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Organization:

Title:

Comments: November 13, 2018

Dear Supervisor Lannom and selected IDT resource specialists,

My scoping comments on your proposed Granite Meadows timber sale are shown below. They are short because I won't waste my time trying to convince you to change your Proposed Action. You made up your mind to implement the Proposed Action prior to scoping. You will prove this when you analyze only 1 action alternative in the EA or EIS. You certainly won't allow the pesky public to interfere in important USFS business. Perhaps the most frightening thing is your IDT resource specialists gladly assist you in your plunder. Sadly, they forget they are paid by the public to protect and preserve the resources they represent. They know they must gratify and please the USFS's corporate masters [hellip] and you with volume.

You must acknowledge that land allocated to a timber MA and suitable land is not "anything goes" land. You are not allowed to trash the non-timber resources and violate the law to generate precious volume.

I saw it as a USFS employee. Some irresponsible Responsible Officials would never read the scoping comments submitted by the public. They directed their executive assistant to assure the names, addresses and emails of those who submitted scoping comments are kept on file for the project so they could notify them that the DEIS or pre-decisional EA is available for comment. Incredibly, they claimed the Proposed Action in the NEPA document was based on public comments and IDT input.

I become so tired of reading USFS timber sale draft EAs and EISs with copy & paste Purpose & Need statement that that are not valid. The vast majority of EAs and EISs use the same P&N statements word for word that might apply to any location.

IDT members who sometimes risk their careers by thinking outside the USFS box know commercial logging and roading an undeveloped forest does not create a healthy forest as you claim here. High school science classes teach this. The Opposing Views Scientific Attachments expose you all to independent science information that your agency does not want you to see. Please see Opposing Views Scientific Attachment #15. This contains quotes of past USFS leaders who tell the public best science drives USFS projects. Apparently, you and your IDT members have chosen to reject the best science that might constrain volume outputs. Opposing Views Scientific Attachments #1 and #4 contain quotes by many independent scientists not affiliated with the USFS who hold Ph.D.s in the biological sciences. Their quotes represent "best science." Please have the courage to open these 2 attachments and read the quotes. Then ask yourself why the quotes would persuade any unbiased, reasonable person that this timber sale must never occur if maintaining the proper functioning of the countless natural resources in and downstream from the sale area is a goal. Conifer tree health definitely does not represent forest health.

As the Opposing Views Scientific Attachments indicate, your proposed timber treatments will inflict major damage that only time will heal. You know the natural resources in the sale area are functioning properly, yet you lied to the public telling them they needed "treatment" (a.k.a. commercial logging).

Have you ever wondered why the findings and conclusions of well respected scientists contradict most of what the USFS teaches you. Either the experts are right or the USFS has it right. Did you ask yourself who might be biased? If you got this far you know the answer, but your job pays well and you have bills to pay. So it comes down to this. To maintain good standing in the USFS and remain competitive for promotions you learned to deny/ignore the truth.

NEPA requires the Responsible Official to "identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment" [40 CFR 1500.2(e)]. In the vast majority of cases this never happens when USFS line-officers pass proposed projects through the NEPA process. Why? The Responsible Official has already selected the Proposed Action described in the scoping package for implementation as you have done here.

Relatively intelligent people know there is more than 1 way to accomplish any goal. This would include the Purpose & Need goals for timber sales. When EAs and EISs analyze only one action alternative in detail that is nearly identical to the Proposed Action described in the scoping package as is the case here this tells the public something? The IDT members know they must cast away their resource ethics and values when they write ridiculous unsubstantiated claims in their Chapter 3 effects disclosures. Regardless of the situation they know they must depict the Proposed Action effects on their resource in a positive manner and describe No Action (keeping the status quo) as a tragic mistake. This is criminal behavior. These same other resource specialists

happily skip home thinking they did their job unaware of their timber sale enabler role.

Supervisor Lannom, Commercially logging

merchantable trees near the WUI is one way to

reduce the threat to human lives and homes

should a wildfire start. You start the fire in your

fireplace using kindling (a.k.a. fine fuels) not 8"

diameter logs. There's another method to reduce

this risk that you know about and ignore: Dr. Jack

Cohen's fine fuels removal methods.

Shouldn't you be using all reasonable methods at your disposal to protect the public?

Your Scoping Package states there is a WUI adjacent to the proposed timber sale area and you plan to reduce the risk of fire damage to homes in the WUI by removing merchantable-sized hazardous fuels. Here's what you say at page 5 of the Description of the Proposed Action for the Granite Meadows Project:

"A mix of vegetative treatments are proposed to: reduce fire hazard in the Wildland-Urban Interface (WUI) (Figure 4)"

Dr. Jack Cohen (a retired USFS employee with a Ph.D. in fire physics) developed this method to reduce or eliminate the danger of wildfire damage and/or human deaths in the WUI. His methods are used throughout the world.

The science below explains why commercially logging hazardous fuels must never be the only action taken to protect WUI values. Please see Opposing Views Scientific Attachment #11 to learn more.

"The notion that commercial logging can prevent wildfires has its believers and loud proponents, but this belief

does not match up with the scientific evidence or history of federal management practices. In fact, it is widely recognized that past commercial logging, road-building, livestock grazing and aggressive firefighting are the sources for "forest health" problems such as increased insect infestations, disease outbreaks, and severe wildfires."

"How can the sources of these problems also be their solution? This internal contradiction needs more than propaganda to be resolved. It is time for the timber industry and their supporters to heed the facts, not fantasies, and develop forest management policies based on science, not politics."

Western National Forests: A Cohesive Strategy is Needed to Address Catastrophic Wildfire Threats

A Report to the Subcommittee on Forests and Forest Health, Committee on Resources, House of Representatives, April 1999

Published by the Government Accounting Office, GAO/RCED-99-65

<http://www.gao.gov/archive/1999/rc99065.pdf>

"Ironically, this very type of logging, experts inform us, is likely to increase, not decrease, the frequency and severity of wildland fires.

In the Forest Service's own National Fire Plan, agency scientists warned against the use of commercial logging to address fire management. The report found that 'the removal of large, merchantable trees from forests does not reduce fire risk and may, in fact, increase such risk.' "

Getting Burned by Logging

Voss, Ren[eacute], Ph.D., Public Policy Director of the John Muir Project of Earth Island Institute

Published by The Baltimore Chronicle, July 2002

http://www.baltimorechronicle.com/firelies_jul02.shtml

"During extreme weather conditions, the relative importance of fuels diminishes since all stands achieve the threshold required to permit crown fire development. This is important since most of the area burned in subalpine forests has historically occurred during very extreme weather (i.e., drought coupled to high winds). The fire behavior relationships predicted in the models support the concept that forest fire behavior is determined primarily by weather variation among years rather than fuel variation associated with stand age."

The Relative Importance of Fuels and Weather on Fire Behavior in Subalpine Forests

By Bessie, W. C. Ph.D. and [not]E. A. Johnson Ph.D.

Published in Ecology, Vol. 76, No. 3 (Apr., 1995) pp. 747-762.

<http://www.jstor.org/pss/1939341>

"Treating fuels to reduce fire occurrence, fire size, or amount of burned area is ultimately both futile and counter-productive." (Pg.1999)

"Some viable fuel treatments may actually result in an increased rate of spread under many conditions (Lertzman et al., 1998; Agee et al., 2000). For example, thinning to reduce crown fire potential can result in surface litter becoming drier and more exposed to wind. It can also result in increased growth of grasses and understory shrubs which can foster a rapidly moving surface fire." (Pg.2000)

Objectives and considerations for wildland fuel treatment in forested ecosystems of the interior western United States

By: Dr. Jack Cohen (a USFS fire physicist)

Published in Forest Ecology and Management, issue 256, 2008

<http://www.firewise.org/Information/Research-and-Guidance/WUI-Home-Ignition-Research/~media/Firewise/Files/Pdfs/Research/CohenFuelTreatment.pdf>

"The current focus on 'fuels' is, in itself, misguided because almost anything in a forest will burn, given the right conditions. Any fire specialist will tell you that the principal factors affecting fire are temperature and moisture, not fuels. No legislation will prevent or even reduce fires in the vast areas of the national forests and to pretend so is fraudulent."

Testimony to the Agriculture, Nutrition and Forestry Committee United State Senate. Hearing to Review Healthy Forests Restoration Act, HR 1904 on June 26, 2003

By:, Arthur Partridge Ph.D., Professor Emeritus, University of Idaho

<http://www.saveamericasforests.org/congress/Fire/PartridgeSenate03.htm>

"Most of the trees that should be removed to reduce accumulated fuels are small in diameter and have little or no commercial value."

"Mechanically removing fuels (through commercial timber harvesting and other means) can also have adverse effects on wildlife habitat and water quality in many areas. Officials told GAO that, because of these effects, a large-scale expansion of commercial timber harvesting alone for removing materials would not be feasible. However, because the Forest Service relies on the timber program for funding many of its activities (including reducing fuels) it has often used this program to address the wildfire problem. The difficulty with such an approach, however, is that the lands with commercially valuable timber are often not those with the greatest wildfire hazards."

A Report to the President in Response to the Wildfires of 2000

By Lyle Lavery USDA Forest Service and Tim Hartzell U.S. Department of the Interior, September 8, 2000

<http://frames.nacse.org/6000/6269.html>

"It is well known scientifically that "commercial logging actually increases fire severity by removing large, fire-resistant trees and leaving behind very small trees and flammable "slash debris"--branches, twigs and needles from felled trees. The removal of mature trees also decreases the forest canopy, creating hotter, drier conditions on the ground. The additional sun exposure encourages the growth of flammable brush and weeds. Reduction of flammable underbrush can reduce fire severity, and environmental groups have encouraged such projects. However, the Bush administration has grossly misused the funds that Congress appropriated for brush reduction near homes. In Sierra Nevada national forests last year, more than 90% of these funds were instead earmarked for preparation of large timber sales focused on the removal of mature and old-growth trees miles from the nearest town."

"The Forest Service, Bush administration and anti-environmental members of Congress are spreading a great deal of misinformation about wildfire, hoping to capitalize on public fire hysteria and minimize public opposition to increased logging and roadbuilding in our national forests," said Jake Kreilick of the National Forest Protection Alliance based in Missoula, Montana. "With virtually all new timber sales couched in terms of 'reducing fuels' or 'restoring forest health,' fire hysteria has emerged as the driving force behind the Forest Service's logging program and the administration's efforts to 'streamline' our nation's environmental laws," Kreilick said."

Commercial Logging Causes Forest Fires

Published in FOREST CONSERVATION NEWS TODAY, July 20, 2002

OVERVIEW & COMMENTARY by Forests.org

<http://wgbis.ces.iisc.ernet.in/envis/doc1999ahtml/biodcomi220928.html>

Please analyze at least 2 action alternatives in detail

Below I present information about NEPA alternatives that comes from the Shipley Group. The Shipley NEPA experts are contracted by the USFS to teach the NEPA process to USFS employees. Please be guided by the red highlighted text below.

"Remember not to be silent about the reasons for considering some alternatives and ignoring others. Silence is a gift to a possible plaintiff. So plan for and provide even a brief rationale about your range of alternatives. Such a discussion is especially important if your EA or EIS includes only a single action alternative. A single action alternative is a risky agency choice, especially if you determine that your EA or EIS is likely to be a high-risk and controversial document."

Range of Reasonable Alternatives

Feature Article, November 2009

by Larry Freeman, PhD

The Shipley Group, Senior Consultant

Please see:

<https://www.fs.fed.us/emc/nepa/>

<https://www.shipleygroup.com/>

The USFS Objection Process was Designed

to give the Responsible Official a Reason to

Ignore the Public's Suggestions and Concerns.

It's Biased in Favor of the USFS Responsible official.

You all work for an agency that tricks the public into believing they actually have influence over USFS decisions

that affect their land.

Intelligent, unbiased, people understand that the Objection Deciding Officer (ADO) must be an unbiased 3rd party with no interest in whether a project is implemented or not. The USFS rigged the Appeal process against concerned members of the public and the same is happening with the Objection process. They assure the ADO is a USFS employee who will claim anything to avoid the appearance that another USFS employee (the Responsible Official) has made an error.

I know that you know my objection will be rejected by the Objection Deciding Officer before he/she reads it.

Please consider this. If you had a child who was critically injured in an accident caused by corporate negligence and sued the corporation would you want an unbiased judge to decide the case or the corporate CEO? Allowing a USFS employee to rule on an American citizen's objection to a project proposed by another USFS employee is no different. The Objection Deciding Officer will be biased and support the Responsible Official unless the objector has a history of taking court action.

The USFS Claims Best Science Drives their Projects

It would be to your advantage to become familiar with 40 CFR 1502.9(b) to learn how to deal with the quotes in the Opposing Views Scientific Attachments.

Future generations of kids will seek-out natural undeveloped landscapes for solitude. How will they feel about your decision here? Will they support development of the Granite Meadows sale area to provide corporate profit opportunities?

The public is getting wise to the USFS trying to deceive them.

The USFS wants the public to believe the parts of the national forests that have never been logged are unhealthy and will be restored back to health when they are logged and roaded. Of course best science shows this is untrue. Agency employees who are clinically obsessed by the need to accumulate volume to and assure the success of the USFS timber agenda will deny this fact.

Opposing Scientific Views Attachments #1 and #4 contain a small sample of this best science. Of course you will

reject the science quotes authored by experts because they do not support the USFS way of doing things. This denial is standard operating procedure for USFS line-officers.

A few of your IDT members will know the science quotes are true. Unfortunately, they will remain silent and play the game for obvious reasons. Then they skip home from work each day immersed in their delusional beliefs that they did what the public wants.

The Opposing Scientific Views Attachments should leave no doubt in your mind that your proposal to log 39.1 square miles and construct an undisclosed (secret) umber of miles of new road will inflict long-term resource damage that only time will heal. Mucking around trying to fix the plunder at a later date will only make it worse.

The USFS Measures Management Success by

Annual Timber Volume Outputs

The public is becoming aware of the USFS's overriding timber agenda and culture. The agency programs its employees to believe the amount of timber cut each year on a forest defines the importance forest and management success. I saw biologists who skewed and padded their Chapter 3 effects to minimize and play-down the adverse effects of Proposed Action implementation to fish and wildlife they knew would result from timber sale implementation. Supervisor Lannom, even if they write the truth you will ignore it. Why? Because the agency programmed you to believe amenity resource destruction is acceptable collateral damage when you take action to "get-out-the-cut." The public knows this is going on. You and your IDT members must earn their admiration and trust by breaking from agency tradition.

I think you know what to do. It's more important to leave the forest intact, biodiverse and functioning properly than it is to spend all your NFTM funding this FY isn't it? There are times when promotion potential must not be a consideration.

Please alert me when the DEIS or pre-decisional EA is posted online and you are accepting comments. I ask that you make major changes in the Proposed Action described in the scoping document to assure the natural resources in and downstream from the sale area will not be harmed in any way. This includes "short-term" harm the agency so often accepts.

Sincerely,

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