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Comments:

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Objections to the Mission Restoration Project

Submitted to: Michael Williams, Forest Supervisor;

Michael Liu, Methow Valley District Ranger

I welcome the opportunity to voice my objections to the Mission Restoration Project. Within my community, I have actively opposed the MRP for the past several years and my opposition and objections stand no less firm than ever. In fact, the majority of my reality-based concerns have not been adequately addressed by the USFS, if at all. These are available on your CARA reading room site. This plan is flawed in the extreme and it is rife with oversight and serious omissions.

My first objection is to the use of the word restoration for the name of this project. It is vital to get have clear terms and definitions because to do otherwise paints an inaccurate portrait of what this project truly entails. Words, after all, have power and have been misused to influence people and decisions and misapplied for thousands of years. If you have any doubt about that, study history, for past, recent, and current events will bear this out.

restoration, noun.

The action of returning something to a former owner, place, or condition.

Thus, restoration is not about thinning forests or resource extraction; it is not about building roads (Note: The USFS has been, after all, one of the world's greatest contributors to road-building. Between approximately 1940 and 1990, it built more than 340,000 miles of logging roads in the woods-enough road to circle the world 15 times); Restoration is not about running treaded, multi-ton feller butchers compacting living soil and contributing further to sedimentation in waters which contain ESA-listed salmonids; it is not about use of a subsoiler to undo what should not have been done in the first place. Pursuit of these practices, i.e., road-building and commercial timber harvest operations, can never legitimately be regarded as restorative. There is no "going back"; there is no turning back the clock, whether to 1930's forest conditions (the preferred reference point for the USFS for our region), 1491 (pre-European) conditions, or any other era. Everything is in flux, that is the only constant. Can humankind stop a tsunami; an earthquake; a volcano; a tornado; an electrical storm? No. Typically, when we act to modify nature we do little but disrupt natural processes which have acted and changed for billions of years. The philosopher Heraclitus offered "everything flows/changes". It is truly an objectionable folly for the USFS to continue to exert control over nature in the guise of forest stewardship.

Attempts to exert and enact legislation over the phenomena of the physical world and those elements which act upon it and its processes will not succeed in the long run; you cannot muscle forces of nature into submission; they will not bend to your will. No one can control the mudslides which are a feature of Black Pine Lake Road, over which you would send logging trucks and other heavy equipment.

Lao Tzu, in The Tao Te Ching cautions, "The world is sacred. It can't be improved.

If you tamper with it, you'll ruin it. If you treat it like an object, you'll lose it." Sadly, rulers at the time ignored this sage advice, for by the Han Dynasty (206 BC-220 AD) deforestation in China had proceeded at an unchecked and alarming rate.

I object to the institutional and bureaucratic tenor of the objection process which is generally not user friendly. While this may be modus operandi for your organization, in reality it does not actually open the process up to the general public. As much as the FS touts its policy of open communication, this is subverted by bureaucratic jargon and deflective responses and policies. If the USFS wants to be transparent this is not the way to do so. As it stands, the USFS is engaged in an exclusionary process designed with only one goal in mind: to foist a pre-determined, "slam dunk" proposal upon a public whom typically believe the authoritative/expert tone and the misleading claims made by the USFS, the North Central WA Forest Health Collaborative, and members of the logging industry/lobby. It is objectionable that most of this process is under terms wholly determined by the USFS and any reasonable alternatives, i.e., those which don't support the goals and methods of this agency and the goals of boosters such as the logging industry, are summarily dismissed. In addition, it is highly objectionable that the USFS has a policy of "shutting down" any attempt to raise very real concerns which provide a broader picture of forest conditions and ways in which they arose and are perpetuated through FS policies, e.g., Methow Valley District Ranger Liu has stated that he would not entertain discussions of the impacts of cattle grazing even though the persistent practice of cattle allotments continues to take a significant toll on forest health. It is ludicrous and misleading that you would not consider the impact of range land and grazing practices and will not even take these into consideration. This deliberate negligence betrays the trust of the American people, most of whom would be surprised to know how you push through an agenda which fails to consider other options even when they are offered freely by other members of the scientific community. Many would also be surprised to hear how the USFS promises "restoration" even though there is no actual money to complete, follow-up, and then retreat the areas of focus. Again, the USFS allows for knowingly harmful practices to continue and then "prescribes" the magic elixir to address the same. This is irresponsible stewardship, wasteful in terms of money, resources, and staff time. It fails to incorporate all of the facts and, subsequently, is objectionable. Additionally, the track record for USFS "restorations" is poor indeed. The MRP is underfunded and there is no clear dollar amount available and committed to actual restoration/recovery activities which are to take place only secondary to logging and significant thinning. Who would go to the hospital for a heart transplant with the knowledge that there is no available heart?

Furthermore, on the topic of open communication, I would like to point out that on 04/02/18 I sent an email to MV District Ranger Liu, which directly addressed concerns regarding the timeline for submitting these objections given that important documents were missing from the text of the Draft Decision Notice and Finding of No Significant Impact. It took him a full eight days to send any response. He offered some vague excuses which, frankly, don't fly. With the clock ticking on a time-limited opportunity to respond, the only appropriate action for Ranger Liu to take was to respond promptly and he did not. The tardy response of Ranger Liu couldn't have been more dismissive. This is yet another example of the FS betraying the public trust and demonstrating that through its own unwillingness to respond in a timely manner, the rights of the public are restricted and this is objectionable. In fact, I would question whether the withholding of information due to stonewalling is even legal.

There is also the matter of previously unreleased documents, comprised of 918 comments/questions/concerns voiced by members of the public in the previous period for comment. These were not released and posted with the other documents on 03/14/18. Due to the oversight, access to the complete range of your documents was not made available until 03/28/18-14 days after the beginning of the 45-day response period. In a phone call with Joanne Cooper (a member of the Libby Creek Watershed Association), Ranger Paul Nash stated that these documents had "fallen through the cracks". We believe that the USFS responses to our prior comments comprise an integral part of the whole and their omission represents a serious gap which impeded our ability to state our objections to the MRP while the clock on the objection period was already "ticking". With what is at stake in this watershed, "falling through the cracks" is not a legitimate excuse. Ranger Liu can explain it away any way he may choose, as he did finally on 4/11/18 (eight days after being contacted about this concern), yet it merely demonstrates the unwillingness of the USFS/MVRD to work with community members. This is highly dishonorable, objectionable and demonstrates poor faith.

Several years ago, I attended a NCWFHC meeting in which, regarding forest "treatments", a Chelan County

Commissioner stated: "We need to increase our footprint..." Well, that's both pretty transparent and blatantly ignorant in its sweeping shortsightedness. At this time in our history, the majority of rational people, including a large contingent of reputable scientists strongly believe the opposite-that our footprint has been far too expansive and must be made smaller if we are to survive. This statement, made by a member of the NCWFHC-an advisory group and supporter of the MRP is staggering in it's oversight. It is objectionable and it a reckless position to espouse. Is this the philosophy with which the USFS wishes to align itself? It just doesn't seem like a sound public relations image to project in 2018. But mainly, it is not an environmentally conscious position to hold and maintain during this time of earth history. In this the USFS betrays the American people and, in fact, the people all over the world for it is supportive of policies which contribute to further planetary degradation. Make no mistake, what happens here, trickles down and reaches everywhere.

There is no true "collaboration" when, as recent experiences demonstrate, the comments and alternatives presented by individuals and organizations in opposition to the MRP are essentially ignored. Part of the plan was, and still is, to have the trees "pay their way out of the forest", to put it in the parlance of FS employees and members of the North Central WA Forest Health Collaborative. As a citizen, and landowner with home and property adjacent to National Forest lands, I find this irresponsible and highly objectionable.

Time and again the USFS states that it has the "best available science" to support a proposal such as the Mission "Restoration" Project, yet only selected and favorable citations are offered, while others which have been provided are ignored. It is objectionable that the FS will not acknowledge the very narrow scope of its consultants, which include those who stand to gain monetarily through the harvest and extraction of timber from public lands. To date, you have not provided a balanced, objective appraisal of the pros and cons of moving forth with the project; you have amended FS guidelines only so as to facilitate and expedite your current goals. In short, the FS changes the rules as the game is played to do its best to assure a favorable outcome for its agenda and this is objectionable.

Neither the forests, the trees, nor the animals have voices and representation in these proposals and protections for the wellbeing of the forest and its dwellers are being relaxed in order to move forward with the MRP. In fact, the USFS acknowledges that there will be impact. To say that there is "no significant impact" is, again, misleading and inaccurate, for most human (anthropogenic) actions are cumulative and impactful for immeasurable years. You cannot honestly claim otherwise and what is happening on the planet today is unprecedented and is even eluding computer modeling projections. There are no rational or justifiable grounds for ignoring the "short-term" impact of these proposed actions, regardless of the human laws written to support them. Nothing is as it once was, conditions change, we are in a new epoch and no one knows knows the ramifications associated with the current pace of environmental degradation. I object to the USFS saying in effect is that it's okay to first damage a fragile ecosystem in order to "restore" it. In this, the USFS sets-back true restoration activities at a cost to the environment and the unsuspecting general public. Is it justifiable to mislead people; to obfuscate the truth; to ignore virtually all of the comments and feedback from the community, both public and scientific, while still claiming to have considered the "best available science"? In a court of law such a claim might easily be considered perjurious. In point of fact, the USFS has utilized some of the available one-sided science which supports it's goals. This, I find objectionable and unconscionable. It makes it glaringly obvious that the decision-making process is one-sided and that the opportunity to voice objections is but a pretense, a mandated exercise which fulfills a mere requirement.

It would be accurate to say that the FS plan is to engage in further manipulation of the forests which have already been mismanaged for over 100 years. This, in part, has created the very conditions which you now claim can be "restored" to some vague historic state, in part through hostile incursions with the massive and destructive tools of mechanized logging. But the USFS eschews referring to this as a timber harvest/logging operation and resource extraction. Is this because it would not be favorable to the image you wish to present to the public?

Why would the FS be marking trees even before a final decision was made? If it is because the FS is so

confident that they can move forward with a timber sale even before the comment and objection periods are completed? Would a fiscally-challenged agency such as the USFS risk paying for tree-marking for a project which was technically not approved? Well, it surely wouldn't be a wise or prudent move unless, of course, the opportunity for public comment and objection were a necessary window-dressing.

Who and what is responsible for the present state of conditions which the USFS has identified as those to be "restored"? To answer that honestly you'd have to primarily examine the role of the USFS for the past 100 years. It was (and is) the FS selling out public lands to the private timber barons; it was (and is) the FS selling out to the cattlemen; it was (and is) continued policies of fire suppression. How are we to feel confident that the USFS can successfully manipulate the forest back to its former state? It cannot be done. No human can accomplish this. We must live with what we have created and leave the land to restore itself.

Humans are so arrogant that we think we get to do whatever we want-we get to lord it over the earth, its creatures, and its systems. Some of the root of this conceit lies in the biblical injunction regarding man's dominion over the earth. Humans excitedly talk about controlling nature and attempt to do so in almost every quarter. We, indeed, can do anything we want, but the real question is: should we? What if we don't like the results when we do whatsoever as we please? Once committed it's not so easy to undo what has been done. Just ask anyone who has worked at the Hanford clean up site.

What does "dominion" mean exactly? It is traditionally interpreted as "to subdue" or "to rule over." When taken to an extreme, it can include oppression and exploitation. Yet, an exploited planet Earth does not leave humanity richer, rather the reverse. Is there a deeper, more sustainable aspect of dominion which includes a sense of responsible service to one's fellow creatures and even a moral imperative to protect those unable to stand up for and protect themselves. Humankind would be far better served through selfless restrained actions rather than pretending to be god-like. We are far from it. We have not done a good job of this yet. Humans simply can't improve upon natural processes. Perhaps, in its highest, purest form, dominion includes responsible governance and stewardship/proper regard to the rights of others, altruistic and without personal/monetary gain and perhaps this is optimally attained through a position of no action in this realm.

It remains a significant oversight that the FS only performed an EA, rather than an EIS. The latter would be more appropriate given the endangered salmonids and wolves in the area flagged for "restoration". This point has been made by a number of citizens and citizen scientists yet somehow is not viewed as credible by the USFS. Might there be a reason why the FS avoids an EIS?

It is apparent by now that the FS has limited tools in their kit: it approves of mechanized logging, even in fragile ecosystems; it prescribes controlled burns; it builds roads-some of which it regards as "temporary"; it continues to suppress fire which perpetuates the ill-health of the forest. These contradictions, particularly regarding the latter, is appallingly staggering. The FS has already acknowledged the role which fire suppression plays in the creation of adverse forest conditions. Now, especially in view of the 2018 Wildfire Disaster Funding Act, the USFS and BLM will have about \$2 billion additional for fire suppression when their firefighting budgets have been exhausted. Thus, it does not appear that fire suppression activities will be halted anytime soon even while contraindicated. I would also like to note that, in the meantime, the reality of very rapid shrub steppe fires is ignored in the FS plan. It is highly objectionable that in promoting the benefits of the MRP, the FS ignores data related to this (particularly that gathered following the 2014 Carlton Complex Fire) and through this fails to acknowledge that the shrub steppe and climatic conditions, more than forested areas, contributed so greatly to the acres burned.

The FS has already acknowledged that in extreme fire conditions, their plans will not be efficacious. There is no historic precedent for the FS actually or effectively following-up on "treatments" and, as mentioned earlier, there is no current funding for this. In the Libby Creek Watershed, for example, look at Hornet Draw, after being clearcut it was replanted (approximately a quarter century ago) yet today it still looks just like an area which had

been clearcut; significant scars remain and will for years to come.

The MRP falls far short of presenting a thoroughly balanced perspective and has given very little consideration to other voices, rejecting virtually all other views and alternatives. On this point alone, this ill-conceived project should only receive a "no action" designation and should be shelved.

Lee Cobert

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