**********, 2015

Dear Supervisor Lannom and selected IDT members

Please read and consider my comments on the DEIS for the proposed Middle Fork Weiser River Landscape Restoration Project below. Remember these wise words as you read my comments:

> *"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**

Introduction

The natural resource specialists I worked with on interdisciplinary teams entered the NEPA process with this goal --- to eliminate the project's actions that could or might harm the resource(s) they are responsible for protecting. They knew it wasn't enough to predict the harm in Chapter 3 and walk away knowing the Responsible Official may or may not modify the project such that the harm would not occur. They were intelligent and curious enough to compare science authored by independent scientists having no connection to the USFS with USFS science that either ignores independent science recommendations or concludes the opposite without supporting data. They asked me to explain USFS science conclusions are the antithesis of what unbiased scientists recommends. These IDT members cared so much about maintaining their resources in a properly functioning condition they were sometimes successful convincing the Responsible Official to make major project changes … but this would not have happened unless they had tried.

I ask each IDT member to have the courage to read these comments with an open mind. Please compare the statements and recommendations authored by independent scientists I present in these comments with what the USFS teaches it's employees should be done to "restore" the forest. Be honest with yourself. The Opposing Views Attachments contain hundreds of quotes written by well-respected Ph.D. scientists. Most are (were) college professors with no interest in selling timber or not selling timber. As you will see, they are interested in the truth.

Comment: It's clear that the line-officers on the Payette National Forest did not learn from the Agriculture Department's inspector general's findings based on a 1999 audit of the USFS timber program. The first sentence of the audit findings says this:

> "Federal auditors have found that the Forest Service frequently fails to assess, prevent or correct environmental damage from logging on the national forests."

This DEIS smoothes-over and minimizes the "environmental damage from logging" that will be caused by the Middle Fk Weiser timber sale." A few IDT members know this but their position pays to well to jeopardize it by doing the right thing for future generations of Americans. The complete text of the USDA audit can be read at the following link:

http://www.nytimes.com/1999/02/05/us/audit-faults-forest-service-on-logging-damage-in-us-forests.html

Supervisor Lannom, its clear you have already selected the alternative you will implement. Now you are passing the Middle Fk Weiser commercial timber sale through the NEPA process to make it legal. Your IDT members (who know better) are helping you. You made your decision prior to scoping which informs the people who own the land what you plan to do to their land. This is safe isn't it? You knew if you kept things secret from the public they would't have a chance to submit their concerns.

My how convenient.

Here's the History of NEPA

Congress promulgated and President Nixon signed the bill establishing the National Environmental Protection Act in 1969. NEPA is referred to as the "environmental Magna Carta." The law was enacted on January 1, 1970. The bill was intended to be an early step towards the development of the United States' environmental policy.

NEPA grew out of the increased appreciation and concern for the environment that resulted from the 1969 Santa Barbara oil spill. During this time, National interest in preserving the environment was bolstered by Rachel Carson's book, *Silent Spring*. Congress responded by passing the Wilderness, Clean Air, and Clean Water Acts.

The preamble to NEPA reads:

> *"To declare national policy which will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the Nation; and to establish a Council on Environmental Quality."*

NEPA describes a process that when followed will ensure that environmental factors are weighted equally when compared to other factors in the decision making process undertaken by federal agencies. NEPA was intended to help the decision-maker select

the alternative that would benefit the public the most. NEPA is not a time-consuming, expensive, meaningless task as you believe it is.

Associate Chief Sally Collins describes how the new USFS deals with timber. Her statements obviously missed the Payette NF.

Please ask yourselves if your proposed timber sale is consistent with Ms. Collins' observations below.

> "Post-World War II, we entered a new period characterized by timber production. From the 1960s to the 1980s, every administration, with strong congressional support, called for more timber harvest from the national forests, with the goal of replacing the depleted stocks of private and state timber as a result of the war effort. We measured success largely in terms of producing timber and providing multiple uses, including outdoor recreation and fish and wildlife.
>
> In the early 1990s, that changed again. Today, we're in a new period focused primarily on ecological restoration and recreation. Maybe more than ever before, we are focusing on delivering values and services like clean air and water, scenic beauty, habitat for wildlife, and opportunities for outdoor recreation. Not only do Americans want these things from their national forests, but this shift is also essential to cope with some huge threats to the sustainability of these forests." (pp 8-9)
>
> Forest Service Associate Chief Sally Collins
> "***The Future of Partnering with the Forest Service*"**
> A speech presented at the Annual Meeting of the
> National Association of Conservation Districts
> Atlanta, GA—February 8, 2005
> http://www.fs.fed.us/spf/coop/library/NACDspeech.pdf

Deputy Chief Jim Furnish reflects on his USFS employment

Please consider retired Deputy Chief Furnish's observations in light of the proposed Middle Fk Weiser timber sale.

Indeed, Mr. Furnish knows the USFS well. He was:

> 1968-1976 – forester on the Black Hills NF
> 1977-1984 – District Ranger on the Bighorn NF
> 1984-1989 – planning staff on the San Juan NF
> 1989-1991 – appeals coordinator in the WO
> 1991-1999 – forest Supervisor on the Siuslaw NF
> 1999-2002 -- Deputy Chief of the USFS in the WO

Here are several quotes from his book.

"What saddens me is that the head of a once-trusted agency implicitly admitted that its leaders lied and broke the law." (page 11)

"He (Jim Hagemeier) wanted these forests to retain their natural character, not become yet another forest landscape of cookie cutter homogeneity.

For any forester schooled in agency dogma, this meant war. Bureaucratic war anyway. Foresters worked at maximizing timber production, minimizing cost, designing the best logging practices, ensuring a fair price for the sale, and overseeing logging operations toughly but fairly. You log it right, and people will like what they see --- or at least you explain to them that they should like it even if they don't." (pages 28 and 29)

"In large part, forest plans held to the agency's timber-first priority. Environmental groups waged war." (page 59)

"*Fewer and fewer people accepted sweeping vistas dominated by clear-cuts and new roads. Instead, they valued naturalness, clean water, abundant fish and wildlife , and a deep sense of connection with the land. They were anguished at what the Forest Service was taking from the forest at the expense of future generations."* (pages 113 and 114)

"*A different set of societal values emerged, inviting the agency to change. The failure to respond to this value shift had profound consequences for the Forest Service. How many polls that show 90 of the people hate clear-cuts does one have to read before concluding that it's time to do something different*?" (pages 134 and 135)

"*Similarly, roadless areas had long been regarded by the Forest Service as merely the next place one goes to log more trees*." (page 151)

"*The timber industry, as well as many people in Forest Service leadership, continued to view roadless area protection antithetical of multiple use mandates.*" (page 151)

"*Next, the agency leaders need to explicitly embrace the mandate of ecosystem management, which I would describe as value-driven resource management with a goal of maintaining or achieving naturalness. Primary values should be clean water and air, abundant fish and wildlife, quality recreation opportunities, and sustaining landscape function*." (page 198)

Here is Mr. Furnish's conclusion:

"How much are public forests worth? They are priceless."

Comment: Ask yourself if Mr. Furnish would consider your Middle Fk Weiser timber sale one that:

- uses *agency dogma* to further the "*agency's timber-first priority*"
- will create a *"landscape of cookie cutter homogeneity"*
- will "*take from the forest at the expense of future generations"*
- ignores emerging "*societal values inviting the agency to change"*
- *"explicitly embraces the mandate of ecosystem management"*

I suggest all USFS employees who wish to learn the truth buy Mr. Furnish's book at:

http://www.towardanaturalforest.com/

Please have the courage to read the book. Finally, ask yourself if you should be assisting to prepare the DEIS. Does the Payette National Forest ignore emerging "*societal values"* that scream out for the *"agency to change"?*

You won't regret taking this giant step forward. It's not to late to reexamine the Purpose & Need. Based on your education and experience will logging 30 square miles and building 44.5 miles of road really improve the resources the P&N claims will be improved by logging? If your answer is "no" you aren't committed yet. Yes reconstructing user located roads creates the same damage as new temporary road construction.

Please join me by having the courage to exit your denial mode and accept the truth.

> **Comment:** I saw it myself during my 31 years with the USFS. Here are the facts. The agency routinely and repeatedly showers its employees with information intended to teach them that satisfying the agency's timber agenda transcends all other actions … including amenity resource protection. Agency foresters are taught timber is king and it's their job to create private industrial tree farm conditions in the national forests. Their rewards system is based on timber outputs and acres "mechanically treated" (a.k.a. logged). Ask yourself why they describe logging using euphemisms.

Issue #1 ----- Logging road construction causes significant ecological harm. Please analyze an action alternative in detail that does not construct any new roads(temporary or system).

Comment: Page 4 indicates "Up to 9.7 miles of planned new and 34.8 miles of existing unauthorized routes would be used as temporary roads and obliterated after use."

Competent USFS line-officers do not let ATV riders locate their roads.

How long have these "unauthorized routes" been ignored and allowed to pump sediment? This is not a rhetorical question.

You say you will "obliterate" the unauthorized routes used as temporary roads after use. Competent USFS line-officers would not allow 34.8 miles of existing unauthorized routes to exist after they were discovered.

A report authored by Gerald Coghlan, WO Acting Director of Engineering in 1998 indicates there are 372,956 miles of existing national forest system road (page 5). The agency currently constructs 2,000 miles of system road per year. At this rate there are 409,000 miles now. In addition to that, there is at least double this amount in unsurfaced, sediment producing, outsloped, temporary roads that have not been totally obliterated and "put to bed" where the fill is returned to the cut. The average distance to the moon (it varies) is 384, 403 miles … and you propose more. Isn't there enough road? Are you clinically obsessed to produce volume at any cost to the public land?

See the 1998 report at this link: http://www.fs.fed.us/eng/road_mgt/roadsummary.pdf

Please read **Opposing Views Attachment #4.**

A "no road construction and reconstruction" alternative will likely reduce the sale volume some. However, it stands out among the possible action alternatives that should be analyzed in detail because it reduces the adverse environmental effects while still meeting the purpose and need for the project. Supervisor Lannom, some members of your IDT know this. Ask yourself why they are afraid to voice their opinions.

Comment: Please don't exclude a "no new road" alternative from analysis in detail by claiming the P&N will not be met. The P&N includes timber harvest but it does not specify a volume of number of acres. The "no new roads" alternative will reduce the acres treated, but will still meet the P&N since most harvest would still occur. This alternative is very important because it eliminates road-construction related adverse natural resource impacts.

Comment: Without exception, road construction and reconstruction are activities that cause damage to some important natural resources in the forest. New road construction is particularly detrimental to aquatic and wildlife resources. Chief Dombeck's statement below supports this fact.

> *"Roads often cause serious ecological impacts. There are few more irreparable marks we can leave on the land than to build a road."*

Dr. Mike Dombeck, Chief, US Forest Service
Remarks to Forest Service employees
and retirees at the University of Montana
February 1998

Link to statement:
https://www.uwsp.edu/cnr/gem/Dombeck/MDSpeeches/CD%20COPY/Chief%20Mike%20Dombeck%27s%20Remarks%20to%20Forest%20Service%20Employees%20and%20.htm

Opposing Views Attachment #4 contains statements by hundreds of Ph.D. scientists describing Chief Dombeck's observations in greater detail.

Comment: Since best science and Dr. Dombeck agree that there are "few more irreparable marks we can leave on the land than to build a road", isn't this is a valid reason to analyze a "no new road" alternative in detail?

Comment: The Administrative Procedures Act directs judges to set aside an agency action if the court determines that the action is "arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law." 5 U.S.C. § 706(2)(A). A line-officer who ignores best-science and instead makes a Decision on weak, meager evidence provided by people with financial interest in a sale being sold (i.e. IDT members that represent timber and engineering) is guilty of violating the APA. You have done this.

Comment: Please don't claim the No Action alternative satisfies this request to analyze a "no new roads" alternative in detail. The timber sale contains some actions that will benefit the ecosystem of the area. A "no new roads" alternative would include these actions. The P&N will still be met because volume will be available from existing roads. A "no new roads" action alternative is reasonable. It will benefit the forested ecosystem, it produces volume and reduces fuels, and eliminates the ecosystem damage caused by roads that is identified in **Opposing Views Attachment #4**.

Request for changes to be made to the final NEPA document: Analyze a no road construction (including temp roads) action alternative in detail. This would satisfy the P&N. Just as with No Action, this alternative provides the public with the trade-off between the Proposed Action and an alternative with less volume and less environmental impact . . . especially to aquatic resources.

Failure to analyze a timber sale with no new road construction will violate:

- 40 CFR 1500.2(e) and (f) because the Responsible Official was unable to avoid or minimize adverse effects of the project upon the quality of the human environment without complete knowledge of all likely adverse effects. Most adverse effects of road construction activities described by scientists in the **Opposing Views Attachment #4** was not mentioned in the final NEPA document EA.

<u>Issue #4</u> ----- Does spewing poison on national forest vegetation where children might play serve the public? Which will it be --- pleasing Monsanto or killing forest visitors?

The Middle Fk Weiser DEIS at page 456 states:

> *"Implementation of regularly-scheduled weed management plans should help contain invasion of nonnative plants and reduce the risk of invasion into surrounding areas. Noxious weeds within the Project area are managed with an Integrated Pest Management (IPM) approach using mechanical, biological, and chemical methods. Currently, nonnative weed invasion is not occurring in the known populations or immediate habitat of rare plants addressed in the Project area."*

The Middle Fk Weiser DEIS at page 456 tells the public what will occur under the No Action alternative:

> *Noxious weeds would continue to be controlled using an integrated management approach (USDA Forest Service 1987). Control methods include chemical, biological, cultural, or mechanical treatments, depending on the weed species present, cost of control, proximity to live water, or other elements applicable to the site. Funding for weed control would not depend on KV funds.*

You cite a tragically outdated 29-year-old, 1987 Payette National Forest Noxious weed and poisonous plant control program. You are smarter than that Supervisor Lannom. A responsible person would never base a life or death decision on a 29 year old USFS document. When dealing with a potential life and death situation most people would want safety determinations based on research done by unbiased scientists.

You propose to apply a chemical to public land that multiple independent research studies show causes cancer and other serious health issues. The law prohibits federal officials from knowingly putting American citizens in danger. See 18 U.S.C. § 1001.

I am saddened that you still believe all herbicides are similar and don't bother to tell the public the herbicide brand name and formulation that will be sprayed. <u>All</u> (emphasis added) herbicides are toxic to mammals (including humans), birds and fish. A few can be lethal. Why isn't there a herbicide specialist on the Payette NF or In R-4. They would know this?

As I will show below, hundreds of independent Ph.D. chemists have written literature showing why glyphosate should never be applied anywhere at any time for any reason. Is it worth the risk when there are other ways to kill noxious weeds without killing people? You won't be popular when your employees …… and the judge, when the local public finds out you ignored this warning.

Please do not apply herbicides that contain the chemical glyphosate. I present my reasons below.

Supervisor Lannom, if you would not spray a chemical that might cause cancer on your property where children and pets might be, you should not decide to contaminate public land with the same chemical. Why would the FDA start testing food for glyphosate if it was safe? See:

FDA to Start Testing Monsanto's Glyphosate in Food, February 19, 2016
http://readersupportednews.org/news-section2/318-66/35283-fda-to-start-testing-monsantos-glyphosate-in-food

Do you really want to do business with Monsanto? Do you trust them to put more importance on public safety than profits? Please open and read this link posted by Global Research:

http://www.globalresearch.ca/the-complete-history-of-monsanto-the-worlds-most-evil-corporation/5387964

MONSANTO'S PESTICIDE IS TOP SUSPECT BEHIND MYSTERIOUS KIDNEY DISEASE

Link: http://www.truth-out.org/news/item/34899-monsanto-s-pesticide-is-top-suspect-behind-mysterious-kidney-disease

A 'Lively' Day at Monsanto Headquarters

Link: https://www.organicconsumers.org/blog/%E2%80%98lively%E2%80%99-day-monsanto-headquarters

MONSANTO'S ROUNDUP KILLS AND DAMAGES MORE THAN WEEDS

Link: http://www.truth-out.org/speakout/item/34689-monsanto-s-roundup-kills-and-damages-more-than-weeds

Supervisor Lannom, please change your draft EIS before it goes final. Tell the public the brand names and formulations of herbicides that will be applied. Please assure this list does not include Roundup or other herbicides that contain gyphosate.

I don't think you want to spew a known carcinogen on land enjoyed by families and children. Multiple scientific studies conclude even casual exposure to glyphosate causes terrible, health problems in mammals (including humans). This research shows Glyphosate exposure might cause cancer later in life.

Glyphosate was first registered for use in the U.S. in 1974. In the last 40 years about 25 billion pounds of this poison has been sprayed in the United States. Please ask yourself if this might be a reason why there is currently a cancer epidemic in America.

Please consider the following online information:

> "The public's appreciation of the toxicity of glyphosate—the active ingredient in Monsanto's broad-spectrum herbicide Roundup—is still limited, despite highly damning research being published.
>
> The fact that Monsanto marketed Roundup as "environmentally friendly" and "biodegradable" probably has a lot to do with this general lack of insight.
>
> More people are apt to remember the Roundup commercial than recall the fact that Monsanto was twice found guilty of false advertising of this herbicide. In 2009, a French court again upheld these earlier convictions.
>
> Mounting evidence shows that glyphosate is **FAR** more toxic than anyone previously suspected, both alone and in combination with other additives (as in the case of Roundup), or in combination with other agricultural chemicals and/or heavy metals.
>
> Dr. Donald Huber, one of the premier plant pathologists in the US, views it far more toxic than DDT. They are spraying nearly ONE BILLION pounds every year on our food crops. That is enough glyphosate to fill 4,000 Olympic sized swimming pools.
>
> Most recently, what's being referred to as "an epidemic" of chronic kidney disease—a mysterious form of toxic nephropathy—striking down farmers in Sri Lanka, India, and Central America's Pacific coastline (El Salvador, Nicaragua, and Costa Rica), has now been traced back to Roundup in combination with contaminated fertilizer." "
>
> Link: http://www.honeycolony.com/article/toxic-combo-roundup-fertilizers-blamed-tens-thousands-deaths/

Herbicides that contain glyphosate are banned in Denmark, England, Italy, El Salvador, Sri Lanka, France, Holland, Austria, Bulgaria, Germany, Greece, Hungary, Ireland, Japan, Chile, South Africa, Luxembourg, Madeira, New Zealand, Peru, South Australia, Russia, France, Switzerland, Columbia, and Costa Rica

Please consider opening the links displayed in this WEB search
http://www.bing.com/search?q=Roundup+Banned+in+What+Countries&first=1&FORM=PERE

In September of 2015 the California Environmental Protection Agency announced its intention to label glyphosate as carcinogenic

These links provide more information:
http://guardianlv.com/2015/09/california-epa-to-label-glyphosate-as-carcinogenic/
http://www.fooddive.com/news/california-epa-pushing-to-label-glyphosate-as-carcinogenic/405238/

Monsanto Is Suing California for Trying to Inform People That Roundup Causes Cancer

By Rebecca Spector, Center for Food Safety March 2, 2016

Link: http://www.alternet.org/environment/monsanto-suing-california-trying-inform-people-roundup-causes-cancer?akid=14027.303761.V7snL_&rd=1&src=newsletter1051814&t=19

The EPA has been in Bed with the Manmade Chemical Corporations for Decades. They will Finally be brought to Justice.

Please read this article: **"Lawsuit Targets EPA's Failure to Release Public Records on Toxic Herbicide"**

> **Excerpt:** "The EPA has yet to fully comply with a Freedom of Information Act request filed by the Center two years ago seeking information about the EPA's decision to register the pesticide cocktail. Today's lawsuit seeks full public disclosure of those documents."

Link to full article: http://www.biologicaldiversity.org/news/press_releases/2016/enlist-duo-02-03-2016.html

Worldwide research on glyphosate safety indicates exposure to the toxic chemical causes the following human health complications: birth defects, miscarriages, premature births, cancer - non-Hodgkin's lymphoma and hairy cell leukemia, DNA damage, autism, irreparable kidney and liver damage, infertility, learning disabilities, ADHD and other neurological disorders (especially in children), mitochondrial damage, cell asphyxia, endocrine disruption, bipolar disorder, skin tumors, thyroid damage, decrease in the sperm count and chromosomal damage.

Here's the abstract discussing Roundup from the April 2013 science periodical *Entropy*:

> "Glyphosate, the active ingredient in Roundup®, is the most popular herbicide used worldwide. The industry asserts it is minimally toxic to humans, but here we argue otherwise. Residues are found in the main foods of the Western diet, comprised primarily of sugar, corn, soy and wheat. Glyphosate's inhibition of cytochrome P450 (CYP) enzymes is an overlooked component of its toxicity to mammals. CYP enzymes play crucial roles in biology, one of which is to detoxify xenobiotics. Thus, glyphosate enhances the damaging effects of other food borne chemical residues and environmental toxins. Negative impact on the body is insidious and manifests slowly over time as inflammation damages cellular systems throughout the body. Here, we show how interference with CYP enzymes acts synergistically with disruption of the biosynthesis of aromatic amino acids by gut bacteria, as well as impairment in serum sulfate transport. Consequences are most of the diseases and conditions associated with a Western diet, which include gastrointestinal disorders, obesity, diabetes, heart disease, depression, autism, infertility, cancer and Alzheimer's disease. We explain the documented effects of glyphosate and its ability to induce disease, and we show that glyphosate is the "textbook example" of exogenous semiotic entropy: the disruption of homeostasis by environmental toxins."
>
> Link: http://www.mdpi.com/1099-4300/15/4/1416

Here are the results of WEB searches on the 11 diseases and afflictions caused by even casual glyphosate exposure:

"glyphosate" "autism" 354,000 hits. Here they are:
http://www.bing.com/search?q=%E2%80%9Cglyphosate%E2%80%9D%20%E2%80%9Cautism%E2%80%9D&qs=n&form=QBRE&pq=%E2%80%9Cglyphosate%E2%80%9D%20%E2%80%9Cautism%E2%80%9D&sc=6-21&sp=-1&sk=&cvid=3BE172C360804C6CA5FCED95F44D6C65

"glyphosate" "dementia" 73,500 hits. Here they are:
http://www.bing.com/search?q=%E2%80%9Cglyphosate%E2%80%9D%20%E2%80%9Cdementia%E2%80%9D&qs=n&form=QBRE&pq=%E2%80%9Cglyphosate%E2%80%9D%20%E2%80%9Cdementia%E2%80%9D&sc=0-0&sp=-1&sk=&cvid=6F6D55E7534547E4B8AC483241265F5D

"glyphosate" "infertility" 56,800 hits. Here they are:
http://www.bing.com/search?q=%E2%80%9Cglyphosate%E2%80%9D%20%E2%80%9Cinfertility%E2%80%9D&qs=n&form=QBRE&pq=%E2%80%9Cglyphosate%E2%80%9D%20%E2%80%9Cinfertility%E2%80%9D&sc=2-26&sp=-1&sk=&cvid=AEC0E7FF60614005BF62C2EAEFEC4FD5

"glyphosate" "diabetes" 975,000 hits. Here they are:
http://www.bing.com/search?q=%E2%80%9Cglyphosate%E2%80%9D%20%E2%80%9Cdiabetes%E2%80%9D&qs=n&form=QBRE&pq=%E2%80%9Cglyphosate%E2%80%9D%20%E2%80%9Cdiabetes%E2%80%9D&sc=2-23&sp=-1&sk=&cvid=C9456FBAC7414D76A3292BC5351401FF

"glyphosate" "premature births" 32,600 hits. Here they are:

http://www.bing.com/search?q=%E2%80%9Cglyphosate%E2%80%9D%20%E2%80%9Cpremature%20births%E2%80%9D&qs=n&form=QBRE&pq=%E2%80%9Cglyphosate%E2%80%9D%20%E2%80%9Cpremature%20births%E2%80%9D&sc=0-0&sp=-1&sk=&cvid=0243581D827147C9A67667B4F3880366

"glyphosate" "asphyxia" 16,700 hits. Here they are:
http://www.bing.com/search?q=%20%E2%80%9Cglyphosate%E2%80%9D%20%E2%80%9Casphyxia%E2%80%9D&qs=n&form=QBRE&pq=%E2%80%9Cglyphosate%E2%80%9D%20%E2%80%9Casphyxia%E2%80%9D&sc=0-0&sp=-1&sk=&cvid=E4238949DBC54EEEAFB9A7F843385DC0

"glyphosate" "hairy cell leukemia" 61,800 hits. Here they are:
http://www.bing.com/search?q=%20%E2%80%9Cglyphosate%E2%80%9D%20%E2%80%9Chairy%20cell%20leukemia%E2%80%9D&qs=n&form=QBRE&pq=%E2%80%9Cglyphosate%E2%80%9D%20%E2%80%9Chairy%20cell%20leukemia%E2%80%9D&sc=0-0&sp=-1&sk=&cvid=6150F9120F7A4A3D8D3CB03652486A88

People that contemplate any risky action intuitively engage the Precautionary Principle. Please take this opportunity yourself.

> *"The precautionary principle or precautionary approach states that if an action or policy has a suspected risk of causing harm to the public or to the environment, in the absence of scientific consensus that the action or policy is not harmful, the burden of proof that it is not harmful falls on those taking an action."*
>
> See: http://en.wikipedia.org/wiki/Precautionary_principle

Important Concluding Statement:

You and I both know that in the vast majority of cases, your Deputy Regional Forester will support your decision regardless of the allegations of violation of law **IF** they believe the objector does not have the resources or motivation to follow-up with court action. You know you can spray Roundup with impunity.

What your Regional Forester cannot do is manipulate your conscience. He/she cannot prevent you from watching videos depicting:

> An autistic child trying to do things other kids do.
> How a family deals with a loved one with premature dementia.
> The look on a mothers face when she is yold her baby has birth defects.
> The last painful minutes of a person dying of cancer.
> The look on a person's face when their doctor tells them they have diabetes.
> The stress and depression of a person told they have fatal kidney disease the day before.
> The sorrow of a woman who has just had a miscarriage

People can be bribed and billion dollar corporations know how to do it. See;

http://www.alternet.org/food/true-inside-story-how-college-professor-sells-out-monsanto?akid=13934.303761.P-FhZW&rd=1&src=newsletter1049885&t=11

The USDA has been in bed with Monsanto for decades
Read "USDA Forces Whole Foods to Accept Monsanto", February 3, 2016

Excerpts:

> *"In a cleverly worded, but profoundly misleading email sent to its customers last week, Whole Foods Market, while proclaiming their support for organics and "seed purity," gave the green light to USDA bureaucrats to approve the "conditional deregulation" of Monsanto's genetically engineered, herbicide-resistant alfalfa.*
>
> *Beyond the regulatory euphemism of "conditional deregulation," this means that WFM and their colleagues are willing to go along with the massive planting of a chemical and energy-intensive GE perennial crop, alfalfa; guaranteed to spread its mutant genes and seeds across the nation; guaranteed to contaminate the alfalfa fed to organic animals; guaranteed to lead to massive poisoning of farm workers and destruction of the essential soil food web by the toxic herbicide, Roundup; and guaranteed to produce Roundup-resistant superweeds that will require even more deadly herbicides such as 2,4 D to be sprayed on millions of acres of alfalfa across the U.S."*
>
> Entire article at: http://readersupportednews.org/opinion2/265-34/34968-usda-forces-whole-foods-to-accept-monsanto

There are alternatives to using Roundup or other herbicides that contain glyphosate. The choice is yours. Is it worth the risk? Please remember Theodore Roosevelt's sage words:

> ***"No man may poison the people for his private profit."***

Here, please read "Monsanto's Sealed Documents Reveal the Truth Behind Roundup's Toxicological Dangers"

Excerpt:

> *"Over the years a large body of independent research has accumulated and now collectively provides a sound scientific rationale to confirm that glyphosate is far more toxic and poses more serious health risks to animals and humans than Monsanto and the US government admit. Among the many diseases and health conditions non-industry studies identified Alzheimer's, Parkinson's and autism since Roundup has been shown to instigate aluminum accumulation in the brain. The herbicide has been responsible for reproductive problems such as infertility, miscarriages, and neural tube and birth defects. It is a causal agent for a variety of cancers: brain, breast, prostate, lung and non-Hodgkin lymphoma. Other disorders include chronic kidney and liver diseases, diabetes, heart disease, hypothyroidism, and leaky gut syndrome. In addition to lung cancer, glyphosate may be responsible for today's growing epidemics of chronic respiratory illnesses among farm workers and their families.[6] However, these findings derive from outside the Big Agriculture industry. Private industries routinely defend themselves by positing their own research to refute independent reports. Consequently, for several decades it has been a he-said-she-said stalemate. Monsanto is content with this. It can conduct business as usual, Roundup*

sales increase, and the debates and media wars continue without government interference. Then who is protecting the public?"

Link to entire article: https://www.organicconsumers.org/news/monsantos-sealed-documents-reveal-truth-behind-roundups-toxicological-dangers

Here's more Recent Evidence. The take-home message? Given the information above, anyone who knowingly applies this poison to land owned by other people could be tried for involuntary manslaughter.

Article Title: Concerns over use of glyphosate-based herbicides and risks associated with exposures: a consensus statement.

Excerpt: "In killing weeds and indeed almost all growing plants, the primary mode of glyphosate herbicidal activity is the inhibition of a key plant enzyme, namely 5-enolpyruvylshikimate-3-phosphate synthase (EPSPS). This enzyme is part of the shikimic acid pathway and is essential for the synthesis of aromatic amino acids that govern multiple, essential metabolic processes in plants, fungi, and some bacteria. Since this EPSPS-driven pathway does not exist in vertebrate cells, some scientists and most regulators assumed that glyphosate would pose minimal risks to mammals. However, several studies, some described below, now show that GBHs can adversely affect mammalian biology via multiple mechanisms."

Published by BioMed Central, February 17, 2016
Link to full article: http://ehjournal.biomedcentral.com/articles/10.1186/s12940-016-0117-0

Article Title: SCIENCE USED TO REGULATE MONSANTO'S ROUNDUP IS OUTDATED, SAYS NEW STUDY

Excerpt: "Despite the extensive and increasing use of glyphosate, we know little about how much of the chemical people are actually being exposed to. Here in the US, glyphosate is not among the pesticide residues for which the US Department of Agriculture (USDA) routinely tests food. It is also not included among the 200-plus

chemicals on the US Centers for Disease Control and Prevention's (CDC) human biomonitoring program."

Published by *TRUTHOUT*, February 24, 2016

Link to full article: http://www.truth-out.org/news/item/34918-science-used-to-regulate-roundup-is-outdated-says-new-study

My Concluding Comments: Supervisor Lannom you can believe one dubious glyphosate safety study, or you can depend on hundreds of independent scientists' research conclusions. Most people would make a life or death decision based on best science. It's your choice.

Request for changes to be made to the final NEPA document: Assure it states "herbicides that contain glyphosate will not be applied." The decision document should also say this.

Failure to tell the public this chemical will not be used leaves the door open for glyphosate application. This violates:

40 CFR 1501.2 (b), 40 CFR 1502.16(a) and (b), and 40 CFR 1508.8(b) because Chapter 3 omits important environmental effect disclosures (i.e. glyphosate exposure sometimes causes cancer)

The Apr. 21, 1997 Executive Order No. 13045 because the Responsible Official does not ensure that this project will not disproportionately expose children to environmental health risks and safety risks.

Issue #5 – Some IDT members claim No Action will result in an increased probability of severe wildfires. This is inconsistent with the "best science" quoted below. Indeed, for decades USFS leaders have promised the public that agency projects will be

based on "best science." Clearly this is not the case with the Middle Fk Weiser timber sale.

The effects disclosures written by the IDT members all indicate selecting the No Action alternative will be a tragic mistake that will decimate, ravage and annihilate the natural resources and recreation opportunities in the sale area as a result of fire.

Where were the fire specialists? Either they didn't read the bungled effects disclosures in Chapter 3 predicting a catastrophic fire if it's not harvested, or they have not kept up with the latest fire science. I invite you and all IDT members to examine independent science explaining how harvested areas interact with fire in **Opposing Views Attachment #3**. It contains conclusions written by 66 well respected scientists not affiliated with the USDA. They explain how harvesting an area does not reduce fire starts, fire intensity, or rate of spread. Some demonstrate how logging exacerbates fire behavior. The IDT members base their No Action effects on skewed, untrue so-called fire science authored by USFS employees.

Here's an explanation of how fuels logging came about.

> **Comment:** Bush appointed timber industry lobbyist Mark Rey to Under Secretary of Agriculture. This put him in charge of the USFS. Rey was sworn in by Agriculture Secretary Ann Veneman on October 2, 2001.
>
> Rey's appointment was a calculated move. Rey knew his job was to invent more excuses to commercially log our national forests. Surprise! Rey did his job well. He played on the public's fear of fire after the 2000 and 2002 fires. He knew they would accept anything … even ineffective fuels logging. Now the USFS routinely offers timber sales to reduce hazardous fuels. Prior to 2003 the USFS had no timber sales with hazardous fuels removal in the P&N. I invite you to check this out.

Mark Rey's March 3, 2003 testimony to the United States House of Representatives Committee on Resources about the Threat of Wildland Fire and the need to log hazardous fuels can be read at:
http://www.wildlandfire.com/docs/2003_n_before/rey_testimony_2003.htm

The following documents authored by independent scientists not connected to the USDA debunk Rey's fuels logging policy. The IDT members are either unaware of this science or refuse to accept it. Please direct them to incorporate it in their No Action effects disclosures in the final EA.

Commercial Logging Causes Forest Fires

Published in *FOREST CONSERVATION NEWS TODAY*, July 20, 2002
OVERVIEW & COMMENTARY by Forests.org
Link: http://forests.org/archived_site/today/recent/2002/grgrurge.htm

Excerpts:

“It is well known scientifically that “commercial logging actually increases fire severity by removing large, fire- resistant trees and leaving behind very small trees and flammable "slash debris"--branches, twigs and needles from felled trees. The removal of mature trees also decreases the forest canopy, creating hotter, drier conditions on the ground. The additional sun exposure encourages the growth of flammable brush and weeds. Reduction of flammable underbrush can reduce fire severity, and environmental groups have encouraged such projects. However, the Bush administration has grossly misused the funds that Congress appropriated for brush reduction near homes. In Sierra Nevada national forests last year, more than 90% of these funds were instead earmarked for preparation of large timber sales focused on the removal of mature and old-growth trees miles from the nearest town.”

"The Forest Service, Bush administration and anti-environmental members of Congress are spreading a great deal of misinformation about wildfire, hoping to capitalize on public fire hysteria and minimize public opposition to increased logging and roadbuilding in our national forests," said Jake Kreilick of the National Forest Protection Alliance based in Missoula, Montana. "With virtually all new timber sales couched in terms of 'reducing fuels' or 'restoring forest health,' fire hysteria has emerged as the driving force behind the Forest Service's logging program and the administration's efforts to 'streamline' our nation's environmental laws," Kreilick said.”

Fight Fire With Logging?

Forestry experts have long known that commercial logging increases the risk of forest fire. So why, critics are asking, does the Bush administration's new fire prevention plan ignore that fact?

By Dan Okoand Ilan Kayatsky
Published by *Mother Jones* magazine, Wed Jul. 31, 2002
Link: http://www.motherjones.com/politics/2002/08/fight-fire-logging

Excerpts:

“Still, forestry experts warned in the 2000 plan that logging should be used carefully and rarely; in fact, the original draft states plainly that the "removal of large merchantable trees from forests does not reduce fire risk and may, in fact, increase such risk."

Now, critics charge that the Bush administration is ignoring that warning. Neil Lawrence, a policy analyst with the Natural Resource Defense Council, claims that Washington has taken a far more aggressive approach to incorporating commercial logging in its wildfire prevention plans. As a result, Lawrence and other critics say, the National Fire Plan is becoming a feeding ground for logging companies. Moreover, critics claim the administration's strategy, far from protecting the lives and homes of those most at risk, could actually increase the likelihood of wildfires.

"The plan consists mostly of complaining about forest fires and ginning up more money for logging," Lawrence says.”

A Burning Issue: Helping Loggers, Hurting Forests

By Dr. Chad Hanson
Published on Monday, July 15, 2002 in the *Los Angeles Times*
Link: http://www.commondreams.org/views02/0715-04.htm

Excerpts:

"Scores of scientists and the federal government's own national fire plan have concluded that the removal of mature trees from forests increases the severity of forest fires. Why then would the Bush administration use the threat of fires to try to increase logging of mature and old-growth trees in our national forests?

That is clearly the administration's intention, as outlined in two recent memos on revising the Northwest Forest Plan and the "Sierra Nevada Framework" plan to allow logging companies increased access to ancient forests on public lands. The move is being led by Mark Rey, a former timber industry lobbyist and a President Bush appointee who oversees the Forest Service."

"*Thus, the use of commercial logging for fire hazard reduction poses yet another paradox: Logging removes the trees that normally survive fires, leaves behind the trees that are most often killed by fire, increases flammable fuel loads, and worsens fire weather conditions*." (pg. 5)

The wildland fires of 2002 illuminate fundamental questions about our relationship to fire

By Dr. Timothy Ingalsbee
Published in the Winter 2002 issue of the *The Oregon Quarterly*
Link: http://www.fire-ecology.org/research/wildfire_paradox.pdf

Excerpts:

"The Congressional Research Service (CRS) recently addressed the effect of logging on wildfires in an August 2000 report and found that the current wave of forest fires is not related to a decline in timber harvest on Federal lands. From a quantitative perspective, the CRS study indicates a very weak relationship between acres logged and the extent and severity of forest fires. To the contrary, in the most recent period (1980 through 1999) the data indicate that fewer acres burned in areas where logging activity was limited."

"Qualitative analysis by CRS supports the same conclusion. The CRS stated: "[T]imber harvesting removes the relatively large diameter wood that can be converted into wood products, but leaves behind the small material, especially twigs and needles. The concentration of these fine fuels on the forest floor increases the rate of spread of wildfires." Similarly, the National Research Council found that logging and clearcutting can cause rapid regeneration of shrubs and trees that can create highly flammable fuel conditions within a few years of cutting."

A Report to the President in Response to the Wildfires of 2000,

By Lyle Laverty USDA Forest Service and Tim Hartzell U.S. Department of the Interior, September 8, 2000
Link: http://frames.nacse.org/6000/6269.html

Excerpts:

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

"Mechanically removing fuels (through commercial timber harvesting and other means) can also have adverse effects on wildlife habitat and water quality in many areas. Officials told GAO that, because of these effects, a large-scale expansion of commercial timber harvesting alone for removing materials would not be feasible. However, because the Forest Service relies on the timber program for funding many of its activities (including reducing fuels) it has often used this program to address the wildfire problem. The difficulty with such an approach, however, is that

the lands with commercially valuable timber are often not those with the greatest wildfire hazards."

Western National Forests: A Cohesive Strategy is Needed to Address Catastrophic Wildfire Threats

Published by the Government Accounting Office, GAO/RCED-99-65
Link: http://www.gao.gov/archive/1999/rc99065.pdf

Excerpts:

> *"The notion that commercial logging can prevent wildfires has its believers and loud proponents, but this belief does not match up with the scientific evidence or history of federal management practices. In fact, it is widely recognized that past commercial logging, road-building, livestock grazing and aggressive firefighting are the sources for "forest health" problems such as increased insect infestations, disease outbreaks, and severe wildfires."*
>
> *"How can the sources of these problems also be their solution? This internal contradiction needs more than propaganda to be resolved. It is time for the timber industry and their supporters to heed the facts, not fantasies, and develop forest management policies based on science, not politics."*

Timber Industry Fails to Convince Judges that Logging Levels Linked to Wildfires

Published by a New Century of Forest Planning, September 29, 2015
Link: http://forestpolicypub.com/2015/09/29/timber-industry-fails-to-convince-judges-that-logging-levels-linked-to-wildfires/

Excerpts:

> *"In a decision dismissing three lawsuits intended to compel more federal land logging in western Oregon, DC federal district court judge Richard Leon found that the timber industry failed to show that less logging means more wildfires (see page 7's footnote)."*
>
> *Judge Leon's ruling likely ends a two-decades long legal skirmish by the timber industry to compel federal agencies to increase logging levels from Northwest Forest Plan lands. The campaign has been led by the Portland-based American Forest Resource Council. For 20 years AFRC chose primarily the courts as its strategy to increase logging. Today's decision suggests that AFRC may change its focus from the courts to Congress*

Commercial Logging for Wildfire Prevention: Facts Vs Fantasies

By Dr. Timothy Ingalsbee
Link: http://www.fire-ecology.org/citizen/logging_and_wildfires.htm

Excerpt:

> *"Timber harvest, through its effects on forest structure, local microclimate, and fuels accumulation, has increased fire severity more than any other recent human activity."*

Sierra Nevada Ecosystem Project: *Final Report to Congress*

Prepared by the USFS Pacific Southwest Research Station, 1996

Link: http://pubs.usgs.gov/dds/dds-43/

Excerpts:

> *"Timber harvest, through its effects on forest structure, local microclimate, and fuels accumulation, has increased fire severity more than any other recent human activity"*
>
> *"Logged areas generally showed a strong association with increased rate of spread and flame length, thereby suggesting that tree harvesting could affect the potential fire behavior within landscapes. In general, rate of spread and flame length were positively correlated with the proportion of area logged in the sample watersheds."*
>
> *"As a by-product of clearcutting, thinning, and other tree-removal activities, activity fuels create both short- and long-term fire hazards to ecosystems. The potential rate of spread and intensity of fires associated with recently cut logging residues is high."*

More Logging Won't Stop Wildfires

By Dr. Chad Hanson and Dr. Dominick DellaSala
Published in the *New York Times* on July 23, 2015
Link: 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."*

Historical and current forest landscapes in eastern Oregon and Washington. Part II: Linking vegetation characteristics to potential fire behavior and related smoke production

By: Mark H. Huff; Roger D. Ottmar; Ernesto Alvarado; Robert E. Vihnanek; John F. Lehmkuhl; Paul F. Hessburg; Richard L. Everett, 1995
Link: https://www.frames.gov/rcs/6000/6691.html

Excerpts:

> *"As a by-product of clearcutting, thinning, and other tree-removal activities, activity fuels create both short- and long-term fire hazards to ecosystems. The potential rate of spread and intensity of fires associated with recently cut logging residues is high, especially the first year or two as the material decays. High fire-behavior hazards associated with the residues can extend, however, for many years depending on the tree. Even though these hazards diminish, their influence on fire behavior can linger for up to 30 years in the dry forest ecosystems of eastern Washington and Oregon."*
>
> *"Logged areas generally showed a strong association with increased rate of spread and flame length, thereby suggesting that tree harvesting could affect the potential fire behavior within landscapes…In general, rate of spread and flame length were positively correlated with the proportion of area logged in the sample watersheds."*

Fire hazard from precommercial thinning of ponderosa pine. Research Paper (PNW-RP-057)

By: G.R. Fahnestock, 1968
Link: https://www.frames.gov/rcs/11000/11147.html

Excerpt:

> *"It appears significant that many large fires in the western United States have burned almost exclusively in slash. Some of these fires have stopped when they reached uncut timber; none has come to attention that started in green timber and stopped when it reached a slash area."*

Testimony to the Agriculture, Nutrition and Forestry Committee United State Senate. Hearing to Review Healthy Forests Restoration Act, HR 1904 June 26, 2003

By:, Arthur Partridge Ph.D., Professor Emeritus, University of Idaho
Link: http://www.univision.co.za/offer-day-oA2A392Cr1N3B2x_2F2du3g3-music.shtml

Excerpt:

> *"The current focus on 'fuels' is, in itself, misguided because almost anything in a forest will burn, given the right conditions. Any fire specialist will tell you that the principal factors affecting fire are temperature and moisture, not fuels. No legislation will prevent or even reduce fires in the vast areas of the national forests and to pretend so is fraudulent."*

Study challenges views about Western forest fires, July 23, 2012

By: Scott Sonner, AP
Published in the *Daily World*
Link: http://www.thedailyworld.com/sections/newswire/northwest/study-challenges-views-about-western-forest-fires.html

Excerpts:

> *"More highly intense fire is not occurring now than historically in dry forests," said William Baker, who teaches fire ecology and landscape ecology in Laramie, Wyo., where he's been doing research more than 20 years. "These forests were much more diverse and experienced a much wider mixture of fire than we thought in the past, including substantial amounts of high-severity fire." "*
>
> *"If he's right, he and others say it means fuel-reduction programs aimed at removing trees and shrubs in the name of easing fire threats are creating artificial conditions that likely make dry forests less resilient."*
>
> *"Now, he believes thinning and post-fire salvage operations should be re-examined and emphasis placed on maintaining high-density stands in certain circumstances that would not threaten people or homes."*
>
> *"We shouldn't be managing just for low-density forests," he said. "We should not be unhappy with — or perhaps even manage for — higher severity fires in the forests."*

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

By: Dr. Jack Cohen (a USFS fire physicist)
Published in *Forest Ecology and Management, i*ssue 256, 2008
http://www.firewise.org/Information/Research-and-Guidance/WUI-Home-Ignition-Research/~/media/Firewise/Files/Pdfs/Research/CohenFuelTreatment.pdf

Excerpts:

> *"Treating fuels to reduce fire occurrence, fire size, or amount of burned area is ultimately both futile and counter-productive." (Pg.1999)*
>
> *"Some viable fuel treatments may actually result in an increased rate of spread under many conditions (Lertzman et al., 1998; Agee et al., 2000). For example, thinning to reduce crown fire potential can result in surface litter becoming drier and more exposed to wind. It can also result in increased growth of grasses and understory shrubs which can foster a rapidly moving surface fire."* (Pg.2000)

Researcher Finds Need for more Prescribed Burning

By Tom Kuglin
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."*

"Healthy Forests" and Wildfire Control: Accumulating Scientific Evidence

By Dr. Thomas Power
A Montana Public Radio Commentary, December 11, 2006
http://forestcouncil.org/so-called-healthy-forests-and-wildfire-control/

Excerpts:

> *"But the Bush Administration and some of the leadership of the Forest Service want to use logging techniques in places far removed from homes and communities to reduce the threat of wildfire. The basic idea is that most of our forests are far too dense. There are way too many trees per acre. This, we are told, not only makes them "unhealthy" but also reduces their productivity for wood production and makes them prone to frequent and severe wildfires that*

damage the forests even further. Cutting down many or most of those trees is the proposed solution."

"Most of the dense forests that the Bush Administration and some in the Forest Service want to thin to return them to "health" are not unhealthy at all. Forest scientists have been studying the fire histories of our forested landscapes in more and more detail to try to understand their densities and fire behaviors in the centuries before we began grazing cows, harvesting trees, and suppressing fires in them. What they are finding is that a significant part of the forest landscape regularly had very dense stands of trees that every few centuries burned in large natural conflagrations. It was only the lower elevation forests that featured park-like mixes of large, almost inflammable, trees and open grasslands."

"This is not a pessimistic story. It means that we need to focus our forest fire protection where our homes, communities, and lives are threatened. We do not have to spend tens of billions of dollars trying to save our forests from themselves. The forests do not need it, thank you, and those billion dollar efforts would not work anyway. If we are careful where and how we live in forests and learn to accept fire as a natural part of a healthy forested landscape, both prescribed fire and natural fires, we can both protect ourselves and enjoy the benefits of diverse natural forests."

Study challenges views about Western forest fires

By Scott Sonner AP
Published in the *Daily World,* July 23, 2012
http://www.thedailyworld.com/sections/newswire/northwest/study-challenges-views-about-western-forest-fires.html

Excerpts:

"Researchers at the University of Wyoming studied historical fire patterns across millions of acres of dry Western forests. Their findings challenge the current operating protocol of the U.S. Forest Service and other agencies that today's fires are burning hotter and more frequently than in the past.

"It means we need to rethink our management of Western dry forests," said Baker, a member of a U.S. Fish and Wildlife Service working group that is developing plans to help bolster northern spotted owl populations in dry forests.

Now, he believes thinning and post-fire salvage operations should be re-examined and emphasis placed on maintaining high-density stands in certain circumstances that would not threaten people or homes.

"We shouldn't be managing just for low-density forests," he said. "We should not be unhappy with — or perhaps even manage for — higher severity fires in the forests."

The 60 science quotes contained in **Opposing Views Attachment #3** clearly and unambiguously indicate the USFS's claim that timber sales create conditions that reduce fire intensity and rate of spread is an untrue fabrication to justify fuels logging.

True to form, 2 IDT members involved in the preparation of this DEIS have chosen to play fast and loose with the truth as they portray the effects of the No Action alternative as ghastly, disgusting, and frightful (see below). They know they will be punished if they

don't give the Responsible Official reason to select the Proposed Action. How do they do it? They claim doing noting will surely be catastrophic.

The American people pay USFS experts in wildlife biology and economics, soils to conduct themselves in a professional manner. Unfortunately, they opted to repeat USFS-approved text intended to promote the agency's timber agenda. This is sad behavior by those paid by the American public to protect their beloved amenity resources from harm. I guess this is what happens when the effect disclosures are copied & pasted from previous EAs and EISs.

Here are the deplorable logging/fire No Action effects disclosures authored by some IDT members:

Comment: Dr. Jack Cohen (a USFS employee) and the 11 independent scientists quoted above all indicate logging does not affect fire starts or intensity, yet Mr. Almack wrote these No Action effects:

Wildlife

Old Forest Habitat

> "These stands are outside of HRV and are increasingly vulnerable to stand-replacement wildfires. Uncharacteristic wildfires have the potential to alter these forests to a successional stage that could further slow the attainment of OF characteristics for many years." (pg 264)

Pileated Woodpecker

> "Combined with the lack of source habitat improvement for Habitat Family 1, the Project area forests would be more susceptible under the No Action Alternative to long-term alteration from uncharacteristic, stand-replacement wildfire." (pg 270)

American Three-toed Woodpecker

> "The American three toed woodpecker would likely benefit under the No Action Alternative from the increased susceptibility of forest stands to uncharacteristic wildfires, and the resulting provision of snags as feeding sites." (pg 281)

Fisher

> "Combined with the lack of source habitat improvement for Habitat Family 1, the Project area forests would be more susceptible under the No Action Alternative to long-term alteration from uncharacteristic, or even stand-replacement wildfire." (pg 299)

Canada Lynx

> "Combined with the lack of source habitat improvement for Habitat Family 1, the Project area forests would be more susceptible under the No Action Alternative to long term alteration from uncharacteristic, or even stand-replacement wildfire." (pg 316)

Wolverine

> "With no action, there would be no source habitat improvement for Habitat Family 1, and the Project area would be more susceptible to long-term alteration from uncharacteristic, or even stand-replacement wildfire." (pg 326)

Rocky Mountain Elk

The No Action effects disclosure is missing!

In the final NEPA document please tell the public why you reject the research conclusions of well respected Ph.D. fire ecologists shown above and instead accept the effects written by Mr. Almack that contradict the scientists' findings.

Mr. Almack, here's a sample of best science you could learn from:

"Animals, as well as plants, can benefit from fire. Some individual animals may be killed, especially by catastrophic fires, but populations and communities are rarely threatened. Many species are attracted to burned areas following fires — some even during or immediately after the fire."

Congressional Research Service Report
"**Forest Fire/Wildfire Protection**"
February 14, 2005
http://www.coloradofirecamp.com/congressional_research/forest-fire-wildfire-effects.htm

"Recently burned areas represent an important type of habitat that many species of animals have evolved to utilize. Snags (standing dead trees) provide critical nesting and foraging habitat for birds and small mammals, and as they decay and fall, create additional habitat for small mammals and terrestrial amphibians as coarse woody debris."

Campbell, John L. Ph.D, Dan C. Donato, Joe B. Fontaine J. Boone Kauffman Ph.D., Beverly E. Law Ph.D., and Doug Robinson
"**Biscuit Fire Study**." Oregon State University Department of Forest Science Terrestrial Ecosystem Research and Regional Analysis. 2003.
http://zircote.forestry.oregonstate.edu/terra/biscuit.htm

"We do not need to be afraid of the effects of wildland fire in our forests. Fire is doing important and beneficial ecological work," said the report's author, Dr. Chad Hanson, a forest and fire ecologist and Director of the John Muir Project. "It may seem counterintuitive, but the scientific evidence is telling us that some of the very best and richest wildlife habitat in western U.S. forests occurs where fire kills most or all of the trees. These areas are relatively rare on the landscape, and the many wildlife species that depend upon the habitat created by high-intensity fire are threatened by fire suppression and post-fire logging."

Hanson, Chad Ph.D. February 2, 2010 "**New Report Debunks Myth of 'Catastrophic Wildfire'** "
http://johnmuirproject.org/documents/Myth%20of%20Catastrophic%20Wildfire%20Media%20Release.pdf

"Contrary to what you may think, a forest fire does not reduce everything to a lifeless ash. Instead, it leaves behind a landscape of blackened trees interspersed with

remnants of green, intact forest. Post-fire specialists such as wood-boring insects quickly colonize the dead trees (snags), attracting an array of woodpeckers."

"Identifying the ecological value of a post-fire structure and the characteristics that make it attractive to wildlife is important."

Nappi, Antoine Ph.D., Pierre Drapeau Ph.D., Jean-François Giroux Ph.D. and Jean-Pierre Savard Ph.D. "**Snag use by foraging black-backed woodpeckers (Picoides articus) in a recently burned eastern boreal forest**." *The Auk* 120(2): 505-511. 2003.
http://www.borealcanada.ca/research_arc_hot_e.cfm

Comment: Dr. Jack Cohen (a USFS employee) and the 11 independent scientists quoted above all indicate logging does not affect fire starts or intensity, yet Mr. Eichman wrote this No Action effect:

Economics

> "For example, the lack of fuels treatment could increase wildland fire-related costs such as property loss, lost revenues, and suppression costs." (pg 519)

In the final NEPA document please tell the public why you reject the research conclusions of well respected Ph.D. fire ecologists shown above and instead accept the effects written by Mr. Eichman that contradict the scientists' findings.

Concluding statements about the tragic, untrue natural resources effects analysis disclosures cooked-up by 2 IDT members.

After reading chapter3, I don't know whether to laugh or cry. I know some IDT members were all striving to be "team players" by portraying the No Action alternative as a dreadful, ill-advised, appalling, ghastly action. They didn't anticipate there would be members of the public reading Chapter 3 who have a basic understanding of fire ecology and the intelligence to compare the IDT effects disclosures above with the research conclusions if independent scientists not connected with the USDA.

Mr. Almack and Mr. Eichman have been listening to and swallowing USFS mythology about how logging and fire interact. It's sad that they didn't have the initiative and curiosity to examine real science conclusions resulting from the research done by independent scientists with no connection to the USDA.

Request for changes to be made to the final NEPA document: Provide independent science validating Mr. Almack's and Mr. Eichman's claims that logging reduces fire effects or remove the IDT's claims that logging prevents fire from Chapter 3. Also, include the No Action effects for Rocky Mountain Elk.

Failure to do so will violate 40 CFR 1500.2(b) because no evidence is presented for environmental effects conclusions, 40 CFR 1501.2(a) because the environmental effects and values are not identified in detail, and without substantiating evidence for

effects conclusions the public cannot determine if they are accurate and based on best science which violates 40 CFR 1500.1(b).

The final NEPA document will also violate 40 CFR 1500.1(b) because the Chapter 3 environmental effects section written by IDT members is contrary to the "best science" statements written by hundreds of well-respected, independent scientists in the **Opposing Views Attachments**. With this being the case, the agency effects disclosures are not "high quality" and an "accurate scientific analysis."

Issue #9 ----- The DEIS fails to describe the effects to scenic/visual resources, cultural and archaeological resources, air quality and climate change in Chapter 3.

> **Comment:** Without exception, EAs and EISs for timber sales written on other national forests contain effects write-ups in Chapter 3 addressing how or whether the timber sale will affect scenery, cultural and archaeological resources, air quality and climate change.
>
> In spite of the fact this timber sale "could" or "may" affect these important resources, the predicted effects to these resources from selecting No Action and Action Alternatives 2, 3 and 4 are not disclosed in Chapter 3. Instead, they are briefly discussed in a section called "Other Concerns Evaluated" on pages 27-31.
>
> Why is the Payette NF excluded from the law. Why do the other 154 national forests comply with the law? Supervisor Lannom, how will you respond to these questions when the plaintiff's attorney asks you.

Request for changes to be made to the final NEPA document: Include discussions, information and data in Chapter 3 showing the effects to scenery, cultural and archaeological resources, air quality and climate change that will result from activities associated with each of the 4 alternatives. If you feel they will not be affected, please describe why.

Failure to do so will violate 40 CFR 1500.1(b) and 1508.8 which state: ""Effects and impacts as used in these regulations are synonymous. Effects includes ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative."

Also you will be in violation of 40 CFR 1501.2(b), 40 CFR 1501.5(c-3), 40 CFR 1502.15, 40 CFR 1502.16 (a, b, and d), and 40 CFR 1504.1.

Issue #10 ----- The DEIS does not discuss how the timber sale's logging and slash/RX burning activities will be mitigated to assure protected bird species' individuals and their habitat are not harmed in any way.

It is not only possible but highly likely that that logging and slash/RX burning will:

> "harm the birds with logging-related pollution",
> "detrimentally alter the bird's habitat",
> "environmentaly degrade the area surrounding the bird's habitat", and
> "kill bird chicks by destroying their nests or eggs".
>
> Note: The 4 quotes above come directly from the Act.

Request for changes to be made to the final NEPA document: Identify the birds that exist in and near the project area that are protected under the Migratory Bird Treaty Act and discuss how these birds will be protected during burning and timber harvest operations. The Act makes no allowance to consciously harm these birds for any reason.

Failure to do so will violate the Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-712; Ch. 128; July 13, 1918; 40 Stat. 755) as amended by: Chapter 634; June 20, 1936; 49 Stat. 1556; P.L. 86-732; September 8, 1960; 74 Stat. 866; P.L. 90-578; October 17, 1968; 82 Stat. 1118; P.L. 91-135; December 5, 1969; 83 Stat. 282; P.L. 93-300; June 1, 1974; 88 Stat. 190; P.L. 95-616; November 8, 1978; 92 Stat. 3111; P.L. 99-645; November 10, 1986; 100 Stat. 3590 and P.L. 105-312; October 30, 1998; 112 Stat. 2956)

Issue #11 ----- Supervisor Lannom, please take additional action to further reduce the risk to people's

homes and the lives of family members in the WUI should a wildfire start nearby.

The DEIS at page 58 indicated there are homes in the WUI that are at risk.

Before Dr. Jack Cohen retired, he was a fire physicist who worked for the USFS doing research to determine the best action to reduce damage to homes in the WUI if a wildfire starts nearby. His research was done at the Forest Service's Missoula Fire Sciences Laboratory at the Rocky Mountain Research Station. His fine fuels removal methods are implemented in foreign countries. They are the most effective fire damage risk reduction methods available.

For more than 15 years, the National Fire Protection Association's (NFPA) wildfire safety recommendations have been shaped by Dr. Cohens fire science. The resulting Firewise Communities Program provides guidance for homeowners on the WUI to help them prepare their homes to resist wildfire.

Some homeowners in the WUI might already be familiar with Firewise and applied its methods to their property. Other homeowners may not know about Firewise and/or are unable to physically treat their property.

Some homeowners in the WUI may have already removed fine fuels within several hundred feet of their homes using the Firewise instructions. Some homeowners have not because they are either unaware of Firewise or they are physically unable to do the work. This is where the USFS should enter the picture. Here is the Firewise information:

> Link to Recommendations from the Firewise Communities Program: http://www.firewise.org/wildfire-preparedness/be-firewise/home-and-landscape/defensible-space.aspx?sso=0
>
> Link to Firewise principles: http://www.firewise.org/wildfire-preparedness/be-firewise/home-and-landscape.aspx?sso=0
>
> Link to the Firewise web site: http://www.nfpa.org/safety-information/for-consumers/outdoors/wildland-fires

Dr. Cohen wrote several books and made presentations to people involved in fire protection describing the methods for reducing fire damage risk.

> **Dr. Cohen states**: "*As stated, the evidence indicates that home ignitions depend on the home materials and design and only those flammables within a few tens of meters of the home (home ignitability). The wildland fuel characteristics beyond the home site have little if any significance to WUI home fire losses*." (Pg. 5)

Source for quote above: Reducing the Wildland Fire Threat to Homes: Where and How Much?
Presented as the Fire Economics Symposium in San Diego, California on April 12, 1999.
http://www.fs.fed.us/rm/pubs_other/rmrs_1999_cohen_j001.pdf

Dr. Cohen states: "*Vegetation management beyond the structure's immediate vicinity has little effect on structure ignitions. That is, vegetation management adjacent to the structure would prevent ignitions from flame exposure; but vegetation management away from the structure would not affect ignition from flame exposure and would not significantly reduce ignitions from firebrands*." (Pg. 4)

Source for quote above: Objectives and considerations for wildland fuel treatment in forested ecosystems of the interior western United States
Published in *Forest Ecology and Management* 256, 2008
http://www.firewise.org/Information/Research-and-Guidance/WUI-Home-Ignition-Research/~/media/Firewise/Files/Pdfs/Research/CohenFuelTreatment.pdf

Dr. Cohen states: ***"****Effective landscape fuel reduction does not necessarily prevent W-UI home fire destruction*." (Pg. 10)

"Treating fuels to reduce fire occurrence, fire size, or amount of burned area is ultimately both futile and counter-productive." (Pg.1999)

"Some viable fuel treatments may actually result in an increased rate of spread under many conditions (Lertzman et al., 1998; Agee et al., 2000). For example, thinning to reduce crown fire potential can result in surface litter becoming drier and more exposed to wind. It can also result in increased growth of grasses and understory shrubs which can foster a rapidly moving surface fire." (Pg.2000)

Source for quotes above: Objectives and considerations for wildland fuel treatment in forested ecosystems of the interior western United States
Published in *Forest Ecology and Management* 256, 2008
http://www.firewise.org/Information/Research-and-Guidance/WUI-Home-Ignition-Research/~/media/Firewise/Files/Pdfs/Research/CohenFuelTreatment.pdf

Here is a link to all 13 publications authored by Dr. Cohen describing the overwhelming effectiveness of using his fine fuels removal methods near homes to reduce the risk that they might burn.
Link: http://firewise.org/wildfire-preparedness/wui-home-ignition-research/the-jack-cohen-files.aspx?sso=0

As Dr. Cohen states, fuels reduction logging removed from the immediate vicinity of the WUI is not a waste of time, but it certainly should not be the only action (emphasis added) that should be taken if saving the home is a primary goal.

Dr. Cohen provides compelling evidence that fuels reduction is not the only way to reduce the risk of fire damage. When the homeowners are exposed to Dr. Cohen's research conclusions quoted above the homeowners will be even more enthusiastic about applying Firewise techniques.

I quote Government Accounting Office, GAO/RCED-99-65 below. The Government Accountability Office (GAO) is a government agency that provides auditing, evaluation, and investigative services for the United States Congress.

> *"The notion that commercial logging can prevent wildfires has its believers and loud proponents, but this belief does not match up with the scientific evidence or history of federal management practices. In fact, it is widely recognized that past commercial logging, road-building, livestock grazing and aggressive firefighting are the sources for "forest health" problems such as increased insect infestations, disease outbreaks, and severe wildfires."*
>
> *"How can the sources of these problems also be their solution? This internal contradiction needs more than propaganda to be resolved. It is time for the timber industry and their supporters to heed the facts, not fantasies, and develop forest management policies based on science, not politics."*
>
> > **Source for quote above: Western National Forests: A Cohesive Strategy is Needed to Address Catastrophic Wildfire Threats**
> > Published by the Government Accounting Office, GAO/RCED-99-65
> > Link: http://www.gao.gov/archive/1999/rc99065.pdf

Clearly, both fuels removal and applying the Firewise methods gives the homeowners more protection that just applying one of the methods without the other.

The Purpose & Need for this project does not reflect the goal to save lives and homes in the WUI using all available methods. The current P&N describes an action (fuels removal) rather than a goal to reduce or eliminate fire damage risk.. Broadening the P&N would open the door to use other fire damage risk reduction methods in addition to fuels logging. Fuels logging is an alternative … not a primary purpose and goal. Indeed, the homeowners living close to the national forests where a fire might start should be given all the protection possible by the USFS.

This member of the public is surprised that a USFS line-officer isn't aware of the research conclusions of Lyle Laverty who is another fire expert also employed by the USFS. Also, there is a vast amount of peer reviewed independent scientific research that reveals logging does not mitigate fire behavior. Several of the scientists quoted below conclude that logging exacerbates fire severity and rate of spread.

I am interested in how you respond to the comments below. Please be thoughtful. Human lives depend on it.

Here is a quote from the 1996 *"**Sierra Nevada Ecosystem Project***: **Final Report to Congress**. Please consider this information as you formulate the final Proposed Action.

> "*Timber harvest, through its effects on forest structure, local microclimate, and fuels accumulation, has increased fire severity more than any other recent human activity*."(pg.62)

"Logged areas generally showed a strong association with increased rate of spread and flame length, thereby suggesting that tree harvesting could affect the potential fire behavior within landscapes. In general, rate of spread and flame length were positively correlated with the proportion of area logged in the sample watersheds."

"As a by-product of clearcutting, thinning, and other tree-removal activities, activity fuels create both short- and long-term fire hazards to ecosystems. The potential rate of spread and intensity of fires associated with recently cut logging residues is high."

Source for quote above: University of California; SNEP Science Team and Special Consultants
"***Sierra Nevada Ecosystem Project*: Final Report to Congress**
Volume 1, Chapter 4 – Fire and Fuels.
http://ceres.ca.gov/snep/pubs/web/PDF/v1_ch04.pdf

Here is a quote from the April 1999 GAO Report to the Subcommittee on Forests and Forest Health, Committee on Resources, House of Representatives regarding fuels reduction. Please consider this information as you formulate the final Proposed Action.

"Mechanically removing fuels (through commercial timber harvesting and other means) can also have adverse effects on wildlife habitat and water quality in many areas. Officials told GAO that, because of these effects, a large-scale expansion of commercial timber harvesting alone for removing materials would not be feasible. However, because the Forest Service relies on the timber program for funding many of its activities, including reducing fuels, it has often used this program to address the wildfire problem. The difficulty with such an approach, however, is that the lands with commercially valuable timber are often not those with the greatest wildfire hazards."

Source for quote above: Government Accounting Office, **Western National Forests: A Cohesive Strategy is Needed to Address Catastrophic Wildfire Threats**
GAO/RCED-99-65
http://www.gao.gov/archive/1999/rc99065.pdf

Request for changes to be made to the final NEPA document: Modify the Proposed Action to do the following in addition to hazardous fuels removal:

- distribute Firewise handouts to WUI residents describing the fine fuels removal methods (where and how).
- contact the people living in the WUI and announce Firewise workshops will be held to answer questions.
- offer to remove the fine fuels (with written permission) on private property owned by elderly and disabled homeowners who cannot do the work themselves.
- modify the P&N to reflect what should be the prime goal of this timber sale: reduce the chance that homes will burn in the WUI should a wildfire start in the area. Fuels reduction would then be an alternative, but this would open the door to the 3 actions shown above.

If this does not occur, you will violate:

- 40 CFR 1500.2(e) because the Responsible Official was unable to avoid or minimize adverse effects of the project upon the quality of the human environment without complete knowledge of all likely adverse effects. Most adverse effects of project activities described by scientists in the **Opposing Views Attachment #11** was not mentioned in the final NEPA document EA.

- 40 CFR 1500.2(f) because the Responsible Official was unable to avoid or minimize any possible adverse effects upon the quality of the human environment without knowledge of the adverse effects. Had the Responsible Official known about these effects he would have acknowledged the existence of some adverse effects described in the **Opposing Views Attachment #11** in the final NEPA document EA.

- NEPA Sec. 101(b)(2) because the Responsible Official does not "assure for all Americans safe, healthful, productive, and esthetically and culturally pleasing surroundings;"

- NEPA Sec. 101(c) because "The Congress recognizes that each person should enjoy a healthful environment and that each person has a responsibility to contribute to the preservation and enhancement of the environment."

- Ex. Ord. No. 13045, Apr. 21, 1997 [section 1-101(a)] because the Responsible Official does not "make it a high priority to identify and assess environmental health risks and safety risks that may disproportionately affect children."

Issue #12 ----- The American people do not want their national forests logged and roaded up. The money for your salary (and the IDT members' salary) comes from tax dollars supplied by these same Americans you propose to backhand by ignoring and rejecting their desires and wishes for their precious public land. Do you enjoy serving your corporate masters first?

The American citizens are your supervisors. In America, when an employee consciously and willfully disobeys his/her supervisor on a regular basis they are terminated. Here are the statistics you ignore.

In 2002, 7,069 Americans were randomly selected in the lower 48 states to respond to the statistically significant Values, Objectives and Beliefs survey sanctioned by Chief Thomas. Chief Thomas spent the American public's money on the survey because he believed it would guide future agency management decisions. Chief Thomas didn't anticipate future USFS line-officers would be clinically obsessed by volume accumulation as is the case here.

Page 1 briefly describes the survey:

> *"The items in the survey have been extensively pre-tested and applied in various other studies. The values scale was designed to focus on values that people hold for public lands (called the Public Lands Values). It was tested using both students and adults around the United States. The objectives scale items were developed using input from 80 focus groups around the country. The beliefs and attitudes scales tier down from the objectives items."*

This survey was intended to measure what the public wants from their national forests. They were asked about their *values* with respect to public lands, *objectives* for the management of public lands, *beliefs* about the role the agency should play in fulfilling those *objectives*, and *attitudes* about the job the agency has been doing.

Why was the survey done? The results were needed to support the 2000 USDA Forest Service RPA Assessment. Gen. Tech. Rep. RMRS-GTR-95. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station.

Here are a few quotes from the final report:

> *"People see the provision of less consumptive services as more important than those that are more consumptive*." (page 2)
>
> "*Overall, the protection of ecosystems and wildlife habitat is seen as an important objective for public land management."* (page 9)
>
> *"It is interesting to note that the public feels that the conservation and protection of watersheds is an important objective, consistent with the USDA Forest Service Organic Act. Also, important objectives for the public are the preservation of natural resources through policies that restrict commodity uses, protection of ecosystems and wildlife habitat, and preservation of the ability to enjoy a "wilderness" experience. A somewhat important objective is the preservation of local cultural uses*." (page 27)
>
> *"The public sees the restriction of mineral development and of timber harvest and grazing as being more important than the provision of natural resources to dependent communities (although this is still seen as somewhat important)."* (page 28)

Link to survey: http://www.fs.fed.us/rm/pubs/rmrs_gtr095.pdf

Comment: Of the 7,069 Americans surveyed in Chief Thomas's values survey in 2002, 88.4% supported elimination of timber harvest and mining, and instead prefer the agency employees to spend their tax dollars on protecting watersheds from harm and less consumptive services. They wanted national forest management to be based on science rather than money. This percentage has increased in the 13 years since the survey. What's so special about the Middle Fk Weiser timber sale that would make these 88.4% of Americans embrace the logging?

Comment: Why do accept the recommendations supplied by a handful of timber IDT members financially motivated to enable and facilitate timber sales regardless of resource impacts, when it is the antithesis of best science described in the **Opposing Views Attachments**?

An executive order requires federal agencies to use best available science:

"Science and the scientific process must inform and guide decisions of my Administration on a wide range of issues, including improvement of public health, protection of the environment, increased efficiency in the use of energy and other resources, mitigation of the threat of climate change, and protection of national security.

The public must be able to trust the science and scientific process informing public policy decisions. Political officials should not suppress or alter scientific or technological findings and conclusions. If scientific and technological information is developed and used by the Federal Government, it should ordinarily be made available to the public. To the extent permitted by law, there should be transparency in the preparation, identification, and use of scientific and technological information in policymaking. The selection of scientists and technology professionals for positions in the executive branch should be based on their scientific and technological knowledge, credentials, experience, and integrity."

Source: **MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES**
THE WHITE HOUSE**,** Office of the Press Secretary, March 9, 2009
http://www.whitehouse.gov/the-press-office/memorandum-heads-executive-departments-and-agencies-3-9-09

"General Principles of Regulation. (a) Our regulatory system must protect public health, welfare, safety, and our environment while promoting economic growth, innovation, competitiveness, and job creation. It must be based on the best available science."

"Sec. 5. *Science.* Consistent with the President's Memorandum for the Heads of Executive Departments and Agencies, ''Scientific Integrity'' (March 9, 2009), and its implementing guidance, each agency shall ensure the objectivity of any scientific and technological information and processes used to support the agency's regulatory actions."

Source: **Improving Regulation and Regulatory Review**
Executive Order 13563 of January 18, 2011
Published in: the Federal Register, Vol. 76, No. 14 Friday, January 21, 2011

http://www.gpo.gov/fdsys/pkg/FR-2011-01-21/pdf/2011-1385.pdf

The Middle Fk Weiser timber sale area contains streams that have year round resident fish. Federal agencies are required by law to use best available science as a basis for their decisions:

> "(2) Conservation and management measures shall be based upon the best scientific information available."
>
> Source: **16 U.S.C. § 1851 : US Code - Section 1851: National standards for fishery conservation and management**.
> http://codes.lp.findlaw.com/uscode/16/38/IV/1851

Comment: Even the USFS acknowledges that the public does not want their public lands logged. Please read about Chief Thomas' survey below:

In 2002, 5,064 Americans were randomly selected in the lower 48 states. This statistically significant survey was intended to measure what the public wants from their national forests. They were asked about their *values* with respect to public lands, *objectives* for the management of public lands, *beliefs* about the role the agency should play in fulfilling those *objectives*, and *attitudes* about the job the agency has been doing. The survey was contracted by Chief Thomas.

Why was the survey done? The results were needed to support the 2000 USDA Forest Service RPA Assessment. Gen. Tech. Rep. RMRS-GTR-95. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station.

Here are a few quotes from the final report:

> "The public sees the restriction of mineral development and of timber harvest and grazing as being more important than the provision of natural resources to dependent communities (although this is still seen as somewhat important)." (page 28)
>
> "Highly familiar members of the public are less likely to support policies that eliminate timber harvest and mining in order to preserve natural resources. These same respondents are also less likely to see the protection of ecosystems and watershed and the preservation of a wilderness experience as appropriate roles for the USDA Forest Service." (page 54)
>
> Link to survey: http://www.fs.fed.us/rm/pubs/rmrs_gtr095.pdf

Of the 5,064 Americans surveyed, 589 indicated they were "highly familiar" with the USDA Forest Service. This means 88.4% of those surveyed with moderate or low familiarity support elimination of timber harvest and mining, and instead prefer the agency employees to spend their tax dollars on protecting watersheds from harm and less consumptive services.

What will the judge conclude when the plaintiff's attorney introduces this information?

Comment: You know there is no "timber famine" as the USFS has been so fond of predicting for many decades. There is no shortage of raw materials for paper and wood products in the United States. Therefore, there is no reason to have commercial timber sales in the national forests. Only 4.8 % of the raw materials for domestically used wood products and paper come from national forest land. The USFS could stop logging today and the market would never react. The volume would be replaced from private-industrial tree farms and private sources without blinking an eye.

Comment: Over 200 Ph.D. scientists are quoted in **Opposing Views Attachments #1 and #4.** They describe how and why logging and roading at any location at any time inflict heavy, unacceptable damage to the amenity natural resources in the national forests so loved by 322 million Americans. Since you defy their recommendations you must believe your Middle Fk Weiser timber sale is different or special. Why do the independent scientists' clear descriptions of the massive resource damage caused by timber sales such as yours not apply to the Middle Fk Weiser sale?

Comment: For decades the USFS has been telling the public that their projects are all based on "best science." **Opposing Views Attachment #15** contains quotes of the following USFS officials who stress "best science" drives agency actions: Hilda Diaz-Soltero, Dr. Ann Bartuska, Chief Dale Bosworth, Associate Chief Sally Collins, Heidi Valetkevitch, Chief Mike Dombeck, Chief F. Dale Robertson, Agriculture Secretary Dan Glickman, Chief Tom Tidwell, John Potyondy, Ann Melle, and Merrill Kaufmann. The **Opposing Views Attachments** contain the quoted statements of hundreds of Ph.D. scientists who describe how logging and road construction should be avoided in the forest to assure all natural resources will function properly. In spite of this best science, you choose to take the advice of 15 IDT members to sell the Middle Fk Weiser timber sale. The timber members of the IDT are all financially motivated to sell national forest trees.

Why do you reject best science?

Request for changes to be made to the final NEPA document: Provide information and data explaining who the people living in Troy are different than the people living in and near Troy. Show why their beliefs that they enjoy recreating near or in areas that have been logged are different than a strong majority of the 7,069 Americans that responded to Chief Thomas' 2002 survey for the RPA who felt it is important that the USFS:

> *"preserve of natural resources through policies that restrict commodity uses, protect ecosystems and wildlife habitat, and preserve of the ability to enjoy a "wilderness" experience."*

Also, include a discussion and supporting data justifying why it's appropriate to take action on public land that the vast majority of the American public does not want to occur. Demonstrate why you feel the Middle Fk Weiser timber sale serves the majority of the American people, or explain why serving the natural resource extraction corporations is more important.

The discussion should explain why the recommendations of over 200 Ph.D. scientists represented in **Opposing Views Attachments #1 and #4** aren't applicable to the Middle Fk Weiser sale area and/or why the information provided by several timber IDT members should trump these independent scientists' research conclusions, thus establishing USFS IDT members' information as "best available science."

Failure to provide justification showing why the USFS can take actions that the vast majority of the American public do not want to occur violates 40 CFR 1500.2(e) and (f) because the Responsible Official does not use all practicable means to "avoid or minimize any possible adverse effects of their actions upon the quality of the human environment" and does not "avoid or minimize adverse effects of these actions upon the quality of the human environment", Executive Order 13563 of January 18, 2011, and 16 U.S.C. § 1851 : US Code - Section 1851.

Issue #13 ----- Please post your responses to public comments online as well as maintaining a hardcopy in the Project File.

> **Comment:** Members of the public who submit comments on a draft NEPA document make the effort to read the NEPA document closely and take the time to compose comments that reflect their issues. Unless you respond to these comments and allow the public to read your responses they don't know if their comments were read and "considered." Plus, such responses show you aren't ignoring the public.

Request for changes to be made to the final NEPA document: Post your responses to ALL public comments online so the 322 million Americans\ national forest owners might read them if they choose.

Hiding your responses to comments in the Project File clearly violates United States' law. This is abuse. Will you pay the bills if a person has an accident driving to the district? Its insane to keep the responses off the net. You clearly have something to hide.

Failure to post your responses to ALL public comments online will violate 36 CFR 215.6(d) because the Responsible Official did not "address comments received from the public during the comment period in an appendix to the environmental assessment."

Ignoring public comments also violates:

40 CFR 1503.4(a) because the objector does not know how the Responsible Official responded to the objector's comments, and

40 CFR 1502.9(b) because the Final environmental impact statement does not respond to comments.

<u>Issue #16</u> ---- Increases in National forest logging do not stabilize or enhance the economy of small communities located near them.

One of your purposes listed in the P&N at page 19 for this timber sale is:

> **"4) Contribute to the economic vitality of the communities adjacent to the Payette National Forest."**

Once again this is a cut & paste get-out the cut P&N statement you will find in the P&Ns for your past timber sale draft EAs and DEISs.

Consider the following excerpts from a research paper that examined community stability vs. increased logging. The study was done on small communities near national forests in Washington State:

> "The relationship between timber harvest and the overall economic health of Washington communities assumed to be most dependent on logging and forest products runs counter to commonly held assumptions."
>
> "Despite a 93 percent decline in National Forest timber harvests and the loss of 7,300 forest products jobs statewide between 1988 and 1998, the number of people employed outside of forest products expanded by 726,000 (total employment increased 33 percent), total real income expanded by almost 50 percent, and population rose by 23 percent."
>
> "Economic vitality was especially evident in the largely non-metropolitan counties adjacent to National Forest lands in eastern and southwestern Washington. Although 3,000 forest products jobs were lost, more than 170,000 jobs were added outside that sector. The counties adjacent to the National Forests were not driven into economic depression as a result of 70 to 90 percent declines in federal harvests. Instead, average real income, employment, and population expanded significantly."
>
> "Even within relatively isolated areas, such as the northeastern tier of counties, there was considerable economic vitality despite the declines in federal timber harvests. In general, all areas gained population at rates above the national average. Some areas, such as Okanogan

County, did almost as well as the state's metropolitan areas despite the decline in federal harvests."

"The relatively high unemployment rates in many of the eastern Washington counties adjacent to National Forests cannot be attributed to the decline in federal harvests. Those counties had even higher unemployment rates at the time of peak harvests in the late 1980s. The unemployment rates in excess of the state average did not rise as federal harvests fell dramatically from these peak levels."

"While its true that average real pay is low in the eastern and southwest Washington counties adjacent to National Forests, this low pay is not the result of the decline in federal harvests. Average real pay plunged during the 1980s while federal harvests were rising to peak levels. In fact, while federal harvests fell in the 1990s, average pay stabilized or increased."

"Federal payments to local governments from revenue generated by local National Forest lands declined with federal harvests during the 1990s. This, however, did not cause an overall decline in the revenues available to local governments. Local and state economic vitality allowed local government revenues to double in the 1990s despite the reduction of the National Forest contributions."

From "*The Economic Impact of Preserving Washington's Roadless National Forests*" by Thomas Michael Power, Ph.D., Professor of Economics, University of Montana, June 13, 2000.
Links to complete article: http://www.kettlerange.org/power/ExecSummary.htm
http://www.kettlerange.org/power/powerreport.htm

Comment: Dr Power makes the following conclusions from his research findings:

> "Even within relatively isolated areas, such as the northeastern tier of counties, there was considerable economic vitality despite the declines in federal timber harvests."
>
> "The relatively high unemployment rates in many of the eastern Washington counties adjacent to National Forests cannot be attributed to the decline in federal harvests. Those counties had even higher unemployment rates at the time of peak harvests in the late 1980s."

Please describe why Dr. Power's research does not apply to the Payette National Forest.

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

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

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

(3) The Forest Service logging program has caused devastating impacts in the ability of the National Forests to provide economically valuable goods and services. Reversing the damage

caused by logging will be costly but ignoring the need to restore damaged forests will cost even more."

From: EcoNorthwest, "Seeing Forests for their Green: Economic Benefits of Forest Protection, Recreation, and Restoration", August 13, 2000
http://econw.com/our-work/publications/seeing-forests-for-their-green-economic-benefits-of-forest-protection-recre/

Comment: Mr. Niemi and Ms. Fifield (the authors of this paper) conclude:

"Despite years of rhetoric and misinformation, national and regional economies are not dependent on logging National Forests."

Please describe why their research findings do not apply to the Payette National Forest.

U.S. Undersecretary of Agriculture Jim Lyons states that recreation revenues from national forests significantly exceed timber revenues. See:

A 1998 presentation to the National Trails Training Partnership by U.S. Undersecretary of Agriculture Jim Lyons' statements quoting figures from the draft RPA (Resources Planning Act) of 1995.
http://www.americantrails.org/resources/economics/EconForestRec.html

Also see this compelling information:
http://illinois.sierraclub.org/piasapalisades/factshee.htm

Here's more from the Portland *Oregonian*:

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

From: Logging expansion won't help rural communities
Portland *Oregonian* online, June 29, 2014
http://www.oregonlive.com/opinion/index.ssf/2014/06/logging_expansion_wont_help_ru.html

Comment: Why do you reject the findings and conclusions of Undersecretary of Agriculture Jim Lyons who states "recreation revenues from national forests significantly exceed timber revenues." Elsewhere in these comments are the results of public survey information indicating the public is less likely to recreate near areas that have been logged, thus logging diminishes recreation revenue. Since recreationists avoid areas that have been logged the many "ma and pa" businesses that depend on recreation are harmed. How do you justify harming the revenues of motels, gas stations, restaurants etc. to increase the profits of a very large corporation?

Please describe why Undersecretary Lyons' conclusions about community stability do not apply to the Payette National Forest.

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

Comment: If you were really concerned about local community stability and local job creation you would offer this sale as an SBA sale to prevent a large timber corporation from logging it using their own labor. This would prevent the logs from being hauled many miles to be processed at a mill far removed from the small communities you claim need economic help. Of course your motivation to sell this timber sale has nothing to do with community stability. We both know "local community stability" and "local job creation" is part of the USFS dishonest script to trick the public into accepting tragic timber sales.

Request for changes to be made to the final NEPA document: Either:

1) remove the following statement from the P&N:

"4) Contribute to the economic vitality of the communities adjacent to the Payette National Forest."

OR

2) offer the sale as an SBA sale and say so in the final NEPA document,

OR

3) include the text or links to the text of the following papers (referenced above) in an Appendix to the NEPA document. Line-officers must not withhold such important information from the public. Congress promulgated laws to prevent zealous federal officials from behaving in such a manner to feather their nest.

"The Economic Impact of Trails-Forest Recreation's Growing Inpact"

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

"*The Economic Impact of Preserving Washington's Roadless National Forests*"

A 1998 presentation to the National Trails Training Partnership by U.S. Undersecretary of Agriculture Jim Lyons

Failure to do so will violate 40 CFR 1500.1(b) because environmental information is not available to citizens before decisions are made.

<u>Issue #21</u> ----- Supervisor Lannom, if you care about maintaining aquatic species' health you would indicate in the final EIS that all newly constructed temporary roads will be obliterated after use by returning the ground to the natural angle of repose and eliminate the running surface.

<u>Comment:</u> Roads that will be used again in the future must be constructed to system road standards with surfacing and a ditch to reduce sediment generation. If the final EIS does not clearly indicate that your proposed temporary roads will be obliterated such that a running surface no longer exists, it will show you plan to allow these temporary roads to pump sediment for decades until the so-called temporary road is used again for the next timber sale. Please become familiar with the Clean Water Act.

<u>Comment:</u> You propose to decommission 80.7 miles of existing road to reduce sediment generation that might enter streams. As part of the timber sale you propose to construct 9.7 miles of new road you refer to as "temporary road" that will generate new sediment. Reconstructing 34.8 miles of unauthorized road will also generate sediment. New roads produce 3 to 5 times more sediment than an existing road produces. There is no sediment analysis. How does the public know if the net sediment is reduced?

<u>Comment:</u> At page 63 you indicate temporary roads will be decommissioned after use. You tell the public: "Decommissioning treatments proposed range from full recontour to "spot treating" isolated areas." You invite massive sediment production yet your P&N isetifies the need for riparian treatment. Who's in charge on the Payette NF?

<u>Comment:</u> Since temporary roads are outsloped with no ditch, sediment that is generated during precipitation events, finds its way to streams and harms the aquatic resources after initial construction … unless the road is really obliterated which you aren't proposing to do. You know roads that are really obliterated have the fill returned to the cut so the original sideslope existed before the temp road was constructed. Your proposal to decommission your temporary roads will leave the road surface in place so you can access the cutting units with less reconstruction costs the next time you log the area.

Your so-called temporary roads are not temporary. You know this and choose to hide it from the public.

Comment: A report authored by Gerald Coghlan, WO Acting Director of Engineering in 1998 (17 years ago) indicated there are 372,956 miles of national forest system road (page 5). The agency currently constructs 2,170 miles of system road per year. At this rate there are 410,000 miles now. In addition to that, there is at least double this amount in unsurfaced, sediment producing, outsloped, temporary roads that have not been obliterated and "put to bed." The average distance to the moon (it varies) is 384, 403 miles … and you propose more? Go figure!

See: http://www.fs.fed.us/eng/road_mgt/roadsummary.pdf

Temporary roads are temporary (emphasis added). They must all 1) be returned to the original angle of repose (full recontour), and 2) have the CMPs removed after use. There is no type of future use that would justify keeping a temporary road running surface intact. If future access is needed a system road should be built.

Links to science showing complete obliteration is more effective at reducing long-term sediment generation than any other closure methods are included below:

"Obliteration
Obliteration can be the most effective treatment for both aquatic and terrestrial species. In full obliteration, culverts are removed, road surfaces are ripped and slopes are recontoured (see below for explanations of these treatments). In simple decommissioning, sites (such as stream crossings) are treated, but the segments (such as the roadbed between two stream crossings, or between water bars) are left intact. In obliteration, all sites and segments are treated. Subsurface water flow is no longer interrupted, allowing water to flow normally throughout the system and therefore aiding with vegetative recovery and reconnecting fragmented habitat. Recovering the original topsoil may also aid in revegetative success and limit the spread of non-native species on the site. Road obliteration, therefore, addresses both the aquatic/hydrologic and terrestrial problems caused by roads."

From **"AN EXPLANATION AND ASSESSMENT OF ROAD REMOVAL IN VARIED HABITATS"**
By Bethanie Walder and Scott Bagley
Published by the Wildlands Center for Preventing Roads, Missoula, MT
Link: http://ntl.bts.gov/DOCS/ICOWET_III/icowet3paper.pdf

"Unless a road is fully obliterated, it is bound to continue receiving human use and fail to fully revegetate."

"These facts and common sense show clearly that a road will not cease functioning as a road or trail until it is fully obliterated to the point where travel off of the former roadbed is easier than travel on it. As the following discussion on the benefits of road obliteration will show, simply gating a road or taking it off of the inventory does not make the impacts or the road go away."

From: **"Road Obliteration: Benefits to the Watershed and Its Inhabitants"**
A Swan View Coalition publication by Keith Hammer, 1994
Link: http://www.swanview.org/home/articles/reports-documents/road_obliteration_benefits_to_the_watershed_and_its_inhabitants/56

"We also believe that roads which cannot be properly maintained should be considered for closure or decommissioning, with natural landscapes and drainages restored (i.e., culverts removed). Road density in the Whitetail-Pipestone area is very high and reduction in road density is needed to protect resources. We believe road networks should be limited to those that are necessary for access and management, and which can be adequately maintained within agency budgets and capabilities. Roads that impact water quality, fisheries and/or sensitive and listed wildlife species should be prioritized for closure and/or decommissioning to maximize ecological benefits. We also recommend road obliteration or full road recontour as a preferred method of road closure, since it is often difficult to effectively restrict motorized access and protect public lands with simple gated road closures."

From: a November 5, 2008, letter to Bruce Ramsey, Forest Supervisor, Beaverhead-Deerlodge National Forest written by John F. Wardell, Director, EPA Montana Office.
Link:
http://yosemite.epa.gov/oeca/webeis.nsf/(PDFView)/20080402/$file/20080402.PDF?OpenElement

Comment: In 1996, Jeffery E. Moll, P.E. who worked at the San Dimas Technology & Development Center wrote *A Guide for Road Closure and Obliteration in the Forest Service* link http://www.fs.fed.us/eng/pubs/pdfimage/96771205.pdf At page 20 Mr. Moll states:

"The recontouring technique described here is considered the highest attainable level of mechanical obliteration and hydrologic restoration for low volume roads. This includes reestablishing original contour-removing embankments and removing cuts-removing drainage structures, establishment of subsurface flow, debris and rock placements, treatments to gullies and their connectivity to stream systems, and vegetative plantings, seeding and mulching."

Here's a definition of road obliteration used by the North Coast Redwoods District of the California State Parks written in May, 2003:

"obliteration - to completely remove the road feature from the landscape. This is accomplished by full recontouring. See full recontouring."

"full recontouring - the treatment of a road that completely eliminates (obliterates) the road from the landscape. Full recontouring is accomplished by recovering all available fill and burying the

cutbank until the surrounding terrain is fully matched. This type of treatment is also referred to as road removal or road obliteration. See obliteration."

Source: http://www.parks.ca.gov/pages/23071/files/fullroadrecontourbmp5_03.pdf

Comment: The EPA's description of road obliteration is quoted below:

> "Road closure and obliteration is one of the most important methods used to improve and protect watersheds within the National Forests of the Pacific Northwest. These are generally compacted, have little sideslope, and usually have grades less than 15%. Road obliteration is the process of removing and treating roads, resulting in partial to complete recontouring of the site to match the surrounding natural terrain.
>
> The main objectives of forest road obliteration are to restore hillslope hydrology, decrease surface erosion and the risk of mass wasting, and promote the re-establishment of native vegetation." (page 2)
>
> Source: http://www.epa.gov/wastes/conserve/tools/greenscapes/pubs/compost-uw.pdf

Since you do not propose to "recontour the site to match the surrounding natural terrain" you are not obliterating your temp roads. EPA says "Road closure and obliteration is one of the most important methods used to improve and protect watersheds within the National Forests of the Pacific Northwest." Clearly, you are not interested in "improving and protecting watersheds."

Here are links to other sources clearly showing the superiority of road obliteration:

http://www.swanview.org/home/articles/reports-documents/road_obliteration_benefits_to_the_watershed_and_its_inhabitants/56
http://www.parks.ca.gov/pages/939/files/Full%20Road%20Recontour.pdf

After the temp roads are obliterated or decommissioned they must be monitored over time to assure they are not generating sediment. This DEIS contains no such monitoring plan.

The forest service discusses the need to monitor road decommissioning methods:

> *"Several national forests have developed road decommissioning monitoring plans. This report builds on their hard work and careful thought to creating a successful monitoring plan. Instead of advocating one method or process for each monitoring project and budget, this document enables selection of the monitoring technique(s) for each situation. Monitoring forms and protocols are attached that can help a district or forest interdisciplinary team design a road decommissioning monitoring program for their area."*

From : "**Road Decommisioning"** by Carolyn Napper, USFS Soils Scientist
A USDA Forest Service Technology and Development paper
Link to paper: http://www.fs.fed.us/t-d/programs/im/road_decomission/road_decommissioning.shtml

Comment: You ignore agency best management practices. You have no temporary road monitoring plan. Spending a little money on monitoring is better than spending a lot of money cleaning the stream … or hiding the fact that temporary roads are the reason the stream is muddy. The DEIS does not contain a discussion explaining why you believe temporary road monitoring is not necessary on this project.

Please see **Opposing Views Attachment #4**.

Request for changes to be made to the final NEPA document: Please indicate all temporary roads will be fully recontoured after use and tell the public this will be done in the draft decision document, or provide scientific information authored by independent scientists in the response to comments that indicates there are other methods more effective at long term sediment elimination than full obliteration.

Also, please assure the final NEPA document includes a road obliteration monitoring plan to assure the sediment is being reduced as expected. The resulting draft decision documents should indicate the USFS will provide funding for the monitoring and accomplish the monitoring.

Failure to do so will violate:

- The Clean Water Act requires federal official to secure National Pollutant Discharge Elimination System (NPDES) permits when federal officials create point sources for water pollution. NPDES permits have been required since 1972. This case shows some federal officials don't seek out these permits from the EPA because they know the EPA won't grant the permit. Here, the Responsible Official cares more about accumulating volume than complying with United States law.

- 40 CFR 1500.1(c) because the ineffective proposal to "spot treat" temporary roads after use will not "protect, restore, and enhance the environment."

- 40 CFR 1500.2(f) because the ineffective proposal to "spot treat" temporary roads after use will not "restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment."

- 40 CFR 1500.2(e) because the ineffective proposal to "spot treat" temporary roads after use will not "avoid or minimize adverse effects of these actions upon the quality of the human environment."

- 36 CFR 212.5(b)(2) because spot treating a road does not restore the road to a more "natural state."

<u>Issue #22</u> ----- Please respond to the opposing views contained in the <u>Opposing Views Attachments</u> to these comments.

<u>Request for changes to be made to the final NEPA document:</u> Each opposing viewpoint is different and is related to a unique subject, therefore a single response attempting to deal with all opposing views simultaneously does not respond to opposing views as required by law. Please respond to each opposing view and post the responses online for the public to see. Simply placing a hardcopy of your opposing views responses in the project file located at the district hides the information from the American public.

How will the judge react when he/she finds out you expected the public to drive thousands of miles to examine a document that legally must be available to the public?

Failure to do so will violate 40 C.F.R. § 1502.9(a) and 1502.9(b) and. 42 USC § 4372(d)(4) because "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." Failure to respond to responsible opposing views (from any source) also is inconsistent with court precedent:

Not responding to responsible opposing views is also inconsistent with court precedent:

In ***Center for Biological Diversity v. United States Forest Service***, Argued and Submitted July 15, 2003, In the United States Court of Appeals, Ninth Circuit, the court stated:

> "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."

In ***Sierra Club v. Eubanks*** 335 F. Supp. 2d 1070 (ED Cal. 2004), the court stated:

> "credible scientific evidence that [contradicts] a proposed action must also be evaluated and considered."

In ***Seattle Audubon Society v. Lyons*** 871 F. Supp. 1291, 1318 (W.D. Wash. 1994), the court stated:

> "[the EIS] must also disclose responsible scientific opinion in opposition to the proposed action, and make a good faith, reasoned response to it."

In ***Seattle Audubon Society v. Moseley*** 798 F. Supp. 1473 (WD Wash. 1992) , the court stated:

> "[t]he agency's explanation is insufficient under NEPA … not because experts disagree, but because the FEIS lacks reasoned discussion of major scientific objections."

In ***Sierra Club v. Bosworth*** 199 F.Supp.2d 971, 980 (N.D. Cal. 2002), the Court held that the Forest Service violated NEPA when it failed to:

> "disclose and analyze scientific opinion in support of and in opposition to the conclusion that the…project will reduce the intensity of future wildfires in the project area."

Issue #24 ----- The Proposed Action will clearly cause the resource degradation and destruction described in the ATTACHMENTS to these comments.

The attachments to these comments present the "responsible" opposing views of between 500 and 600 independent, unbiased Ph.D. biological scientists who describe the resource damage caused by commercial timber sale logging and road construction activities that occur at any location, on any topography, at any elevation, at any time logging takes place.

> **Comment:** The Middle Fk Weiser timber sale will cause major damage to non-vegetative natural resources described by experts in the **Opposing Viewpoint Attachments.** Forging ahead with the timber sale with full knowledge of the likely resource damage that the sale will cause indicates 1) weighing the relative value of the natural resources in the area against timber outputs has not been done, and 2) they have not been "harmoniously coordinated." Also, since outdoor recreation, watershed, wildlife and fish are adversely affected by the sale, you obviously consider timber more important that these 4 other resources.

Request for changes to be made to the final NEPA document: Include the source literature for particularly relevant science quotes contained in the **Opposing Viewpoint**

Attachments in the References section of the final EIS and cite the quotes contained in the attachments in the body of the final EIS. Indeed, it makes sense for a public servant to present the public with the whole story which includes benefits and drawbacks of project implementation.

Failure to do this will violate:

- 40 CFR 1500.2(b) because the USFS could not complete the necessary environmental analyses without all the effects evidence,

- 40 CFR 1501.2(a) because the USFS did not identify environmental effects in adequate detail to complete a technical analyses of the project.

- 40 CFR 1500.2(e) because the Responsible Official was unable to avoid or minimize adverse effects of the project upon the quality of the human environment without complete knowledge of all likely adverse effects. Some adverse effects of project activities described by scientists in the **Attachments** was not mentioned in the final NEPA document EA.

- 40 CFR 1500.2(f) because the Responsible Official was unable to avoid or minimize any possible adverse effects upon the quality of the human environment without knowledge of the adverse effects. Had the Responsible Official known about these effects he would have acknowledged the existence of some adverse effects described in the **Attachments** in the final NEPA document EA.

Rejecting valid science because it s at odds with USFS timber agenda is also inconsistent with court precedent:

Sierra Club v. Eubanks 335 F. Supp. 2d 1070 (ED Cal. 2004)
Opinion excerpt:

> "credible scientific evidence that [contradicts] a proposed action must also be evaluated and considered."

Seattle Audubon Society v. Lyons 871 F. Supp. 1291, 1318 (W.D. Wash. 1994)
Opinion excerpt:

> "[the EIS] must also disclose responsible scientific opinion in opposition to the proposed action, and make a good faith, reasoned response to it."

Seattle Audubon Society v. Moseley 798 F. Supp. 1473 (WD Wash. 1992)
Opinion excerpt:

> "[t]he agency's explanation is insufficient under NEPA … not because experts disagree, but because the FEIS lacks reasoned discussion of major scientific objections."

Sierra Club v. Bosworth**,** 199 F.Supp.2d 971, 980 (N.D. Cal. 2002)
Opinion excerpt:

> The forest service failed to "disclose and analyze scientific opinion in support of and in opposition to the conclusion that the…project will reduce the intensity of future wildfires in the project area."

Issue #25 ----- The DEIS does not discuss the items shown below

> (e) Energy requirements and conservation potential of various alternatives and mitigation measures.
>
> (f) Natural or depletable resource requirements and conservation potential of various alternatives and mitigation measures.
>
> (g) Urban quality, historic and cultural resources, and the design of the buil environment, including the reuse and conservation potential of various alternatives and mitigation measures.

Request for final NEPA document modifications: Please comply with the law by including the missing information above.

Failure to do so violates 40 CR 1502.16

Issue #26 ----- You have consciously selected literature for the References section that excludes science describing how logging will adversely affect non-timber natural resources in the sale area.

> **Comment:** The vast majority of available literature written by independent scientists unaffiliated with the USDA that discusses logging and forest road construction describes

the natural resource destruction and adverse effects of these 2 actions. You exclude this science from your References section that describes how logging activities harm (and sometimes destroy) proper natural resource functioning. You select references that support logging and roading because including a representative sample of available logging-related effects science would clearly explain why logging the Stoney timber sale is a mistake. Why am I not surprised that you exclude this independently prepared science and instead include and cite biased documents authored by USFS employees that support logging and road construction? How will the District Court judge rule when the plaintiff's attorneys present these facts? How will you defend your actions?

Comment: The 42 page References section includes 396 documents. Incredibly, 96 (24%) of these were authored by USFS employees. A word search of the DEIS reveals some of the references not written by USFS employees were not cited in the DEIS. They were included in the Literature Cited section for looks. Since this unprofessional behavior occurs here, why should the public believe what is contained in the DEIS?

Real professionals who author NEPA documents do not selectively choose literature to cite in their References section that supports their proposed project and systematically exclude documents those that don't.

Comments: There are no documents listed in your References section that describe the likely or potential natural resource harm, damage and impairment that might occur by constructing 40 miles of road and logging 30 square miles that are part of the Proposed Action. Yes, when the adverse effects are considered, reconstructing user created roads sometimes produces as much sediment as new construction.

A WEB search of the words TIMBER ADVERSE EFFECTS LOGGING gets 2,330,000 hits. See for yourself:
http://www.bing.com/search?q=timber%20adverse%20effects%20logging&qs=n&form=QBRE&pq=timber%20adverse%20effects%20logging&sc=0-23&sp=-1&sk=&cvid=e4548830f3cf4a34a71c3919ee83fa9c

Clearly, you hoodwink and deceive the public by presenting only part of the story.

Your References section does not include **ANY** (emphasis added) source documents for the scientific quotes contained in the **Opposing Views Attachments.**

Your proposal to offer the Middle Fk Weiser timber sale in spite of the scientist's conclusion ignores best science, therefore you 1) violate the law, and 2) reject your responsibility to serve the recreating public. See below.

"This uncertainty has affected the ability of the Forest Service to utilize fully the provisions of § 219.35 paragraph (a) to consider the best science available in plan amendments and project decision making. For example, while population data have been held to be required for management indicator species under the 1982 rules, other tools often can be useful and more appropriate in predicting the effects of projects that implement a land management plan, such as examining the effect of proposed activities on the habitat of specific species; using information identified, obtained, or developed through a variety of methods, such as assessments, analysis, and monitoring results; or using information obtained from other sources such as State fish and wildlife agencies and organizations such as The Nature Conservancy. The purpose of this

interpretative rule is to clarify that, both for projects implementing plans and plan amendments, paragraph (a)'s mandate to use the best available science applies."

"The transition provisions as originally enacted, and now twice amended, explicitly refer to the 1982 planning rule as the rule ''in effect prior to November 9, 2000.'' At the same time, given the extension of the effective date of paragraph (d), within which site specific decisions must comply with the 2000 planning rule (68 FR 53294), it is clear that site-specific decisions entered into during the transition period are not to comply with the substantive provisions of the 2000 planning rule. This interpretative rule clarifies that until a new final rule is promulgated, the transition provisions of the 2000 planning rule, as amended by the May 2002 interim final rule remain in effect, including the requirement of § 219.35 paragraph (a) of the transition provisions that responsible officials consider the best available science in implementing national forest land management plans and, as appropriate, plan amendments. Pursuant to paragraph (b), the provisions of the 1982 planning rule may continue to be used only for plan amendments and revisions upon election of the responsible official. Appropriate plan amendments and projects proposed during the transition period should be developed considering the best available science in accordance with § 219.35 paragraph (a)."

Federal Register / Vol. 69, No. 188, page 58056
Wednesday, September 29, 2004
Rules and Regulations
http://www.fs.fed.us/r1//projects/plan_rule/intrpretative-rule.pdf

Request for changes to be made to the final NEPA document: Include some source documents from the **Opposing Views Attachments** in the References section of the final EIS. Also, cite some the specific quotes related to the issue that are presented in the source literature in the **Opposing Views Attachments**.

The public deserves to be informed of this information so they can make an informed decision to support or oppose the timber sale based on complete data.

Failure to do so will violate:

- 40 CFR 1500.1(b) because important environmental information was not made available to citizens before the decision was made.
- 40 CFR 1500.1(c) because the public was denied the opportunity to understand the adverse environmental consequences of the logging treatment.
- 40 CFR 1500.2(e) because the Responsible Official was unable to avoid or minimize adverse effects of the project upon the quality of the human environment without complete knowledge of all likely adverse effects. Some adverse effects of project activities described by scientists in the **Attachments** was not mentioned in the final EA EIS.
- 40 CFR 1500.2(f) because the Responsible Official was unable to avoid or minimize any possible adverse effects upon the quality of the human environment without knowledge of the adverse effects. Had the Responsible

Official known about these effects he she would have acknowledged the existence of some adverse effects described in the **Attachments** in the final EIS.

Issue #31 ----- After reading this far you must know the proposed Middle Fk Weiser timber sale is not a "restoration" project.

I cannot believe there are still USFS employees who really believe commercial timber sales restore anything but the purchaser's bottom line.

Here's a little history. The public's opposition to timber sales had been steadily increasing. In the fall of 2008 Chief Kimbell took action hoping to regain agency credibility. She issued verbal direction to the Regional Foresters to phase out the use of the terms "timber sale" and "logging" in documents that might be read by the public. "Timber sale" was to be replaced with "restoration project" and "logging" was to be replaced by "treatment."

So you see, the USFS corruption and public deception to serve their corporate masters goes all the way to the top.

> **Comment:** The USDA Office of Inspector General concludes that commercial timber sales are not restoration projects.
>
> > "We concluded that commercial timber sales do not meet the criteria for forest restoration." (Pg. 11)
> >
> > Long, Richard D., U.S. Department of Agriculture Office of Inspector General
> > **"Western Region Audit Report: Forest Service National Fire Plan Implementation"**
> > *Report No. 08601-26-SF*, November 2001.
> > http://www.usda.gov/oig/webdocs/08601-26-SF.pdf
>
> Why do you disagree with the OIG by referring to your Middle Fk Weiser timber sale as a restoration project?
>
> > **Comment:** The following eminent Ph.D. biological scientists, the USDA Office of Inspector General and NOAA fisheries employees conclude commercial logging will significantly damage and even destroy natural resources in the forest. These conclusions are based on research. Supervisor Lannom, here is a small sample of the science you ignored and/or rejected as you planned the Middle Fk Weiser timber sale:

"Land use activities associated with logging, road construction, urban development, mining, agriculture, and recreation have significantly altered fish habitat quantity and quality. Associated impacts of these activities include: alteration of streambanks and channel morphology; alteration of ambient stream water temperatures; degradation of water quality; reduction in available food supply; elimination of spawning and rearing habitat; fragmentation of available habitats; elimination of downstream recruitment of spawning gravels and large woody debris; removal of riparian vegetation resulting in increased stream bank erosion; and increased sedimentation input into spawning and rearing areas resulting in the loss of channel complexity, pool habitat, suitable gravel substrate, and large woody debris."

Pacific Salmonids: Major Threats and Impacts
Published by NOAA fisheries Office of Protecte Resources, May 15, 2014
http://www.nmfs.noaa.gov/pr/species/fish/salmon.html

"Forests are structured systems of many life forms interacting in intricate ways and disturbances are essential to their functioning. It's not fire disease fungi bacteria and insects that are threatening the well being of forests. Disease, fire, windthrow, and other disturbances are a natural part of the forest ecosystem and assist in dynamic processes such as succession that are essential to long term ecosystem maintenance. The real threat facing forests are excessive logging, clearcutting and roadbuilding that homogenize and destroy soil, watersheds and biodiversity of native forests."

Partridge, Arthur Ph.D., professor emeritus, University of Idaho
Statement at a Press Conference with Senator Robert Torricelli
about S. 977 and HR 1376), the Act to Save America's Forests
April 28, 1998, U.S. Capitol
http://www.saveamericasforests.org/news/ScientistsStatement.htm

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

"The continued logging of our National Forests also wastes American tax dollars and diminishes the possibilities of future economic benefits. The Forest Service lost $2 billion dollars on the commercial logging program between 1992-1997. Annually, timber produces roughly $4 billion while recreation, fish and wildlife, clean water, and unroaded areas provide a combined total of $224 billion to the American economy. Forests purify our drinking water - 60 million Americans get their drinking water from National Forests. When the dramatic values of ecological goods and services are taken into account, it is clear that protecting National Forests creates more economic benefits than continued logging."

Ehrlich, Anne Ph.D., David Foster Ph.D. and Peter Raven Ph.D. 2002
"Scientists Seek Logging Ban on U.S.-Owned Land"
New York Times, April 15, 2002
http://www.nativeforest.org/campaigns/public_lands/stb_5_30_02.htm

"We concluded that commercial timber sales do not meet the criteria for forest restoration." (Pg. 11)

Long, Richard D., U.S. Department of Agriculture Office of Inspector General
"Western Region Audit Report: Forest Service National Fire Plan Implementation"

Report No. 08601-26-SF, November 2001.
http://www.usda.gov/oig/webdocs/08601-26-SF.pdf

Who are these IDT members who so cavalierly reject "best science"?

Comment: Supervisor Lannom, your insincere, disingenuous, trickery desperately trying to convince the public that your logging and roading "restores" anything but corporate profit is now a Forest Service Employees for Environmental Ethics focus issue. You destroy your professional integrity by pushing this "restoration" lie. Here's what the Forest Service Employees for Environmental Ethics group has to say:

> *"Two decades ago, it wasn't uncommon to hear Forest Service managers brag about "getting out the cut." Career advancement often depended on how much timber volume could be produced. The word clearcut was not yet taboo.*
>
> *Those days are gone, thank goodness. Once again, though, the Forest Service is laying plans to cut down wide swaths of our National Forests. And those would-be timber beasts have learned an important lesson—language matters.*
>
> *They've ditched the terms they learned in forestry school, replacing them with feel-good jargon like "restoration," "forest health," "wildfire resilience" and "collaboration." "*
>
> *"Countering these damaging, falsely advertised restoration projects takes time and resources. It requires close reading of lengthy, complicated environmental review documents. It requires careful strategizing. It requires forming alliances with residents and elected officials. Often, it requires litigation.*
>
> *FSEEE is uniquely positioned to lead the charge against these damaging and misleading restoration logging projects. We know the laws and we know how the Forest Service works."*
>
> *"This is the sad reality being proposed for hundreds of thousands of acres of public lands around the nation. The Forest Service is waging a cynical public-relations campaign designed to fool the public into supporting more logging of our National Forests under the guise of restoration, when in reality, it's just cover for more clearcuts."*

Link to full report: http://fseee.org/index.php/stay-informed/projects/1004368

Are you aware that some of your employees are secret dues-paying FSEEE members?

Comment: You are obedient Supervisor Lannom. You title your timber sale The Middle Fork Weiser River Landscape Restoration Project. Like any good USFS team player, you use "forest health" 6 times in the draft EIS. You use the word "restore" 104 times in the draft EIS. You know the USFS deception language well. It would bother most people to fool and lie to their supervisors (322 million Americans) who provide the money for their salary. You don't care do you? Why? Your job pays well and you know dealing with timber sales in the public arena **honestly** will eliminate your future promotion opportunities. I have included hundreds of statements by independent Ph.D. scientists describing how logging and road construction destroy the ability of many natural resources in the forest to function properly. How can this be "restoration"?

<u>Request for changes to be made to the final NEPA document:</u> Assure the timber sale name does not include the words “restore” or “restoration.” Also wherever the NEPA document tells the public a natural resource will be restored include the following information:

1) the present condition of the resource and how it got that way.
2) why the resource should be restored.
3) the specific action you will take to restore the resources including effectiveness information.
4) identify other proposed actions that will still occur that might further harm the resource that needs to be restored.

Finally, please list the qualifications of your IDT members that justifies their rejection of these scientists’ descriptions of the tragic damage inflicted on forest resources and instead conclude this timber sale restores the forest.

Failure to do so violates:

18 USC § 1519 and the public trust.

40 CFR § 1500.1(b) because actions were not taken to protect, restore, and enhance the environment, and

40 CFR 1500.2(f) because actions were not taken to avoid or minimize any possible adverse effects of their actions on the quality of the human environment.

Lying about the effects will give the Responsible Official an excuse to take no action to eliminate the damage, thus 18 U.S.C. § 1001 has been violated.

The children born 50 years from today will not appreciate the ecological plunder caused by this timber sale. How could anyone ignore children? They won’t appreciate their land being plundered to provide a natural resource extraction corporation with profit.

Most Americans want future generations of kids to have the opportunity to experience the quietness and solitude in a real, undeveloped forest. This will become more important in 2070 when the predicted population of the United States will be 418 million

people. The wild **UNDEVELOPED** national forests will provide one of the only escapes from the insanity of a world driven even more by money than it is now.

> **Comment:** The Middle Fk Weiser sale will take away more undeveloped national forest acres from the legacy the unborn kids of the future. Which is most important: the future kids of America or another summer home for the CEO of a timber extraction corporation?
>
> In 2015 the total area commercially logged in all USFS regions was 205,000 acres. The 10-year average is 220,000 acres. At this rate, future generations will loose 11,880,000 acres of undeveloped forestland. You contribute to this sad statistic with this timber sale. I wonder if all your IDT members are proud to assist you in your plunder. Do they know the USFS logged 903,000 acres in 1990?

By now you may have read the information contained in the **Opposing View Attachments**. Reasonable people would have doubts about the wisdom of their proposal that is likely to create major adverse impacts to their resources as described by hundreds of Ph.D. scientists in the attachments.

Responsible people that contemplate any action intuitively engage the Precautionary Principle. Perhaps you have never heard of it. Here it is in a nutshell:

> *The precautionary principle or precautionary approach states that if an action or policy has a suspected risk of causing harm to the public or to the environment, in the absence of scientific consensus that the action or policy is not harmful, the burden of proof that it is not harmful falls on those taking an action.*
>
> See: http://en.wikipedia.org/wiki/Precautionary_principle
>
> **Opposing Views Attachment #15** contains quotes by Hilda Diaz-Soltero, Dr. Ann Bartuska, Chief Dale Bosworth, Associate Chief Sally Collins, Chief Dr. Mike Dombeck, Chief F. Dale Robertson, Agriculture Secretary Dan Glickman, and USFS Chief Tom Tidwell, who all tell the public the USFS depends on "best science" as the basis for it's projects How do you justify not complying?

Supervisor Lannom, as you and your IDT will find out, the **Opposing Views Attachments** contain the wisdom of several hundreds Ph.D. scientists who all agree

that logging and roading the forest will inflict major adverse ecological impacts. They show how the passing of time without human manipulation is the only way to bring these logged areas back to health in spite of the fact you claim this timber sale will create a healthy forest and "restore" the natural resources in the area. Some of your IDT members know this is true and are frightened to speak up.

A small sample of the opposing views from the **Opposing Views Attachments** is included below. Please meet with your IDT and discuss each science statement. Let them know the meeting will be open and honest and they should not be afraid to express their feelings. I'm sure some members of the IDT are familiar with the work these scientists have produced: E.O. Wilson, Chris Maser, Jerry Franklin … and Aldo Leopold.

> **1)** "*Human beings and the natural world are on a collision course. Human activities inflict harsh and often irreversible damage on the environment and on critical resources. If not checked, many of our current practices put at serious risk the future that we wish for human society and the plant and animal kingdoms, and may so alter the living world that it will be unable to sustain life in the manner that we know. Fundamental changes are urgent if we are to avoid the collision our present course will bring about*."
>
> **Union of Concerned Scientists**

> **2)** "*The primary goal of resource management (sustained yield) evolved from the utilitarian values of the Progressive Era. Intuitively, sustained yield is a logical and laudable goal: no more is taken than can be replenished. As it has come to be implemented, however, the concept of sustained yield has been modified to mean taking the maximum supply a system can withstand (i.e., the furthest point to which production can be pushed without impairment of the resource's ability to reproduce). One of our colleagues calls this 'management at the edge of harm'."*
>
> **Hanna Cortner and Margaret A. Moote**
> **in *The Politics of Ecosystem Management***

> **3)** "*Nature designed forests to live 100 to 5000 years. We are designing a forest to live between 60 and 120 years.*
>
> *Nature continually regenerates diverse forests of single and multiple tree species (usually between one and 10 tree species) including plants, animals, micro-organisms and fungi. We design forests of single and multiple tree species (often planting two or more tree species on the same site) leaving regeneration of other components of the ecosystem to nature.*
>
> *Nature designed some forests to be connected, and others to be disconnected, "in space and time over vast landscapes." We are designing fragmented forests disconnected in space and time on clearcut patches.*
>
> *Nature designed a forest to be self-sustaining, self-repairing. We are designing a forest to require external expenditures and subsidies, watershed restoration, brushing, spacing and fertilizers."*
>
> **Anthony Britneff, RPForum, Oct 97**

> **4)** "*The one process now going on that will take millions of years to correct is the loss of genetic and species diversity by the destruction of natural habitats. This is the folly our descendants are least likely to forgive us*."
>
> **E.O. Wilson**

5) "*Evidence points to a common cause behind past failures of investments in sustainable development. Historically, the management of forest, rangelands, fisheries, and wildlife resources was dominated by theories of carrying capacity and goals of sustainable yield. Human behavior was ignored. The application of these theories led to the expectation that target variables such as employment could be stabilized and created a demand for a constant flow of product. These policies were successful initially, and profit and employment were, in fact, stabilized. But their very success resulted in slow changes in key ecological, social, and cultural components not captured in the management models: changes that typically led to the collapse of the entire system. The "economic extinction" of cod along the coast of eastern North America is a prime example. From a review of a wide range of failed sustainable development initiatives, a common pathology emerges. At the extreme, the ecological system loses resilience, the industries become dependent and inflexible, the management agencies become rigid and myopic, and the public loses trust in governance*."

C.S. Holling, Dec 2000

6) "*The instrument, the knife, that carved out the new, rudimentary forest was the razor-sharp interest in the production of a single commodity. Everything that interfered with the efficient production of the key commodity was implacably eliminated. Everything that seemed unrelated to efficient production was ignored. Having come to see the forest as a commodity, scientific forestry set about refashioning it as a commodity machine. Utilitarian simplification in the forest was an effective way of maximizing wood production in the short and intermediate term. Ultimately, however, its emphasis on yield and paper profits, its relatively short time horizon, and, above all, the vast array of consequences it had resolutely bracketed came back to haunt it."*

James C. Scott in *Seeing Like a State*

7) "*Ecological forestry that maintains an effective coarse filter differs markedly from the 'engineering' approach common under sustained-yield timber management. Under that model, foresters try to define precise objectives for specific ecosystem components (e.g., trees, water, habitat for a particular endangered species) and use sophisticated quantitative methods to determine optimal management strategies. Though it can be considered appropriate for certain narrowly defined problems, we believe that there is a certain arrogance to such an approach to managing forests for biodiversity. It assumes a near- perfect understanding of the ecosystems under management."*

Robert Seymour and M.L. Hunter in their book
Maintaining Biodiversity in Forest Ecosystems

8) "*Two broad schools of thought exist regarding landscape planning. In one, future landscape patterns are described in specific desired products (e.g., wood fiber, habitat) and known ecosystem processes. The theme can be summarized as 'we know what we want and we know how to get it'.*

In the other approach, future patterns are based upon historic patterns to the degree feasible. This point of view reflects the fact that we cannot even name all the species in the landscape, much less rationally plan for their habitat needs and ecosystem functions. A premise of this approach is that native species have adapted to the disturbance events and resulting range of habitat patterns of the past thousands of years. The probability of their survival is reduced if their environment deviates substantially from the range of historic conditions."

Cissel, Swanson, McKee and Burditt *Journal of Forestry*

9) *"Current standards represent the protection of environmental and cultural values as constraints on managing the timber resource. Current standards do not effectively integrate ecosystem and cultural values. Nor do they adequately address requirements for ecosystem sustainability, harmonious stewardship of all resources, and the needs of future generations.*

Historical approaches to forest management have focused largely on products rather than on the biological systems from which these products derive. In Clayoquot Sound, as elsewhere in British Columbia, sustaining timber production has historically taken precedence over maintaining forest ecosystems.

The Panel believes that forests should be managed as ecosystems, rather than as potential products, and that forest practices should not put at risk the long-term health of forest ecosystems. 'Sustainable ecosystem management' is characterized by resource management practices that are scientifically based, ecologically sound, and socially responsible.

The Scientific Panel's recommendations are among the first efforts taken to shift forestry from its historical focus on sustaining output levels for specific forest products, to a focus on sustaining forest ecosystems."

Clayoquot Sound Scientific Panel

10) "*If we choose to continue our current patterns of use, we face almost certain declines in the ability of ecosystems to yield their broad spectrum of benefits … from clean water to stable climate, fuelwood to food crops, timber to wildlife habitat. We can choose another option, however. It requires reorienting how we see ecosystems, so that we learn to view their sustainability as essential to our own. Adopting this "ecosystem approach" means we evaluate our decisions on land and resource use in terms of how they affect the capacity of ecosystems to sustain life, not only human well-being but also the health and productive potential of plants, animals, and natural systems. Maintaining this capacity becomes our passkey to human and national development, our hope to end poverty, our safeguard for biodiversity, our passage to a sustainable future."*

in *People and Ecosystems: The Fraying Web of Life*
by the World Resources Institute

11) "*Nature designed a forest as an experiment in unpredictability. We are trying to design a regulated forest. Nature designed a forest of long-term trends. We are trying to design a forest of short-term absolutes. Nature designed a forest with diversity. We are designing a forest with simplistic uniformity. Nature designed a forest with interrelated processes. We are trying to design a forest based on isolated products."*

Chris Maser in *The Redesigned Forest*

12) "*One of the most fundamental lessons of the last several decades of ecological research is that the biological diversity of North American forests is far greater than previously thought. At the same time, much more is at risk through traditional forestry programs then ever imagined. Perhaps nowhere has this been more pronounced that in the debate over the fate of the remaining old forests of the Pacific North-West.*"

Bruce Marcot
in *Creating a Forestry for the 21st Century*

13) "*Limiting the periodic harvest of a renewable resource to its periodic growth is the fundamental dictum of sustained yield, but it can take at least two forms. The benign and conservative form sets the harvest level according to the spontaneous (some might say 'natural') periodic increment of the resource.*

A bolder, more vigorous approach applies capital to the resource, to stimulate production 'artificially'. This approach holds an immense appeal to resource managers with exaggerated anxieties about scarcity, and it appeals immensely to those of the Type A, cabbage-patch, persuasion. Maximum sustained yield would be limited only by the biological capacity of the land to absorb productive capital inputs.

"As the second half of the twentieth century got underway, the bold form of sustained yield was pursued enthusiastically by the federal resource agencies. After WW11, the budget floodgates of

public capital opened, and the maximizers of sustained yield went on a binge of dam construction, rangeland 'improvement', recreational facilities development, road building, and clear-cutting. Single-resource agencies, cheered on by their single-resource clientele groups undertook Type A management activities with unprecedented capability.

"Labeled 'intensive management' in the Forest Service, the enthusiasm led to 'a conspiracy of optimism' as historian Paul Hirt described the period. What timber management meant, in the post-war years, was the conversion of complex biological systems, the old growth forests of the West, into simplified timber plantations."

Richard W. Behan
in *Plundered Promise*

14) "*The primary goal of resource management (sustained yield) evolved from the utilitarian values of the Progressive Era. Intuitively, sustained yield is a logical and laudable goal: no more is taken than can be replenished. As it has come to be implemented, however, the concept of sustained yield has been modified to mean taking the maximum supply a system can withstand (i.e., the furthest point to which production can be pushed without impairment of the resource's ability to reproduce). One of our colleagues calls this 'management at the edge of harm'."*

Hanna Cortner and Margaret A. Moote
in *The Politics Of Ecosystem Management*

15) "*If 20th century forestry was about simplifying systems, producing wood, and managing at the stand level, 21st century forestry will be defined by understanding and managing complexity, providing a wide range of ecological goods and services, and managing across broad landscapes…managing for wholeness rather than for the efficiency of individual components."*

Kohm and Franklin
in *Creating A Forestry For the 21th Century*

16) "*Sustainable forestry will not result from lengthening rotations on tree farms and preserving a few small areas for display of other forest qualities.*

The evolution to sustainable forestry requires, at a minimum, a recognition of the limitations of present knowledge and of the risk that human intervention will do irreversible harm before enough knowledge accumulates to identify the practices of sustainable forestry. This recognition leads to a double strategy:

1) intensify research on how forest systems work and

2) preserve options for the future.

Preserving options implies stopping policies that are doing harm by destroying watersheds, biological diversity, scenic beauty and other forest values. It means developing new forest management techniques that give far less weight to the present and more to the future and less weight to wood production and more to other values."

Alice Rivlin
in *Defining Sustainable Forestry*

17) "*The concept of conservation ecology is often limited to a protectionist agenda: buy, fence, and lock up as much as possible of the natural world. But fences rot and locks rust. Arbitrary lines drawn on a map have always faded in time; just ask a Cherokee. The critical challenge for science, and our species, demands that we abolish intellectual barriers, crush limited paradigms, and take the broadest possible view of the problem."*

O'Neill, Kahn, and Russell

18) "*In a sense, the need for integration is also the lesson of the old paradigm's failure. The paradigm failed because it oversimplified a complex reality. It is still not clearly understood that the oversimplification took two forms. First, the sustained yield paradigm failed to understand the complexity of forest ecosystems, systematically downgrading the mounting evidence of soil erosion, biodiversity loss, and disappearing habitat as so many anomalies to be handled by doing better in future. Second, it failed to come to terms with the fact that sustainability is as much a social as an ecological problem. Sustained yield forestry is only a problem to the extent that it fails to provide us with what we want from our forests. It continues to be defended precisely because it is providing some people with exactly what they want."*

Jeremy Rayner, Implementing Sustainability in West Coast Forests in the *Journal of Canadian Studies*

19) "*EM (ecosystem management) technology will probably emerge as more important to people than either the technology of the communications revolution or biotechnology, because of its potential usefulness in guaranteeing a livable environment."*

John Gordon, Yale University

20) "*Decisions made when the sustained yield paradigm was established after the Second World War set British Columbia on a path that has been and will continue to be extremely costly and disruptive to reverse."*

Cashore et al., Change and Stability in BC Forest Policy from *In Search of Sustainability*

21) "*To illustrate how inadequate existing knowledge has been, consider the important discoveries of the last 25 years with regard to:*

> *1) the extraordinary dynamics of the below-ground subsystem and its high energy requirements;*
>
> *2) the importance of the dead tree and its derivatives in the long-term functioning and habitat diversity of forests, streams, and rivers;*
>
> *3) the scale and complexity of edge influences that can be created through forest harvest practices; and*
>
> *4) the importance of biological legacies, living and dead, in ecosystem recovery following catastrophic disturbances, and the poor match in conditions and processes between most natural disturbances and clearcutting.*

This is just a small sample of recent scientific insights into forest ecosystems. In fundamental ways, each of these findings alters our view of these forests and how they work. We simply did not understand some very basic aspects of forest structure and function. Consequently, traditional forestry approaches, based on a very simple view of a forest, have proven very inadequate. Resource managers thought that they could grossly simplify forests without consequence. They have done so on a grand scale, and often react energetically against adoption of alternative models of how forest ecosystems work.

There is no question that recognizing the potential ecological value of a dead tree makes life much more difficult (or, put another way, more interesting) for the silviculturalist. Perhaps as important, it challenges the basic value set for foresters, many of whom share a strongly utilitarian view of the forest."

Jerry Franklin in *Conservation Ecology*

22) "*Sustained yield is not the same thing as sustainability. You could produce a sustained yield of timber (for several rotations anyway) without practicing sustainable forestry. Managing for a*

consistent and sustained supply of one commodity does not ensure that all other commodities and values will be maintained. Nor is the concept of sustained yield particularly appropriate for forests as ecosystems. Even if one includes all known non-timber forest products and all aspects of 'wildcrafting', most components of forest biodiversity are not harvestable resources. Nevertheless, natural resources have continued to be managed (or mismanaged) under the rubric of sustained yield in one form or another, and the histories of forestry, fisheries, and wildlife management show similar patterns [of resource depletion]."

Pojar et al.
in *Silvicultural Options on the Central Coast* draft BC MoF, 1999

23) *"When systems are pushed outside the bounds of natural variability, there is a substantial risk that biological diversity and ecological function will be jeopardized and therefore, ecological systems will not be naturally maintained."*

Ayn Shlisky *Journal of Forestry*

24) "*Forestry has been largely concerned with silviculture, defined as "that branch of forestry which deals with the establishment, development, care, and reproduction of stands of timber" (Toumey 1947). The aim of silviculture, according to Toumey, is the "continuous production of wood". But forests comprise much more than wood and other products for human consumption, much more even then the "public service" functions of climate regulation, water supply, pest control, gene banks, or recreational opportunities. What future generations can afford to lose is not the only consideration. Forests are valuable and must be sustained for their own sake. Until we acquire such an attitude, the sustainability concept may just be a smoke screen, behind which we continue to chip away at our biotic heritage."*

Dr. Reed Noss in *Defining Sustainable Forestry*

25) "*The agricultural paradigm of forestry adopted in this century (simplification and uniformity in structure, pattern, and product) and the regulated landscape (fully occupied by an ordered age sequence of managed stands) no longer suffices. The simplistic notion that four regeneration harvest practices, designed with the knowledge and objectives of the 19th century, can meet the objectives of the 21st century must be given up*."

Kohm and Franklin
in *Creating a Forestry for the 21st Century*

26) "*Sustained yield and sustainable development are unquestionably in conflict. Attitudes, policies, and management strategies that evolved to serve the sustained yield ideal are, in many respects, outmoded. Sustainable development demands that timber primacy be replaced by a concern for a forests' contribution to human welfare in the broadest sense.*

The emphasis must shift from maintaining timber supplies over the long run to maintaining a multitude of resource values that are dependent upon site productivity, ecosystem, ecosystem health, integrity, and diversity."

David Haley and Martin Luckert
in *Managing Natural Resources in BC*

27) *"Sustaining the yield of a single resource is based on the concept of equilibrium. That is, balance between growth and harvest can be sustained in perpetuity. However the sustained yield idea simply does not fit contemporary circumstances. A different paradigm of forest management is required in a society:*

- *where change is ubiquitous,*
- *where change is rapid and encouraged,*
- *where a scarcity of wood products has failed to materialize, and*
- *where the forest is appreciated for an array of commodity and amenity values*."

R.W. Behan *Journal of Forestry*

28) "*On a net basis, the forest-planning adventure has been disastrous. Achievements have been grossly outweighed by the environmental, social, managerial, and political damages and costs. Indicting the Forest Service for this travesty of professional management and public administration is indeed inescapable … but it is also insufficient.*

Also at fault is the obsolete paradigm of professional forestry based on producing a maximum sustained yield of timber. Maximum sustained yield of timber might well be called the forestry of the 20th century - and it differs little from the 19th or 18th."

R.W. Behan in *Creating A Forestry For The 21st Century*

29) "*The major change in forestry thinking wrought by Ecosystem Management has been the abandonment of the concept of a stable flow of wood from the land as a universally dominant management objective. As an environmental paradigm replaces utilitarian, conservation, and preservation paradigms in land managers' and the public's view of the landscape, the management of whole systems for a variety of purposes rather than commodity flows or single resources (including "wilderness") will become increasingly overt and explicit. Ecosystem Management will differ from multiple-use management in focusing on inputs, interactions, and processes, as well as uses and outputs*."

Dr. John C. Gordon, Yale University

30) "*A student of forestry in the 1950's or 1960's would have found information on converting old-growth stands into even-aged regulated forests, preventing and suppressing fire, creating habitat for game species, or calculating optimum rotations. Little mention was made of institutional or social issues. The forester of the 20th century could go to his post in the woods, plan for a sustained flow of timber, mitigate the negative effects of harvesting, provide for other values where possible, and feel secure in the knowledge that he had carried out his professional duties.*

Of course, the 21st century will not be such a time."

Katherine Kohm and Jerry Franklin
in *Creating a Forestry for the 21st Century*

31) "*The growing demand for forest products led the government to quickly take measures to manipulate the forest cover to obtain more wood or to justify larger harvests. To attain increased productivity, forest policy tried to change to make industry more responsible in exploiting the forest in a manner that redistributes the stock of trees on its areas. Under the mechanical interpretation, harvesting the forest is to be structured in such a way that after a transition period, average annual growth is maximized. This is what is meant by 'normalizing the forest.' The policy has two objectives. One is always to try and support industry. The second, however, is to ensure that the commercial forest has the maximum quantity of available wood for harvesting. The forest becomes a variable factor of production. The 'normal' forest, where each age class of tree occupies the same space over time, is the desired goal because it represents a condition of social stability and maximizes all the functions of the forest.*

This model of a normal forest raises a number of questions. The idea that an even flow of wood could stabilize human communities betrays, once more, a lack of understanding of economics. Normalization does not take into account the profit motive of mills, where the wood is transformed, although the pursuit of profit is a basic rule of business. We find rhetorical and mysterious the assertion that the normal forest would eventually lead to a situation in which all the functions of the ecosystem are optimized. It does have the trappings of an ecosystem approach. Nevertheless, in our view, the objective of the normal forest, or the normalization of the forest, is merely an elegant way to justify an increase in allowable cuts without increasing the responsibilities of industry."

Luc Boutillier in Howlett, ed *CANADIAN FOREST POLICY*

32) "*Principle 1: Sustain healthy, diverse, and productive ecosystems in the long term. A key lesson of the 1980's was that a national forest or grassland is much greater than the sum of its multiple uses. People demanded that management goals and objectives go beyond the yields of board feet of timber, user days of recreation, animal-unit-months of grazing, and other "multiple use outputs" projected in the endless tables and graphs within forest plans. For too long, federal land use managers had been treating natural resources "as discreet entities, focusing on their economic value and paying little attention to underlying natural systems and processes"(Keiter 1990).*

This first principle suggests an important corollary for multiple-use management: the key to sustaining all benefits is in managing for ecosystem health. Earlier, it was assumed that land would be taken care of as long as management succeeded in sustaining yields of the various multiple uses. It is now recognized that ecosystem health must be a conscious and deliberate goal as well as the over all context for multiple use management."

Dr. Winnifred Kessler and Dr. Hal Salwasser
in *A New Century for Natural Resources Management*

33) "*Tensions over ecosystem management are at their starkest in cases where environmentalists and their allies contend that harvesting plans endorsed by the industry and other parts of the development coalition involve a rate of logging too high to allow protection of ecosystem characteristics. Anxious to maintain harvest levels, the industry and its supporters usually adopt as their first line of defense a set of responses based upon the sustained yield … multiple use (integrated management) discourse that was employed to legitimate operations through out the 1970s and 1980s. Industry spokespersons argue that their harvesting practices are designed to sustain the timber supply and protect other important forest values such as wildlife, viewscapes, and riparian zones. Where this response fails to neutralize pressure for ecosystem management, industry interests usually begin to explore what might be referred to as 'old wine in new bottles' strategies.*

Typically these combine symbolic maneuvering with limited substantive concessions. Elements of the ecosystem management discourse are incorporated into rejigged defenses of the practices, and if necessary, these practices are adjusted with an eye to convincing at least the undecided portions of the attentive public that these constructions are credible. Throughout this exercise, industry interests try to create and capitalize on the ambiguity surrounding ecosystem management concepts, hoping to maintain a set of meanings loose enough to allow limited modifications of the practice to be sold as a genuine response to new ideas. Ultimately, the development coalition aims to neutralize pressures for policy change by winning support for the claim that it has brought practices into line with the standards embodied in the ascendant discourse."

Jeremy Wilson in Howlett, ed *CANADIAN FOREST POLICY*

34) "*As conceived in the Multiple Use and Sustained Yield Act, within the limits set by ecological sustainability, land and resource planning was to seek the achievement and maintenance in perpetuity of high levels or regular periodic outputs of the various renewable resources of the national forests. Two realities make this approach problematic. First, the dynamics of ecosystems means that scheduling a regular, predictable output of a single product probably will fail because productivity varies through time. For example, experience has shown the difficulty of achieving even flow when management focuses upon maintenance of a high level of production of a short list of outputs (such as wood fiber and forage). Second, an even flow can be sustained under variability, but it often comes by over-exploiting the system's productivity (e.g., by harvesting more than is produced annually) or by impairing other ecosystem elements (e.g., grazing under conditions that cause erosion).*

When managed this way, National Forests appear to promise a stability of commodity flow that they can not deliver, and public expectations are raised about the long-term capability of the land

and likely resource flows. At the extreme, forests managed this way become subject to catastrophic surprises when unusual, but natural, events occur (e.g., greatly increased flooding and landslides during heavy rains). Communities that grow dependent on artificially high or constant commodity flows can eventually suffer the same catastrophic surprises … losing all semblance of sustainability."

Committee of Scientists Third Draft Preliminary Report, July 98

35) "*From the inception of American forestry in the late nineteenth century, foresters saw old growth as an obstacle in the way of the ultimate goal of forestry: to achieve a fully regulated forest producing desired goods and services efficiently and without waste. Foresters hoped to convert old growth as quickly as possible to thrifty, young, growing forests. This remarkably enduring perspective remained largely unchallenged within the forestry profession until the 1980's, even though for decades many non-timber-oriented resource management professionals defended the positive values of old growth. Greatly outnumbered in the forestry schools, the timber industry and government agencies, these dissenters remained on the margins of policy debates until the 1980's."*

Paul Hirt
in *Institutional Failure in the U.S. Forest Service*

36) "*There are currently many plans for sustainable use or sustainable development that are founded upon scientific information and consensus. Such ideas reflect ignorance of the history of resource exploitation and misunderstanding of the possibility of achieving scientific consensus concerning resources and the environment. Although there is considerable variation in detail, there is remarkable consistency in the history of resource exploitation: resources are inevitably overexploited, often to the point of collapse or extinction*."

Dr. Carl Walters, Donald Ludwig, and Dr. Ray Hilbor

37) "*A good example of a policy that might be portrayed as precautionary, but is not and should be reformed, is the traditional approach of taking the maximum sustainable yield (MSY) from a fishery.*

The MSY approach to managing fisheries involves creating a bell-shaped curve to determine the total advisable catch of a targeted stock. In theory, as long as the catch remains on the ascending side of the curve, increased fishing will yield a larger sustainable take. But once the catch moves to the downside of the curve, more fishing will mean less catch because of undue thinning of the population's ability to replenish itself. Managers thus strive to remain at the peak of the curve, known as the MSY plateau.

Yet it has been shown time and again that MSY is very difficult to predict and that damage is done by overfishing. Commercial fish populations fluctuate considerably, and often unpredictably, because of ever-changing ocean conditions. Meanwhile, industry attempts to stay at the peak of a historically determined MSY curve have led to dramatic collapses. Rather than give due regard to conservation for the long term, MSY management practices seek to maximize short-term exploitation of the sea."

Wilder, Tegner and Dayton

38) "*Those advancing anthropocentric (or softer, less biocentric) definitions (of ecosystem management) are criticized for offering a naïve, 'we can have our cake and eat it too' position that dilutes ecosystem management into something closely resembling discredited concepts such as multiple use and integrated resource management. It is easy, critics say, to 'cheery pick' a few elements from the list of ecosystem management goals and principles. Full and genuine adoption of this list, however, would require and/or entail a comprehensive package of changes, a 'seismic shift' in mindset that would overturn assumptions and practices based upon utilitarianism and the 'commodity forest' and replace them with ones based on a Leopoldian land ethic and the*

'environmental forest'. Out would go the tacit assumptions underlying traditional resource management practices including earth as a resource for humans, competition over cooperation, control in place of adaptation, viewing all problems as soluble, and viewing nature as stable or balanced. In would come contextual thinking, management premised on complex conceptions of ecological and organizational systems, and new approaches 'based upon the science of surprise, complexity and non-linearity."

Jeremy Wilson in Howlett, ed *CANADIAN FOREST POLICY*

39) "*In my own field, forestry, group A is quite content to grow trees like cabbages, with cellulose as the basic forest commodity. It feels no inhibition against violence … its ideology is agronomic. Group B, on the other hand, sees forestry as fundamentally different from agronomy because it employs natural species, and manages a natural environment rather than creating an artificial one. Group B prefers natural reproduction on principle. It worries on biotic as well as economic grounds about the loss of species like chestnut, and the threatened loss of the white pines. It worries about a whole series of secondary forest functions: wildlife, recreation, watersheds, wilderness areas. To my mind, Group B feels the stirrings of an ecological conscience*."

Aldo Leopold
in *A Sand County Almanac*

40) "*Preservation of future stewardship options is rarely possible when current rates of resource exploitation are high. Preserving options assumes an acceptable "decision space" will be available to address the environmental problems confronting future human generations. However, many forest and range ecosystems have experienced intensive resource management and utilization by Euro-Americans with adverse effects on their productive potential. The most significant changes in these systems have occurred over the last 200 years.*

For example, in forested systems most of the old-growth has been converted to younger stands, extensive road systems have been built with outdated technologies based on unsustainable levels of resource use. In rangeland areas, alterations to riparian systems and stream channels has been extensive, a consequence of historical watershed and riparian management practices. In either of these situations, future stewardship options have been reduced or, in some cases, essentially eliminated. While current stewardship activities can potentially reduce (sometimes increase) future options, if these practices significantly and adversely affect other resources or values, then they are also likely to significantly limit future options. If current practices result in species becoming threatened or endangered, water quality standards being exceeded, or public values and trust violated, then dramatic readjustments to current stewardship activities are clearly needed.

Preserving options is also a way of explicitly acknowledging our incomplete knowledge of complex ecosystems – that is, our ignorance of how they function and their interactions with natural and human influenced disturbance regimes and our responsibilities to future human generations. This philosophy is perhaps best encapsulated by focusing more on what we leave behind in exploited ecosystems than on what is taken from them."

Committee of Scientists
Third draft Preliminary report, July 98

41) "*Increasingly, after World War II, the assumptions foresters adopted regarding these myriad considerations shifted first toward the ever-optimistic and finally to the improbable. Those altered assumptions produced a watershed change in forest management an aggressive approach appropriately labeled "intensive management" and advocated in an important document produced by the Forest Service in 1969 titled the Douglas-fir Supply Study. The philosophy of intensive management lent a façade of rationality to a timber program that was, in fact, driven by markets and unsustainable over the long haul. Intensive management ideology also deflected, to an extent, criticisms of the Forest Service by non-timber resource users. Intensive management promised more of everything: more commercial resource extraction and more recreation, more*

logging and more wildlife. Intensive management also promised to mitigate any resource damage due to development. Unfortunately, these hopeful visions often failed to pan out for lack of funding or because of irresolvable conflicts between uses or simple environmental limitations. Still, as long as the agency promised more and better management, it could elicit a certain amount of patience from critics and deference from policy-makers. But this would not last indefinitely. The proliferation of timber roads and rapid liquidation of old growth eventually made a mockery of sustained yield and multiple use policies on Northwest national forests, and this, in turn, spelled disaster for the Forest Service's public image."

Paul Hirt
in *Institutional Failure in the U.S. Forest Service*

42) *"In the past, Registered Professional Foresters emerging from forestry schools across Canada were narrowly trained to maximize fibre production on a given area of land. Safeguarding the health and integrity of ecosystems did not constitute an important dimension of their education or of their work. In the 1990s, significant and long-needed changes are taking place in the forestry curricula in many Canadian schools. However, the new approach is still framed within the sustained yield forest management paradigm, and on prioritizing fibre production over ecosystem health and integrity. Only fundamental reform of the forestry profession can create the New Forester to practice the New Forestry."*

Fred Gale in *The Wealth of Forests*

43) "*Through government regulation, "sustained-yield" forestry has become the norm for forest management in North America. As the name implies, sustained-yield forest management focuses on the net productivity of surface resources in the forest. Economic considerations are paramount, and to achieve commercially viable levels of timber in perpetuity, sustained-yield forest management requires frequent intrusions into the woods and aggressive reforestation after harvest. This results in more evenly-aged, less diverse tracts of forestland. In essence, sustained-yield forest management is lowest-common-denominator forestry, producing wood of only average quality and engineering a forest ecosystem that lacks the depth and richness of the natural order*."

David Ford Certified Forest Products Council
in *Wrong Focus of Resource Management*

44) "*The government's forest policy proposal was released in June 1985 in a document entitled To Build a Forest for the Future. The hypothesis underlying the ministry's study was an idea dear to professional foresters in Quebec. They took for granted that maintaining a tree cover sufficient to meet the needs of the wood industry would preserve all of the functions of the forest. This hypothesis brings us back to the classic interpretation of the concept of sustained yield. Focussing on the trees, this concept reduced the function of the forest to wood. This reasoning sacrifices the complexity of the forest to bolster a reductionist and technical approach. The merit of the report, however, was that it simplified the aims of the emerging forest policy and consequently enhanced its short-term chances of success*."

Luc Bouthillier in Howlett, ed *CANADIAN FOREST POLICY*

Based on the evidence, several IDT members can and should take action to stop the Middle Fk Weiser timber sale. You know what to do. When the 44 statements above are combined with the rest of the science conclusions in the **Opposing Views Attachments** your next move should be clear.

These statements clearly represent "best science." Allowing Ms. Bresee, Ms. Ellis, and Mr. Wright who are financially motivated to produce volume to trump the best science is folly.

Supervisor Lannom, after reading the effects disclosures in Chapter 3, I must conclude Mr. Almack, Mr. Bumgarner, Ms. Cropp, Mr. Eichman, Mr. Epstein, Ms. Dobb, Ms. Giambra, Ms. Hanson, Mr. LaChapelle, Mr. Penny, Melanie Vining, Mr. Whiteman, and Ms. Wroblewski have been obedient. Their analysis disclosures show they have no problem trading off the health of the resources they are responsible for protecting for your precious volume. They wrote what you wanted to read.

Don't the kids born in 50 years deserve a place to escape the insanity of a United States with 400 million people? Don't they deserve to experience solitude, quietness and an occasional nature sound? Unless USFS employees start rejecting the USDA notion that a forest is like a wheat field to be "harvested" regularly, these kids will only be able to experience an undeveloped forest on a DVD depicting the "old times."

Sincerely,

Dick Artley's scanned signature is contained in the "signature" attachment.

Dick Artley [retired USFS forest planner and a person who believes the availability of undeveloped public land for his grandchildren to enjoy is orders of magnitude more important than short-term corporate profit)
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