored by experts you will learn logging does not Enhance the Economy/Employment of Small Communities Located near the Forest. Of course this is one of the many untrue excuses used by the USFS to justify more logging.

The Truth about the Economics of Logging
Published by the Tillamook Pioneer September 14, 2022

Link:
<https://www.tillamookcountypioneer.net/the-truth-about-the-economics-of-logging/>

Excerpts from this paper:

"Mr. Niemi broke down the true cost of logging and how to rethink forestry. Ernie specializes in applying the principles of cost-benefit analysis, economic valuation, and economic-impact analysis to describe the economic importance of natural resources.

"In the past 30 years the timber industry has eliminated about 30,000 jobs in Oregon, or about 1/3 of their workers and is continuing to press to eliminate more jobs. New machine technology can eliminate 8 jobs per machine"

"Industrial land owners have about 6 million acres of forest land in Oregon which generate around \$1 billion in profits, half of which goes to Wall street, and about 40% of that leaves the United States."

The Economic Impact of Preserving Washington's Roadless National Forests
By Thomas Michael Power, Ph.D., Professor of Economics, University of Montana, June 13, 2000.

Link:
<http://www.kettlerange.org/power/powerreport.htm>

Excerpt

"Estimates have not been made for most of the economic values associated with the long list of natural forest environmental services provided in Figure 1.1. Of the non-commercial economic values, only recreation and roadless area passive use values have been estimated. Of course, the market provides an indication of

commercial timber values. The Forest Service has estimated that in 1995 the passive use values totaled over \$3.5 billion dollars for all of the Interior Columbia Basin's federal lands. Recreation values totaled about \$3.2 billion. Timber values amounted to about \$900 million

The combination of recreation and passive use values were almost eight times the size of the timber values. In areas where recreation is less important and timber more important, the relative importance of timber values would be greater, but it would remain a distinct minority of the total economic value associated with the National Forests. If watershed, fishery, wildlife and other forest values listed in Figure 1.1 were included in the total economic value, timber would decline even further in relative terms. Just as important, the relative importance of timber economic values in the total of forest economic values is expected to decline over the next 50 years from about 11.5 percent to about 5.4 percent as recreation values increase.

Outdoor Industry Association Releases State-By-State Outdoor Recreation Economy Report

From: The Outdoor Industry Assn. News

Link:

<https://outdoorindustry.org/article/outdoor-industry-association-releases-state-by-state-outdoor-recreation-economy-report/#oia-press-room>

Excerpts:

"Earlier this year, OIA released its national outdoor recreation economy report, which found that the outdoor recreation economy generates \$887 billion in consumer spending annually and directly sustains 7.6 million American jobs. The state report released today offers a deeper look into a thriving sector that's helping to create healthier economies and healthier communities.

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

Recreation is redefining the value of Western public lands

Published by High Country News, May 14, 2018

Link:

https://www.hcn.org/issues/50.8/recreation-recreation-is-redefining-the-value-of-western-public-lands?utm_source=wc&utm_medium=email \t "_blank

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.

The West's vast public lands remain its defining factor, but these days, their economic value increasingly comes

from the outdoor industry. Nationally, that industry is worth nearly \$900 billion annually, according to the Outdoor Industry Association. People made over 290 million visits to the West's public lands last year and spent a lot of time - and money - along the way. Those numbers are growing, while the jobs and revenue associated with hydrocarbons and timber have declined over the past several decades. The West's nearly 600 million acres of public lands have tremendous influence on what it means to be a Westerner, and that picture is changing. Here, a by-the-numbers look at the economic heft of recreation and public lands:

Oregon sees big jump in outdoor recreation spending
From the Bend Bulletin newspaper, July 26, 2017

Link:

<http://www.bendbulletin.com/localstate/5472143-151/oregon-sees-big-jump-in-outdoor-recreation-spending?referrer=home&referrer=top>

Excerpts:

"Outdoor activities generate more than \$16 billion annually in Oregon, according to an industry study released to the public on Wednesday."

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

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

Comment: You must know by pushing logging where it's not needed for cooked-up reasons you simultaneously backhand the vast majority of the American public who don't want their forests logged at any location for any reason. This is why the USFS often finds itself in Federal District Court. You know logging has nothing to do with the economies of local communities. This P&N statement is copied & pasted from your past timber sales. This is the routinely used, (USFS-approved) way of assuring any alternative analyzed in detail must include commercial logging. This is the agency's way of gifting their corporate masters. You are all integral cogs in this tragic scheme. The IDT members should be ashamed.

Indeed, keeping areas unlogged and undeveloped to attract recreationists is what enhances the economy/employment of small communities located near the forest

You and your IDT members reject/ignore the available literature discussing the fact that most national forest visitors are seeking recreational opportunities. Camping, fishing, hiking and wildlife watching are a few. They avoid "managed" land. Recreationists spend their money on gas, motels, sporting goods stores for supplies, restaurants etc. in small communities located near the Forest. This is what really drives their economy.

I invite you to read the Opposing Views Attachment #24 to learn what you should already know.

If you were really concerned about local community stability and local job creation you would offer this as an SBA sale to prevent a large timber corporation located far away from buying the sale and hauling the logs away from the local community to be processed.

Of course your motivation to sell this timber sale has nothing to do with community stability. We both know "local

community stability" and "local job creation" is part of the USFS dishonest script to trick the public into accepting tragic timber sales like this.

When the recreating public bypasses and avoids communities with timber driven economies surrounded by "managed" national forest land these communities lose out on their share of the recreation-generated financial community stability benefits reported in 2006 shown below. In the last 11 years these benefits have increased. The level of the 10 year increase in recreation benefits exceeds the total jobs & revenues created by national forest "management" (a.k.a. logging).

Request for changes to be made to the final NEPA document: Either 1) Offer the sale as an SBA sale and say so in the final NEPA document, or 2) drop the sale immediately and replace it with one where you don't need to lie about the sale's benefits.

Failure to do this will violate:

40 CFR 1500.1(c) because eliminating natural disturbance events will not "restore" the resources in and downstream from the timber sale. Therefore, you did not create a "high quality" pre-decisional EA based on "accurate scientific analysis."

40 CFR § 1500.1(b) because the science I present in Opposing Views Attachment #1 and #4 attached to these comments show this timber sale will not "restore" any resources in and downstream from the timber sale. Therefore, you did not create a "high quality" pre-decisional EA based on "accurate scientific analysis."

40 CFR 1500.2(f) because the Proposed Action will not "use all practicable means, consistent with the requirements of the Act and other essential considerations of national policy, to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment"

You are Required to Mitigate ALL Predicted
Adverse Effects Caused by your Timber Sale and Monitor the Mitigation for Effectiveness.

Request for changes to be made to the final NEPA document: Include a section that describes the required mitigation measures designed to reduce adverse effects resulting from timber sale activities that might or could be affected. Include the monitoring plan to measure the mitigation effectiveness.

If you don't you will violate:

40 CFR Sec. 1502.14(f) and 40 CFR 1502.16(e, f, g, and h) "because you have failed to require effectiveness monitoring on all mitigation designed to reduce the predicted adverse resource effects caused by your timber sale."

FSH 1909.12 - LAND MANAGEMENT PLANNING HANDBOOK CHAPTER 10 - 12 Monitoring:

"The plan must describe a monitoring program for the plan area (36 CFR 219.6(b)) that establishes monitoring questions and associated performance measures. Monitoring questions must link to one or more desired condition, objective, or guideline. Not every desired condition, objective, and guideline must be associated with a monitoring question. When developing the monitoring program, the Responsible Official shall:

Use an interdisciplinary approach and involve the public (36 CFR 219.9(a)).

Consider multi-agency approaches.

Design the monitoring program to form the basis for continual improvement (adaptive management).

Focus on key plan components where plan implementation is likely to cause a change over time.

Address the minimum timber management requirements of the National Forest Management Act, for example, restocking, cut block size and shape, and watershed protection."

40 CFR Sec. 1505.2(c) because you have failed to adopt a monitoring "enforcement program where applicable for any mitigation."

The January 21, 2011 CEQ Final Guidance for Federal Departments and Agencies on the Appropriate Use of Mitigation and Monitoring and Clarifying the Appropriate Use of Mitigated Findings of No Significant Impact in the Federal Register. The link is below.

<https://www.federalregister.gov/documents/2011/01/21/2011-1188/final-guidance-for-federal-departments-and-agencies-on-the-appropriate-use-of-mitigation-and>

This direction is not ambiguous or hard to understand. Here are some quotes from the CEQ guidance:

"SUMMARY:

This guidance outlines principles Federal agencies should apply in the development of their NEPA implementing regulations and procedures to guide their consideration of measures to mitigate adverse environmental impacts in EAs and EISs; their commitments to carry out mitigation made in related decision documents, such as the Record of Decision; the implementation of mitigation; and the monitoring of mitigation outcomes during and after implementation."

The last task shown in the USFS NEPA flowchart is "Implementation with monitoring as provided in the decision" <https://www.fs.usda.gov/emc/nepa/revisions/includes/docs/NEPAProcessFlowchart-508.pdf>

Forest Service Handbook 1909.12 Chapter 30

https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5409877.pdf

The Forest Service's Monitoring and Evaluation Framework states:

"The NFS Monitoring and Evaluation (M&E) Framework responds to the National Forest Management Act of 1976 (16 USC 1600-1614). Through this law, Congress has directed the Forest Service to use monitoring and assessment to evaluate the effects of land management."

<https://www.fs.usda.gov/emc/met/>

Noise and Dust caused by Timber Harvest
Adversely Affects Recreation and Wildlife, thus
These Adverse Social and Environmental Impacts
must be Disclosed in Chapter 3 and the NEPA
Document must Describe the Mitigation Required to
Eliminate or Reduce these Adverse Effects

Sadly, the pre-decisional EA fails to mention noise and dust resulting from logging activities. The noise is clearly evident and disruptive to recreationists and wildlife species several miles away from the source.

Anyone responsible for protecting the land owned and loved by 322 million Americans must understand that their job under NEPA requires them to disclose and analyze all effects (positive and negative) resulting from project implementation. This includes industrial noise and dust effects. You have failed to disclose these effects. Does your logging not cause dust and noise? Noise pollution in particular is a problem for animals like bats, frogs, and birds that rely on sound to communicate.

Let me educate you with some science.

When the woods get noisy, the animals get nervous

By Christine Peterson

Published by High Country News, July 4, 2023

https://www.hcn.org/articles/recreation-when-the-woods-get-noisy-the-animals-gets-nervous?utm_source=wc1&utm_medium=email&utm_campaign=2023-07-07-Newsletter

Excerpts:

"The new study, currently underway in Wyoming's Bridger-Teton National Forest, adds to mounting evidence that the mere presence of human sound, no matter how loud or quiet, fast or slow, changes how animals behave."

Effects of Noise on Wildlife

Published by the Nature Sounds Society

https://www.nps.gov/subjects/sound/effects_wildlife.htm

Excerpt:

"Sound, just like the availability of nesting materials or food sources, plays an important role in the ecosystem. Activities such as finding desirable habitat and mates, avoiding predators, protecting young, and establishing territories are all dependent on the acoustical environment. In order to continue with these activities, animals are being forced to adapt to increasing noise levels. Research shows that males of at least one frog species are adapting to traffic noise by calling at a higher pitch (Parris et al. 2009). This could be problematic for the females, because they prefer lower-pitched calls, which indicate larger and more experienced males. Human-caused noise has produced similar results in multiple bird species (Barber et al. 2009)."

Noise pollution threatens animals

Published by BBC and Earth News, 14 October 2009

http://news.bbc.co.uk/earth/hi/earth_news/newsid_8305000/8305320.stm

Excerpts:

"Sounds produced by vehicles, oil and gas fields and urban sprawl interfere with the way animals communicate, mate and prey on one another.

The sounds are becoming so ubiquitous that they may threaten biodiversity, say the review's authors.

Even the animals living in protected National Parks in the US are being exposed to chronic levels of noise.

Writing in the journal Trends in Ecology and Evolution, three scientists based in Fort Collins, Colorado, US detail the extent to which noise pollution is now harming wild animals."

Here are others:

Effects of Noise on Wildlife

Published by the National Park Service, February 2, 2018

https://www.nps.gov/subjects/sound/effects_wildlife.htm

The Effects of Noise on Animals

Published by Springerlink, October 4, 2022

https://link.springer.com/chapter/10.1007/978-3-030-97540-1_13

Noise pollution: how to reduce the impact of an invisible threat?

Published by Environment Pollution and Climate Change, April 25, 2022

<https://www.omicsonline.org/open-access/noise-pollution-how-to-reduce-the-impact-of-an-invisible-threat-2573-458X-1000276-119727.html>

A synthesis of two decades of research documenting the effects of noise on wildlife

Published by Biological Reviews, June 26, 2015

<https://onlinelibrary.wiley.com/doi/abs/10.1111/brv.12207>

Logging Truck Noise Near Nesting Northern Goshawks

Published by USFS, 1998

<https://research.fs.usda.gov/treearch/30632>

Noise pollution and its effect on wildlife

Published by Noise News, July 19, 2021

<https://www.cirrusresearch.co.uk/blog/2021/07/noise-pollution-wildlife/>

Estimating Exposure and Effects of Sound on Wildlife

Published by National Academy of Sciences, 2024

<https://nap.nationalacademies.org/read/23479/chapter/4#32>

How noise pollution from humans is wreaking havoc on U.S. wildlife

Aired by PBS Jul 18, 2017

<https://www.pbs.org/newshour/nation/noise-pollution-humans-wreaking-havoc-u-s-wildlife>

Noise: an invisible threat that harms wildlife, degrades habitats

Published by MONGABAY, October 2, 2015

<https://news.mongabay.com/2015/10/noise-an-invisible-threat-that-harms-wildlife-degrades-habitats/>

Logging noise inflames tension

Published by Driftwood, May 6, 2020

<https://gulfislandsdriftwood.com/logging-noise-inflames-tension/>

Request for final NEPA document modifications: Please assure Chapter 3 discloses the noise and dust effects to wildlife species according to the literature presented above. Chapter 3 should also disclose how noise and dust may adversely affect the recreation experience of human visitors to the forest. Indicate how you plan to mitigate this.

Failure to do this will violate:

40 CFR 1508.3.because the omission of this information from Chapter 3 also violates 42 USC section 7641 and Title 42--The Public Health and Welfare, Chapter 65-- NOISE CONTROL, Sec. 4901.

42 USC section 7641 because you did not contact the EPA Office of Noise Abatement and Control so they can determine:

<https://www.law.cornell.edu/uscode/text/42/7641>

- *effects at various levels;
- *projected growth of noise levels in urban areas through the year 2000;
- *the psychological and physiological effect on humans;
- *effects of sporadic extreme noise (such as jet noise near airports) as compared with constant noise;
- *effect on wildlife and property (including values);
- *effect of sonic booms on property (including values); and
- *such other matters as may be of interest in the public welfare.

Title 42(3)--The Public Health and Welfare, Chapter 65-- NOISE CONTROL, Sec. 4901 because you did not take action to control of noise.

42 USC section 7641 (c)

All reasonable action alternatives that don't include commercial logging were eliminated from consideration because the Purpose & Need was too narrow, specific and described an action (harvest timber) rather than a goal. The Purpose & Need was written in such a way as to force and justify selection of the Proposed Action that must harvest timber which renders other reasonable alternatives to the Proposed Action which don't harvest timber inapplicable.

Request for changes to be made to the final NEPA document: write a new (expanded) Purpose & Need that allows reasonable alternatives to the Proposed Action to be analyzed in detail that do not include timber harvest and assure the project goals stated in the P&N are not mutually exclusive ... that is achieving the goals for one resource will adversely affect another resource mentioned in the P&N as a resource to be enhanced. Then reinstate the NEPA comment and analysis process to analyze the new reasonable alternatives, especially those suggested by the public during the comment period.

If this is not done the final EA violates 40 CFR 1500.2(d) and (e) and 40 CFR 1506.6(a)

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

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

Opinion Excerpt:

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

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

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

Opinion Excerpt:

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

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

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

Opinion Excerpt:

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

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

Opinion Excerpt:

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

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

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

Opinion Excerpt:

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

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

Opinion Excerpt:

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

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

Opinion Excerpt:

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

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

Opinion Excerpt:

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

Ranger Smith, Tricking the Public
into Believing your Temporary Road Construction
can be Ecosystem Friendly is Devious and Corrupt.

You indicate you will construct 14 miles of temporary road. You also say 8 miles of the total 14 miles will be constructed on "existing templates." (pg 2-36)

You know your "existing templates" are old so-called temporary roads left on the land for many years after the last timber sale. You also know the roads are outsloped with no ditch. You know these roads are ready-made sediment generators that have damaged and harmed aquatic resources in nearby streams. When you constructed the old "temporary" roads you told the public they would be "decommissioned and closed." You lied. Your real goal was to minimize reconstruction cost the next time the area is logged. Clearly, you don't care about water quality and aquatic resource health.

USFS line-officers who value the health and proper functioning of the aquatic resources ALWAYS obliterate temporary roads after they have served their purpose. The obliteration process eliminates the road's running surface. If you had done the right thing there would be nothing to close or decommission would there?

I suggest you place a hydrologist and fisheries biologist on the IDT. Had these specialists been available they would have explained the concept of obliteration to you and how frequent, continued sediment production from "temporary roads" at each precip event will inflict major long-term aquatic harm.

Here's a statement by one of your fellow USFS employees about the aquatic habitat damage caused by "temporary" roads:

National Forest Road System and Use
By Gerald Coghlan Acting Director of Engineering USFS and Richard Sowa
Transportation Development Program Leader USFS
https://www.fs.fed.us/eng/road_mgt/roadsummary.pdf

Excerpts:

"Temporary roads are proposed where one-time access is needed as part of a single timber sale. They have lower initial development costs than permanent roads, but their long-term management implications are more significant." (pg 4)

There are many, many more science papers authored by independent scientists that describe the aquatic

damage caused by temporary roads.

Request for changes to be made to the final NEPA document: Do not build temporary roads on "existing road templates." Tell the public the existing road templates will be obliterated ... which should have been done years ago. Do not construct another so-called "temporary" road near the location of the obliterated road for obvious reasons. Consider longer skidding distances or eliminating the cutting unit. You cannot wiggle out of this one.

If you fail to do this, you will violate:

40 CFR 1500.1(c) because you did not take action to "protect, restore, and enhance" the aquatic environment.

40 CFR 1500.2(e) and (f) because you did not choose to avoid or minimize adverse effects of the project upon the quality of the human environment without complete knowledge of all likely adverse effects and did not "Use all practicable means, consistent with the requirements of the Act and other essential considerations of national policy, to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment."

The pre-decisional EA does not Require
Streams to be Surveyed Before and During
Treatments. This Data is Essential to
Determine Whether the Stream Conditions are
being Harmed by Project Activities.
You should know this.

You want to assure you don't know if the proposed project has harmed (or is harming) the riparian conditions on streams in and downstream from the sale area thus you do not require stream surveys prior to and after sale implementation.

Stream surveys will not happen unless they are required in the NEPA document. Most line-officers include stream surveys in their monitoring plan.

The pre-decisional EA contains no such direction for the fisheries biologist or hydrologist to do this. Reliable, accurate before and after characteristics can only be determined by direct field measurements.

NEPA's Scientific and Information Standards-Taking the Harder Look
By Murray D. Feldman and Kristin A. Nichols HOLLAND & HART LLP Boise, Idaho and Greenwood Village, Colorado

Excerpt:

"In recent years, courts have focused on an agency's obligation to adequately assess baseline data as part of its environmental analysis.⁸⁰ In *Oregon Natural Desert Association v. Jewell*,⁸¹ the Ninth Circuit reversed and remanded BLM's approval of a wind energy project based on its failure to conduct surveys in order to determine whether sage grouse were present at the project site in the winter months, despite the potential conflict between the proposed location of the wind energy project and greater sage-grouse winter foraging habitat. As opposed to preparing surveys for the project site, BLM relied on an extrapolation from surveys conducted on nearby sites to conclude that no sage grouse winter habitat was present at the project site. The court rejected BLM's reliance on extrapolated surveys because:

Without appropriate data regarding sage grouse use of the [project] site during the winter, whether direct or via a

supportable extrapolation, it was not possible to begin to assess whether sage grouse would be impacted with regard to access to viable sagebrush habitat in the winter months.⁸²

80 See *N. Plains Res. Council v. Surface Transp. Bd.*, 668 F.3d 1067, 1085 (9th Cir. 2011) (rejecting "[t]he use of mitigation measures as a proxy for baseline data"); see also *Openlands v. U.S. Dep't of Transp.*, 124 F.Supp.3d 796, 806 (N.D. Ill. 2015) (rejecting baseline forecasts that assumed the existence of the project under consideration).

81 840 F.3d 562, 568-70 (9th Cir. 2016)

82 *Id.* at 570"

Request for changes to be made to the final NEPA document: Include direction to the fisheries biologist or hydrologist to survey the streams that might be affected before, during and after sale implementation and include this direction in the NEPA document.

Failure to do so will violate:

40 CFR 1500.1(b) because you did not consider relevant environmental information early in the process in order to ensure informed decision making.

40 CFR 1500.2(f) because you failed to "use all practicable means, consistent with the requirements of the Act and other essential considerations of national policy, to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment."

The Pre-Decisional EA does not Contain a
Monitoring Plan to Determine the Effectiveness of
the Planned Road Work.

Page 51 of the Guidelines for Storing and Decommissioning Roads says you "should develop monitoring plans for evaluating the effectiveness of decommissioning treatments."

https://www.fs.usda.gov/t-d/pubs/pdfpubs/pdf16771804P/1677-1804P_GuideStoreDecomRoads_Sec508_07-02-18a_400dpi.pdf

Excerpt:

"Followup Monitoring

Interdisciplinary teams familiar with the watershed restoration goals and objectives should develop monitoring plans for evaluating the effectiveness of decommissioning treatments. Monitoring provides feedback for evaluating the successes or deficiencies of treatments and determining if changes are necessary. Developing processes to gather information on road closure effectiveness in conjunction with other projects can improve efficiencies and costs of monitoring road closures."

Page 24786 of Vol. 81 of the Federal Register, April 27, 2016 also addresses monitoring
<https://www.govinfo.gov/content/pkg/FR-2016-04-27/pdf/2016-09750.pdf>

Excerpt:

"Monitoring and evaluation of restoration projects are essential adaptive management steps for achieving sustainable ecosystems."

You claim your treatments will "restore" the project area, yet your pre-decisional EA contains no direction to monitor and evaluate your treatments to determine if they are achieving a sustainable ecosystem as intended.

Request for changes to be made to the final NEPA document: Include a section that describes the required monitoring for 1) planned Road Decommissioning to determine its effectiveness, and 2) your treatments to determine if they are achieving a sustainable ecosystem.

If you don't you violate:

FSH 1909.12 - LAND MANAGEMENT PLANNING HANDBOOK
CHAPTER - ZERO CODE at pages 4 and 5 states:

04.2 - Interdisciplinary Team

It is the role of an interdisciplinary team to monitor and evaluate results of plan implementation.

40 CFR Sec. 1505.2(c) because you have failed to adopt a monitoring "enforcement program where applicable for any mitigation."

40 CFR Sec. 1505.3 because you will be unable to "Upon request, make available to the public the results of relevant monitoring."

The January 21, 2011 CEQ Final Guidance for Federal Departments and Agencies on the Appropriate Use of Mitigation and Monitoring and Clarifying the Appropriate Use of Mitigated Findings of No Significant Impact in the Federal Register.

This direction is not ambiguous or hard to understand. Here's a quote from the CEQ guidance:

"SUMMARY:

This guidance outlines principles Federal agencies should apply in the development of their NEPA implementing regulations and procedures to guide their consideration of measures to mitigate adverse environmental impacts in EAs and EISs; their commitments to carry out mitigation made in related decision documents, such as the Record of Decision; the implementation of mitigation; and the monitoring of mitigation outcomes during and after implementation."

Forest Service Handbook (fsh) 1909.12 30.5 states:

"Project monitoring is a valuable means of understanding the effects of projects and activities. Project monitoring can provide useful information to adapt future project plans to improve resource protection and restoration. Project and activity monitoring may be used to gather information for the plan monitoring program, and plan monitoring information may inform the development of specific projects and activities. However, the Responsible Official has the discretion to strategically select which projects to monitor and the monitoring questions related to those projects that will best inform the monitoring program, test assumptions, track changing conditions, or evaluate management effectiveness."

The Forest Service's Monitoring and Evaluation Framework states:

"The NFS Monitoring and Evaluation (M&E) Framework responds to the National Forest Management Act of 1976 (16 USC 1600-1614). Through this law, Congress has directed the Forest Service to use monitoring and assessment to evaluate the effects of land management."

<https://www.fs.fed.us/emc/met/>

Never, Ever Entertain the Notion
that you Serve the Public.

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

Most IDT members have science backgrounds. Most understand the value of biodiversity in the forest. By helping to plan this timber sale they are helping to simplify the forest which eliminates the biodiversity. Aren't there some decisions that should not be based on money?

The IDT members should remove themselves from their denial mode and have the courage to examine the cut & paste Purpose & Need closely and ask themselves if the P&N statement reflects the real needs of the countless non-timber natural resources in and downstream from the sale area? Will a commercial timber sale accomplish these needs? Of course not. As my attachments show, best science indicates commercial timber sale activity harms and sometimes destroys the proper functioning of the countless forest resources besides trees. Some IDT members know this, but they do not choose to jeopardize a job that pays well. They prefer to live a life of hypocrisy for the money.

As is the case here, the IDT members know the silviculturist encourages them to believe the trees in this natural, biodiverse forest are sick and may die because he/she concludes they are not resilient to natural disturbance events such as insects, disease and fire. Why is killing the trees with chainsaws and removing them for corporate profit better than allowing them to die a natural death as God intended and remain in the forest to replenish the organics in the soils and serve as habitat for some wildlife species? Of course this is a rhetorical question.

The IDT members have never asked themselves why a human vision of how things should be in the forest should override God's vision when He created the forest and allowed it to pass through different successional stages ... where each stage benefits the natural resources in different ways.

The Bonanza timber sale will take away more undeveloped national forest acres that the unborn kids of the future should inherit. Which is most important to you: the future kids of America seeking solitude and quietness, or another summer home and yacht for the CEO of the timber extraction corporation that purchases this timber sale?

After reading the science attachments to this comment letter any rational, unbiased, intelligent person would immediately understand that this sale is a goofy, unprecedented assault on Americans who own the Helena National Forest.

Please, withdraw this tragic timber sale and serve the public. Spend your NFTM dollars elsewhere where timber harvest might really benefit the countless forest resources.

Each IDT member knows if they make it known to their peers they oppose this timber sale they will jeopardize their good standing in the agency and tarnish their promotion potential. A few do not know their job as an IDT

member is to be a timber sale enabler regardless of how their resource is ravaged.

The few who understand this are hypocrites as they backhand the public to provide short-term profit opportunities for the natural resource extraction corporations. You will all live with this the rest of your life. I feel bad for people who will sell their soul for money ... especially if they claim to work for the American people.

If the USFS had not Rigged the Objection Process against the Public my Objection would not be Rejected

The public is now starting to realize the USFS Objection process is a joke. Sadly, the IDT members believe the agency can do no wrong. The English language has a word to describe this --- "Pollyanna." Webster defines it as "a person characterized by irrepressible optimism and a tendency to find good in everything."

Intelligent, unbiased, un-brainwashed people understand that the Objection Deciding Officer (ODO) must be an unbiased 3rd party with no interest in whether a project is implemented or not. The USFS rigged the Objection process against concerned members of the public by assuring the ODO is a USFS employee who will claim anything to avoid the appearance that the Responsible Official made a mistake.

You people must never, ever seriously think you serve the public. It's a cruel joke perpetuated by your agency for many decades.

I know that you know my objection will be rejected by the Objection Deciding Officer before he/she reads it.

The agency treats objections fairly and professionally only if they are filed by groups or individuals who have a history of taking the USFS to court. My motivation for writing these comments is to identify how unprofessional, naive and clueless you all are. For those of you who know what's going on and still press on because your job pays well, I hope the guilt sneaks up on you later in life. People of the future will want to know who was responsible for the development and plunder of their public land.

When the Objection Deciding Officer rejects my daughter's objection it opens the door to court action. My daughter will use this opportunity.

I know, I know, you are thinking this guy is crazy, what can he possibly do that would cause me to act in an unusual way that could cause my supervisor to become concerned. Remember:

the court of public opinion is often more effective than a court of law ... a good letter to the editor takes about 10 minutes and will generate many letters to you from the public expressing their outrage.

I have found that writing letters to Democratic members of Congress can be effective sometimes.
