

Data Submitted (UTC 11): 2/27/2021 11:00:00 AM

First name: Dick

Last name: Artley

Organization:

Title:

Comments: February 27, 2021

Dear, Supervisor Chadwick and other USFS employees who might be interested,

Hi Kara. I hope you are doing well. I enjoyed working with you on the Nez Perce NF.

Supervisor Chadwick, as you will see you have a major problem on the Dolores Ranger District that needs attention. I just finished reading the Salter Vegetation Management pre-decisional EA. I thought it was a joke.

Never before have I heard of such ham-handed mismanagement of the precious land owned by 332 million Americans. Ranger Padilla proposes to log 38.8 square miles (Table 1 at page 6) and construct 106 miles of temporary road (EA at pages 56 & 57).

EA link:

https://www.fs.usda.gov/nfs/11558/www/nepa/113183_FSPLT3_5584277.pdf

Kara, please exercise your authority and responsibility to restrain and control witless goons like Padilla. I guess the USFS has not yet purged all the line-officers who will trash precious, fully functioning national forest resources to generate volume for personal gain.

My comments will be written in this format.

I will quote Padilla's claims (with page number) and then offer information authored by Ph.D. scientists who are experts in their fields who present "best science" showing why he is not telling the truth. The USFS tells the public its projects are based on "best science." Please examine Opposing Views Science Attachments #10. Most of the Responsible Officials' projects are driven by "best science" [hellip] with the exception of the Salter project. In addition to being contrary to best science, the Salter project violates several of the environmental laws of the United States that apply to proposed federal projects. I will point these out.

Please understand the 332 million Americans who own the national forests expect the employees of the agency that administers these lands to 1) obey the law and 2) use "best science" to design the projects.

Since the Salter project fails them both, I ask you to consider directing Ranger Padilla to withdraw the project before he wastes any more of the American taxpayer's money. Salter will surely be stopped by a Federal District Court judge. I would appreciate receiving the legal ad that does so.

Here is a small sample if the expert opinion I will present.

Destructive federal timber sale program loses nearly \$2 billion a year

By John Talberth Ph.D.

Published by the Center for Sustainable Economy, May 2019

<https://sustainable-economy.org/destructive-federal-timber-sale-program-loses-nearly-2-billion-a-year/>

Excerpt:

"Our federal forests are far more valuable as carbon sinks, recreation destinations, wildlife habitat and natural water filters than they are for timber production."

Forest Roads and Sediment Project

By W. Mike Aust, Ph.D., Kevin McGuire, Ph.D., M. Chad Bolding, Ph.D. and Scott Barrett, Ph.D.

Published by Virginia Tech University, 2017

<http://hydro.vwrrc.vt.edu/research/projects/forest-roads-and-sediment-project/>

Excerpt:

"Forested watersheds typically release clean water, yet forest roads and trails can drastically impact water quality. Increased stream sedimentation from road and skid trail crossings represent the most significant water quality threat associated with forestry operations."

The USFS is Legally Required to Respond to my Opposing Views Science Attachments

The Opposing Views Science Attachments present quotes authored by scientists (with no interest in volume accumulation) that describe the long-term irreparable damage that will be inflicted to the natural resources in the San Juan National Forest by logging and roading the Salter timber sale. The authors of the science quotes are experts.

Please be aware of what 40 CFR 1502.9(c) and 36 CFR 775.11(b)(1)(ii) requires:

"Final environmental impact statements shall respond to comments as required in part 1503 of this chapter. The agency shall discuss at appropriate points in the final statement any responsible opposing view which was not adequately discussed in the draft statement and shall indicate the agency's response to the issues raised."

You must respond to each opposing view that is not irresponsible. If you think the science quote is irresponsible please explain why.

My Comments on Specific Issues in this Draft NEPA Document are shown Below

Supervisor Chadwick, Padilla proposes to apply herbicides to invasive weeds and keeps the brand name of the herbicide secret. Please assure he does not apply herbicides that contain the chemical glyphosate.

At page 38 he says:

"High priority weed infestations are treated with herbicide with the intent of eradication, though eradication is not always achieved."

Breaking News!!!!

Environmental and Farming Groups Start US Legal Action in Attempt to Ban Glyphosate

Posted by Sustainable Pulse, December 24, 2020

https://sustainablepulse.com/2020/12/24/environmental-and-farming-groups-start-us-legal-action-in-attempt-to-ban-glyphosate/?utm_source=newsletter&utm_medium=email&utm_campaign=glyphosate_gmos_and_pesticides_weekly_global_news_bulletin&utm_term=2020-12-25#.X-ZRUIVKi1s

Excerpts:

"Last Friday, Center for Food Safety (CFS) filed the opening arguments and evidence in its litigation challenging the U.S. Environmental Protection Agency's (EPA) re-approval of glyphosate, best known as the active ingredient in Monsanto's "Roundup" pesticides. Representing a broad coalition of farmworkers, farmers, and conservationists, CFS filed the federal lawsuit in the Ninth Circuit Court of Appeals in March. The groups seek to have the pesticide prohibited from use or sale because of its unlawful approval.

Today's filing includes volumes of evidence showing how EPA ignored glyphosate's health risks, including cancer risks, to farmworkers and farmers exposed during spraying. The evidence filed also shows how EPA disregarded glyphosate's ecological impacts and that EPA failed to account for the costs to farmers from glyphosate-resistant "superweeds" and off-field drift damage."

Mexico proposes phasing out Roundup pesticide by 2024

By the Associated Press, December 14, 2020

<https://abcnews.go.com/Business/wireStory/mexico-proposes-phasing-roundup-pesticide-2024-74717626>

Excerpts:

MEXICO CITY -- Mexico's Agriculture Department has proposed rules for phasing out the use of glyphosate, the active ingredient in weed killer Roundup, by early 2024.

President Andr[eacute]s Manuel L[oacute]pez Obrador has long objected to the pesticide, and in late 2019, Mexico blocked a 1,000-ton shipment of the pesticide from entering the country, citing health and environmental concerns.

"We do not use glyphosate on our crops, but we have been the victims of external contamination by this substance anyway" said Homero Blas Bustamante, president of the organic society. "This has caused economic losses for organic producers, mainly of coffee and honey."

Glyphosate Causes Genetic Changes Leading to Increased Disease in Future Generations - New Study
Published by Sustainable Pulse, December 10, 2020

https://sustainablepulse.com/2020/12/10/glyphosate-causes-genetic-changes-leading-to-increased-disease-in-future-generations-new-study/?utm_source=newsletter&utm_medium=email&utm_campaign=glyphosate_gmos_and_pesticides_weekly_global_news_bulletin&utm_term=2020-12-13#.X9a4_FVKi1s

Excerpts:

"The study provides evidence that glyphosate-induced changes to sperm from exposed rats could be used as biomarkers for determining propensity in subsequent generations for prostate and kidney diseases as well as obesity and incurring multiple diseases at once. In fact, by the time third- and fourth-generation rats whose

predecessors had been exposed to the chemical were middle-aged, 90% had one or more of these health problems, a dramatically higher rate than the control group.

While limited in scope, the study, which tested generational groups of around 50 rats each, provides a proof of concept that could lead to a new medical diagnostic tool, said Michael Skinner, the corresponding author on the study published in the journal *Epigenetics* on Dec. 9.

This study follows a 2019 paper in *Scientific Reports* in which Skinner's lab demonstrated the ability of glyphosate to promote the transgenerational inheritance of disease in mice.

"We need to change how we think about toxicology," Skinner said. "Today worldwide, we only assess direct exposure toxicology; we don't consider subsequent generational toxicity. We do have some responsibility to our future generations." "

EPA Finds Glyphosate Is Likely to Injure or Kill 93% of Endangered Species

By Lori Ann Burd,

Published in *Common Dreams*, November 25, 2020

https://www.commondreams.org/newswire/2020/11/25/epa-finds-glyphosate-likely-injure-or-kill-93-endangered-species?cd-origin=rss&utm_term=AO&utm_campaign=Daily%20Newsletter&utm_content=email&utm_source=Daily%20Newsletter&utm_medium=Email

https://sustainablepulse.com/2020/11/28/us-epa-evaluation-finds-glyphosate-likely-to-injure-or-kill-93-of-endangered-species/?utm_source=newsletter&utm_medium=email&utm_campaign=glyphosate_gmos_and_pesticides_weekly_global_news_bulletin&utm_term=2020-12-04#.X8qa1WVKi1s

Excerpts:

"WASHINGTON - The Environmental Protection Agency released a draft biological evaluation today finding that glyphosate is likely to injure or kill 93% of the plants and animals protected under the Endangered Species Act.

The long-anticipated draft biological evaluation released by the agency's pesticide office found that 1,676 endangered species are likely to be harmed by glyphosate, the active ingredient in Roundup and the world's most-used pesticide.

The draft biological opinion also found that glyphosate adversely modifies critical habitat for 759 endangered species, or 96% of all species for which critical habitat has been designated.

"The hideous impacts of glyphosate on the nation's most endangered species are impossible to ignore now," said Lori Ann Burd, environmental health director at the Center for Biological Diversity. "Glyphosate use is so widespread that even the EPA's notoriously industry-friendly pesticide office had to conclude that there are hardly any endangered species that can manage to evade its toxic impacts." "

Glyphosate Fact Sheet: Cancer and Other Health Concerns

Posted in U.S. Right to Know on October 1, 2020 by Stacy Malkan

<https://usrtk.org/pesticides/glyphosate-health-concerns/>

Excerpts:

"More than 42,000 people have filed suit against Monsanto Company (now Bayer) alleging that exposure to Roundup herbicide caused them or their loved ones to develop non-Hodgkin lymphoma (NHL), and that Monsanto covered up the risks. As part of the discovery process, Monsanto has had to turn over millions of pages of internal records. We are posting these Monsanto Papers as they become available. For news and tips about the ongoing legislation, see Carey Gillam's Roundup Trial Tracker. The first three trials ended in large awards to plaintiffs for liability and damages, with juries ruling that Monsanto's weed killer was a substantial contributing factor in causing them to develop NHL. Bayer is appealing the rulings."

"Monsanto influence in research: In March 2017, the federal court judge unsealed some internal Monsanto documents that raised new questions about Monsanto's influence on the EPA process and about the research regulators rely on. The documents suggest that Monsanto's long-standing claims about the safety of glyphosate and Roundup do not necessarily rely on sound science as the company asserts, but on efforts to manipulate the science."

"The USDA quietly dropped a plan to start testing food for residues of glyphosate in 2017. Internal agency documents obtained by U.S. Right to Know show the agency had planned to start testing over 300 samples of corn syrup for glyphosate in April 2017. But the agency killed the project before it started. The U.S. Food and Drug Administration began a limited testing program in 2016, but the effort was fraught with controversy and internal difficulties and the program was suspended in September 2016. Both agencies have programs that annually test foods for pesticide residues but both have routinely skipped testing for glyphosate."

It's not unusual for legal firms to advertise their services to people who have been diagnosed with non-Hodgkin lymphoma after using Roundup. Why? They do this because they get lots of cases and win most of them. Check out their websites:

James Harris Law

Link:

https://www.recallsuit.com/roundup-lawsuit-b/?msclkid=5be7029551971de0ec305fab2abdbbd2&utm_source=bing&utm_medium=cpc&utm_campaign=Roundup&utm_term=lymphoma%20lawsuits&utm_content=Lymphoma%20Lawsuit

Sokolove Law

Link:

https://roundup.sokolovelaw.com/?src=bing_webppc_328577675_%2Bmonsanto%20%2Blawsuit_%7Bcontent%7D_b_o_lymphoma%20lawsuits%20against%20monsanto&numberToReplace&campaignId&ringPoolId&jpow=aa_328577675_bb_1233652168336312_cc_%2Bmonsanto%20%2Blawsuit_dd_b_ee_o_ff_%7Bbadposition%7D_gg_c_hh_%7BdeviceModel%7D_ii_jj_110194_kk_ll_%7Bplacement%7D_mm_%7Btarget%7D_nn_kwd-77103363003058%3Aloc-190_oo_%7Bcreative%7D_pp_%7Bbrand%7D_qq_%7Bacid%7D_rr_77103314975124_ss_77103363003058

Class Claims LLC

Link:

<https://www.class.claims/round-up-lawsuit>

Trustwell Law Group

Link:

https://www.trustwelllaw.com/environmental/roundup/lawsuit?utm_source=bing-ads&utm_medium=paid-search&utm_campaign=roundup&msclkid=7aa5b3c82ae01c32cf94eef65692be31&utm_term=monsanto%20lymphoma%20lawsuit&utm_content=Monsanto%20Lymphoma%20Lawsuit%20%7C%20Exact

Pintas and Mullins Law Firm

Link:

https://roundupsettlements.com/?utm_source=bing&utm_medium=cpc&utm_campaign=369199413&utm_term=roundup%20lawsuit&utm_content=82875860687107&msclkid=1fb4e9f4b0451049b80eb4ca32754d40

ROUNDUPCANCER ATTORNEYS.COM

Link:

https://roundupcancerattorneys.com/roundup-lawsuit?msclkid=b0a975edf092161d3c4628d372a24497&utm_source=bing&utm_medium=cpc&utm_campaign=RoundUp%20Cancer&utm_term=roundup%20lawsuit&utm_content=Lawsuit%20roundup

Carlson Law Firm

Link:

<https://www.carlsonattorneys.com/news-and-update/roundup-2019/>

A Case for Women

Link:

https://www.acaseforwomen.com/adv/roundup-lawsuit/?utm_campaign=369081443&utm_source=bing&utm_medium=cpc&utm_content=79439809871843&utm_term=roundup%20lawsuit&adgroupid=1271035841951610&msclkid=f2058d93dd24196d73b4d0ad5f144d1c

Saiontz & Kirk

Link:

<https://www.youhavealawyer.com/roundup/cancer-settlements-faq/>

Greenberg & Bederman, LLC

Link:

<https://www.gblawyers.com/roundup-lawsuits/>

Rosen Injury Lawyers

Link:

<https://roseninjurylawyers.com/roundup-lawsuits/>

Garber Law Offices

Link:

<https://www.garber.law/glyphosate-roundup/>

Monsanto continues to be sued. They claim that their manufactured chemical glyphosate is safe [hellip] and juries continue to rule against them. This would convince intelligent people to use something else.

"More than 13,400 plaintiffs allege that Roundup, which contains glyphosate, caused their non-Hodgkin's lymphoma and that the manufacturer failed to warn about that risk. Most of the lawsuits are pending in state courts." (NY Times, 5/22/2019)

In Nebraska, farmers filed a class action lawsuit against Monsanto. Lawsuits were also filed by a Kona Coffee farm owner in Hawaii, and a widow of a California farmer. All of these lawsuits share one thing in common: Farmers used Monsanto Roundup Weed Killer for years believing it was safe, and were eventually diagnosed with non-Hodgkin's lymphoma.

Involuntary manslaughter is a felony. So is negligent homicide. So is wanton endangerment.

The definition of involuntary manslaughter: the unjustifiable, inexcusable, and intentional killing of a human being without deliberation, premeditation, and malice. The unlawful killing of a human being without any deliberation, which may be involuntary, in the commission of a lawful act without due caution and circumspection.

The definition of negligent homicide: the killing of another person through gross negligence

Here are of 4 recent court opinions. Only a fool would conclude Roundup is safe after reading about them.

Roundup Court Case #1

On March 27, 2019 a San Francisco jury said Monsanto (now owned by BayerAG) was liable for Mr. Edwin Hardeman's non-curable cancer called non-Hodgkin lymphoma. The judge ordered Monsanto to pay Mr. Hardeman \$200 million.

The jury stated:

"It is clear from Monsanto's actions that it does not care whether Roundup causes cancer, focusing instead on manipulating public opinion and undermining anyone who raises genuine and legitimate concerns about Roundup. It speaks volumes that not one Monsanto employee, past or present, came live to trial to defend Roundup's safety or Monsanto's actions. Today, the jury resoundingly held Monsanto accountable for its 40 years of corporate malfeasance and sent a message to Monsanto that it needs to change the way it does business."

Here are a 4 of the many links to the case:

Monsanto trial: cancer patient says he used herbicide for three decades

<https://www.theguardian.com/us-news/2019/mar/05/monsanto-roundup-trial-cancer-weed-killer>

Second Jury Trial Implicates Roundup in Lymphatic Cancer

<https://articles.mercola.com/sites/articles/archive/2019/04/03/roundup-guilty-non-hodgkin-lymphoma.aspx>

Jury Awards Edwin Hardeman \$80.2 Million in Roundup Cancer Lawsuit

<https://www.lawyersandsettlements.com/legal-news/monsanto-facing-lawsuits-over-alleged-roundup-cancer/jury-awards-edward-hardeman-80-2-million-in-roundup-cancer-lawsu-23071.html>

Did weed killer Roundup cause cancer in Sonoma County resident Edwin Hardeman?

<https://www.pressdemocrat.com/news/9363655-181/did-weed-killer-roundup-cause>

Roundup Court Case #2

On May 13, 2019 a jury in Alameda County California ruled that the couple, Alva and Alberta Pilliod of Livermore, Calif., both contracted non-Hodgkin's lymphoma because of their use of a glyphosate-based herbicide. They were each awarded \$1 billion in punitive damages and an additional \$55 million in collective compensatory damages.

Here are a few of the many links to the verdict:

California Jury Awards \$2 Billion to Couple In Roundup Weed Killer Cancer Trial

<https://www.npr.org/2019/05/13/723056453/california-jury-awards-2-billion-to-couple-in-roundup-weed-killer-cancer-trial>

Alva Pilliod & Alberta Pilliod: 5 Fast Facts You Need to Know

<https://heavy.com/news/2019/05/alberta-alva-pilliod/>

Pilliod v. Monsanto Company | California Roundup JCCP

<https://www.baumhedlundlaw.com/pilliod-v-monsanto-trial/>

The EPA says a chemical in Monsanto's weed-killer doesn't cause cancer - but there's compelling evidence the agency is wrong

<https://www.businessinsider.com/glyphosate-cancer-dangers-roundup-epa-2019-5>

Bayer Loses Third Glyphosate Lawsuit; Plaintiffs Awarded More Than \$2 Billion in Damages

<https://www.agriculture.com/news/business/bayer-loses-third-glyphosate-lawsuit-plaintiffs-awarded-more-than-2-billion-in-damages>

Bayer-Monsanto Ordered to Pay \$2 Billion to Glyphosate Cancer Victims

<https://healthimpactnews.com/2019/bayer-monsanto-ordered-to-pay-2-billion-to-glyphosate-cancer-victims/>

Bayer's stock falls after \$2 billion verdict against Roundup maker Monsanto

https://www.washingtonpost.com/business/2019/05/14/bayers-stock-falls-after-billion-verdict-against-roundup-maker-monsanto/?hpid=hp_hp-top-table-main-bayer-verdict%3Ahomepage%2Ft-bayer-verdict&utm_term=.d1848f7731e6

Roundup Court Case #3

In July 2018, Dewayne Johnson (a former school groundskeeper) was diagnosed with non-Hodgkin's lymphoma. He sued Monsanto alleging the chemical glyphosate (an ingredient in Roundup) caused his cancer. Mr. Johnson used Roundup as part of his job. On August 10, 2018 a jury in San Francisco delivered a verdict in Mr. Johnson's favor. The judge ordered Monsanto to pay Mr. Johnson \$289 million in total damages.

Here are a few of the many links to the verdict:

4 Must-See Videos of the Huge Win in the Monsanto Trial

<https://www.organicconsumers.org/blog/monsanto-trial-verdict-videos>

San Francisco Jurors Hear Hours of Scientific Data About Herbicide's Link to Cancer

<https://www.law.com/therecorder/2018/07/09/san-francisco-jurors-hear-hours-of-scientific-data-about-herbicides-link-to-cancer/?slreturn=20180713081135>

Monsanto Loses Landmark Roundup Cancer Trial, Set to Pay USD 289 Million in Damages

<https://mail.google.com/mail/u/0/#inbox/FMfcgxvxBxtJCGsfZgnVKVKfStZmxqSM>

Monsanto "Taken To The Cleaners" In Jury Verdict Dwayne Johnson v. Monsanto

<https://www.activistpost.com/2018/08/monsanto-taken-to-the-cleaners-in-jury-verdict-dwayne-johnson-v-monsanto.html>

Jury rules Monsanto liable in weed killer case

<https://abc7news.com/society/verdict-reached-in-lawsuit-against-monsanto/3925454/>

Monsanto ordered to pay \$289 million in world's first Roundup cancer trial

<https://www.reuters.com/article/us-monsanto-cancer-lawsuit/jury-orders-monsanto-to-pay-290-million-in-california-roundup-cancer-trial-idUSKBN1KV2HB>

Monsanto Loses \$289 Million Verdict in Roundup Cancer Trial

<https://www.bloomberg.com/news/articles/2018-08-10/monsanto-s-roundup-caused-groundskeeper-s-cancer-jury-finds>

Jury orders Monsanto to pay nearly \$290M in Roundup trial

<https://www.nbcnews.com/news/us-news/jury-orders-monsanto-pay-290m-roundup-trial-n899811>

Roundup Court Case #4

On June 24, 2020 BayerAG was ordered to pay more than \$10 billion to end tens of thousands of lawsuits filed over its Roundup weedkiller.

The settlement calls for Bayer to pay from \$8.8 billion to \$9.6 billion to resolve current Roundup lawsuits. The company will also set aside \$1.25 billion to fund payouts for potential claims in the future.

Parts of the deal are pending court approval, including from Judge Vince Chhabria of the U.S. District Court for the Northern District of California.

Here is a link to an explanation of the case:

Bayer To Pay More Than \$10 Billion To Resolve Cancer Lawsuits Over Weedkiller Roundup

<https://www.npr.org/2020/06/24/882949098/bayer-to-pay-more-than-10-billion-to-resolve-roundup-cancer-lawsuits>

Appeals Court Upholds Groundskeeper's Roundup Cancer Trial Win over Monsanto

Excerpts:

"In yet another court loss for Monsanto owner Bayer AG, an appeals court rejected the company's effort to overturn the trial victory notched by a California school groundskeeper who alleged exposure to Monsanto's glyphosate herbicides caused him to develop cancer, though the court did say damages should be cut to \$20.5 million, USRTK reported.

The Court of Appeal for the First Appellate District of California said Monday that Monsanto's arguments were unpersuasive and Dewayne "Lee" Johnson was entitled to collect \$10.25 million in compensatory damages and another \$10.25 million in punitive damages."

Posted online by Sustainable Pulse, Jul 21 2020

https://sustainablepulse.com/2020/07/21/appeals-court-upholds-groundskeepers-roundup-cancer-trial-win-over-monsanto/?utm_source=newsletter&utm_medium=email&utm_campaign=glyphosate_gmos_and_pesticides_weekly_global_news_bulletin&utm_term=2020-07-29#.XyHQIYhKi1s

Federal workers are not exempt from being charged with reckless endangerment which is a felony.

Reckless endangerment is a crime consisting of acts that create a substantial risk of serious physical injury to another person. The accused person isn't required to intend the resulting or potential harm, but must have acted in a way that showed a disregard for the foreseeable consequences of the actions.

Any one of you could be called to testify.

The court will know you have read these comments. This establishes the fact that you knew the consequences of your actions. The plaintiff's attorney will ask why you ignored the science in the Opposing Views Science Attachment #6 and #18 and did not use an alternative to Roundup.

Request for changes to be made to the final NEPA document: Withdraw the timber sale and there will be no problem.

Padilla will be risking the lives of his neighbors who live on the WUI to generate precious volume for personal gain by ignoring Dr. Cohen's findings. He knows line-officers who fail to "get out the cut" are passed over for promotions.

At pages 7 and 8 Padilla says:

"The San Juan National Forest Land and Resource Management Plan defines portions of the Carlyle Point, Plateau Creek, Boggy Draw and Turkey Knoll blocks as wildland-urban interface (USDA 2013)."

Dr. Cohen's research resulted in his fine fuels removal methods which reduce the risk of fire damage should a wildfire occur. Dr. Cohen was a USFS employee before he retired. His methods are used worldwide. You know about his methods and their effectiveness yet you reject them because they do not generate timber volume. By not applying the most effective fire damage reduction process there is you increase the risk that homes will burn and the residents will be injured or killed.

Involuntary manslaughter is a felony. Here's the definition of involuntary manslaughter:

"the unjustifiable, inexcusable, and intentional killing of a human being without deliberation, premeditation, and malice. The unlawful killing of a human being without any deliberation, which may be involuntary, in the commission of a lawful act without due caution and circumspection."

Federal officials are not exempt from this law.

The EA does not include the word "Cohen."

We both know why Padilla conveniently omitted Dr. Cohen's research findings. Here are some quotes he rejected:

Structure Ignition Assessment Model (SIAM)¹

By Dr. Jack Cohen

Presented at the Biswell Symposium: Fire Issues and Solutions in Urban Interface and Wildland Ecosystems, 1995

<https://www.fs.fed.us/psw/publications/documents/gtr-158/gtr-158-cover.pdf>

Excerpts:

"These results suggest that to reduce ignitions, the distances from a structure for managing vegetation are much smaller than the lofting distances for firebrands. Thus, beyond some relatively short distance from the structure (depending on the vegetation and topography), vegetation management has no significant benefit for reducing flame generated ignitions. Vegetation management, on the other hand, cannot be extensive enough, in a practical sense, to significantly reduce firebrand ignitions. Therefore, the structure and its immediate surroundings should be the focus for activities intended for improving ignition risk." (pg 92)

Community destruction during extreme wildfires is a home ignition problem

By Dr. Jack Cohen and Dave Strohmaier

Published online by The Missoulian, August 9, 2020

https://www.reddit.com/r/chaparral/comments/i6p1qq/community_destruction_during_extreme_wildfires_is/

Excerpts:

"To make this shift, land managers, elected officials, and members of the public must question some of our most deeply ingrained assumptions regarding fire. For the sake of fiscal responsibility, scientific integrity, and effective outcomes, it's high time we abandon the tired and disingenuous policies of our century-old all-out war on wildfire and fuel treatments conducted under the guise of protecting communities. Instead, let's focus on mitigating WU fire risk where ignitions are determined - within the home ignition zone."

Reducing the Wildland Fire Threat to Homes: Where and How Much?

By Dr. Jack Cohen

Presented as the Fire Economics Symposium in San Diego, California on April 12, 1999.

USDA Forest Service Gen.Tech.Rep. PSW-GTR-173

http://www.fs.fed.us/rm/pubs_other/rmrs_1999_cohen_j001.pdf

Excerpts:

"As stated, the evidence indicates that home ignitions depend on the home materials and design and only those flammables within a few tens of meters of the home (home ignitability). The wildland fuel characteristics beyond the home site have little if any significance to WUI home fire losses." (Pg. 193)

"Extensive wildland vegetation management does not effectively change home ignitability." (Pg. 193)

"Home ignitability also dictates that effective mitigating actions focus on the home and its immediate surroundings rather than on extensive wildland fuel management." (Pg. 193)

Built to Burn

By Dr. Jack Cohen

Presented at a fire conference in front of people from the Forest Service and state fire agencies, 1999

<https://99percentinvisible.org/episode/built-to-burn/>

Excerpts:

"Cohen thought he had come up with a way to save houses and to let fires burn naturally - he thought it was a win-win. And so in 1999, he presented a paper about his findings at a fire conference in front of people from the Forest Service and state fire agencies. These were people who were in a position to change policies. But Cohen says they were totally uninterested. Cohen's research implied that basically everything about how the Forest Service dealt with wildfires was wrong.

The 10 AM rule had left us with a huge fire fighting infrastructure, so the Forest Service was spending hundreds of millions of dollars on planes and fire crews, and was approving massive logging projects on the grounds that thinning out the forest would help reduce the intensity of wildfires and save homes. Cohen was saying: actually, it would be way more effective if you just encouraged homeowners to maintain and retrofit their properties."

Objectives and considerations for wildland fuel treatment in forested ecosystems of the interior western United States (page 10)

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

Published in Forest Ecology and Management, issue 256, 2008

https://www.fs.fed.us/rm/pubs_other/rmrs_2008_reinhardt_e001.pdf

Excerpts:

"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)

This 2014 High Country News article describes the effectiveness Dr. Cohen's fine fuels removal methods:
<http://www.hcn.org/articles/the-loss-of-homes-to-wildfire-is-as-much-a-sociopolitical-problem-as-it-is-a-physical>

Only a fool would reject Dr. Cohen's research conclusions. Read this to learn more about Dr. Cohen:

<https://www.firelab.org/profile/cohen-jack>

Without changes between draft & final EIS you and the interdisciplinary team (IDT) members who are preparing the EIS will risk people's lives. There are severe civil penalties for federal officials convicted of knowingly putting the public at risk.

Some Rangers and Supervisors on other national forests do everything they can to protect people living on the WUI.

Here's what they do:

- * offer to remove fine fuels near homes in the WUI owned by handicapped and/or elderly residents using USFS employees with written permission from the landowner.

- * distribute handouts to WUI residents describing Dr. Cohen's fine fuels removal methods so they can do the work themselves.

- * contact the people living in the WUI and announce fine fuels removal workshops will be held to answer questions. These workshops will present Dr. Cohen's research conclusions that prove commercial hazardous fuels logging farther than 100 yards from the WUI is ineffective.

Please include the bulleted actions above as part of the Proposed Action.

Please click on the link below so you can view a video interview with Dr. Cohen. In it he describes how the FS squelches and hides his research on wildfire because it threatens their logging/thinning programs.

<https://99percentinvisible.org/episode/built-to-burn/>

Other scientists also know logging does NOT reduce fire intensity and rate of spread (see below):

Lots of smoke and mirrors about fires and their causes

By George Wuerthner

George Wuerthner has published 36 books including *Wildfire: A Century of Failed Forest Policy*. He serves on the board of the Western Watersheds Project.

Published by Columbus Free Press, September 28, 2020

<https://columbusfreepress.com/article/lots-smoke-and-mirrors-about-fires-and-their-causes>

Excerpts:

"One recent study reviewed 1,500 fires around the West and found the highest severity blazes occurred in areas with "active forest management" while protected landscapes like wilderness areas where presumably, fuels were higher, burned less intensely.

"We cannot preclude large fires through forest management; however, we can reduce the impacts on humans. A shift from logging the forest miles from towns to an emphasis on reducing the flammability of houses, planning evacuation routes, burying power lines, zoning to reduce sprawl, and other measures can enhance the safety of our communities."

The Forest Service Not Only Loses Money Logging, It Makes Fires Worse

Quotes by Dr. Philip Higuera, associate professor of fire ecology, University of Montana

Published by Counterpunch, September 25, 2020

<https://www.counterpunch.org/2020/09/25/the-forest-service-not-only-loses-money-logging-it-makes-fires-worse/>

Excerpts:

" "Not only does national forest commercial logging lose money, it increases the threat of big wildfires. Dr. Higuera noted: "However, research studies have shown logged areas and young forest plantation projects have little beneficial effect on wildfire spread and can actually aggravate fire growth in some cases."

In the largest wildfire analysis ever done, in 2016 scientists found that forests with the most logging and the fewest environmental protections actually had the highest levels of fire intensity. Why? Because logging opens up the forest allowing more sunlight and wind which dries out forests and makes them more flammable."

Open Letter to Decision Makers Concerning Wildfires in the West

Signed by more than 200 preeminent scientists

Published by The GEOS Institute, August 27, 2018

<https://naturalresources.house.gov/imo/media/doc/Letter%20From%202015%20Environmental%20Scientists%20Opposing%20Farm%20Bill%20Aug.%2027%202018.pdf>

Excerpts:

"Thinning is most often proposed to reduce fire risk and lower fire intensity[hellip]However, as the climate changes, most of our fires will occur during extreme fire-weather (high winds and temperatures, low humidity, low vegetation moisture). These fires, like the ones burning in the West this summer, will affect large landscapes, regardless of thinning, and, in some cases, burn hundreds or thousands of acres in just a few days." (pg 2)

"Thinning large trees, including overstory trees in a stand, can increase the rate of fire spread by opening up the forest to increased wind velocity, damage soils, introduce invasive species that increase flammable understory vegetation, and impact wildlife habitat." (pg 2)

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>

Excerpt:

"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."

Indeed, there is a reason people use fine fuels (i.e. kindling) to start a fire in the fireplace.

See Opposing Views Science Attachment #11

Request for changes to be made to the final NEPA document: Drop the sale and begin working with the people who live in the WUI to teach them Dr. Cohen's methods.

Increases in national forest logging do not stabilize or enhance the economy of small communities located near the forest. Most people who visit the forest for recreation seek out natural areas that have not been logged.

One of the corporate-friendly purposes Padilla lists in the P&N at page 4 for this timber sale is:

"provide economic support to local communities by providing timber products to local industries in a sustainable manner."

Padilla pulls this need straight from the USFS public deception manual. The vast majority of timber sales use this lie. He parrots the USFS untrue claims perfectly.

He must know by pushing logging where it's not needed for cooked-up reasons he simultaneously reject the feelings of the vast majority if the American public who don't want their forests logged at any location for any reason.

He also rejects/ignores the literature available discussing the fact that most national forest visitors are seeking recreational opportunities. Camping, fishing, hiking and wildlife watching are a few. They avoid "managed" (aka logged-over) land. Here's a High Country News article the USFS does not want its employees to see that should guide your actions:

Article Title: Recreation is redefining the value of Western public lands

Excerpts:

"Once, the West's public lands were valued primarily for the timber, minerals and fossil fuels they held, which were extracted and then sold around the world. In the 1970s, more than two dozen Western counties relied on timber for at least a fifth of their revenue, while energy companies expanded onto public lands for coal and natural gas. Small communities swelled with loggers and miners and the businesses that supported them, providing an economy that helped preserve the West's rural feel. Today, though, natural resource economies are waning, and many of those towns are struggling. Public lands are increasingly used for fun and leisure, and the West has joined the Northeast as the two most urbanized regions in the country, according to U.S. Census data analyzed by Headwaters Economics."

"More than 290 million people visited Western public lands in 2017. Despite increasing visits to public lands and the billions of dollars in consumer spending on outdoor recreation that often takes place there, the percent of the federal budget allocated to manage these places has shrunk."

https://www.hcn.org/issues/50.8/recreation-recreation-is-redefining-the-value-of-western-public-lands?utm_source=wc1&utm_medium=email

What type of person would read the article above and still claim logging (which drives away people who visit their national forest to pursue recreation opportunities) enhances the economies of local communities near the forest.

ECONorthwest reached conclusions similar to those of Dr. Power quoted above:

Excerpts:

"(1) Despite years of rhetoric and misinformation, national and regional economies are not dependent on logging National Forests. The most often cited misconception is that the regional economy of the Pacific Northwest declined after a court injunction and related events reduced National Forest logging. In fact, instead of collapsing, the region's economy expanded and the Pacific Northwest weathered virtually unscathed the national economic recession that occurred at the same time as the court injunction.

(2) National Forests now produce goods and services that are much more significant than the value of logging.

(3) The Forest Service logging program has caused devastating impacts in the ability of the National Forests to

provide economically valuable goods and services. Reversing the damage caused by logging will be costly but ignoring the need to restore damaged forests will cost even more."

Seeing Forests for their Green: Economic Benefits of Forest Protection, Recreation, and Restoration"

Published in EcoNorthwest, August 13, 2000

<http://econw.com/our-work/publications/seeing-forests-for-their-green-economic-benefits-of-forest-protection-recre/>

When the recreating public bypasses and avoids communities with timber driven economies surrounded by "managed" national forest land these communities lose out on their share of the recreation-generated financial community stability benefits reported in 2006 shown below. In the last 13 years these benefits have increased. The level of the 10 year increase in recreation benefits exceeds the total jobs & revenues created by national forest "management" (a.k.a. logging).

Forest recreation:

- * Contributes \$730 billion annually to the U.S. economy
- * Supports nearly 6.5 million jobs across the U.S.
- * Generates \$88 billion in annual state and national tax revenue
- * Provides sustainable growth in rural communities
- * Generates \$289 billion annually in retail sales and services across the U.S.
- * Touches over 8 percent of America's personal consumption expenditures-more than 1 in every 12 dollars circulating in the economy

Source of these statistics: <http://outdoorindustry.org/images/researchfiles/RecEconomypublic.pdf?26>

Recreation revenue is significantly more than logging revenue on national forests. People will drive long distances to avoid camping, hiking and fishing near cutting units.

"Recreation has replaced logging as the golden egg of the national forest system. While the extensive logging practices lose \$1 billion a year, recreation based in national forests provides \$111 billion per year to the country's gross domestic product. And that's according to the U.S. Forest Service's own study, which also declares only 3% of jobs in rural communities are linked to logging on public land, while 75% of jobs in rural communities come from recreation based on public lands. Recreation contributes 30 times more income to the nation's economy and creates 38 times more jobs than logging. Yet current Forest Service policy still favors logging over recreation."

From: "Logging vs. Recreation"

By Graham Averill

Published by Blue Ridge Outdoors, July 2008

<https://www.blueridgeoutdoors.com/magazine/july-2008/logging-vs-recreation/>

"Increased logging on federal lands will not fix these problems. Instead, it will diminish jobs in one of Oregon's fastest growing industries, outdoor recreation. The outdoor recreation industry employs about 140,000 workers in Oregon (logging and wood-products manufacturing employ fewer than 30,000). Nationally, jobs in outdoor recreation are growing 5 percent annually. High-quality recreation attracts middle- and high-income families to settle in rural counties, too, boosting local economic activity. There is abundant research and data showing that our federal forests would do far more for workers, families and local businesses if managed for ecosystem and human health rather than as tree farms."

From: Logging expansion won't help rural communities

By Ernie Niemi (president of Natural Resource Economics, Inc.) and John Kober (executive director of the Pacific Rivers Council)

Published by Portland Oregonian online, June 29, 2014

http://www.oregonlive.com/opinion/index.ssf/2014/06/logging_expansion_wont_help_ru.html

"Local harvests do not necessarily flow to local mills because logs are often hauled hundreds of miles to the mills that win the timber sale bids. As a result, any employment impact may well not be local."

From: Linking Federal Timber Harvests to the Local Economy: Why Has the Historical Link Been So Weak?

<http://www.kettlerange.org/power/Ch3.htm>

"The USFS top managers have revealed that outdoor recreation and general ecology uses of National Forests are now of much greater economic value than timber harvest."

From: Forest Recreation's Growing Impact

By Paul McHugh, Chronicle Staff Writer

Published by SFGATE, September 19, 1996

<https://www.sfgate.com/sports/article/FOREST-RECREATION-S-GROWING-IMPACT-2965645.php>

"The USFS top managers have revealed that outdoor recreation and general ecology uses of National Forests are now of much greater economic value than timber harvest."

From: Forest Recreation's Growing Impact

Published by National Trails Training Partnership

<http://www.americantrails.org/resources/economics/EconForestRec.html>

"Earlier this year, OIA released its national Outdoor Recreation Economy Report, which found that the outdoor recreation economy generates \$887 billion in consumer spending annually and directly sustains 7.6 million American jobs. The state report released today offers a deeper look into a thriving sector that's helping to create healthier economies and healthier communities.

"No matter your political affiliation, where you live or your walk of life, the outdoors brings us together," said Amy Roberts, OIA executive director. "From Maine to California, consumers are spending more on outdoor recreation

as millions of Americans depend on it for their livelihoods. Outdoor recreation is a powerful economic engine that contributes to businesses and healthy communities in each and every state and is a vital and sustainable sector that relies on investing in and protecting America's public lands and waters." "

From: Outdoor Industry Association Releases State-By-State Outdoor Recreation Economy Report

Published by The Outdoor Industry Assn. News

<https://outdoorindustry.org/article/outdoor-industry-association-releases-state-by-state-outdoor-recreation-economy-report/#oia-press-room>

"Outdoor activities generate more than \$16 billion annually in Oregon, according to an industry study released to the public on Wednesday."

"According to the association's report on Oregon, the state's spending on outdoor recreation - a sprawling category that the organization uses to include everything from the cost of new bikes or skis, to travel costs associated with outdoor recreation trips - has grown by more than 28 percent since the last iteration of the study was released in 2013.

In addition, the number of people employed in the industry increased from 141,000 to 172,000, a jump of nearly 22 percent. According to the study, 69 percent of Oregonians surveyed said they participate in outdoor recreation each year, up from 60 percent during the previous survey."

From: Outdoor activities generate more than \$16 billion in state, according to study

Published by the Bend Bulletin newspaper, July 26, 2017

<http://www.bendbulletin.com/localstate/5472143-151/oregon-sees-big-jump-in-outdoor-recreation-spending?referrer=home&referrer=top>

Padilla should ask himself why he pursues actions that scores of unbiased independent scientists describe as likely to destroy the proper functioning of important natural resources.

Padilla rejected the research conclusions of 241 Ph.D. scientists quoted in Opposing Views Science Attachment #1 who demonstrate how logging-related harm (and in a few cases destruction) is inflicted on multiple natural resources in and near the sale area. Incredibly, he relies on the advice of 3 or 4 USFS timber employees financially motivated to sell timber. He knows the log for community stability P&N statement appears in at least 80% of all timber sale NEPA documents. This has become the commonly used excuse by USFS line-officers to sell unneeded timber sales.

I have presented him with verified information showing outdoor recreation generates 790 billion dollars and 65 million jobs annually. Most of this benefits local economies. The fact is, the Salter timber sale will harm the economy of the communities near it. People seek out areas that have not been logged for their recreation.

The US Department of Commerce released a report showing the Outdoor recreation contribution to the GDP is larger than that of oil and gas extraction.

Excerpts:

"That information can be useful when advocating for conservation or trying to change policy, Cottingham said."

"The federal report will be a useful advocacy tool, said Katherine Hollis the conservation and advocacy director for the Mountaineers."

Reported in the March 2, 2018 issue of the Spokane Washington Spokesman Review newspaper.

http://montanauntamed.com/get-outside/article_b8da11ba-97fe-5e1e-8d18-c9d994dc5148.html

Request for changes to be made to the final NEPA document: Withdraw the sale.

Caring USFS line-officers do not knowingly take action that will degrade aquatic habitat and water quality. If he cared about maintaining aquatic species' health he would have indicated that all newly constructed temporary roads will be obliterated or decommissioned according to 36 CFR 212.5(b)(2) (see below) after use.

He indicates he will construct 106 miles of temporary road at pages 56 and 57.

He says he will "physically close temporary roads with barriers" temporary roads after use (pg 57). I expect his decommissioning to be consistent with 36 CFR 212.5(b)(2). He must pay special attention to the requirement that you "completely eliminate the roadbed by restoring natural contours and slopes."

Request for changes to be made to the final NEPA document: Since he will not obliterate temp roads the timber sale must be withdrawn. "Physically closing" these roads creates 106 miles of linear sediment generators

I hope the non-timber IDT members working on this NEPA document agree with the wise quotes below.

The public has been led to believe these quotes guide your actions. Perhaps Padilla thinks he knows more than the people quoted below.

"When the last tree is cut down, the last fish eaten, and the last stream poisoned, you will realize that you cannot eat money"

Cree Indian Proverb, about 1885

"A nation that destroys its soils destroys itself. Forests are the lungs of our land, purifying the air and giving fresh strength to our people."

Franklin D. Roosevelt

"Thou shalt not destroy the trees thereof by forcing an axe against them: for thou mayest eat of them, and thou shalt not cut them down (for the tree of the field is man's life).

Deuteronomy 20:19

"We must protect the forests for our children, grandchildren and children yet to be born. We must protect the forests for those who can't speak for themselves such as the birds, animals, fish and trees."

Chief Edward Moody

"It is horrifying that we have to fight our own government to save the environment."

Ansel Adams

"The Eyes of the Future are looking back at us and they are praying for us to see beyond our own time."

Terry Tempest Williams

Padilla apparently thinks he has more experience and resource knowledge than the scientists listed below.

Why else would he plan a timber sale that these experts warn must never occur?

Jerry Franklin, Ph.D.,

David Perry Ph.D.,

Reed Noss Ph.D.,

David Montgomery Ph.D.,

Anne Ehrlich, Ph.D.,

David Foster Ph.D.,

Peter Raven Ph.D., and

Why would these scientists be motivated to misrepresent the truth.?

Perhaps Padilla has the courage to read what the experts say about logging and forest road construction.

"The proposition that forest values are protected with more, rather than less logging, and that forest reserves are not only unnecessary, but undesirable, has great appeal to many with a vested interest in maximizing timber harvest. These ideas are particularly attractive to institutions and individuals whose incomes depend upon a forest land base." (page 2)

"On the other hand, approaches that involve reserving of a portion of the land base, or harvest practices that leave commercially valuable trees uncut to achieve ecological goals, are often considered much less desirable as they reduce traditional sources of timber income." (page 2)

Simplified Forest Management to Achieve Watershed and Forest Health: A Critique.

By Franklin, Jerry Ph.D., David Perry Ph.D., Reed Noss Ph.D., David Montgomery Ph.D. and Christopher Frissell Ph.D. 2000.

<http://www.coastrange.org/documents/forestreport.pdf>

"For much of the past century the Forest Service, entrusted as the institutional steward of our National Forests, focused its management on an industrial-scale logging program. The result of the massive logging and road construction program was to damage watersheds, destroy wildlife habitat and imperiled plant and animal species."

"Dr. David R. Foster, a professor of ecology at Harvard University, said that a ban on public-lands logging would not affect the nation's supply of timber. Just 4 percent of the nation's timber comes from federal forest land, according to the letter, an amount Dr. Foster said could be made up through more intensive cutting on tree farms and recycling, among other things."

Scientists Seek Logging Ban on U.S.-Owned Land

By Anne Ehrlich Ph.D., David Foster Ph.D. and Peter Raven Ph.D. 2002

New York Times, April 16, 2002

<http://www.nytimes.com/2002/04/16/us/scientists-seek-logging-ban-on-us-owned-land.html>

"Among the environmental effects of unimproved roads, those on water quality and aquatic ecology are some of the most critical. Increased chronic sedimentation, in particular, can dramatically change the food web in affected streams and lakes."

"The nearly impervious nature of road surfaces (or treads) makes them unique within forested environments and causes runoff generation even in mild rainfall events, leading to chronic fine sediment contributions."

"If we look at the issue of what we need to learn or the research priorities for forest road hydrology, I would argue that the areas of cutslope hydrology and effectiveness of restoration efforts are perhaps most critical."

"At a few sites in the mountains of Idaho and Oregon a substantial portion of the road runoff (80-95%) came from subsurface flow intercepted by the cutslope (Burroughs et al., 1972; Megahan, 1972; Wemple, 1998)."

Hydrological processes and pathways affected by forest roads: what do we still need to learn?

By Luce, Charles H. Ph.D., USFS, Rocky Mountain Research Station, Boise Aquatic Sciences Laboratory, 2002

<https://www.fs.usda.gov/treearch/pubs/23954>

"Few marks on the land are more lasting than roads."

"The negative effects on the landscape of constructing new roads, deferring maintenance, and decommissioning old roads are well documented. Unwanted or non-native plant species can be transported on vehicles and clothing by users of roads, ultimately displacing native species. Roads may fragment and degrade habitat for wildlife species and eliminate travel corridors of other species. Poorly designed or maintained roads promote erosion and landslides, degrading riparian and wetland habitat through sedimentation and changes in streamflow and water temperature, with associated reductions in fish habitat and productivity. Also, roads allow people to travel into previously difficult or impossible to access areas, resulting in indirect impacts such as ground and habitat disturbance, increased pressure on wildlife species, increased litter, sanitation needs and vandalism, and increased frequency of human-caused fires."

National Forest System Road Management

Federal Register: March 3, 2000 (Volume 65, Number 43) Page 11675

A Notice by the Forest Service on 03/03/2000, signed by USFS Chief Dr. Mike Dombeck on February 25, 2000

<https://www.federalregister.gov/documents/2000/03/03/00-5002/national-forest-system-road-management>

Concluding Remarks

It frightens me to think Padilla actually believes the Salter timber sale will serve the recreating public.

I'll bet the people who read the Denver Post who hike, fish, camp and view wildlife north of Dolores will want to know about Padilla's shocking, appalling gift to the natural resource extraction corporation.

ATTACHMENTS:

Opposing Views Attachment 1:

Opposing Views Attachment 11:

Opposing Views Attachment 6:

OV Attachment 10:

OV Attachment 18:

extraction corporation.

ATTACHMENTS:

Opposing Views Attachment 1: Quotes by Scientists who are Experts in their Fields Reveals Commercial Timber Harvest Activities will Inflict Major, Tragic Damage to the Natural Resources in and Downstream from any Timber Sale Area.

Opposing Views Attachment 11: Dr. Cohen's fine fuels removal methods

Opposing Views Attachment 6: Glyphosate Dangers

OV Attachment 10: Polls about whether the Public Accepts Logging on National Forests

OV Attachment 18: Following Label Directions on "Approved" Herbicides Containers does not Assure Safety

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