

Data Submitted (UTC 11): 12/13/2022 4:51:53 AM

First name: Dick

Last name: Artley

Organization:

Title:

Comments: Dear Ranger Cross and selected IDT members,

I'm sorry for you all. From your first day on the job you have all been subjected to the USFS's well-oiled mind manipulation scheme to make you reject what you learned in college about your resource. They knew you must accept and embrace the USFS way without question. When was the last time you discussed independently authored science written by an expert with your supervisor that showed why your latest USFS timber sale would harm the same resources you told the public would be "restored" back to health?

Most of your IDT members will reject (and even laugh at) the wise quotes below. The American public who supplies the money for your salaries thinks these quotes (or something similar to them) guide you. Of course they don't in your case.

"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

"Let us a little permit Nature to take her own way;
she better understands her own affairs than we."

Michel de Montaigne

"I would feel more optimistic about a bright future for man if
he spent less time proving that he can outwit Nature and
more time tasting her sweetness and respecting her seniority."

Elwyn Brooks White

from Essays of E.B. White, 1977

"Government cannot close its eyes to the pollution of
waters, to the erosion of soil, to the slashing of forests any more than
it can close its eyes to the need for slum clearance and schools."

Franklin D. Roosevelt

"Today you can murder land for private profit. You can
leave the corpse for all to see and nobody calls the cops."

Paul Brooks, environmentalist and author

from The Pursuit of Wilderness (1971)

"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

"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

"Anyone can destroy trees. They cannot run away ... God has
cared for these trees, saved them from draught, disease,

and avalanches ... but he cannot save them from fools"

John Muir

from "Save the redwoods, 1900

The USFS keeps independently authored science literature away from you. You will not find it in your library.

You will find it in these attachments:

Opposing Views Attachment #2

Opposing Views Attachment #3

Opposing Views Attachment #4

Opposing Views Attachment #21

Please read them. Nobody will find out. Here is a small sample of what they don't want you to see:

Getting it Right: Environmentalism for the 21st Century

By Patrick Moore Ph.D.

Published online by Berkely Rausser, College of Natural Resources, October 01, 1999

<https://nature.berkeley.edu/events/2017/06/getting-it-right-environmentalism-21st-century>

Excerpt:

"I have spent the last 15 years trying to understand the relationship between forestry and the environment, to separate fact from fiction, myth from reality. Since 1991 I have chaired the Sustainable Forestry Committee of the Forest Alliance of British Columbia. This has provided an ideal opportunity to explore all aspects of the subject. This presentation is the synthesis of what I have learned. But first, let me give you a little background."

"Forests are home to the majority of living species; not the oceans, nor the grasslands, nor the alpine areas, but ecosystems that are dominated by trees. There is a fairly simple reason for this. The living to bodies of the trees themselves create a new environment that would not be there in their absence. Now the canopy above is home to millions of birds and insects where there was once only thin air. And beneath the canopy, in the interior of the forest, the environment is now protected from frost and sun and wind. This, in combination with the food provided by the leaves, fruits and even the wood of the trees, creates thousands of new habitats into which new species can evolve, species that could never have existed if it were not for the presence of the living trees."

"This gives rise to the obvious concern that if the trees are cut down the habitats or homes will be lost and the species that live in them will die. Indeed, in 1996 the World Wildlife Fund, at a media conference in Geneva, announced that 50,000 species are going extinct each year due to human activity. And the main cause of these 50,000 extinctions, they said, is commercial logging. The story was carried around the world by Associated Press and other media and hundreds of millions of people came to believe that forestry is the main cause of species extinction.

During the past three years I have asked the World Wildlife Fund on many occasions to please provide me with a list of some of the species that have supposedly become extinct due to logging. They have not offered up a single example as evidence. In fact, to the best of our scientific knowledge, no species has become extinct in North America due to forestry."

Thinning Nuance

By George Wuerthner

Published online by the Wildlife News, July 6, 2021

<http://www.thewildlifenews.com/2021/07/06/36536/>

Excerpt:

"One frequently hears from proponents of thinning that active forest management can reduce fire intensity and thus is a beneficial policy to reduce large blazes. However, most of the scientific support for thinning is based on modeling of fuel loading, not real-life experiences. For instance, a recent LTE in the Missoulian made such a claim. The amount of fuel is often the least important factor in fire spread.

First, what drives large fires is drought, low humidity, high temperatures, and lastly, and most importantly is wind. Wind's effect on wildfire spread is not linear but exponential. A 20 mph wind does not double fire spread over a 10 mph wind but quadruples it. One can imagine how rapidly a blaze spreads when winds are blowing 50-70 mph, as often is the case when large acreages burn.

Now imagine what happens when a forest stand is thinned. The forest is opened up to greater wind penetration, and the wind is the most crucial factor in wildfire spread. Thinning also results in more fine fuels on the ground that will carry a fire. And opening up the canopy allows greater solar penetration meaning fuels and soils dry out quicker."

2. Logging is a source of great harm for forest ecosystems

Published by Population Education, September 29, 2021

<https://populationeducation.org/six-leading-causes-of-habitat-destruction/>

Excerpt:

"Harvesting timber is another primary driver of global forest loss. Because of demand for wood and paper products, approximately 30% of the world's tree species are facing the possibility of extinction. Selective logging entails removing highly valued trees, and clearcut logging knocks down entire forests. Both of these practices destroy habitats, as even the removal of one tree creates residual damage for dozens of trees left behind.

Logging's damage to the forest environment is extensive. Trees naturally absorb water and provide nutrients to soil, so when they're cut down, soil erodes. Decreases in tree cover also alter levels of light penetration, creating new ecological conditions which cannot support the same variety of species. The roads built for logging change sediment patterns in streams. And removing trees that would naturally fall into streams destroys thermal cover and degrades aquatic ecosystems. Lessening such harm calls for balance between the demands of the logging industry and the need to preserve forest health."

Hunter's View: Modern timber harvesting is erasing wildlife habitat

Published online by Duluth News Tribune, 2022

<https://www.duluthnewstribune.com/opinion/4537108-hunters-view-modern-timber-harvesting-erasing-wildlife-habitat>

Excerpt:

"There seems to be no evidence to explain the low grouse numbers and struggling deer population other than the destruction of habitat and the forest monoculture left in the wake of modern timber harvesting. Diversity is being upended. Stated more accurately, it is being erased.

Come to the George Washington State Forest and walk with me, and you'll see areas where you can look for miles over the rubble of timber harvests.

No habitat, no diversity, no wildlife: that's my theory."

Scientists Oppose Western Logging Bills In Congress

Published online by Iowa PBS, Nov 8, 2013

<https://www.iowapbs.org/mtom/story/12178/scientists-oppose-logging-bills-congress>

Excerpt:

"More than 200 biologists, ecologists and other scientists are urging Congress to defeat legislation they say would destroy critical wildlife habitat by setting aside U.S. environmental laws to speed logging of burned trees at Yosemite National Park and other national forests and wilderness areas across the West.

The experts say two measures pushed by pro-logging interests ignore a growing scientific consensus that the burned landscape plays a critical role in forest regeneration and is home to many birds, bats and other species found nowhere else.

"We urge you to consider what the science is telling us: that post-fire habitat created by fire, including patches of severe fire, are ecological treasures rather than ecological catastrophes, and that post-fire logging does far more harm than good to the nation's public lands," they wrote in a letter mailed to members of Congress Friday."

Industrial Logging in the Sierra Nevada

Published online by the Sierra Forest Legacy, 2008

https://www.sierraforestlegacy.org/FC_FireForestEcology/FFE_IndustrialForestlands.php

Excerpt:

"In 2007, the California Department of Fish and Game completed the California Wildlife Action Plan, which specifically identified logging impacts as a threat to the survival of wildlife in our region's forests. The WAP identified several remedies, including:

*Using the best-available science, forest and wildlife managers should determine the extent, pattern, and pace for timber-harvest in a forest watershed or cluster of watersheds.

*Ecologically based standards or limits should be set for timber-harvest. State and federal forest managers should coordinate to ensure that cumulative effects of timber-harvest plans for public and private lands meet the standards for each watershed.

*Banning clearcutting in favor of intermediate harvest styles which still allow for timber production and profits without environmental devastation.

*Limiting the amount of clearcutting that can be conducted in any watershed.

*Creating buffers along all streams that will be free from any logging activity, and increasing the number of large trees that are protected on industrial forestlands.

*Set sustainable limits for logging within a single watershed.

*Limiting the use of herbicides that persist in soils, contaminate streams, and threaten the survival of aquatic species such as fish and amphibians."

Excessive damage to residual trees during a timber harvest can negate the intended benefits of forest improvement operations.

Proceedings of Residual Stand Damage Workshop. UNH Cooperative Extension, March 11, 2010

<https://extension.unh.edu/goodforestry/html/5-4.htm>

Excerpt:

"Activities associated with felling, winching, and skidding can damage 20 to 40 percent of the residual trees (trees left behind).

Young trees may be bent or broken during felling or crushed by harvesting equipment. Branches and tops of residual trees may be broken during felling, reducing crown area and eventually tree vigor. Valuable lower trunks of larger trees may be wounded, allowing entry of fungi or insects that cause wood discoloration and decay. Injuries resulting in exposed sapwood wounds of 100 square inches or greater are likely to develop decay. Approximately 80 percent of skidding injuries are from bark scraped from the butt log of residual trees.

Skidding can cause root damage, allowing entry of rot-causing microorganisms. Repeated passes of heavy equipment over certain types of soils, especially during wet conditions, can compact soil air spaces, impeding root growth. Most healthy forest soils maintain about 50 percent solids, 25 percent air space and 25 percent water by volume. When these ratios change through compaction, roots are damaged and their growth restricted, erosion and run-off increase due to decreased permeability, and changes in soil temperature and microbial action disrupt soil nutrient cycling.

Logging may also combine with other stress factors to make individual trees (and eventually entire stands) more susceptible to dieback. Poor vigor invites attacks by insect pests and diseases. Also, though a stand may not be physically damaged, removing trees may reduce the stand's ability to withstand wind."

How and How Much, Do Harvesting Activities Affect Forest Soil, Regeneration and Stands?

By Rodolfo Picchio Ph.D., Piotr S. Mederski Ph.D. and Farzam Tavankar Ph.D.

Published in Current Forestry Reports volume 6, pages 115-128 (2020)

<https://link.springer.com/article/10.1007/s40725-020-00113-8>

Excerpt:

"There are a large number of publications tackling forest harvesting, but most of them do not give a comprehensive framework and they mainly focus on one or very few aspects of forest damage. In order to improve general knowledge of the impact of forest operations, it was proposed that the scope of recent findings should be examined and a compilation of the available results from different regions should be presented in one paper."

"The physical, chemical and biological properties of the forest soil change as a result of harvesting operations, and this is commonly referred to as soil disturbance [4, 16,17,18,19]. Chemical and biological changes occur in the soil after physical modification. Therefore, changes in the physical properties of the soil are the most prominent indicator of soil disturbance following the use of logging equipment [4, 20]. Detrimental soil disturbance associated with ground-based extraction often includes compaction, rutting, lateral soil displacement, topsoil mixing and the formation of puddles."

Forest Service's Huge Clearcutting Plan Next to Yellowstone National Park Threatens Grizzlies, Lynx

Published by Center for Biological Diversity, April 23, 2021

<https://biologicaldiversity.org/w/news/press-releases/forest-services-huge-clearcutting-plan-next-to-yellowstone-national-park-threatens-grizzlies-lynx-2021-04-23/>

Excerpt:

"WEST YELLOWSTONE, Mont.- Four conservation groups today challenged a U.S. Forest Service plan to

clearcut more than 4,600 acres of pine forests, log across an additional 9,000 acres, and bulldoze up to 56 miles of road on lands just outside Yellowstone National Park within the Custer Gallatin National Forest.

The Center for Biological Diversity, WildEarth Guardians, Alliance for the Wild Rockies and Native Ecosystems Council said the South Plateau project will destroy habitat for grizzly bears, lynx, pine marten and wolverine. The logging project will also bring noise and destroy the scenery for hikers using the Continental Divide National Scenic Trail, which traverses the timber sale area."

200 scientists sign letter against logging national forests
By John Myers, Duluth News Tribune Staff Writer
Published by Duluth News Tribune, April 16 2002
<https://www.iatp.org/news/200-scientists-sign-letter-against-logging-national-forests>

Excerpts:

"More than 200 scientists, including several from Minnesota and Wisconsin, have signed a letter to President Bush urging him to stop all commercial logging in national forests.

The scientists are asking Bush to set aside national forests as areas where habitat can be restored for diverse plant and animal species and for recreation.

"Without protection from further logging, the biological diversity we so greatly need could be lost," the letter states. "Mr. President, we urge you to end the destructive practice of commercial logging in the national forests and to begin a scientifically based program to restore habitat and native species."

The scientists' letter will be unveiled in a national campaign today by the Sierra Club, which has for years called for an end to commercial logging in national forests. The campaign also supports a bill in Congress to end commercial logging on federal lands.

Nancy Butler, professor of aquatic biology at Gustavus Adolphus College in St. Peter, Minn., said she signed the letter because of logging impacts she's documented.

"I've done research in logged areas... that suggests that, even with the best management guidelines we have now (for logging), it's not enough. Logging is detrimental to aquatic ecosystems, both locally and on a larger scale," Butler said.

While she fully expects her action to be labeled political, Butler said it's important for scientists to support what their efforts have revealed.

"This isn't about Bush or about politics, this is about good science," she said.

The letter is not likely to be endorsed by the Bush administration, which has generally moved to maintain or increase logging on federal lands.

U.S. Forest Service spokesman Joe Walsh in Washington, D.C., said he wouldn't comment on the letter until he'd seen it. "We'll comment when we're sure they've actually sent a letter to the president," Walsh said. "And we want to see first who these scientists are."

Forestry Impacts on Freshwater Habitat of Anadromous Salmonids in the Pacific Northwest and Alaska:
requirements for protection and restoration
By Murphy, Michael L.

Published by NOAA/National Centers for Coastal Ocean Science, 10/08/2022
<https://aquadocs.org/bitstream/handle/1834/30531/das7.pdf?sequence=1&isAllowed=y>

Excerpt:

"Impacts from over 100 years of logging and other land uses are still evident in streams of the Pacific Northwest and other regions. The most pervasive effect has been reduced habitat complexity due to loss of LWD, causing a widespread reduction in salmonid abundance and diversity. Despite improvements over the last 20 years, logging activities can still have multiple impacts. Effects of timber harvest, road construction, and other activities anywhere in a watershed can be transmitted through hydrologic and erosional processes to affect salmonid habitat. The most important impacts result from changes in sediment, streamflow, temperature, and LWD."

CHAPTER 2: WATER QUALITY AND FORESTRY ACTIVITIES

Published by EPA National Management Measures to Control Nonpoint Source Pollution from Forestry
<https://www.epa.gov/sites/default/files/2015-10/documents/ch2.pdf>

Excerpt:

"The effects of forestry activities on surface waters are of concern to EPA and state and local authorities because healthy, clean waters are important for aquatic life, drinking water, and recreational use. Surface waters and their ecology can be affected by inputs of sediment, nutrients, and chemicals, and by alterations to stream flow that can result from forestry activities."

Agents of Watershed Change

By Thomas C. O'Keefe Ph.D., James M. Helfield Ph.D., and Robert J. Naiman Ph.D.

Published in EPA's Watershed Academy WEB 8/10/2022

https://cfpub.epa.gov/watertrain/moduleFrame.cfm?parent_object_id=681

Excerpt:

"Erosion and sedimentation typically increase as a consequence of the hydrologic impacts of land use practices. Streams and lakes in urbanized, agricultural and logged watersheds are therefore characterized by increased levels of turbidity, relatively uniform substrates and high proportions of fine particles. These conditions may be detrimental to aquatic life in themselves: For example, suspended sediments can clog the gills of fish, while increased fines in spawning beds impede water flow and hamper oxygenation of incubating salmon eggs." (pg 28)

Logging Forests to Halt Wildfires Would Do More Harm Than Good

By Derek E. Lee Ph.D., Associate Research Professor of Biology, Pennsylvania State University

Published in Science Alert, 22 AUGUST 2018

<https://www.sciencealert.com/logging-forests-to-halt-wildfires-would-destroy-essential-habitats-for-native-species>

Excerpt:

"Despite this steadily accumulating evidence, the U.S. Forest Service advocates logging in old-growth forest reserves and Spotted Owl critical habitat in the name of protecting Spotted Owls from forest fires."

Open Letter to President Biden and Members of Congress from Scientists: It is essential to Remove Climate-Harming Logging and Fossil Fuel Provisions from Reconciliation and Infrastructure Bills, November 4, 2021

Signed by 186 Ph.D. scientists

<https://johnmuirproject.org/wp->

Excerpt:

"We urge Congress to move in the opposite direction by shifting from more logging toward natural climate solutions that store carbon in mature and older forests and allow naturally regenerating forests to continue growing for greater carbon accumulation. For example, protecting U.S. federal public forestlands from logging would not only reduce direct carbon emissions but would also increase annual drawdown of atmospheric CO₂ by 84 million tons per year. We do not wish to follow our Canadian neighbors where some of their managed forests have become a source of emissions because they followed many of the proposed policies in these Bills. There is a path toward meeting the vital 2030 climate crisis mitigation goals, but not with the Reconciliation and Infrastructure Bills as currently written."

Logging: Cutting Down Wildlife Habitats

Published by Adopt An Animal Kits, February 28, 2022

<https://www.adoptananimalkits.com/advocate/wild-earth/params/params/post/1286170/logging-cutting-down-wildlife-habitats>

Excerpt:

*"Logging causes a loss of bio-diversity. When forests are logged, species lose their habitat, food sources, and shelter. Primary trees also provide seeds for new trees. The seed source is lost when the trees are harvested.

*Logging causes extinction. Many animal species rely on trees for their food sources and shelter.

*Logging causes ecosystem fragmentation. Habitats are cut into fragments, affecting food availability, migration patterns and shelter.

*Logging causes erosion. Trees and leaf litter are essential nutrients for the soil in forests and prevent erosion by absorbing water - keeping nutrients in the top-soil from washing away.

*Logging causes flooding. Trees stabilize soil by absorbing rain water. When trees are removed, flooding and mud-slides can result.

*Logging obstructs streams and rivers. Erosion and flooding caused by logging causes soil and silt to flow into water systems. Clouded water can prevent fish and other species from laying eggs and constructing nests.

*Logging is changing the climate. Trees store carbon. When forests are harvested, the carbon is released into the atmosphere in the form of carbon dioxide. A greenhouse gas, carbon dioxide absorbs heat and creates global warming."

Federal Appeals Court Axes Commercial Logging in Los Padres National Forest Roadless Area in California, Center for Biological Diversity Reports

Published in Center for Biological Diversity, 04 February 2022

<https://www.pressreleasepoint.com/federal-appeals-court-axes-commercial-logging-los-padres-national-forest-roadless-area-california>

Excerpt:

"LOS ANGELES? A federal appeals court blocked a commercial logging project in a roadless area of the Los Padres National Forest today, siding with three conservation groups to protect 1,100 acres of old-growth forest actively used by endangered California condors.

"This ruling is a big victory for the Antimony Roadless Area, which covers about 68% of the project area, and an even bigger win for the endangered California condors that have been roosting there for the past several years," said Bryant Baker, conservation director for Los Padres ForestWatch.

"Under federal law, logging in roadless areas is limited to small trees. In today's ruling, the 9th U.S. Circuit Court of Appeals said the U.S. Forest Service's plan to cut down numerous trees up to 21-inches in diameter along Tecuya Ridge in the Antimony Roadless Area violated the law.

This decision upholds the sanctity of the Roadless Rule, which protects some of the last remaining wild places in our national forests from harmful logging practices," said Justin Augustine, an attorney at the Center for Biological Diversity. "The previous administration made a reckless decision to OK cutting down trees in a remote area that contains prime habitat for California condors, California spotted owls and northern goshawks. Since the Biden administration values our roadless areas and wildlife, I expect they'll ensure this beautiful forest remains protected, not commercially logged."

In 2019 conservation groups sued the Forest Service, saying the project violated the Roadless Area Conservation Rule, would destroy prime habitat for endangered California condors and would fail to protect communities from wildfires as federal officials had claimed.

Today's ruling sends the logging plan back to the Forest Service to complete the roadless rule review it failed to do before it approved the project."

How Does Deforestation Affect Animals?

Published by Greentumble, July 18, 2018

<https://greentumble.com/how-does-deforestation-affect-animals/>

Excerpt:

"Effects of deforestation on animals

1 Habitat loss

Deforestation can lead to a direct loss of wildlife habitat as well as a general degradation of their habitat.

The removal of trees and other types of vegetation reduces available food, shelter, and breeding habitat. Wildlife habitats become fragmented, where native species must live on remaining habitat islands that are surrounded by disturbed land that is being used for agriculture and other uses.

Habitat fragments may be too small to maintain viable populations of animals, and an animal living in one population may no longer be able to freely breed with individuals in other populations. Animals may not be able to find adequate shelter, water, and food to survive within remaining habitat.

Animals may also encounter dangerous situations such as increased human-wildlife conflicts and being hit by vehicles when they attempt to migrate between habitat fragments.

With increased habitat edge, wildlife may experience an increased vulnerability to predation, poaching, wind, sunlight, invasion of exotic plant and animal species into remaining forest habitat, and other factors such as direct exposure to natural disasters that were not as much of a threat prior to the deforestation event.

Some animal species are entirely dependent upon old growth forest habitat, such as the Northern Spotted Owl in the Western United States, and cannot survive in secondary forest habitat. This means that in places where any deforestation is happening, these species cannot thrive and will gradually disappear"

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"This gives rise to the obvious concern that if the trees are cut down the habitats or homes will be lost and the species that live in them will die. Indeed, in 1996 the World Wildlife Fund, at a media conference in Geneva, announced that 50,000 species are going extinct each year due to human activity. And the main cause of these 50,000 extinctions, they said, is commercial logging. The story was carried around the world by Associated Press and other media and hundreds of millions of people came to believe that forestry is the main cause of species extinction."

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First, what drives large fires is drought, low humidity, high temperatures, and lastly, and most importantly is wind. Wind's effect on wildfire spread is not linear but exponential. A 20 mph wind does not double fire spread over a 10 mph wind but quadruples it. One can imagine how rapidly a blaze spreads when winds are blowing 50-70 mph, as often is the case when large acreages burn.

Now imagine what happens when a forest stand is thinned. The forest is opened up to greater wind penetration, and the wind is the most crucial factor in wildfire spread. Thinning also results in more fine fuels on the ground that will carry a fire. And opening up the canopy allows greater solar penetration meaning fuels and soils dry out quicker."

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Logging's damage to the forest environment is extensive. Trees naturally absorb water and provide nutrients to soil, so when they're cut down, soil erodes. Decreases in tree cover also alter levels of light penetration, creating new ecological conditions which cannot support the same variety of species. The roads built for logging change sediment patterns in streams. And removing trees that would naturally fall into streams destroys thermal cover and degrades aquatic ecosystems. Lessening such harm calls for balance between the demands of the logging industry and the need to preserve forest health."

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Soil and Root Damage in Forestry. 200 pages

By Iwan Wasterlund

Published by Elsevier, 26 August 2020

<https://www.readonbooks.net/pdf/soil-and-root-damage-in-forestry/>

Excerpt:

"Agroforestry has significantly impacted our forests, but an often-overlooked issue is the effect of harvesting on soils and root systems. Soil and Root Damage in Forestry explains how soil and roots might be damaged through logging activities or silvicultural activities, how resulting root diseases impact the root and soil systems, and the impacts of chemical applications on the soil and root system. This book goes beyond the 'why' to also provide methods to reduce the impacts of machines on soils and offers solutions to minimize the impacts of machines on

soils. Soil and Root Damage in Forestry serves as a valuable resource not only for those already working in soil science and forest ecology, but also provides insights for advanced students seeking an entrance to the "hidden half" of the planet. Combines damages to soil and roots in one volume for the first time Includes calculations related to soil strength providing soil scientists and ecologists with methods to estimate root damage Provides suggestions on how to reduce the impact of harvesting on soil and root systems."

How and How Much, Do Harvesting Activities Affect Forest Soil, Regeneration and Stands?

By Rodolfo Picchio Ph.D., Piotr S. Mederski Ph.D. and Farzam Tavankar Ph.D.

Published in Current Forestry Reports volume 6, pages 115-128 (2020)

<https://link.springer.com/article/10.1007/s40725-020-00113-8>

Excerpt:

"There are a large number of publications tackling forest harvesting, but most of them do not give a comprehensive framework and they mainly focus on one or very few aspects of forest damage. In order to improve general knowledge of the impact of forest operations, it was proposed that the scope of recent findings should be examined and a compilation of the available results from different regions should be presented in one paper."

"The physical, chemical and biological properties of the forest soil change as a result of harvesting operations, and this is commonly referred to as soil disturbance [4, 16,17,18,19]. Chemical and biological changes occur in the soil after physical modification. Therefore, changes in the physical properties of the soil are the most prominent indicator of soil disturbance following the use of logging equipment [4, 20]. Detrimental soil disturbance associated with ground-based extraction often includes compaction, rutting, lateral soil displacement, topsoil mixing and the formation of puddles."

Forest Service's Huge Clearcutting Plan Next to Yellowstone National Park Threatens Grizzlies, Lynx

Published by Center for Biological Diversity, April 23, 2021

<https://biologicaldiversity.org/w/news/press-releases/forest-services-huge-clearcutting-plan-next-to-yellowstone-national-park-threatens-grizzlies-lynx-2021-04-23/>

Excerpt:

"WEST YELLOWSTONE, Mont.- Four conservation groups today challenged a U.S. Forest Service plan to clearcut more than 4,600 acres of pine forests, log across an additional 9,000 acres, and bulldoze up to 56 miles of road on lands just outside Yellowstone National Park within the Custer Gallatin National Forest.

The Center for Biological Diversity, WildEarth Guardians, Alliance for the Wild Rockies and Native Ecosystems Council said the South Plateau project will destroy habitat for grizzly bears, lynx, pine marten and wolverine. The logging project will also bring noise and destroy the scenery for hikers using the Continental Divide National Scenic Trail, which traverses the timber sale area."

The exceptional value of intact forest ecosystems

By James E. M. Watson Ph.D.

Published by Nature Ecology & Evolution volume 2, pages 599-610 (2018)

Excerpts:

"As the terrestrial human footprint continues to expand, the amount of native forest that is free from significant damaging human activities is in precipitous decline. There is emerging evidence that the remaining intact forest supports an exceptional confluence of globally significant environmental values relative to degraded forests,

including imperilled biodiversity, carbon sequestration and storage, water provision, indigenous culture and the maintenance of human health. Here we argue that maintaining and, where possible, restoring the integrity of dwindling intact forests is an urgent priority for current global efforts to halt the ongoing biodiversity crisis, slow rapid climate change and achieve sustainability goals. Retaining the integrity of intact forest ecosystems should be a central component of proactive global and national environmental strategies, alongside current efforts aimed at halting

The Photos USFS restoration projects attachment illustrates why recreationists avoid managed land.

"Any competent, caring, professional biologist and recreation specialist helping to prepare an EA or EIS for a commercial timber sale should meet with the Responsible Official to tell them the likely damage that will be inflicted to their resource is unacceptable. If the Responsible Official still indicates they will plan, prepare and sell the sale, the IDT members should resign from the IDT so as not to compromise their land values/ethics and maintain their dignity and self-esteem.

Otherwise there is no need to disclose the adverse environmental effects if the Responsible Official will ignore them and select the Proposed Action and accept the damage."

My Comments

Please note that I would like you to obey the law by responding to my scoping 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: Here is an example.

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 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 by a frightened USFS employee to avoid complying with the law.

You must Discuss Responsible Opposing Views

I will remind you of 40 CFR §1502.9(b):

"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.

It's time for you to start creating reasons why you believe the science quotes in my Opposing Views Attachments are not responsible ... or agree with the science that shows the Jellico timber sale will inflict appalling, calamitous damage to the natural resources the public pays you to protect and take care of.

Generating Volume for Personal Gain

Ranger Cross, after I read the December 9, 2022 Dear Friends and Neighbors letter I had no doubt you are one of those USFS line-officers who seek volume at any cost to the health of the countless natural resources for unscientific reasons that make no sense. You know those who do not routinely generate volume do not get promoted in the agency. Some of your IDT members are obedient helpers who have cast away their land values and ethics as they prepare a NEPA document for this tragic timber sale. The public expects your Scoping Package to tell them 1) what's wrong with their forest and how you know, 2) how the health of the forest's

resources is being compromised by the problem, 3) how your "treatments" will solve the problem (including science citations supporting your "treatments"), 4) what will happen if it's not "treated", and 5) how you will mitigate the clear damage your "treatments" will inflict on resources that are currently healthy and functioning properly.

Why must a member of the public need to tell you these obvious truths? Clearly the scoping package was written by your silviculturist trying to justify this needless timber sale.

Here is what you should already know about the Resource Damage caused by Logging. Please be Professionals and don't Ignore this Information.

The Resource Damage your Timber Sale will cause isn't Worth it.

Those of you with Ph.D.s are qualified to suggest the research conclusions by the experts presented below are wrong. Highlights are shown in bold, red font.

Logging Forests to Halt Wildfires Would Do More Harm than Good

By Derek E. Lee Ph.D., Associate Research Professor of Biology, Pennsylvania State University

Published in Science Alert, 22 AUGUST 2018

<https://www.sciencealert.com/logging-forests-to-halt-wildfires-would-destroy-essential-habitats-for-native-species>

Excerpt:

"But the idea that wildfires should be suppressed by logging the forest is far too simplistic. Most scientists agree that large hot wildfires produce many benefits for North American forests. Notably, they create essential habitat for many native species.

Fifteen years of research on Spotted Owls - a species that has played an oversized role in shaping U.S. forest management policies and practices for the past several decades - directly contradicts the argument that logging is needed to protect wildlife from fires.

Wildlife biologists, including me, have shown in a string of peer-reviewed studies, that wildfires have little to no effect on Spotted Owls' occupancy, reproduction or foraging, and even provide benefits to the owls."

Logging: Cutting Down Wildlife Habitats

Published by Adopt An Animal Kits, February 28, 2022

<https://www.adoptananimalkits.com/advocate/wild-earth/params/params/post/1286170/logging-cutting-down-wildlife-habitats>

Excerpt:

*"Logging causes a loss of bio-diversity. When forests are logged, species lose their habitat, food sources, and shelter. Primary trees also provide seeds for new trees. The seed source is lost when the trees are harvested.

*Logging causes extinction. Many animal species rely on trees for their food sources and shelter.

*Logging causes ecosystem fragmentation. Habitats are cut into fragments, affecting food availability, migration patterns and shelter. Forest fragmentation is threatening the survival of many species.

*Logging causes erosion. Trees and leaf litter are essential nutrients for the soil in forests and prevent erosion by absorbing water - keeping nutrients in the top-soil from washing away.

*Logging causes flooding. Trees stable soil by absorbing rain water. When trees are removed, flooding and mud-slides can result.

*Logging obstructs streams and rivers. Erosion and flooding caused by logging causes soil and silt to flow into water systems. Clouded water can prevent fish and other species from laying eggs and constructing nests.

*Logging is changing the climate. Trees store carbon. When forests are harvested, the carbon is released into the atmosphere in the form of carbon dioxide. A greenhouse gas, carbon dioxide absorbs heat and creates global warming."

Federal Appeals Court Axes Commercial Logging in Los Padres National Forest Roadless Area in California,
Center for Biological Diversity Reports

Published in Center for Biological Diversity, 04 February 2022

<https://www.pressreleasepoint.com/federal-appeals-court-axes-commercial-logging-los-padres-national-forest-roadless-area-california>

Excerpt:

"LOS ANGELES? A federal appeals court blocked a commercial logging project in a roadless area of the Los Padres National Forest today, siding with three conservation groups to protect 1,100 acres of old-growth forest actively used by endangered California condors.

"This ruling is a big victory for the Antimony Roadless Area, which covers about 68% of the project area, and an even bigger win for the endangered California condors that have been roosting there for the past several years," said Bryant Baker, conservation director for Los Padres ForestWatch.

"Under federal law, logging in roadless areas is limited to small trees. In today's ruling, the 9th U.S. Circuit Court of Appeals said the U.S. Forest Service plan to cut down numerous trees up to 21-inches in diameter along Tecuya Ridge in the Antimony Roadless Area violated the law.

This decision upholds the sanctity of the Roadless Rule, which protects some of the last remaining wild places in our national forests from harmful logging practices," said Justin Augustine, an attorney at the Center for Biological Diversity. "The previous administration made a reckless decision to OK cutting down trees in a remote area that contains prime habitat for California condors, California spotted owls and northern goshawks. Since the Biden administration values our roadless areas and wildlife, I expect they'll ensure this beautiful forest remains protected, not commercially logged."

In 2019 conservation groups sued the Forest Service, saying the project violated the Roadless Area Conservation Rule, would destroy prime habitat for endangered California condors and would fail to protect communities from wildfires as federal officials had claimed.

Today's ruling sends the logging plan back to the Forest Service to complete the roadless rule review it failed to do before it approved the project."

Repeated logging depletes soil, pushing forests to ecological limits, finds new study

Published by Earth Day, December 20, 2019

<https://www.earthday.org/repeated-logging-depletes-soil-pushing-forests-to-ecological-limits-finds-new-study/>

Excerpt:

"A study published Tuesday in Global Change Biology found that repeated logging and re-growth of forests depletes soils of vital nutrients over time, pushing forest systems to ecological limits.

"Old-growth tropical forests that have been the same for millions of years are now changing irreversible due to repeated logging," said first author Dr. Tom Swinfield in a press release from the University of Cambridge.

Old-growth forests, however, sidestep this issue through natural ecological processes - through decomposition

and uptake by roots, nutrients are continually cycled. Essentially, when a tree falls in the forest, it rots and releases its nutrients back into the top levels of soil. These nutrients are eventually absorbed by other trees

Unfortunately, logging not only prevents the natural cycles of tree fall, decomposition and nutrient release; logging also exports large quantities of phosphorus (trees) out of forests, reducing access to this critical nutrient, Swinfield explained. And as logged forests increase, the differences between old and new forests become more pronounced."

How Does Deforestation Affect Animals?

Published by Greentumble, July 18, 2018

<https://greentumble.com/how-does-deforestation-affect-animals/>

Excerpt:

"Effects of deforestation on animals

1-Habitat Loss

Deforestation can lead to a direct loss of wildlife habitat as well as a general degradation of their habitat.

The removal of trees and other types of vegetation reduces available food, shelter, and breeding habitat. Wildlife habitats become fragmented, where native species must live on remaining habitat islands that are surrounded by disturbed land that is being used for agriculture and other uses.

Habitat fragments may be too small to maintain viable populations of animals, and an animal living in one population may no longer be able to freely breed with individuals in other populations. Animals may not be able to find adequate shelter, water, and food to survive within remaining habitat.

Animals may also encounter dangerous situations such as increased human-wildlife conflicts and being hit by vehicles when they attempt to migrate between habitat fragments.

With increased habitat edge, wildlife may experience an increased vulnerability to predation, poaching, wind, sunlight, invasion of exotic plant and animal species into remaining forest habitat, and other factors such as direct exposure to natural disasters that were not as much of a threat prior to the deforestation event.

Some animal species are entirely dependent upon old growth forest habitat, such as the Northern Spotted Owl in the Western United States, and cannot survive in secondary forest habitat. This means that in places where is any deforestation happening, these species cannot thrive and will gradually disappear"

Getting it Right: Environmentalism for the 21st Century

By Patrick Moore Ph.D.

Published online by Berkely Rausser, College of Natural Resources, October 01, 1999

<https://nature.berkeley.edu/events/2017/06/getting-it-right-environmentalism-21st-century>

Excerpt:

"This gives rise to the obvious concern that if the trees are cut down the habitats or homes will be lost and the species that live in them will die. Indeed, in 1996 the World Wildlife Fund, at a media conference in Geneva, announced that 50,000 species are going extinct each year due to human activity. And the main cause of these 50,000 extinctions, they said, is commercial logging. The story was carried around the world by Associated Press and other media and hundreds of millions of people came to believe that forestry is the main cause of species

extinction."

Thinning Nuance

By George Wuerthner

Published online by the Wildlife News, July 6, 2021

<http://www.thewildlifenews.com/2021/07/06/36536/>

Excerpts:

"One frequently hears from proponents of thinning that active forest management can reduce fire intensity and thus is a beneficial policy to reduce large blazes. However, most of the scientific support for thinning is based on modeling of fuel loading, not real-life experiences. For instance, a recent LTE in the Missoulian made such a claim. The amount of fuel is often the least important factor in fire spread.

First, what drives large fires is drought, low humidity, high temperatures, and lastly, and most importantly is wind. Wind's effect on wildfire spread is not linear but exponential. A 20 mph wind does not double fire spread over a 10 mph wind but quadruples it. One can imagine how rapidly a blaze spreads when winds are blowing 50-70 mph, as often is the case when large acreages burn.

Now imagine what happens when a forest stand is thinned. The forest is opened up to greater wind penetration, and the wind is the most crucial factor in wildfire spread. Thinning also results in more fine fuels on the ground that will carry a fire. And opening up the canopy allows greater solar penetration meaning fuels and soils dry out quicker."

2. Logging is a source of great harm for forest ecosystems

Published by Population Education, September 29, 2021

<https://populationeducation.org/six-leading-causes-of-habitat-destruction/>

Excerpts:

"Harvesting timber is another primary driver of global forest loss. Because of demand for wood and paper products, approximately 30% of the world's tree species are facing the possibility of extinction. Selective logging entails removing highly valued trees, and clearcut logging knocks down entire forests. Both of these practices destroy habitats, as even the removal of one tree creates residual damage for dozens of trees left behind.

Logging's damage to the forest environment is extensive. Trees naturally absorb water and provide nutrients to soil, so when they're cut down, soil erodes. Decreases in tree cover also alter levels of light penetration, creating new ecological conditions which cannot support the same variety of species. The roads built for logging change sediment patterns in streams. And removing trees that would naturally fall into streams destroys thermal cover and degrades aquatic ecosystems. Lessening such harm calls for balance between the demands of the logging industry and the need to preserve forest health."

Hunter's View: Modern timber harvesting is erasing wildlife habitat

Published online by Duluth News Tribune, 2022

<https://www.duluthnewstribune.com/opinion/4537108-hunters-view-modern-timber-harvesting-erasing-wildlife-habitat>

Excerpt:

"There seems to be no evidence to explain the low grouse numbers and struggling deer population other than the destruction of habitat and the forest monoculture left in the wake of modern timber harvesting. Diversity is being

upended. Stated more accurately, it is being erased.

Come to the George Washington State Forest and walk with me, and you'll see areas where you can look for miles over the rubble of timber harvests.

No habitat, no diversity, no wildlife: that's my theory."

Scientists Oppose Western Logging Bills in Congress

Published online by Iowa PBS, Nov 8, 2013

<https://www.iowapbs.org/mtom/story/12178/scientists-oppose-logging-bills-congress>

Excerpt:

"More than 200 biologists, ecologists and other scientists are urging Congress to defeat legislation they say would destroy critical wildlife habitat by setting aside U.S. environmental laws to speed logging of burned trees at Yosemite National Park and other national forests and wilderness areas across the West.

The experts say two measures pushed by pro-logging interests ignore a growing scientific consensus that the burned landscape plays a critical role in forest regeneration and is home to many birds, bats and other species found nowhere else.

"We urge you to consider what the science is telling us: that post-fire habitat created by fire, including patches of severe fire, are ecological treasures rather than ecological catastrophes, and that post-fire logging does far more harm than good to the nation's public lands," they wrote in a letter mailed to members of Congress Friday."

Industrial Logging in the Sierra Nevada

Published online by the Sierra Forest Legacy, 2008

https://www.sierraforestlegacy.org/FC_FireForestEcology/FFE_IndustrialForestlands.php

Excerpt:

"In 2007, the California Department of Fish and Game completed the California Wildlife Action Plan, which specifically identified logging impacts as a threat to the survival of wildlife in our region's forests. The WAP identified several remedies, including:

*Using the best-available science, forest and wildlife managers should determine the extent, pattern, and pace for timber-harvest in a forest watershed or cluster of watersheds.

*Ecologically based standards or limits should be set for timber-harvest. State and federal forest managers should coordinate to ensure that cumulative effects of timber-harvest plans for public and private lands meet the standards for each watershed.

*Banning clearcutting in favor of intermediate harvest styles which still allow for timber production and profits without environmental devastation.

*Limiting the amount of clearcutting that can be conducted in any watershed.

*Creating buffers along all streams that will be free from any logging activity, and increasing the number of large trees that are protected on industrial forestlands.

*Set sustainable limits for logging within a single watershed.

*Limiting the use of herbicides that persist in soils, contaminate streams, and threaten the survival of aquatic species such as fish and amphibians."

Excessive damage to residual trees during a timber harvest can negate the intended benefits of forest improvement operations.

Proceedings of Residual Stand Damage Workshop. UNH Cooperative Extension, March 11, 2010
<https://extension.unh.edu/goodforestry/html/5-4.htm>

Excerpt:

"Activities associated with felling, winching, and skidding can damage 20 to 40 percent of the residual trees (trees left behind).

Young trees may be bent or broken during felling or crushed by harvesting equipment. Branches and tops of residual trees may be broken during felling, reducing crown area and eventually tree vigor. Valuable lower trunks of larger trees may be wounded, allowing entry of fungi or insects that cause wood discoloration and decay. Injuries resulting in exposed sapwood wounds of 100 square inches or greater are likely to develop decay. Approximately 80 percent of skidding injuries are from bark scraped from the butt log of residual trees.

Skidding can cause root damage, allowing entry of rot-causing microorganisms. Repeated passes of heavy equipment over certain types of soils, especially during wet conditions, can compact soil air spaces, impeding root growth. Most healthy forest soils maintain about 50 percent solids, 25 percent air space and 25 percent water by volume. When these ratios change through compaction, roots are damaged and their growth restricted, erosion and run-off increase due to decreased permeability, and changes in soil temperature and microbial action disrupt soil nutrient cycling.

Logging may also combine with other stress factors to make individual trees (and eventually entire stands) more susceptible to dieback. Poor vigor invites attacks by insect pests and diseases. Also, though a stand may not be physically damaged, removing trees may reduce the stand's ability to withstand wind."

Soil and Root Damage in Forestry

By Iwan Wasterlund

Published by Elsevier, 26 August 2020

<https://www.readonbooks.net/pdf/soil-and-root-damage-in-forestry/>

Excerpt:

"Agroforestry has significantly impacted our forests, but an often-overlooked issue is the effect of harvesting on soils and root systems. Soil and Root Damage in Forestry explains how soil and roots might be damaged through logging activities or silvicultural activities, how resulting root diseases impact the root and soil systems, and the impacts of chemical applications on the soil and root system. This book goes beyond the 'why' to also provide methods to reduce the impacts of machines on soils and offers solutions to minimize the impacts of machines on soils. Soil and Root Damage in Forestry serves as a valuable resource not only for those already working in soil science and forest ecology, but also provides insights for advanced students seeking an entrance to the "hidden half" of the planet. Combines damages to soil and roots in one volume for the first time Includes calculations related to soil strength providing soil scientists and ecologists with methods to estimate root damage Provides suggestions on how to reduce the impact of harvesting on soil and root systems."

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200 scientists sign letter against logging national forests
By John Myers, Duluth News Tribune Staff Writer
Published by Duluth News Tribune, April 16 2002
<https://www.iatp.org/news/200-scientists-sign-letter-against-logging-national-forests>

Excerpts:

"More than 200 scientists, including several from Minnesota and Wisconsin, have signed a letter to President Bush urging him to stop all commercial logging in national forests.

The scientists are asking Bush to set aside national forests as areas where habitat can be restored for diverse plant and animal species and for recreation.

"Without protection from further logging, the biological diversity we so greatly need could be lost," the letter states. "Mr. President, we urge you to end the destructive practice of commercial logging in the national forests and to begin a scientifically based program to restore habitat and native species."

The scientists' letter will be unveiled in a national campaign today by the Sierra Club, which has for years called for an end to commercial logging in national forests. The campaign also supports a bill in Congress to end commercial logging on federal lands.

Nancy Butler, professor of aquatic biology at Gustavus Adolphus College in St. Peter, Minn., said she signed the letter because of logging impacts she's documented.

"I've done research in logged areas... that suggests that, even with the best management guidelines we have now (for logging), it's not enough. Logging is detrimental to aquatic ecosystems, both locally and on a larger scale," Butler said.

While she fully expects her action to be labeled political, Butler said it's important for scientists to support what their efforts have revealed.

"This isn't about Bush or about politics, this is about good science," she said.

The letter is not likely to be endorsed by the Bush administration, which has generally moved to maintain or increase logging on federal lands.

U.S. Forest Service spokesman Joe Walsh in Washington, D.C., said he wouldn't comment on the letter until he'd seen it. "We'll comment when we're sure they've actually sent a letter to the president," Walsh said. "And we want to see first who these scientists are."

Here are more reasons why you should never turn industrial equipment loose in a fragile forest. Please read Opposing Views Attachment #1

Only those with Ph.D.s in a biological science have the education to declare the quotes in Opposing Views Attachment #1 to be incorrect. Understand the USFS keeps this type of information from its employees so as not to let it interfere with the agency's timber agenda. Competent, intelligent members of the IDT will set up a meeting with you to discuss why USFS treatments are often inconsistent with independently authored science. You will not agree to meet because your reason for this sale is to generate volume.

Comment #1 for which I'd like a meaningful response in the Response to Comments section in the pending NEPA document: I have provided you with a letter signed by 200 scientists with Ph.D.'s who are experts in their fields who agree:

"Without protection from further logging, the biological diversity we so greatly need could be lost"

"even with the best management guidelines we have now (for logging), it's not enough. Logging is detrimental to aquatic ecosystems, both locally and on a larger scale"

"national forests are more valuable as areas for recreation and wildlife habitat and as generators of clean water"

"Not only have taxpayers had to subsidize logging, but the environmental costs have been devastating,"

Will you drop the Jellico timber sale? If not why not? Selling this timber sale indicates to me you believe generating volume is more important than 1) maintaining real biodiversity, 2) healthy aquatic ecosystems, 3) providing recreation opportunities and 4) fully functioning wildlife habitat. Please show the public you are willing to break-ranks with other agency line-officers to maintain forest health.

Experts Understand Removing

Merchantable Logs to Lessen Fire Behavior
is Absurd and Nonsensical.

More Logging Won't Stop Wildfires

By Chad Hanson Ph.D. and Dominick DellaSala Ph.D.

Published in the New York Times on July 23, 2015

http://www.nytimes.com/2015/07/23/opinion/more-logging-wont-stop-wildfires.html?_r=0

Excerpt:

"In the case of the Rim Fire, our research found that protected forest areas with no history of logging burned least intensely. There was a similar pattern in other large fires in recent years. Logging removes the mature, thick-barked, fire-resistant trees. The small trees planted in their place and the debris left behind by loggers act as kindling; in effect, the logged areas become combustible tree plantations that are poor wildlife habitat."

Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western United States?

By Curt Bradley Ph.D., Chad Hanson Ph.D. and Dr. Dominick Della Sala Ph.D.

Published in Ecosphere October 26, 2016

<http://onlinelibrary.wiley.com/doi/10.1002/ecs2.1492/full>

Excerpt:

"We investigated the relationship between protected status and fire severity using the Random Forests algorithm applied to 1500 fires affecting 9.5 million hectares between 1984 and 2014 in pine (*Pinus ponderosa*, *Pinus jeffreyi*) and mixed-conifer forests of western United States, accounting for key topographic and climate variables. We found forests with higher levels of protection had lower severity values even though they are generally identified as having the highest overall levels of biomass and fuel loading. Our results suggest a need to reconsider current overly simplistic assumptions about the relationship between forest protection and fire severity in fire management and policy."

Fanning the Flames! The U.S. Forest Service: A Fire-Dependent Bureaucracy

By Timothy Ingalsbee Ph.D.

Published in the Missoula Independent. Vol. 14 No. 24, June 2003

<http://www.klamathforestalliance.org/Documents/fanningtheflames.html>

Excerpts:

"In the face of growing public scrutiny and criticism of the agency's logging policies and practices, the Forest Service and their enablers in Congress have learned to mask timber sales as so-called 'fuels reduction' and 'forest restoration' projects. Yet, the net effect of these logging projects is to actually increase fire risks and fuel hazards."

"Decades of encouraging private logging companies to take the biggest, oldest, most fire-resistant trees from public lands, while leaving behind a volatile fuel load of small trees, brush, weeds, stumps and slash has vastly increased the flammability of forestlands."

"In addition to post-fire salvage logging, the Forest Service and timber industry advocates in Congress have been pushing pre-fire timber sales, often falsely billed as hazardous fuels reduction or 'thinning' projects, to lower the risk or hazard of future wildfires. In too many cases, these so-called thinning projects are logging thick-diameter fire-resistant overstory trees instead of or in addition to cutting thin-sized fire-susceptible understory trees. The

resulting logging slash and the increased solar and wind exposure can paradoxically increase the fuel hazards and fire risks."

A USFS scientist comments on logging and fire behavior

By Tom Kuglin, writing about Dr. Mark Finney's research

Mark Finney, Ph.D., a research forester with the U.S. Forest Service Fire Lab in Missoula.

Published in the Helena Independent Record newspaper, June 17, 2015

http://helenair.com/news/local/researcher-finds-need-for-more-prescribed-burning/article_4a58c3c3-a7bb-5905-a505-4567e8107600.html

Excerpts:

"Finney presented his research on fire behavior in landscapes of varying levels of logging and prescribed burning at last week's "Fire on the Landscape" lecture series in Helena. While logging or thinning is often touted as a means to mitigate fire, he has found it does little to stop a wildfire."

"There's a confusion that if you do timber management you're doing fuel management -- you're not," Finney said. "We're not going to cut our way out of the problem, but there are ways to do this strategically, get the benefits and have a sustainable fire management approach."

"Finney found that fire "ripped through logged areas," and only units where prescribed fire was introduced showed effectiveness in stopping or mitigating wildfire spread."

Logging without Limits isn't a Solution to Wildfires

By Timothy Ingalsbee Ph.D.

Published in the Portland Oregonian, August 6, 2002

<http://www.klamathforestalliance.org/Documents/loggingwithoutlimits.html>

Excerpt:

"Since the 'New Perspectives' program of the early 1990s, the agency has tried to dodge public opposition to commercial logging by using various euphemisms, such as this gem from the Siskiyou National Forest: Clearcuts are called 'minimum green tree retention units.' Accordingly, Forest Service managers have believed that if they simply refer to logging as 'thinning,' or add the phrases 'fuels reduction' or 'forest restoration' to the title of their timber sale plans, then the public will accept these projects at face value, and business-as-usual commercial logging can proceed. In the face of multiple scandals and widespread public skepticism of the Forest Service's credibility, it seems that only Congress is buying the agency's labeling scheme."

Thinning not enough to prevent wildfires

By Alex Syphard, Ph.D.

Published by Conservation Biology Institute, September 11, 2019

<https://consbio.org/newsroom/news/forest-thinning-wont-stop-cas-fires>

Excerpt:

"Time and time again in my research, I find that fuel is one of the least important factors when it comes to protecting the home."

A Cohesive Strategy is Needed to Address Catastrophic Wildfire Threats

By Barry T. Hill, Associate Director, Energy Resources, and Science Issues

GAO/RCED-99-65 Catastrophic Wildfire Threats, April 2, 1999

<https://www.gao.gov/assets/rced-99-65.pdf>

Excerpt:

"Most of the trees that should be removed to reduce accumulated fuels are small in diameter and have little or no commercial value." (pg 44)

Comment #2 for which I'd like a meaningful response in the Response to Comments section in the pending NEPA document: I have presented you with literature written by experts who all agree logging does not affect fires. Please list the science you depend on in the References section of the pending NEPA document that's not authored by biased USFS employee that says logging does decrease intensity and rate of spread. If you won't or can't you know what that means.

Please do not include References authored by biased USFS employees for obvious reasons.

This should be enough science to convince most intelligent, unbiased people logging will not reduce fire effects. If you need more, please see Opposing Views Attachment #3.

Caring, Honest IDT Members are Never Afraid to
Interact with the Responsible Official before they
make their Decision.

Before I retired from the USFS I worked with honest IDT resource specialists who were not afraid to describe the tragic effects of implementing the timber sale Proposed Action in Chapter 3 of the DEIS or Pre-decisional EA. Most of them knew allowing machinery weighing 42,400 pounds with spinning wheels and tracks to operate on the fragile forest floor would eliminate the proper functioning of some important resource in and downstream from the sale area.

They knew their effort to disclose the predicted environmental effects was a waste of their time because the Responsible Official would routinely ignore this information and choose to implement the Proposed Action with no concern about the resource damage that will result. This happens too often. The IDT members knew why. They knew the Responsible Official must always comply with the 3 requirements below or be reprimanded and lose their promotion opportunities.

- *meet or exceed their supervisor's volume expectations,
- *spend every penny of their NTFM budget in the same FY they received it, and
- *provide profit opportunities for the local resource extraction corporation that might purchase the timber sale.

These honest, caring IDT resource specialists knew it was worthwhile to try to convince the line-officer to drop or significantly modify the sale because the other resource damage would be worse than unacceptable. Sometimes they were successful.

Ranger Reed, please serve the people who recreate in the Daniel Boone National Forest. You know most of them avoid logged areas. Please see Opposing Views Attachments #3 and #21. Your proposed actions indicate you are clueless about how the sale will affect recreation that occurs on the Stearns Ranger District. Your recreation specialist on the IDT should have insisted you change your plans.

Who are you Ranger Reed? We provide the money for your salary yet you choose to reject our wishes as you reward your corporate masters. Is it worth it?

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 a pariah. Please find other employment where you will not have the opportunity to violate, abuse and assault most Americans on a weekly basis.

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

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

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.

Please face the reality that the USFS has manipulated your minds. You were conditioned to reject science authored by independent scientists not affiliated with the USFS and instead embrace USFS "treatments" from your first day on the job. You swallowed the disinformation whole without thinking. Please read the science in Opposing Views Attachments #1, #3, #4, and #21. Ask yourself why the USFS rejects it.

Best Science

The USFS tells people their projects are grounded in "best science." I present you with "best science" in Opposing Views Attachment #1, #3, #8, and #20. Once again, it's clear your minds have been programmed 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. We don't deserve this treatment so you can advance up the promotion ladder.

Comment Requirements
Project Name Calloway project
Responsible Official and Title Ranger Darren Cross
District & Forest where it will be implemented McKenzie River Ranger District, Willamette National Forest

When I read your Dear Friends and Neighbors of the Willamette National Forest, letter it was clear you and your IDT members haven't yet grasped the basics of how ground disturbing actions in the forest adversely affect the countless natural resources there.

I'm sorry for you all.

After reading this far the IDT members are saying to themselves:

"They pay me a generous salary to help plan timber sales and I'm good at what I do. Who is this guy?"

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 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." Duh.

After reading your Calloway timber sale scoping letter I do not know whether to laugh or cry.

It's time for you all to crawl out of the safety of your USFS box and be professionals.

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.

You are all thinking:

"Oh well. Why create waves? I'll just do as I am told and assume I'm wrong thinking the USFS spends the public's money on projects that are consistent with its timber agenda and culture."

The Good News

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

The USFS uses 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.

Read more at:

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

For years, your IDT work made it possible to claim timber sales "restore" the forest back to health. Incredibly, several of these sales had the word "restoration" in the sale name. What does this tell you about your agency?

There are a few 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 kids 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 all done. You have been aware that 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 tragic situations like this 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.

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 the IDT members to face reality. Those of you who will 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. He wants a good reason to select the scoping Proposed Action. How? You know you must describe the No Action alternative effects as a tragic ... and describe little or no adverse effects inflicted by the Proposed Action to your resource. The USFS expects you all to lie to be team players.

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.

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 needs to treat with commercial timber sales. Rangers know they must spend every penny of NFTM dollars each fiscal year. Here is the scheme: The silviculturists find the wood and conjure up a believable Purpose and Need to justify cutting down a healthy forest.

Comment #3 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 foresters go to the field looking for high volume stands that will be easy to access and inexpensive to harvest, and they declare the trees unhealthy and prescribe logging to cure the alleged problem.

At the end of the year the RO is happy the healthy trees have been removed and hauled to the mill.

Your Hypocrisy is Unprecedented

Someday the kids of Oregon 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 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. The public won't find out some resource specialists will write anything so as not to jeopardize their high-paying jobs. Incredibly, some members of the public still trust you people.

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. You can view one that needs work yourself in the Temp Rd Photos attachment.

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

Independent Science

Ranger Cross, please let independent science guide you. I have attached some. These experts all agree that commercial logging restores nothing and creates an unhealthy forest where too many important natural resources do not function properly. Why does your agency do what the experts recommend not doing? Of course this is a rhetorical question.

The truth is you people have been so programmed and indoctrinated you are no longer able to think independently. When your supervisor tells you what to do next, most of you never ask yourself if it's 1) the right thing to do, and 2) do most members of the public want this done. Why???? You already know the answers. What would you call your behavior?

After reading my scoping comments most IDT members are laughing that a member of the public who really thinks his comments might influence USFS line-officers when they have already made up their minds what they will do. NEPA requires the USFS to ask the public for their comments. The Act also requires the Responsible Official to "consider" the comments. Of course nobody can prove if they were considered or not. Since January 1, 1970, the USFS has learned many ways to circumvent and dodge some of the most important parts of the Act. They are expert lawbreakers.

Before I retired I remember watching a Ranger laugh hysterically as she ripped up the comments she had received on a proposed timber sale.

As I said before I don't expect these comments to change a thing. So why am I writing them? I'm rubbing your noses in it. I'm showing how unprofessional, naive and clueless you all are to believe your work is valued and makes a difference. The USFS needs your names and specialties to prove the development of the NEPA document was an interdisciplinary effort and ignores what you write.

Ranger Cross, the owners of the Willamette National Forest must become aware of your corporate-friendly goals.

My letters to the editor in the Portland Oregon, Eugene Register Guard and Salem Statesman Journal will inform them. I hope it generates more public outrage than you can handle.

Ranger Cross, you won't be happy when hundreds of people contact you asking "why."

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 Willamette 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 insist you use mitigation that will assure there will be no harm to their resource ... even short term. If you don't, I'm certain you will be invited to Federal District Court where you will try and fail to justify this needless proposal to a judge.

Your IDT members are tired of being timber sale enablers!

Sincerely,