

Data Submitted (UTC 11): 3/19/2022 3:29:28 AM

First name: Dick

Last name: Artley

Organization:

Title:

Comments: March 18, 2022

Dear Supervisor Gould and selected IDT members,

"God has cared for these trees, saved them from drought, disease, avalanches, and a thousand tempests and floods. But he cannot save them from fools.

John Muir

"insanity is doing the same thing over and over
and expecting different results."

Albert Einstein

Supervisor Gould, after I read the purpose of the March 3, 2022 Dear Forest Friends and Neighbors letter I had no doubt you are clinically obsessed by the need to accumulate maximum volume to increase your promotion chances. Your IDT members are obedient helpers who have cast away their values and ethics for possible cash awards and QSIs. Before I retired from the USFS I read about so-called resource specialists who had no problem helping to finalize logging and roading treatments they knew would decimate the possibility of the resource they are trained to protect to function properly.

Your actions to cuddle with and reward the natural resource extraction corporations by allowing them to mistreat and abuse our national forests prove you are beholden to your corporate masters. Your proposed timber sale is not grounded in "best science" as the USFS tells the public. Only a proud "timber beast" would choose to be associated with a commercial timber sale on public land after reading the science in Opposing Views Attachments #3, #4, #21 and #1. You people are the reason most members of the public who use national forests for recreation do not trust, admire or respect USFS employees.

Who are you people? We provide the money for your salaries yet you choose to cuddle with the natural resource extraction corporations. You know line-officers who do not satisfy their supervisor's volume expectations will not be promoted to jobs with higher pay and more power. Is it worth it? This is not what we pay you to do. When you retire the guilt and sorrow will be overwhelming. You will know you cannot turn back the clock. People who are aware of your past transgressions will consider you pariahs. Please find other employment.

I hope the IDT members ask themselves if the
Public wants them to help develop a project with
corporate-friendly "treatments" that will abuse
and ravage the recreating public's opportunities.

There are refreshing, uncommon things you can do to eliminate or significantly reduce the damage. When you act, you will maintain your dignity and self respect.

Please understand the Responsible Official expects you to create a Purpose and Need so ludicrous is a laughable. Of course Supervisor Gould wants you to give him a believable excuse to accumulate volume.

The experts know what should and should not be done to a fully functioning, healthy forest. Unlike USFS line-

officers these experts are not captivated by volume.

Those of you with Ph.D.s are qualified to suggest the research conclusions presented by experts below are wrong.

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.

A National Wildlife Federation publication sponsored by the Bullitt Foundation, 2000

<https://www.irmforestry.com/downloads/pdf1.pdf>

Excerpts:

"We do not believe that the scientific literature or forestry experience support the notions that intensively managed forests can fully duplicate the role of natural forests, or that sufficient knowledge and ability exist to create even an approximation of a natural old-growth forest stand." (pg 3)

"Any proposal to improve forest health through logging must account for the fact that logging and associated activities can create problems themselves." (pg 23)

"Logging roads are now generally recognized as the most pervasive source of damage to streams from forest management activities." (pg 30)

Impacts of Timber Harvesting on Soil Organic Matter, Nitrogen, Productivity, and Health of Inland Northwest Forests

By M.F. Jurgensen Ph.D., Professor of Forest Soils, School of Forestry Michigan Technological University

A.E. Harvey, Principal Plant Pathologist, Intermountain Research Station, USDA Forest Service

R.T. Graham, Research Forester, Intermountain Research Station, USDA Forest Service

D.S. Page-Dumroese, Research Soil Scientist, Intermountain Research Station, USDA Forest Service

J. R. Tonn, Forester, Intermountain Research Station, USDA Forest Service

M.J. Larsen, Principal Mycologist, Intermountain Research Station, USDA Forest Service

T.B. Jain, Forester, Intermountain Research Station, USDA Forest Service

Published in Forest Science 43(2), 1997

https://file.dnr.wa.gov/publications/em_fp_biomass_sq12.pdf

Excerpts:

"Timber harvesting and subsequent site preparation alter the cycling of aboveground forest organic materials and their incorporation into the soil. Soil organic matter is important to maintaining site productivity because of its roles in supporting soil nutrient availability Gas exchange, and water supply (Powers et al. 1990, Blake Ruark 1992, Henderson 1995). Organic matter also is essential to soil microflora and microfauna active in nutrient cycling, soil aggregation, and disease incidence or prevention (Harvey et al. 1987a). In the past, wood removal was not considered detrimental to site productivity because harvesting old, mature stands left large amounts of residue. However, recent trends toward harvesting younger stands, coupled with total-tree utilization, raise concerns about how such management will impact soil processes, site productivity, global carbon sequestration, and forest biodiversity (McColl and Powers1984, Harvey et al. 1989c, Harmon et al. 1990, Powers 1991, Johnson 1992)."

The Effects of Forest Management on Erosion and Soil Productivity

By William J. Elliot, Ph.D., USDA Forest Service Rocky Mountain Research Station Deborah Page-Dumroese,

Ph.D., USDA Forest Service, Supervisory Research Soil Scientist, Rocky Mountain Research Station

Peter R. Robichaud, Ph.D., Research Engineer, USDA Forest Service Rocky Mountain Research Station
An invited paper presented at the Symposium on Soil Quality and Erosion Interaction sponsored by The Soil and Water Conservation Society of America, 1996
https://forest.moscowfsl.wsu.edu/smp/docs/docs/Elliot_1-57444-100-0.html

Excerpts:

"Tree cutting by itself does not cause significant erosion, and timber harvest operations usually cause less erosion per unit area than roads, but the area of timber harvest is usually large relative to roads so that the total erosion from timber harvest operations may approach that from roads (Megahan, 1986). However, the decrease in the number of trees results in a decrease in evapotranspiration, which contributes to increased subsurface flow, streamflow, and channel erosion. Field research has found that timber harvesting tends to compact the soil. Compaction increases soil erosion and adversely impacts forest productivity (Yoho, 1980). Most erosion comes from skid trails on timber harvest units because of the reduced infiltration rates and disturbance to the organic layer (Robichaud et al., 1993b). Therefore, the accelerated erosion caused by timber harvesting may result in deterioration of soil physical properties, nutrient loss, and degraded stream water quality from sediment, herbicides, and plant nutrients (Douglas and Goodwin, 1980)."

Logging and forest roads related to increased debris slides in southwestern Oregon
By Amaranthus, Mike P. Ph.D., Raymond M. Rice Ph.D., N. R. Barr and R. R. Ziemer Ph.D. "
Published in the Journal of Forestry Vol. 83, No. 4. 1985
<https://www.fs.fed.us/psw/publications/ziemer/Ziemer85.pdf>

Excerpts:

"Debris slides over a 20-year period were inventoried on 137,500 acres of forested land in the Klamath Mountains of southwest Oregon. Frequency during the study period was about one slide every 4.3 years on each 1,000 acres-an erosion rate of about 1/2 yd³ per acre per year Erosion rates on roads and landings were 100 times those on undisturbed areas, while erosion on harvested areas was seven times that of undisturbed areas." (pg 1)

Please face the reality the USFS tried to purge from your minds. Don't skip home after work believing you helped restore something.

I hope the IDT members ask themselves if they should
be helping to develop a project with corporate-
friendly "treatments" that will abuse and ravage the
recreating public's opportunities. There are
still things you can to maintain your dignity
and self respect.

Before I retired from the USFS I remember working with 3 people who behaved like the IDT members for this project. They believed everything they read and their supervisor told them about the best types of projects to implement on national forest land that would improve the proper functioning of the resources. I felt bad for them because as is the case here they swallowed the disinformation whole without thinking. If members of the recreating public were told what happens when the forest is "treated" with 8 square miles of commercial logging and 6 miles of road construction they would try to stop it. If they were shown the photos of USFS cutting units after logging in this attachment they would be complaining to their members of Congress. See:USFS restoration projects Photos Attachment If they were shown the best science describing the tragic resource destruction caused by logging and road construction they would be outraged that the USFS lied to them calling this a "restoration project." See: Opposing Views Attachments #3 and #1.

Only mindless, intelligence challenged USFS employees would knowingly participate on a scheme to trick and deceive the people they are paid to serve by using euphemisms to make damaging projects like this one appear wonderful.

Only the name has changed ... not the impacts. Please have the courage to read independent science conclusions in the attachments that are of course different than USFS science. Why are the science conclusions of the independent experts the antithesis of what the USFS tells its employees what is what should be done to assure a healthy forest? They can't both be right can they? Your agency started calling timber sales "restoration projects" to trick the public.

Read what the experts say:

"Shifting value orientations and priorities have resulted in two conflicting management paradigms concerning natural resources. These paradigms and the societal shifts associated with them have been well articulated by Brown and Harris (1992) and Bengston (1994), as well as others. The two competing natural resource paradigms-derived from the ideas of Gifford Pinchot and Aldo Leopold, respectively- have been labeled the "Dominant Resource Management Paradigm" and the postmodern, "New Resource Management Paradigm" (Table 1). The former view advocates the utilitarian belief that natural resource management ought to be directed toward the production of goods and services beneficial to humans, whereas the latter takes a relatively biocentric view that reflects a more environmentally holistic way of thinking about resources. In terms of implementation, the postmodern paradigm questions the wisdom of top-down decision making (Shindler et al. 1996). More directly, many who identify with this paradigm simply do not trust forest management or research experts-especially those who work for the government (Steel et al. 1992)." (page 29)

From Shifting Public Values for Forest Management: Making Sense of Wicked Problems

By Dr. Bruce Shindler, Department of Forest Resources, and Dr. Lori A. Cramer, Department of Sociology, Oregon State University

Reprinted from the Western Journal of Applied Forestry, Vol. 14, No. 1, January 1999.

<https://andrewsforest.oregonstate.edu/sites/default/files/liter/pubs/pdf/pub2465.pdf>

If you were intelligent and curious you would not swallow USFS disinformation without thinking.

Best Science

The USFS tells people their projects are grounded in "best science" see Tourists Preferences Attachment. I present you with "best science" in Opposing Views Attachment #3, #4, #8, and #20. Your minds have been manipulated to reject and disbelieve science authored by scientists not affiliated with the USFS who point out how the USFS despoils and plunders the amenity resources so loved by the people who seek rewarding recreation experiences in the national forests they own. We don't deserve this treatment so you can advance up the promotion ladder.

Please drop this timber sale and spend my tax dollars on a project that will enhance the proper functioning of the natural resources in the Sierra National Forest. Do your job! Your IDT members will admire you. They will find it refreshing to do what they were trained to do ... help design projects and recommend mitigation that will assure there will be no harm to their resource. They are tired of being timber sale enablers!

My Comments

Please note that I would like you to obey the law by responding to my comments with meaningful responses in the pending draft NEPA document. The comments are numbered and shown in purple and green bold font so

you won't miss them:

Comment # for which I'd like a meaningful response in the Response to Comments section in the pending NEPA document: Comment

I will remind you 40 CFR 1503.4 Response to comments is clear about what the agency must and must not do. There is no ambiguity. Please don't respond with absurd, senseless statements like "thank you for the comment," "so noted" or other obvious attempts to avoid complying with the law.

Comment Requirements

Project NameCreek Fire Ecological Restoration Project

Responsible Official and TitleDean Gould, forest supervisor

District & Forest where it will be implementedSierra National Forest

When I read your March 3, 2022 Dear Forest Friends and Neighbors letter it was clear you and your IDT members haven't yet grasped the basics of how human action in the forest affects the countless natural resources there.

You Propose to Log Secret Number of Square Miles of
Forest Knowing the Vast Majority of the
People who Visit their National Forests
do so Seeking Naturally Appearing
Undeveloped (emphasis added)
Recreation Opportunities.

Your proposed Creek Fire timber sale Purpose and Need for Action document fails miserably to convince me the natural resources in and downstream from the sale area will benefit from your planned logging and roading.

Which of you really believe assaulting the fragile forest with 35,000 pound machines with spinning tracks and wheels will create a healthy forest?

Biologists, landscape architects, recreation specialists, heritage specialists, and soils scientists who will not sell themselves have no business ever being part of an IDT for a timber sale.

I'm tired of reading USFS NEPA documents that claim a properly functioning forest is sick and logging is the only way to bring it back to health. You know this is what USFS line-officers are supposed to say to comply with the agency's overriding timber agenda. You also know if you remove your timber beast hat and concentrate on taking action to maintain amenity resource health your supervisor will not be happy.

In the late 1990s I remember working with IDT specialists who refused to play the timber sale enabler game to please the Responsible Official. They would "go the extra mile" to assure their resource was not harmed (even short-term harm) by a USFS project. They knew it might affect their future relationship with the forest's line-officers but they did it anyway. They had self-esteem and their forest ethics and values that would not be compromised. They served the public rather than the USFS's corporate masters.

Supervisor Gould, if you were a normal, caring, intelligent human being you would be overcome by guilt just thinking about what you are about to do.

You Propose to Construct a Hidden Number of Miles of
New Temporary Road. You know Temporary
Roads Cause more Long-Term harm

to Aquatic Resource Health than
any other Human Activity in the Forest.
You Obviously don't Care.

Comment # for which I'd like a meaningful response in the Response to Comments section in the pending NEPA document: You say the 10 miles of new temporary road will be closed and stabilized with cross-drainage, covered with slash (where needed to control erosion), and seeded with a native subalpine grass mix. A professional USFS line-officer would always obliterate temporary roads after use such that the running surface no longer exists. Not doing so leaves an outsloped road with no ditch which is a ready-made linear sediment source.

Your aquatic specialists on the IDT should not have kept quiet.

Comment # for which I'd like a meaningful response in the Response to Comments section in the pending NEPA document: A report authored by Gerald Coghlan, WO Acting Director of Engineering in 1998 indicated there are 372,956 miles of national forest system road (page 5). The agency currently constructs 2,170 miles of system road per year. At this rate there are over 400,000 miles now. In addition to that, there is at least double this amount of unsurfaced, sediment producing, outsloped, temporary roads... and you propose more. The average distance to the moon (it varies) is 384,400 miles. Can you visualize the aquatic damage this will cause when the USFS road miles reach this number? Do you really want to increase this total?
http://www.fs.fed.us/eng/road_mgt/roadsummary.pdf

Please consider the following 2 articles. Also include the source documents for the articles below in the References section of the pending DEIS or pre-decisional EA and cite them in the text. These articles represent "best-science." The public deserves to understand the pros and cons of all proposed national forest projects.

If they don't appear in the References section it means you are frightened to show the public the truth which might jeopardize attainment of your precious volume.

Article Name: Road Woes for the Forest Service,
Posted online by Taxpayers for Common Sense, March 2002
<http://www.taxpayer.net/library/weekly-wastebasket/article/road-woes-at-the-forest-service>

Excerpt:

"Since 1975, the construction of timber roads has cost taxpayers in excess of \$5 billion. In addition, the Forest Service gives trees free of charge to logging companies in exchange for building access roads. This system has resulted in enough roads in the national forests to circle the globe more than 17 times, or to travel to the moon and back."

Article Name: The United States Forest Service: the World's Largest Socialized Road-Building Company,
Posted online by The Future of Freedom Foundation, May 1993
<http://fff.org/explore-freedom/article/united-states-forest-service-worlds-largest-socialized-roadbuilding-company/>

Excerpt:

"As implausible as this may seem, the numbers do not lie. So far, the Forest Service has constructed 343,000 miles of road on our national forests. This alone is eight times the entire mileage of the United States Interstate Highway System. Think about that the next time you're driving cross-country on I-80, or heading for Florida on I-95."

You should all be ashamed.

A normal human being that is able to think and not embrace foolish, senseless beliefs to protect their high paying job would ask themselves why the USFS proposes actions that hundreds of independent scientists prove should never, ever be considered. I will introduce you all to some of this science below. Of course you have all rejected the science before you have read it. You know what it says. For several decades the USFS has assured the public that its projects are grounded in "best science."

After reading your Creek Fire scoping package I do not know whether to laugh or cry.

The IDT biologists, LAs, rec. specialists, archaeologists, soil scientists, hydrologists and botanists came out of college wanting to use their skills in the field to protect their resource from harm from both natural and manmade disturbances. Their land ethics and values were impeccable. They wanted to work outdoors. The USFS appeared to be a perfect fit.

The USFS began working on you all from your first day on the job. They knew you must be broken. The USFS line-officers hoped the agency's well-oiled indoctrination machine would cause you to reject the science you learned in college authored by well respected independent scientists and accept the USFS way ... in spite of the fact the USFS science reached different conclusions. For some reason this didn't bother you. Oh well.

The Good News

None if you are fools or clueless. Sophisticated brainwashing processes will program a mind without people knowing they had been manipulated.

The USFS used the Us vs. Them process:

By saying that there is an Us and a Them, the manipulator is immediately offering the victim the chance to choose which group they want to belong to. Their goal is now to achieve absolute obedience and loyalty.

Read more at:
<https://www.learning-mind.com/brainwashing-techniques/>

For years, your IDT work made it possible for "restoration" projects like the ones shown in the photos in the USFS restoration attachment.

There are several ways you can change yourself and perhaps change what the USFS is doing to my land to create corporate profit opportunities ... if you want to. Then you would be serving the public as yet unborn.

The vast majority of college educated people who have not been brainwashed by their employer do not reject best science authored by independent scientists as you have done. You have been aware this science exists during your entire career and you rejected it because "it does not support the USFS way." Someday they will write books about this tragic situation as they examine and inventory the devastation that exists in national forest areas that had been commercially logged and roaded ... timber sales you helped to design.

The tragic thing is none of you are aware you are being used. You all happily skip home after work each day thinking you earned the \$\$\$ the public provides for your salary by helping to plan projects that they don't want. The USFS Restoration Photo Attachment will remind you about what you plan on a routine basis. For each photo please determine where the members of the public would want to pitch their tent or have a picnic.

You purchased a home and put your kids in school and became part of the community. You are dependent on

your well-paying USFS job, thus, you would never do anything to jeopardize it. To keep your sanity you delude yourself into believing you serve the public and spend their tax dollars the way they would want them spent.

It is time for you to face reality. Those of you who take the risk of writing honest predicted environmental effects for Chapter 3 in the pending NEPA document should know the Responsible Official will not seriously consider them. They want a good reason to select the scoping Proposed Action. How? You know you must describe the No Action alternative effects as a tragic undertaking ... and describe little or no adverse effects inflicted by the Proposed Action to your resource. The USFS expects you to lie.

Many of you don't believe what you have just read. Most people will deny that they have been mentally programmed without their knowledge in order to replace their deeply held values with agency rhetoric.

Dead Trees are Important

Comment # for which I'd like a meaningful response in the Response to Comments section in the pending NEPA document: A dead tree is a legacy that can take dozens of years to replace, and in many cases, it will never be. Whenever a tree is cut down needlessly and hauled away prematurely we short-change our forest resources that depend on dead trees.

Dead, dying, and decaying trees play an essential role increasing forest life.

By Jack Gescherdt

Published by Tree Spirit Project, January 29, 2019

<https://treespiritproject.com/uncategorized/dead-trees-the-life-of-the-forest/>

Excerpts:

"But fans of forest beware: timber companies hellbent on extracting more wood from U.S. and world forests have concocted yet another way of saying down is up, wrong is right, and denuding forests does a forest good. Their newest sell-off-the-forest pitch is to "remove" only "dead" or "dying" trees, to "clean up" or "manage" forests more "responsibly" implying this does no harm. Don't believe it. All the quotations are used to indicate these terms are euphemisms which don't convey the reality of how damage is done in "responsibly" "managing" a forest. This would actually entail leaving it alone, and certainly not bringing in heavy machinery.

Extracting "dead" or "down" or "dying" trees is only the latest insidious way of doing additional harm while ignoring the reality of our current situation: global warming is threatening humanity, which is caused in large part by decades of massive, and ongoing deforestation, nationally and globally. What we humans should instead be doing is leaving existing forests be, especially old-growth forests, not inflicting more damage or extractions of any kind. And planting more trees than we cut down - I mean, "harvest." Important note: planting a sapling is NOT an equivalent replacement for cutting down a mature tree. Leave mature trees stand AND plant more trees. This would benefit us humans - as well as animals and plants and planet, because we're actually all in this together. Deforestation for short term profit equals environmental and societal catastrophe in the long term."

The Specialists need to Know there is a Reason
the Allocation of Timber Funding is
not Based on Ecological Need

The Regional Offices allocate NFTM dollars to each national forest in the Region each year without knowing the number of acres the forest plans to treat with commercial timber sales. Rangers know they must spend every penny of NFTM dollars each fiscal year. So what do they do in some cases? The silviculturists find the wood and conjure up a believable Purpose and Need to justify cutting down a healthy forest.

Comment # for which I'd like a meaningful response in the Response to Comments section in the pending NEPA document: There is a reason the USFS does not ask the Forest Supervisor what their timber workload will be before allocating NFTM money to the forest. They don't want to know. They know the volume they need from the forest and allocate enough to get it. Then the scheme unfolds. The foresters go to the field looking for high volume stands that will be easy to access and inexpensive to harvest.

At the end of the year the RO is happy and healthy trees have been removed and hauled to the mill. To justify this unnecessary liquidation a forester conjures up a believable Purpose and Need.

Your Hypocrisy is Unprecedented

Someday the kids of Colorado will need undeveloped forested areas to experience solitude and Nature sounds. They will soon learn that your proposed corporate-friendly mismanagement will make these experiences impossible. The IDT members obviously believe it's more important to help serve you provide short-term corporate profit opportunities than it is to assure the forest remains intact and the resources function properly. The public will wonder why the specialists paid to protect these resources from harm did not object to this project they knew would cause their resource to be decimated.

You all have been conditioned to believe the USFS can do no wrong. You were taught that members of the public who criticize agency proposals are radical "enviros" and the enemy who must never be taken seriously. During my 31 years with the USFS I walked many miles of temporary road and visited hundreds of cutting units after they had been logged. I saw too many areas where it would take decades for the resources to once again function properly ... mostly wildlife and riparian habitat.

Yes, I oppose this proposed timber sale. I am one of those radical "enviros" and proud of it.

Supervisor Gould, in the future I suggest you pay a contractor do your NEPA documents or assure that your IDT is balanced. If you choose to continue doing them yourself please assure there should be 1 timber person (silviculturist) or 1 USFS employee (regardless of title) whose goal is to maximize volume. Your current IDT has too many timber people. This will introduce bias towards getting volume regardless of the impacts to other resources.

Please drop this proposed timber sale immediately and spend your NFTM dollars where removing trees might do some good. If you don't I'm certain you will be invited to Federal District Court where you will try to justify this insane proposal to a judge.

I pity you people who live your life in clueless hypocrisy.