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Organization:
Title:
Comments: Attached are an objection letter and a PDF file. I am attaching my objection letter rather than typing it here to preserve the formatting. I am aware my letter will probably be disregarded since I did not follow the rules, which I only just read. Too late to remedy that now. Oh well. I should be used to it by now anyway.
Objections to Revision of Forest Plan for the Gila National Forest
Part One: Forest [ldquo]Thinning[rdquo]

I would like to convey my objection to forest thinning based on the fact that the efficacy of thinning as a wildfire mitigator is by no means a universally accepted hypothesis. In fact, there have been studies done showing the opposite[mdash]that thinning the forest makes wildfires worse due to increased sun and wind penetration and increased brush regeneration.

Deanna Meyer eloquently sums up many of the conclusions of these studies. (She ran the internet site Stop Thinning Forests before it became cost-prohibitive):

Fuel load is not a leading contributor to fires. Wind and climate are. If anyone takes the time to study "catastrophic" fires, the ones that burn homes, buildings, and infrastructure, they understand that they are driven by high winds. We can look at this week's Boulder fire. There were NO FORESTS!! And in most cases, thinned forests burn faster because of all of the slash that is left behind, the lack of windbreaks since the forest has lost most of the trees, the dried out soil, (intact forests provide shade, have more plants, mycelium, and healthier soil which all contribute to holding a lot more moisture). Right now the forest destroyers are leaving between 3 to 12 inches of mulched-up trees lying on the surface and they are also leaving huge piles of logs on the forest floor to either rot or burn. How anyone thinks this will lessen fire danger is beyond me[hellip].

Logging (or raking, thinning or other mechanical treatment) does not reduce fire severity. Research shows that the least intensive fires occur where forests are the most protected and fuel biomass is highest which is counter-intuitive.

The whole lie of "cleaning up the forests" so that there is less "fuel" is an atrocity. Even without all the ecological science that proves this is simply NOT true (one study looks at millions of acres that have burned in the West and in every case forest "management" never slowed down the fires and in many cases in made it more severe). When you destroy a forest's canopy and obliterate all the plants and turn the soil into dust, you bring in more sunlight and this completely dries everything out. It removes ground cover and destroys carbon sinks and creates a much more arid forest floor. On top of that, you open up wind breaks so if a hot fire comes through (wind and climate drive fires, not fuel) it can move faster because the windbreaks are eliminated. So now, after destroying the soil, trees and the shade they provide on the forest floor, you have just biotically cleansed the area and made it more likely for a severe fire to rip through the area.

On top of all of that, you have destroyed the homes of many squirrels and other rodents, as well as plants, birds, insects, mycelium, lichen, and moss, and in this case they did it in the fall after the squirrels and birds have been busy for months storing up their winter food supply. When I walked this area, I saw a ton of stored food scattered all through the ground with the mulched up trees that were these animals homes and food supplies. It is devastating for the entire forest community.

In [ldquo]The Thinning Trap: Fear, Fire and Logging[rdquo] https://www.counterpunch.org/2010/02/09/the-thinning-trap/ ,George Weurthner points out these and other facts:

In addition, since thinning reduces completion and opens up the forest floor to more light, thus new plant growth, thinning can often lead to the creation of even more of the flashy fine fuels that sustain forest fires. Unless these thinned stands are repeatedly treated, they can actually exacerbate the fire hazard by increasing the overall abundance of the very fuels which are most problematic[mdash]the smaller shrubs, grasses, and small trees that sustain fire spread.

In addition, thinning can increase solar penetration leading to more rapid drying and greater penetration of wind[mdash]both factors that aid fire spread.[rdquo]

The probability that any particular thinned stand will experience a blaze during the period when the thinning may still be effective is extremely low.

Logging/thinning is not benign. Logging has many impacts to forest ecosystems including spread of weeds, sedimentation of streams, alteration in water drainage, removal of biomass, and so on. These impacts are almost universally ignored and externalized by thinning/logging proponents.

One of the other major problems I have with the way many organizations have chosen to work on these issues is the way they [ldquo]frame[rdquo] the issues. When words like [ldquo]working landscapes[rdquo], [ldquo]restoration[rdquo] , [ldquo]unhealthy forests[rdquo] [ldquo]catastrophic blazes[rdquo] [ldquo]beetle outbreaks[rdquo] are used in any discussion related to forests, they solidify in the public[rsquo]s mind that there is a major problem with our forests, and more importantly that the [ldquo]cure[rdquo] is some kind of major invasive manipulation of forest ecosystems.

Our role as humans is to get out of the way as much as possible, not to intrude and advocate for invasive solutions like logging.

Another study addresses the issue of fires threatening people[rsquo]s homes: [ldquo]Wildland-Urban Fire[mdash]A Different Approach[rdquo] by Jack Cohen. Jack Cohen[rsquo]s studies prove that whatever is done to a forest beyond two-hundred feet of a home makes no difference to the ignitability of the structure. It is up to the homeowner to fireproof that area. Homes that were thus fireproofed survived even severe crown fires. Any manipulation to the forest beyond that distance was irrelevant.

During a wildland-urban fire a home ignites from two possible sources: directly from flames (radiation and convection heating) and/or from firebrands accumulating directly on the home. Even the large flames of high intensity crown fires do not directly ignite homes at distances beyond 200 feet. Given that fires adjacent to a home do not ignite it, firebrands can only ignite a home through contact.

And a quote from yet another study:

https://esajournals.onlinelibrary.wiley.com/doi/full/10.1002/ecs2.1492
Protected forests burn at lower severities
We found no evidence to support the prevailing forest/fire management hypothesis that higher levels of forest protections are associated with more severe fires based on the RF and linear mixed-effects modeling approaches. On the contrary, using over three decades of fire severity data from relatively frequent-fire pine and mixed-conifer forests throughout the western United States, we found support for the opposite conclusion[mdash]burn severity tended to be higher in areas with lower levels of protection status (more intense management), after accounting for topographic and climatic conditions in all three model runs. Thus, we rejected the prevailing forest management view that areas with higher protection levels burn most severely during wildfires.

In general, our findings[mdash]that forests with the highest levels of protection from logging tend to burn least

severely[mdash]suggest a need for managers and policymakers to rethink current forest and fire management direction, particularly proposals that seek to weaken forest protections or suspend environmental laws ostensibly to facilitate a more extensive and industrial forest[ndash]fire management regime. Such approaches would likely achieve the opposite of their intended consequences and would degrade complex early seral forests (DellaSala et al. 2015). We suggest that the results of our study counsel in favor of increased protection for federal forestlands without the concern that this may lead to more severe fires.

See also: https://sandiegofreepress.org/2016/01/pinyon-juniper-forests-blms-false-claims-to-virtue/

I am attaching a PDF file of a paper entitled [ldquo]Fuel Reduction[rdquo] Logging Increases Wildfire Intensity.[rdquo] Summary: [ldquo]A large and growing body of scientific evidence and opinion concludes that commercial thinning and post-fire logging/clearcutting makes wildfires spread faster and/or burn more severely, and this puts nearby communities at greater risk.[rdquo] I found these quotes to be particularly pertinent:

The only effective way to protect homes from fire is home-hardening and defensible space pruning within 100 to 200 feet of homes or less.

The only relevant zone to protect homes from wildland fire is within approximately 135 feet or less from each home[mdash]not out in wildland forests.

Vegetation management and removal beyond approximately 100 feet from homes provides no additional benefit in terms of protecting homes from wildfires.

In addition to actually increasing the danger of fire, thinning also causes a number of other problems:

* The soil disturbance created by the activity involved in the project and the wider spaces between trees will be an open invitation to ATV riders that couldn[rsquo]t care less about staying on legal trails.
* Wildlife habitat is destroyed. The number of species that live and breed and hibernate in the leaf litter on the forest floor alone is astronomical.
* The deafening and maddening cacophony of chain saws and wood chippers, as well as the oppressive and inescapable human presence where it is not usually present, will terrify the native inhabitants and disrupt their lives.
* The compacted and disturbed soil is an open invitation for invasive plant species to come and set up shop.
* Floods become more and more catastrophic as vegetation is eliminated. Trees prevent runoff and erosion and transport of sediment into streams.
* Forest thinning is a factor in global warming. [ldquo]Forest thinning to help prevent or reduce severe wildfire will release more carbon to the atmosphere than any amount saved by successful fire prevention, a new study concludes: http://www.sciencedaily.com/releases/2011/12/111220133913.htm

I highly recommend listening to this interview between Derrick Jensen and Deanna Meyer. Ms. Meyer is working to expose the lies and detrimental policies of the Forest Service and their plans to destroy public land forests up and down the Front Range of Colorado and throughout the West.

https://podcasts.apple.com/us/podcast/resistance-radio-interview-of-deanna-meyer/id723644446?i=1000612215354

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Part Two: Poisons

There is one practice even worse than [ldquo]thinning.[rdquo] For the record, I am against [ldquo]thinning[rdquo]
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because it causes habitat destruction, soil drying, wind penetration, and brush regeneration, causing fires to be worse, not better.

I am against application of poison because it is a crime against the earth and against humanity. It is a cure always worse than the perceived disease, an indefensible and heinous act for which there can be no excuse.

There is no excuse good enough, no argument persuasive enough, and no reasoning convincing enough to EVER put POISON on this planet. Not EVER. It is beyond the pale.

For my little corner of the Gila National Forest, the forest service has plans to apply the following poisons:

* Glyphosate: a proven cancer-causer.
* Clopyralid: Persistent, breaking down slowly, giving rainwater and natural erosion plenty of time to transport it downhill, where it keeps on killing.
* Hexazinone: According to the EPA, hexazinone contamination of aquatic sites adjacent to treated areas could be of great ecological significance and may be exacerbated by its persistence and mobility. Hexazinone also is likely to have a significant impact on ground water quality.
* Imazapyr: Does not bind to alkaline soils, can easily be moved by water flowing through the soil, and can be absorbed by plant roots in the vicinity.
* Picloram: Has been linked to leukemia.
* Tebuthiuron: According to the NIH, tebuthiuron is very toxic to aquatic life with long lasting effects. Runoff from fire control or dilution water may cause environmental contamination. According to the EPA tebuthiuron is persistent and mobile and can leach to ground water. Transport to ground water through leaching and to surface water through run-off are likely as a result of tebuthiuron's persistence and low absorption to soil.
* TCP : The EPA is concerned about the potential chronic toxicity and persistence of
* the triclopyr degradate, TCP, in the aquatic environment.

In particular, my neighborhood, being downhill from the areas to be treated, and hosting a creek which during certain times of the year supports an abundance and variety of life including frogs and toads, is at high risk for damage and degradation.

I consider being subjected to forced exposure to these harmful chemicals to be an act of aggression and a physical assault.

Whatever ill-advised plan will ultimately be put into effect, I can only repeat:

NO POISONS, NO POISONS, NO POISONS.

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I[rsquo]ve been writing letters to the forest service for 45 years. I[rsquo]m sick of outlining the reasons, whys, and wherefores of my objections to your irresponsible treatment of our forests. Those have been documented countless times in myriad books and articles. And the forest service never listens anyway; just goes its merry way, placating and catering to loggers and ranchers. So let me just say in conclusion:

NO THINNING!

NO POISONS!

NO COWS!
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NO MINING!

NO LOGGING!

NO ATVs!

NO HUNTING!

NO VIOLENT OR DESTRUCTIVE ACTIVITIES AT ALL!

YOUR MANAGEMENT PLAN SHOULD BE TO LET THE FOREST MANAGE ITSELF, AS IT HAS SUCCESSFULLY DONE FOR MILLIONS OF YEARS.

LEAVE IT ALONE.

Sincerely,

Joanne Cockerill