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Organization:

Title:

Comments: November 12, 2018

Dear Acting Ranger Truax,

Enjoy your gig as a USFS Acting District Ranger now because it will be your last opportunity to do so.

USFS line-officers should have 1) a basic knowledge of forest ecology, and 2) the courage to say "NO" to employees who come up with destructive projects and simultaneously propose to backhand the public who provides the money for their salaries.

Mr. Crary is a silviculturist who was trained in college to function as a private industrial tree farm manager. Most USFS line-officers restrain their silviculturists who want to create conditions in national forest land that mimic these tree farms. In a few isolated cases silviculturists take action that will maximize volume at any cost to the other resources. Indeed, Mr. Crary's job depends on volume.

Please think of the 324 million Americans who own the Eagle-Holy Cross District of the White River NF. Ask yourself what they would want. Even a child knows the general recreating public abhors clearcuts. I'm sorry you agreed with Mr. Crary who wants to create massive openings larger than 40 acres with clearcuts in LPP stands. His reasoning is incorrect.

Mr. Crary wrote the Oct 29, 2018 "Dear Interested Party" letter. Had you read the letter before you signed it you would know Mtn. Pine Beetle activity on LPP is not a "natural catastrophic condition" as Mr. Crary claims. It's an integral part of the LPP life cycle. You should know this. Mr. Crary is afraid the public would provide good reasons for not creating massive openings. So what does he do? By incorrectly declaring Mtn. Pine Beetle activity a "catastrophic condition" he takes away the public's right to comment when he says:

"Therefore, openings greater than 40 acres in the lodgepole pine component (clearcut with leave tree) of this project are the result of natural catastrophic conditions and not Subject to a 60-day public review, or Regional Forester approval."

Mr. Crary knows logging dead LPP will not stop MPB activity. Knowledgeable silviculturists who are more concerned about stopping the MPB than they are volume accumulation use pheromones. They know stands of dead LPP without needles that have flammable resin are less likely to burn with the intensity of live LPP stands. Thus, by blindly supporting Mr. Crary's suggestion to 1) eliminate the right for the public to comment on proposed openings over 40 acres, and 2) eliminate the public's right to submit both scoping comments and comments on the pending draft NEPA document you will violate:

40 CFR §1500.2 Policy.

Federal agencies shall to the fullest extent possible:

(d) Encourage and facilitate public involvement in decisions which affect the quality of the human environment.

40 CFR §1506.6 Public involvement.

Agencies shall:

(a) Make diligent efforts to involve the public in preparing and implementing their NEPA procedures.

Please rewrite the Oct 29, 2018 "Dear Interested Party" letter yourself to replace the incorrect one and be sure the letter is clear about public comment opportunities.

Most politicians will not respond to people who don't live in their state. I know a person who lives in Grand Junction with a similar love for national forest recreation that I have. New governor Polis will welcome the chance to help her.

Finally, you and Mr. Crary will both learn about LPP and the value of dead trees by opening and reading Opposing Views Science Attachments #14 and #17.

Sincerely,

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