

Data Submitted (UTC 11): 3/13/2026 7:00:00 AM

First name: Dick

Last name: Artley

Organization:

Title:

Comments: March 13, 2026

Dear Mr. Piehl,

I am sending these comments to you first because your SOPA indicates you are the contact for the North Slope Vegetation Management Project and your e-mail address appears to be valid.

Please forward these comments to your leadership team and NEPA/fuels specialists. The Ranger(s) who have projects that will remove fuels (shown in your SOPA) have ignored the science I show below. I hope some of the Rangers are smart enough to learn from this fuels science and act accordingly.

The NEPA and fire specialists who work on the Ochoco National Forest have failed. It's difficult for me to express my disappointment in words. I have read the childish SOPA for your forest and am quite concerned.

I remember it well. Several years before my retirement from the USFS it became clear that most USFS employees (at all levels) were conservative Republicans. Most of them believed the science of forest ecosystem restoration was a joke. They preferred to take action according to the rules composed by the timber industry. They let their politics spill over into their project decisions. The politics have not changed.

Especially important text is highlighted in RED.

The agency leader's stress best science must form the basis for all public land treatments. Please modify your project so it does not include actions that conflict with best science quoted in Attachments #1, #4 and #3.

Your NEPA document References include literature that support your project. The vast majority of authors are employed by the USDA which makes the References biased. This means your proposed timber sale is a carbon copy of past timber sales that inflicted major damage to many forest resources[hellip]to the point they stopped functioning properly.

Please forget volume and do not implement this timber sale. The public wants their tax dollars spent wisely not on resource damage caused by a timber sale that you know would cause such damage. Please read attachment #1. Do your employees have Ph.D.s?

Please serve the public rather than yourself and the timber industry.

The following people provided statements affirming the need for the USFS to ground their projects in best science.

USDA Secretary Dan Glickman,

a 9th Circuit judge,

5 USFS Chiefs, 1 USFS and

2 USFS Associate Chiefs

1 USFS Deputy Chief

7 USFS scientists

USFS must use Best Science Quote #1 - "Our challenge is to protect all the different uses of our forests which well-kept roads undoubtedly serve while protecting these remaining untouched places. This is a long and delicate process. It will not happen overnight. We must rely on the best science and broad-based public participation. But in the interim, I am prepared to authorize an 18-month moratorium on the construction of new roads in the last pristine areas of our national forests."

By Agriculture Secretary Dan Glickman

From an Announcement of Interim Ban on Forest Road Construction

Washington, D.C., February 11, 1999

<http://www.ibiblio.org/london/permaculture/permaculture-list-archives-1999-2002/msg04621.html>

USFS must use Best Science Quote #2 - "The agency has been able to face changing and challenging times and incorporate new information based on science."

"I am very much involved in trying to integrate the science and the management sides of the Forest Service. It's very, very important that we conduct that integration, because our management decisions are scientifically based, and there is an ever increasing need for more scientific information."

Excerpts from an interview with Hilda Diaz-Soltero

Associate Chief for Natural Resources, USDA Forest Service

Women in Natural Resources, Vol. 21, No. 3

August 2000

<http://www.fs.fed.us/publications/2000/00nov02-Hilda-Diaz-Soltero-Interview.pdf>

USFS must use Best Science Quote #3 - "Forest Service managers strive to use the best science available in their decision making."

By Dr. Ann Bartuska, Deputy Chief for Research and Development, USDA Forest Service

Excerpt from testimony before the House Resources Forest and Forest Health Subcommittee

July 15, 2004

<http://www.fs.fed.us/congress/108/house/oversight/bartuska/071504.html>

USFS must use Best Science Quote #4 - "We are committed to accomplishing the aggressive treatments planned in the President's Budget for FY 2005 using new authorities in the Healthy Forests Restoration Act that improve the condition class of the nation's watersheds and thus protect communities and resources for future generations, and our Research Station directors are committed to providing the Forest Service with the best science available."

Dale Bosworth Chief, USDA Forest Service

Excerpt from a statement before the Committee on Energy and Natural Resources United States Senate

March 3, 2004

<http://www.pirate4x4.com/forum/land-use-issues/232684-statement-dale-n-bosworth-chief-usda-forest-service.html>

USFS must use Best Science Quote #5 - "Our direction will address these emerging issues to ensure it is based on the available best science."

Sally Collins Associate Chief USDA Forest Service

Excerpt from testimony before the Committee on Energy and Natural Resources, United States Senate

July 11, 2006

<http://www.fs.fed.us/congress/109/senate/oversight/collins/071106.html>

USFS must use Best Science Quote #6 - "The American people have come to expect us to use the best science, and we ought to use the best science." (pg.4)

Dale N. Bosworth Chief USDA Forest Service

Excerpt from a speech on Sustainable Management of the National Forests,

at the Andrus Center for Public Policy, Boise State University

December 12, 2001

http://www.andruscenter.org/images/transcripts/Sustainable_transcript.pdf

USFS must use Best Science Quote #7 - "Always use the best science. Science can't decide for us, but it can

help us understand the consequences of our decisions. Forest Service Research and others in academia can deliver some of the best science and technical resources to help inform how these special areas should be managed for the long term."

Sally Collins Associate Chief USDA Forest Service

Excerpt from a speech to the Land Trust Alliance Rally "Protecting Open Spaces: Partners in a Common Cause"

October 31, 2004

<http://www.fs.fed.us/news/2004/speeches/10/open-spaces.shtml>

USFS must use Best Science Quote #8 - "The new rule directs forest managers to use the best science available to protect species at a landscape level. The emphasis is to preserve ecosystems as a whole."

Statement by Heidi Valetkevitch

National Media Officer USDA Forest Service

to Joe Bauman, reporter for the Deseret Morning News

December 24, 2004

<http://www.deseretnews.com/article/600100084/New-forest-rules-focus-on-holistic-approach.html>

USFS must use Best Science Quote #9 - "The Forest Service must be a leader in using the best science and the best managers to accomplish what I think is one of the noblest, most important callings of our generation bringing people together and helping them find ways to live within the limits of the land." (Pg. 30)

Statement by Chief Dr. Mike Dombeck

"Forest Chief Shifts focus to clean water"

April 1998 TRANSITIONS

<http://www.waterplanet.ws/transitions/tr9804/>

USFS must use Best Science Quote #10 - "We have made great progress under New Perspectives to get land managers and scientists working together as a team in doing the best job possible. Let's keep it up and make sure our decisions reflect the best science and close the gap between the level of scientific knowledge and its application in our day-to-day management."

Chief F. Dale Robertson

From FIVE YEAR REVIEW - B-3 # #, 1992

http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsbdev3_053856.pdf

USFS must use Best Science Quote #11 - "We have some of the best science, and we need to make sure we're applying that, using that and sharing that as we move forward. I think we have a key leadership role, not only in the application of science but to help inform and educate our community and the folks we work with."

Statement by USFS Chief Tom Tidwell

From an interview with Rob Chaney of the Missoulian, June 19, 2009

<http://westinstenv.org/sosf/2009/06/19/tidwell-interviewed-by-the-missoulian/>

USFS must use Best Science Quote #12 - "Since that time, they have consulted with a wide array of scientists in the Forest Service, other agencies, universities, and consultants, with the aim of arriving at a consensus on the best science available to address this issue."

Potyondy, John P. 2007 "The Evolution of Channel Maintenance Science in the Forest Service"

Mr. Potyondy is the WO Watershed, Fish, Wildlife, Air, and Rare Plants Staff

<http://www.stream.fs.fed.us/afsc/pdfs/Potyondy.pdf>

USFS must use Best Science Quote #13 - "The FS manages the National Forest System's natural resources with a commitment to long term ecosystem sustainability, multiple use, local community involvement and economic stability, interaction of social and cultural values with forest resource management, and the use of management practices based on the best science available."

By Melle, Ann R.

The U.S. Forest Service Approach to Forest Law Enforcement"

A presentation to the East Asia Ministerial Conference, September 12, 2001

Ms. Melle is the Asst. Director of Law Enforcement and Investigations, USDS Forest Service

<http://www.for.gov.bc.ca/hfd/library/documents/bib49682.pdf>

USFS must use Best Science Quote #14 - " "The responsible policy maker ought to seek out the best science, because ultimately that will yield the best result." . "

"To put things in perspective, Dombeck says, "Science should not be the only driver of policy; there are economic, social and political concerns, but ... scientists can provide information that informs policymaking; 'If we

adopt this policy, this will be the outcome,' and that certainly does not appear to be happening." "

Statements by retired Chief Dr. Mike Dombeck

"Politics vs. Science," October 19, 2006

Published by the University of Wisconsin, Board of Regents.

http://whyfiles.org/247sci_politics/index.php?g=5.txt

USFS must use Best Science Quote #15 - "Carefully done science can provide common ground for agreement among different stakeholders, enabling communities to unify."

"The best science available tells us that at some point we must reinstall this missing ecosystem process so the natural machinery functions properly again." (pg. 9)

By Kaufmann, Merrill R. 2005

Good Fire,Bad Fire

Mr. Kaufmann is the Rocky Mountain Research Station's team leader for ecosystem management

Fort Collins, CO, USDA Forest Service

http://csfs.colostate.edu/pdfs/Good_Fire_Bad_Fire.pdf

USFS must use Best Science Quote #16 - "The general objective of this Symposium was to build on the best science and technology available to assure that the data and information produced in future inventory and monitoring programs are comparable, quality assured, available, and adequate for their intended purposes, thereby providing a reliable framework for characterization, assessment, and management of forest ecosystems in North America."

By Bravo, Aguirre Celedonio and Carlos Rodriguez Franco, compilers

1999.

North American Science Symposium: Toward a Unified, Framework for Inventorying and Monitoring Forest Ecosystem Resources.

Guadalajara, Mexico (November 2-6,1998). Proceedings RMRS-P-12. U.S.

Department of Agriculture, Forest Service, Rocky Mountain Research Station

http://cwt33.ecology.uga.edu/publications/pubs_martha_new_01282003/Batch_2_@300dpi/PDF/1389.pdf

USFS must use Best Science Quote #17 - "Accordingly, we find that the Final EIS fails to disclose and discuss responsible opposing scientific viewpoints in the final statement itself in violation of NEPA and the implementing regulations. We therefore reverse the district court's grant of summary judgment and remand to the district court with directions that it remand the final statement to the Forest Service for further proceedings consistent with this opinion. See *Vitarelli v. Seaton*, 359 U.S. 535, 545, 79 S.Ct. 968, 3 L.Ed.2d 1012 (1959) (standing for the well-established principle that an agency is generally required to follow its regulations); see also *Cal. v. Block*, 690 F.2d at 769 ("Agencies are [middot] obliged to adhere to the procedures mandated by NEPA.") (citing *Vt. Yankee Nuclear Power Corp. v. Natural Res. Def. Council, Inc.*, 435 U.S. 519, 549 n. 21, 98 S.Ct. 1197, 55 L.Ed.2d 460 (1978)).

REVERSED AND REMANDED."

CENTER FOR BIOLOGICAL DIVERSITY vs. UNITED STATES FOREST SERVICE

Argued and Submitted July 15, 2003. -- November 18, 2003

Before: KLEINFELD, WARDLAW, Circuit Judges, and POGUE, Judge.

In the United States Court of Appeals,Ninth Circuit

<http://caselaw.findlaw.com/us-9th-circuit/1173711.html>

USFS must use Best Science Quote #18 "Interagency wildland fire policy directs manager to apply "best available science" to management plans and activities. But what does "best available science" mean? With a vague definition of this concept and few guidelines for delivering or integrating science into management, it can be difficult for scientists to effectively provide managers with the science they need. As a result, valuable information and tools can go unused. To better understand the factors influencing research use, principal investigator Vita Wright conducted a literature review, agency meetings, in-depth interviews, and a survey of approximately 500 fire and fuels specialists and decision makers. Her study was based on social science theory, including the Diffusion of Innovations theory, which notes that there is a time lag between the introduction of a new idea and its full acceptance and adoption. By investigating social science theory and gathering perspectives from the fire management community, Wright explored the following factors that can support, or impede, research use: individual beliefs and attitudes, education and work backgrounds, current position, and organizational culture. Based on her research, Wright was able to provide tangible recommendations aimed at shortening the time to diffusion by improving the delivery, communication, and ultimately, the use of the best available scientific information."

Wright, Vita. 2010. Challenges to implementing "best available science". Fire Science Brief. 124: 1-6.

Challenges to implementing "best available science" | US Forest Service Research and Development

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USFS must use Best Science Quote #19 "As the Northern Research Station's Acting Director, I am proud of Station science and results that are both intriguing and meaningful. American forests face complex issues, but they are not new. Our work contributes to forest resiliency, watershed stewardship, and enhancing the broad spectrum of benefits people derive from forests. Our role extends beyond "doing" the science - the Northern

Research Station also works to deliver the research we produce in innovative and accessible ways.

It is my honor to present 25 research highlights, including six "Director's Choice" research highlights that deliver timely scientific knowledge and assist land managers laying the groundwork for the forests of tomorrow. These highlights are a sample of the pivotal and incredibly diverse scientific work being done at the Northern Research Station. From public participation in National Forest planning during the digital (and pandemic) age to restoration of fire-adapted ecosystems, mercury and sulfur pollution in the Great Lakes and decades of silviculture research, our 2022 Research Highlights showcase the skill, curiosity, and determination of Northern Research employees.

The Station serves a region that is both highly forested and highly populated. From Maine to Minnesota and from Missouri to Maryland, the Station produces research and science-based tools that respond to land managers' questions, spark scientific curiosity, and address ecological challenges of all kinds.

I am thankful for the many hands involved in producing these Highlights, including partners, so this notable science reaches extensive audiences and addresses the needs of National Forests for years to come."

By Steven McNulty, Acting Director Northern Research Station

2022 Research Highlights - Northern Research Station, USDA Forest Service

USFS must use Best Science Quote #20 - "Science that advances our understanding of the environmental, economic, and social implications of how climate change impacts forests and grasslands is essential for scientists, managers and policymakers. There is a wide range of existing science that needs to be translated into land management applications, tools and information. In addition, citizens knowledgeable about climate change and its impacts on ecosystems will be better prepared to participate in decisions and actions affecting their national forests and grasslands."

Abigail Kimbell Chief, USDA Forest Service

Statement BEFORE THE UNITED STATES HOUSE OF REPRESENTATIVES COMMITTEE ON NATURAL RESOURCES SUBCOMMITTEE ON NATIONAL PARKS, FORESTS, AND PUBLIC LANDS

March 3, 2009

STATEMENT OF

USFS must use Best Science Quote #21 - "The new rule directs forest managers to use the best science available to protect species at a landscape level. The emphasis is to preserve ecosystems as a whole."

Statement by Heidi Valetkevitch

National Media Officer USDA Forest Service

to Joe Bauman, reporter for the Deseret Morning News

December 24, 2004

USFS must use Best Science Quote #22 - "Our challenge is to protect all the different uses of our forests which well-kept roads undoubtedly serve while protecting these remaining untouched places. This is a long and delicate

process. It will not happen overnight. We must rely on the best science and broad-based public participation. But in the interim, I am prepared to authorize an 18-month moratorium on the construction of new roads in the last pristine areas of our national forests."

By Agriculture Secretary Dan Glickman

From an Announcement of Interim Ban on Forest Road Construction

Washington, D.C., February 11, 1999

USFS must use Best Science Quote #23 - "and make sure our decisions reflect the best science and close the gap between the level of scientific knowledge and its application in our day-to-day management."

Chief F. Dale Robertson

From FIVE YEAR REVIEW - B-3 # #, 1992

http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsbdev3_053856.pdf

USFS must use Best Science Quote #24 - "Our direction will address these emerging issues to ensure it is based on the available best science."

Sally Collins Associate Chief USDA Forest Service

Excerpt from testimony before the Committee on Energy and Natural Resources, United States Senate

July 11, 2006

USFS must use Best Science Quote #25 - "progress under New Perspectives to get land managers and scientists working together as a team in doing the best job possible. Let's keep it up and make sure our decisions reflect the best science and close the gap between the level of scientific knowledge and its application in our day-to-day management."

Chief F. Dale Robertson

From FIVE YEAR REVIEW - B-3 # #, 1992

http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsbdev3_053856.pdf

USFS must use Best Science Quote #26 "Interagency wildland fire policy directs manager to apply "best available science" to management plans and activities. But what does "best available science" mean? With a vague definition of this concept and few guidelines for delivering or integrating science into management, it can be difficult for scientists to effectively provide managers with the science they need. As a result, valuable information and tools can go unused. To better understand the factors influencing research use, principal investigator Vita Wright conducted a literature review, agency meetings, in-depth interviews, and a survey of approximately 500 fire and fuels specialists and decision makers. Her study was based on social science theory, including the Diffusion of Innovations theory, which notes that there is a time lag between the introduction of a new idea and its full acceptance and adoption. By investigating social science theory and gathering perspectives from the fire management community, Wright explored the following factors that can support, or impede, research use: individual beliefs and attitudes, education and work backgrounds, current position, and organizational culture. Based on her research, Wright was able to provide tangible recommendations aimed at

shortening the time to diffusion by improving the delivery, communication, and ultimately, the use of the best available scientific information."

Wright, Vita. 2010. Challenges to implementing "best available science". Fire Science Brief. 124: 1-6.

Challenges to implementing "best available science" | US Forest Service Research and Development

USFS must use Best Science Quote #27 - "The new rule directs forest managers to use the best science available to protect species at a landscape level. The emphasis is to preserve ecosystems as a whole."

Statement by Heidi Valetkevitch

National Media Officer USDA Forest Service

to Joe Bauman, reporter for the Deseret Morning News

December 24, 2004

USFS must use Best Science Quote #28 - "Our direction will address these emerging issues to ensure it is based on the available best science."

Sally Collins Associate Chief USDA Forest Service

Excerpt from testimony before the Committee on Energy and Natural Resources, United States Senate

July 11, 2006

Basing new projects on best science is now USFS policy. I will expect you to use each item of best science in the attachments and compare what it says to what you plan to do as part of your

I know the Responsible Official has no intention of changing any commercial logging projects to comply with best science as USFS policy requires. The easiest way to force the USFS to do the right thing is to write a letter to the editor explaining the situation [hellip] which I am doing. It will suggest members of the public write to the Responsible Official with their questions and concerns. Please see the Prineville Review to read my letter.

PS---A NEPA document must be written using best science. Rangers must understand they must never Categorically Exclude projects with obvious adverse effects. Most members of the public do not want human caused actions to cause adverse effects to the forest. The public wants to see 1) the effects of not taking action, 2) the resources that will or will not be affected, 3) a detailed explanation of the effects on major resources the public values for each action alternative [hellip] and more. The only way to assure these 3 effects related information is to forget a CE and write an EA.

Doing otherwise makes a mockery of the NEPA.

It's sad the public trusts the USFS will do what the public wants is gone. We know working to obtain timber volume is the most important thing a USFS line-officer can do to raise his/her chances of promotion.

The public wants to see 1) the effects of not taking action, 2) the resources that will or will not be affected, 3) a detailed explanation of the effects on major resources the public values for each action alternative [hellip] and more.

Attachment: Science Attachment 1: Commercial Timber Harvest Degrades Forest Health and Restores Nothing in a Forested Ecosystem Except the Purchaser's Financial Bottom Line.

Attachment: Science Attachment 3: Fuels Science

Attachment: Science Attachment 4: Roads Damage the Proper Ecological Functioning of the Natural resources in the Forest Especially (so called) temporary roads