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First name: Michele
Last name: Dieterich
Organization:
Title:
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USDA Forest Service
Washington, DC
Comments submitted via website: https://cara.ecosystem-management.org/Public/CommentInput?project=ORMS-2747

Dear Forest Service Agents involved in proposed amendments to 2400 series directives pertaining to the sale and disposal of forest products.

Please consider these comments. I live on the edge of national forest lands in Montana and am a US citizen. I am concerned about these changes to the Forest Service directives on timber management. I think these changes should be postponed until they are reviewed by the new administration to see if they comply with the goals for climate change and the directive to use science in making decisions.

The directive changes as presented, were hard to decipher. It would have been better to have physically denoted the new additions and changes. As written, there is no quick way to see what changes have been made under the new directive making it difficult for the public to make meaningful comment. It would have also helped to have a contact in your documentation where questions could be directed.

I am concerned about the addition that "other valid appraisal methods may be used for sales where a detailed appraisal is not warranted, such as an appraisal by comparison or similar sale offerings and the use standard rates." This should be much clearer and more specific. I would refer to a recent audit of a recent Prince of Wales District in Alaska appraisal that was suspect and is causing a backlash. How can we prevent this from happening in the future? I don't think this wording would prevent and might enable more appraisal misconduct in the future. Please also be clear about what circumstances "other appraisal methods" would be allowed.

I disagree with new sections concerning Stewardship. All NEPA should include whether the project will be part of a stewardship contract. The public has a right to know who will be in charge and how projects will be funded using their tax dollars and who will receive the proceeds. I am also concerned that Forest Service (FS) seems to be instructed to appropriate funds to the states to cover costs, but then will receive no reimbursement for those costs. FS supports and manages federal lands for the public. The public as a whole should receive reimbursement or benefit from any resources sold. It makes no sense to give the entire proceeds to the State when the FS has used federal funds to support a project. Nor does it make fiscal sense to give States the entire proceed. They should only receive reimbursement for their costs. Federal lands should benefit all members of the public who own those lands.

I am very concerned about the emphasis on "collaborative groups" as public input for projects on public lands. The public should have the motherlode of say in what happens on their land. Collaboration sounds great in theory but has been lax in actual implementation. The groups are hand picked and many of the collaborative groups that I have experienced including one I was on, were skewed and not equally representational for all sides of an issue. For example, the Forest Action Advisory Council in Montana was heavily loaded with timber and forest products industry individuals. Not surprisingly, the outcome was a broad plan to log most of the Montana's forests. The science presented to the council was at times incorrect, incomplete and did not present all scientific views on the subject. Public input was provided to the council, but research papers were only available upon request by the council members, not provided to them as a matter of course. This left the public out of the process and did not give the council a view of the entire picture. Again it is not surprising that they

concluded logging was the solution to fire which has been disputed by the weight of available science. Sadly, the science has shown that logging dries out the forest floor and removes vital wind breaks to extreme weather conditions which exacerbates fire. The success of collaboratives is in the true balance of views and solutions that come from that balance. We have not seen a balance of views in any of the agency collaboratives in Montana. We have also seen the same people well known to agencies on these collaboratives. There is no process or collaboration if the outcome is predetermined.

I am also wondering why you would not require performance bonds. Once the trees are cut and sold, there must be a way to ensure necessary restoration and service work agreed upon in the contract. Performance bonds are a guarantee the public deserves. We had a project on the Bitterroot National Forest called the Westside Project. One of the purpose and needs of the project was to re-direct a road that was too close to Moose Creek. We were told this was necessary and the "timber sale" would pay for this change. The logging trucks used the old road and logs were removed from a very illogical place to move the road and in the end, the road was never redirected. Again performance bonds as well as direction for more scrutiny by the forest service of contractors needs to be a part of these directives. I see too many leave trees on the ground and way too many merchantable trees in the slash piles of project after project. FS needs to be more involved in making certain correct implementation happens. Bonds will aid in this process.

When entering into Good Neighbor Authority contracts, the NEPA documentation should show specifically how the national forest lands would benefit from the project and this should be based in the best available science. I fear the Good Neighbor Authority contracts are giving way too much authority to a single state in making decisions concerning lands owned by the public residing in all 50 states. States benefit greatly from federal lands in their state. I am not sure why they should receive revenues rightfully owned by all citizens of the United States. On the Bitterroot National Forest, a Good Neighbor Authority project was too expensive for contractors. No one bid on it, so the FS fixed the roads leading to the project with federal funds. The contract was much more lucrative and they received a bid. So the contractor did not have to pay for the road improvements and the state will receive the proceeds. This makes little sense. Taxpayers paid for that road. This does not show the true costs of these timber sales. Another Good Neighbor Authority project Gird point was left without bids. The forest used GOA funding to improve the road. The contract is still without a bidder. Could that money have gone to better use rather than to support a contract that would benefit only the state?

In section 81.4 2 b, you state the "targeted grazing" can be used as a restoration technique in a Good Neighbor Authority contract. This needs to be removed. The weight of available science does not show that grazing is a restoration tool. Science shows that grazing damages our forest lands it is not a "tool for vegetation and landscape management" or "hazardous fuels reduction." The detrimental results of grazing far outweigh their use as a tool to manage our federal lands. The only application might be using goats or other animals to eat noxious weeds. I know this has been successful with leafy spurge. This is especially pertinent to the administrations focus on climate change. 18% of global greenhouse gases are produced by animal agriculture. And in the West, animal agriculture consumes a large portion of available water.

Instead, the permanent retirement of grazing allotments should be made a priority in these directives. There should also be a directive that all retired allotments and currently unused allotments should be retired permanently. Grazing allotments on public lands come at a huge financial and resource cost to the American public. They should be phased out.

The interpretation for the use of Knutsen-Vanberg funds are misguided. These directives allude to the idea that they can be used for the construction of dams. The funds explicitly state that they cannot be used for construction or maintenance of facilities.

I would consider an emphasis on cumulative effects of climate change and how they affect timber management choices as well has a reconsideration of rotation times based on climate science. It is time to make climate

change and science the focus as directed by the new administration.

Again, I ask that the new administration be given time to review these changes. The changes should be clearly denoted so it is easier to see what exactly has been added or modified. The public process of comment should begin again after the new administration has had sufficient time to review these far-reaching changes to timber directives.

I appreciate your consideration of these comments.