Data Submitted (UTC 11): 4/15/2015 10:01:25 PM
First name: Dick
Last name: Artley
Organization:
Title:
Comments: Re: Grass Valley Fire Restoration Project

Thanks for the timely response Beth. Most of the time when I send these science attachments as part of my comments on a proposed timber sale to the USFS Responsible Official, they either hide and don't respond or attempt to convince me Ph.D.'s are over educated idiots and their TMA know the real world better.

I don't have the $$ to take court action when my objections are rejected (which happens 99% of the time) but I do regularly communicate with 2 environmental group reps. in R-1 and R-5. They retain full-time attorneys. Sometimes we work together if the env. group also submitted timely comments. It could all be solved if:

1) the USFS cared more about future generations of kids when our population doubles than it does about providing corporations with short-term profit. Then, forested, undeveloped public land which will be precious and priceless might still exist.

2) the USFS would write their Purpose & Need statements honestly. I see too many with ecosystem improvement goals to correct problems timber sales will exacerbate. I'm tired of seeing P&N that (as the last goal) say they need timber harvest to strengthen the local community. There are many versions of wording for this but its really an excuse to log. They never have an analysis of the ecomomic structure of the community and never name the community. In addition they forget the businesses that depend on recreation/tourism $$$ and that recreationists and tourists don't like logged areas.

3) the USFS would call a timber sale a timber sale. As you might know Chief Kimbell thought she could solve the ever increasing public feeling that they don't want their national forests logged. Kimbell replaced "timber sale" with "restoration project." Duh.

4) the USFS would stop wording their P&Ns to imitate what a private industrial tree farm manager would want. When they want vigorous, fast growing trees they wipe out the biodiversity. Healthy forests have many areas with dead and dying trees .... and they should remain.

5) the USFS would stop their war against climax tree species (GF, hemlock, spruce etc.). They say they want fire adapted species. Its no coincidence that the fire adapted species have a much higher lumber value than climax species. Once again we see pleasing corporations driving the management of our forests. Since I mentioned the term "management" I'd like the agency to stop using management and logging as "synonyms." Indeed, to a USFS line-officer an unmanaged area is an unlogged area.

Please enjoy this day and let Mother Nature restore herself after the fire which can only happen if humans stay out of the way. There is a reason fire comes from the sky during the summer when the temps are high and the humidity is low. The forests functioned much more properly for thousands of years before we started logging. Yes, this included stand replacing fires. A fire is catastrophic (a USFS term for fires) only when they burn houses. Think of the money that would become available to fix amenity resources if the USFS would only do initial attack on fires close to the WUI.

Yes, America needs wood and pulp. Private industry now exports logs grown in America. I think the substitution law is violated at times. I think private timberlands and timber from private land could easily make up for the 4% that comes from national forests. I voted for Cynthia McKinney (Green party) against Mr. Obama because one of the major planks of her platform was ending all commercial logging in national forests.

Once again I appreciate the opportunity to communicate with you. This is a trait of a real public servant.

Sincerely,

Dick

On Wed, Apr 15, 2015 at 7:38 AM, FS-comments-pacificsouthwest-san-bernardino-mountaintop <comments_pacificsouthwest_san_bernardino_mountaintop@fs.fed.us> wrote:

Dear Mr. Artley,

Thank you for providing this information. Please send any other correspondence that you may wish to be included as part of the "Grass Valley Fire Restoration Project" to this inbox.

We do appreciate and value input from the public, to assist and guide us in our analysis work. I do sincerely appreciate your interest in this project, and so would like to hear from you, as would Ranger Stamer. We do ask, however, that if you want to submit any information that applies specifically to this project, that you send it to this inbox.

I sincerely want to apologize myself for sending you emails from my personal Forest Service email. I did want you to know that I am the project contact, but to stay within the 36 CFR 218.25 Regulations: <http://www.ecfr.gov/cgi-bin/text-idx?SID=42d5129690775803b953a433eada9804&mc=true&node=se36.2.218_125&rgn=div8> http://www.ecfr.gov/cgi-bin/text-idx?SID=42d5129690775803b953a433eada9804&mc=true&node=se36.2.218_125&rgn=div8

We need to ensure that correspondence is directed to the project inbox listed on the Scoping Notice.

Thanks again for your input, please feel free to contact me at 530-601-1519 if you have specific things you would like to discuss about the Grass Valley Fire Restoration Project.

Sincerely,

Beth

Beth Stewart, Forester
Project leader

Forest Service

Washington Office Enterprise Program, VMS Enterprise Unit

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Caring for the land and serving people

From: Dick Artley [mailto:da99333@gmail.com]
Sent: Tuesday, April 14, 2015 12:44 PM
To: Stewart, Beth A -FS
Subject: Re: Not a timber sale --- RE: Project contact for Grass Valley Fire Restoration Project, San Bernardino National Forest, Mountaintop Ranger District

Thanks Beth. Its sad that you are willing to risk human lives and homes in the WUI by fuels removal and not using the most effective means to reduce the risk of wildfire damage developed by a USFS employee.

Please let me know why you reject Dr. Cohen's methods. Dr. Cohen says fuels logging is ineffective. I am sending 2 attachments on the subject. I would appreciate a response to both.

Thanks and have a good day.

Dick

On Tue, Apr 14, 2015 at 9:19 AM, Stewart, Beth A -FS <bethstewart@fs.fed.us> wrote:

Mr. Artley,

We are not planning on salvage logging, and in our documents we clearly identify the rationale for our vegetation and fuels management activities : "The basis for activities would be to protect communities, as the area is entirely within the WUI defense zone. Fuels would be removed from site, where practicable, and could include use of ground based equipment, chainsaws, skyline or helicopter yarding. Removal of fuels from site is in consideration of reducing fuels and not driven by economic factors (i.e., sale of commercial products). Capacity to sell products (mills) does not exist within reasonable hauling distances nor is the vegetation density such that economically viable sales can be prepared. Air quality is being considered within this fuels and vegetation resource area, as the arrangement of fuels and live vegetation will affect subsequent burning activities."

The fire occurred in 2007, and the area is largely deforested. There are no trees to harvest that were fire killed, and we wouldn't propose salvage 8 years post fire due to the fact that, if there were trees, there would be no economic value to them. I appreciate your willingness to engage the project, but feel you do not understand the proposal. Until you understand our proposal, we cannot engage a discussion. If you would like clarification, I am available at 530-601-1519 and can answer your questions.

I have provided a map with imagery that will hopefully assist you in seeing the condition of the vegetation as a result of the high severity fire. Areas that do have trees have little commercial economic value, due their size, growth form, and long hauling distances. We propose removing trees to decrease densities, due to the proximity to urban areas and to decrease stand densities. California is in a fourth year of drought, and so any thinning would be guided with the overarching goal of reducing hazardous fuels, and decreasing residual stand densities. I am re-sending you the documents I provided yesterday, so you can clearly see that this project is in the WUI, and that much destruction has already occurred. R5-TP-26a, page 16 highlights fuels reduction efforts that assisted fire managers in the 2007 Grass Valley Fire.

Please also note the high density of urban dwellings that are adjacent to the project area. R5-TP-026b "Home Destruction Examination" details the total of 199 structures were lost during the fire. You will find very telling photographs and information of the amount of loss. This project is being proposed in the WUI defense zone. The types of treatments we have proposed in the Scoping letter are to facilitate removal of fuels and manipulation

of vegetation, with the least amount of resource damage. The people who live next to this project area will benefit from our proposal, which, again, does not include salvage logging. We are attempting to restore forests (reforestation proposals) as well as reduce fuels. We also propose to eradicate invasive plants, and restore roads and trails.

Your attachment is not assisting us in guiding our proposal, as we have not proposed salvage logging. I thought I clarified this for you yesterday. We will include your information in our project record, but it has no relevance to our project and so isn't helping us to guide the analysis. As such, it is a comment from the public that is not applicable to our project. We do value input from the public and consider it in our project development so I would like to make sure you understand the proposal so we can receive your input and include it in our project development.

Thanks for your time, I also hope you have a nice day.

Sincerely, Beth

Beth Stewart, Forester
Project leader

Forest Service

Washington Office Enterprise Program, VMS Enterprise Unit

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Caring for the land and serving people

From: Dick Artley [mailto:da99333@gmail.com]
Sent: Tuesday, April 14, 2015 7:59 AM
To: Stewart, Beth A -FS
Subject: Re: Not a timber sale --- RE: Project contact for Grass Valley Fire Restoration Project, San Bernardino National Forest, Mountaintop Ranger District

April 14, 2015

Hi Beth. I have supplied you with an attachment below. It contains the wisdom of 183 Ph.D. scientists discussing the folly of logging a post fire landscape. I guess since you propose post-fire logging you will conclude these scientists are wrong.

Please tell me which ones are wrong and why. Then tell me why your qualifications to make such a conclusion transcend the qualifications of these 183 independent, unbiased scientists.

Your Purpose & Need says you need to "restore damaged lands" yet these scientists describe how a fire is Natures way of restoring herself. Last, I'll remind you that USFS leaders in the WO tell the public their projects are based on "best science." Please explain how ignoring the recommendations of 183 experts with no financial incentive to accumulate volume constitutes "best science."

Enjoy your day. I look forward to your response.

Dick Artley (retired forest planner from the Nez Perce National Forest, Idaho, duties were 1) NEPA legal compliance reviewer, 2) forest NEPA coordinator, and 3) forest appeals/litigation coordinator. Education: BS in forestry from the University of Washington and MS in logging engineering from Oregon State University)

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restore damaged lands

On Mon, Apr 13, 2015 at 12:58 PM, Stewart, Beth A -FS <bethstewart@fs.fed.us> wrote:

Dear Mr. Artley,

I wanted to address the comment you make below: "This robs the public of their opportunity to become involved in the Grass Valley timber sale." This is the Grass Valley Fire Restoration Project, and will use a variety of methods to treat fuels and vegetation but is not being developed or pursued as a timber sale. I am sending you this clarifying email so you don't erroneously assume this when submitting any comments or input you may have. We value your input in helping us develop this project, and so want you to fully understand our current proposal.

The Grass Valley Fire Restoration Project is not intended to be pursued as a timber sale. It is a fire restoration project, that is being pursued to restore lands that have been damaged from the Grass Valley fire. It is also being pursued to reduce fuel loading around communities. I have attached some documents that show some of the underlying reason for this project, the Grass Valley Fire of 2007. This fire is what caused the project to be initiated. This is not a project that is intended to produce commercial timber. If viable markets exist, trees may be sold, but the closest log mill is in Terra Bella, CA, which is about 225 miles from the project area. There are also only small trees in the project area, and so commercial timber is likely totally unviable from an economic standpoint. We want to use the different methods that are described in the Scoping letter as a means to most adequately reduce fuels and cause the least resource damage, we have no underlying goals other than what have been stated in our documents.

Thanks, and I do apologize for so many emails ! I was really concerned that my email address was incorrect, but I do think it works, so hopefully my emails were not too much of a burden.

Sincerely,
Beth

From: Dick Artley [mailto:da99333@gmail.com]
Sent: Monday, April 13, 2015 11:29 AM
To: Stewart, Beth A -FS
Subject: Re: Project contact for Grass Valley Fire Restoration Project, San Bernardino National Forest, Mountaintop Ranger District

Thanks Beth.

I'd like to point out that your March 31 scoping letter gives the public the incorrect email address to submit their scoping comments:

comments_pacificsouthwest_san_bernardino_mountaintop@fs.fed.us

I should not need to emphasize that this oversight is not trivial. This robs the public of their opportunity to become involved in the Grass Valley timber sale. Congress promulgated several laws to keep this from happening.

I will expect the online scoping letter to be corrected today. Thanks. Please let me know when its corrected. It should be <mailto:comments-pacificsouthwest-san-Bernardino-mountaintop@fs.fed.us> comments-pacificsouthwest-san-Bernardino-mountaintop@fs.fed.us

Dick Artley (retired forest planner from the Nez Perce National Forest, Idaho, duties were 1) NEPA legal compliance reviewer, 2) forest NEPA coordinator, and 3) forest appeals/litigation coordinator)

Grangeville, Idaho 83530

da99333@gmail.com

On Mon, Apr 13, 2015 at 7:04 AM, Stewart, Beth A -FS <bethstewart@fs.fed.us> wrote:

Dear Mr. Artley,

I am writing to let you know that I am the project contact for the Grass Valley Project. I am certain that you noted this during your review of the Scoping information.

I am just contacting you so you will have my email, in case I can assist you with anything. My understanding is that we have the correct email address on file for you, and that you did receive our public scoping information.

Can you please reply to this email to confirm that you have our Scoping information, and also let us know if you need anything additional at this time?

Sincerely,
Beth

Beth Stewart, Forester
Project leader

Forest Service

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