

Data Submitted (UTC 11): 10/15/2018 5:58:57 PM

First name: Dick

Last name: Artley

Organization:

Title:

Comments: October 15, 2018

Dear Ranger Padilla and selected IDT resource specialists,

Never before have I encountered a USFS line-officer who allowed a timber employee to dictate how their District will be administered. You and your IDT specialists know better but you are all afraid. Nobody gets promoted in the USFS who even hints that commercial logging will not fix all problems in the forest ... real or imagined. Your Lone Pine timber sale is worse than tragic.

Mr. Casey learned industrial forestry in college. He was taught how to plant, tend and log trees at least cost. He learned that ecological harm and destruction caused by logging & roading is a natural, foreseeable, acceptable outcome of generating volume at least cost. His training was intended to prepare a forester for employment in the private sector. Of course USFS leaders have encouraged these foresters to practice their trade on public land for many decades. He's obedient. He's attempting to create industrial tree farm conditions.

IDT other resource specialists are there because NEPA requires interdisciplinary analysis. These people are frightened. They know they must always champion the timber sale Proposed Action and tell the public the ecological effects of not logging (No action) will be harmful. The USFS needs their names and resource specialties in the list of preparers. No more...no less. I'm sure a few of these people share my concerns but they know they must never write or say anything critical of a proposed timber sale which are now called "restoration" projects. The agency has had lots of practice using euphemisms to fool the public.

I'm not a forest ecologist but I know what a fully functioning forest looks like.

Mr. Casey presents us with an electronic document that contains 10 photographs. See:
https://www.fs.usda.gov/nfs/11558/www/nepa/110005_FSPLT3_4415641.pdf

Figure 1, 2 and 3 depict stand conditions that must be changed by logging. A forest ecologist would say biodiverse forests with patches of conditions shown here represent healthy forests.

Figure 4 and 5 show how stands should look after they have been logged. A forest ecologist would say this is a park-like stand devoid of biodiversity. Mr. Casey does not understand real fully-functioning forests are not neat & tidy.

Figure 6 shows a stand with dead PP having brown needles. Healthy forests have a mixture of live, dead & dying trees. Any healthy population of living things has dead individuals. Dead trees are important for some species of birds. Insect activity creates a natural beneficial disturbance event which must never be touched by humans. Salvage logging trees killed by insects will not slow the insects down. Of Mr. Casey were more interested in stopping the insects than accumulating volume he would use pheromones.

Figure 7 shows 2 pictures of a disaster zone massive clearcut planned by you Mr. Casey. Your caption indicates you are proud of the plunder. I'm sorry for you.

Figure 8 shows dead and dying trees with brown needles. My comments on Figure 6 apply here.

Figure 9 shows PP trees growing close creating a dense canopy. So what? Mr. Casey wants to remove some of the trees to make it appear as a parklike stand. Healthy forests have areas of crowded trees and where the trees are far apart. This is a biodiverse forest.

Figure 10 shows a stand Mr. Casey claims is overstocked. Stocking levels are only valid in private industrial tree farms.

Mr Casey's solution for all the problems he claims exist is commercial logging. The USFS teaches its employees logging/roading will solve nearly every problem in the forest real or imagined. Actually, commercial logging creates real restoration opportunities.

A professional forest ecologist and wildlife biologist would agree that Mr. Casey's photos show why the area must not be logged. Some IDT members know this. I wish they weren't so timid.

Your Abuse of Public Land will Continue and expand

The scoping document at page 9 says:

"It is estimated that 1,000 to 3,000 acres per year would be harvested in the first few years of implementation, and up to 6,000 acres per year would be harvested in later years."

and

"A more aggressive approach to harvest needs to be taken on these stands as this is the source of future beetle populations."

On page 8 you describe the silvicultural Rx that will be used for lightly and heavily infested stands. The lightly and heavily infested areas should have been delineated in the map. This isn't the case since all infested areas will be declared heavily infested. Your "more aggressive" approach will be massive clearcuts like the ones shown on figure 7.

Temporary Roads

You don't give the public an estimate of the temp road mileage. You say you will rehabilitate the temp roads after use. Professionals concerned about the health of aquatic resources obliterate temporary roads, thus there is no longer a running surface to seed. "Rehabilitated" temporary roads become linear sediment producers.

I wonder why Ms. Jensen and Ms. Vanderbilt didn't stop this. Why isn't there a fisheries biologist on the IDT.

Clearly, you all need education in how to maintain a properly functioning forest. Please read the attachments.

#1.....Logging harms resources

#4.....Road construction harms resources

#5.....Insects are a beneficial natural disturbance event

#14.....Dead & dying trees are important

#17.....MPB does not increase fire risk

#19Clearcuts harm resources

#21.....Logging not restoration

#26.....Clearcut with reserves photos

#27...."Restored" areas photos

Sincerely,

Dick Artley (retired forest planner, NEPA legal compliance reviewer, forest NEPA coordinator, and forest appeals/litigation coordinator)

Grangeville, Idaho 83530

da99333@gmail.com