



FEDERAL FOREST

RESOURCE COALITION

Office of Regulatory and Management Services,
c/o Michael Migliori;
USDA Forest Service,
Mailstop 1150,
1400 Independence Avenue SW,
Washington, DC 20250.

36 CFR Part 216
PIN 0596-AC65

Via Public Participation

Portal: <https://cara.ecosystemmanagement.org/Public/CommentInput?project=ORMS-1893>.

Dear Mr. Migliori:

Thank you for the opportunity to file comments on the Final Rule for Forest Service Directives (Federal Register Vol. 83, No. 62, March 30, 2018, 13646-13649).

FFRC supports the decision to allow public comment on Forest Service directives intended for use in the Forest Service Handbook. As the preamble notes, the Forest Service "Handbook may contain directives subject to the notice and comment requirements of section 14(a) of FRRRPA." (FR 13647). FFRC agrees. We also agree with the approach of ensuring a centrally located repository on the web of all proposed handbook changes, and allowing both web based and postal based commenting processes. We strongly agree with the preservation of interim directives, which can go into effect upon publication, while still allowing public input.

FFRC urges the Forest Service to reach out to key stakeholders with accurate and timely information about changes to the Forest Service directives system, whether they are done as part of the Manual, Handbook, or other regulatory processes. We hope use of the web based notice and comment system does not replace thoughtful outreach to affected stakeholders. For instance, the Forest Service staff should share on a timely basis all correspondence (not just directives) sent out to Forest Service field units pertaining to the forest products program with timber purchasers and their designated association representatives. Doing so ensures timely and thoughtful response and better communication with Forest Service customers.

Thank you again for the opportunity to provide feedback on this final rule.

Sincerely,

Bill Imbergamo
Executive Director
FFRC



Via Public Participation Portal:

<https://cara.ecosystemmanagement.org/Public/CommentInput?project=ORMS-1893>

May 25, 2018

Office of Regulatory and Management Services
c/o Michael Migliori
USDA Forest Service
1400 Independence Avenue SW, Mailstop 1150
Washington, DC 20250.

Dear Mr. Migliori:

Thank you for the opportunity to file comments on the Final Rule for Forest Service Directives (Federal Register Vol. 83, No. 62, March 30, 2018, 13646-13649).

The American Forest Resource Council (AFRC) supports the decision to allow public comment on Forest Service directives intended for use in the Forest Service Handbook. As the preamble notes, the Forest Service "Handbook may contain directives subject to the notice and comment requirements of section 14(a) of FRRRPA." (FR 13647). AFRC agrees. We also agree with the approach of ensuring a centrally located repository on the web of all proposed handbook changes and allowing both web based and postal based commenting processes. We strongly agree with the preservation of interim directives, which can go into effect upon publication, while still allowing public input.

AFRC urges the Forest Service to reach out to key stakeholders with accurate and timely information about changes to the Forest Service directives system, whether they are done as part of the Manual, Handbook, or other regulatory processes. We hope use of the web based notice and comment system does not replace thoughtful outreach to affected stakeholders. For instance, the Forest Service staff should share on a timely basis all correspondence (not just directives) sent out to Forest Service field units pertaining to the forest products program with timber purchasers and their designated association representatives. Doing so ensures timely and thoughtful response and better communication with Forest Service customers.

Thank you again for the opportunity to provide feedback on this final rule.

Sincerely,

Travis Joseph, President

5100 S.W. Macadam Avenue, Suite 350
Portland, Oregon 97239
Tel. (503) 222-9505 • Fax (503) 222-3255



TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.

HEADQUARTERS: P.O. BOX 33695 DENVER, COLORADO 80233-0695 303-452-6111

May 21, 2018

Office of Regulatory and Management Services
c/o Michael Migliori
USDA Forest Service, Mailstop 1150
1400 Independence Avenue SW
Washington, DC 20250

Submitted via email to: directive_comments@fs.fed.us

RE: Forest Service Directives Final rule with request for comments 83 Federal Register 13646
(March 30, 2018)

Dear Mr. Migliori,

Tri-State Generation and Transmission Association, Inc. (Tri-State) is a not-for-profit wholesale electric power supply cooperative providing electric power to 43 member distribution systems that serve customers in a 250,000 square-mile territory including Colorado, Nebraska, New Mexico, and Wyoming. Tri-State provides its member-systems with a reliable, cost-based supply of electricity while maintaining high environmental standards, based on a diverse mix of generation sources including coal, natural gas, hydroelectric, wind and solar power. Tri-State operates multiple overhead electric transmission lines on various National Forests within its service territory.

Tri-State welcomes the opportunity to comment on the final rule regarding Forest Service (FS) Directives (final rule) and supports expanding the applicability of 36 CFR Part 216 to Forest Service Handbooks (Handbooks). Though Handbooks are directed at FS employees, their use can affect entities that operate and maintain existing facilities or plan and develop new facilities on National Forests. As an affected stakeholder, Tri-State looks forward to the future ability to review and comment on proposed FS Handbook changes afforded by this final rule. Tri-State also appreciates the FS' attempt to reduce its costs by using a centralized repository on the FS website to facilitate public notice and comment rather than Federal Register publication.

Suggested change to § 216.2 of the Final Rule

Tri-State suggests a change to the definition of *Directive* found in § 216.2 to avoid possible confusion over the scope of the Final Rule. The phrase "... by the Office of the Chief,...." appears unnecessary and may be interpreted to exclude directives issued by Regional Foresters or other FS decision-makers besides the Chief. As described within 36 CFR 200.4(c), the FS directive system issuances are published under delegated authority which can come from the Office of the Chief or multiple other field office decision-makers when regional supplements are needed. To ensure clarity that all forms of FS directives, whether issued by the Office of the Chief or other applicable FS decision-makers listed at 36 CFR 200.4(c)(2), are included within





May 21, 2018
Page2

the Final Rule's definition of *Directive*, Tri-State suggests deleting the phrase "by the Office of the Chief" as depicted below.

§ 216.2 Definition.

***Directive* means the contents of the Forest Service Manual and Forest Service Handbooks issued by the Office of the Chief, as described at 36 CFR 200.4(c).**

If it was the FS' intent to only apply 36 CFR Part 216 to those directives issued by the Office of the Chief and not, for example, by Regional Foresters or Forest Supervisors, that intent should be made clear in the notice affirming this final rule planned for September 26, 2018. However, Tri-State hopes that this is not the intent and that the final rule applies to directives issued under both 36 CFR 200.4(c)(1) and 36 CFR 200.4(c)(2).

Tri-State appreciates the opportunity to provide these comments. Should you have any questions or need additional information, please contact Chris Reichard at 303-254-3097.

SW_M


Barbara A. Walz
Senior Vice President
Policy and Compliance
Chief Compliance Officer

BAW:cfr:der





May 29, 2018

Office of Regulatory and Management Services
c/o Michael Migliori
USDA Forest Service
Mailstop 1150
Independence Avenue SW
Washington, DC 20250

Re: Forest Service Directives Rule Change

Dear Michael Migliori,

Minnesota Forest Industries (MFI) supports the above referenced rule change from the Forest Service that will modify existing regulations to include public notice and opportunities to comment on Forest Service Handbook directives.

MFI is an association representing the state's forest product companies. MFI and its member companies encourage conservation, proper forest management and industry development that foster sound environmental stewardship, multiple-use of timber lands, and sustainable, long-term timber supply. The Minnesota forest products industry provides nearly 64,000 people with employment throughout the state with a total economic impact of \$7.9 billion added to the Gross State Product.

MFI members include Bell Timber Inc., Boise Paper a subsidiary of Packaging Corporation of America, Hedstrom Lumber Company, Louisiana Pacific Corporation, Minnesota Power, Molpus Timberlands and Management LLC, Verso Corporation, Norbord Minnesota, PotlatchDeltic Corporation, Sappi Fine Paper North America, Savanna Pallets and UPM Blandin Paper Mill.

The proposed revision to broaden regulation 36 CFR 216, which specifies how the public comments on internal Forest Service policies, is supported by MFI. By broadening the regulation to include more opportunities to review and comment on internal policies within the Forest Service Handbook, it gives the public greater transparency into the federal agency. This increased transparency for the public into Forest Service policies would benefit the relationship between the producer and consumer of forest products. Furthermore, allowing insight and opportunity to comment on changes to the Forest Service Manual or Forest Service Handbooks increases the trust between the two partners, which is vital to the success of both organizations.

Again, MFI highly supports the action of changing regulation 36 CFR 216 to increase public review and comment on Forest Service Manual and Handbooks.



MINNESOTA FOREST INDUSTRIES

903 Medical Arts Building • 324 West Superior Street • Duluth, MN 55802 • 218-722-5013 • Fax 218-722-2065 • www.minnesotaforests.com

Thank you,

Ashlee Lehner

Ashlee Lehner
Director of Forest Policy
Minnesota Forest Industries



Minnesota Timber Producers Association

903 Medical Arts Building • 324 W. Superior St. • Duluth, Minnesota 55802
Phone 218-722-5013 • Fax 218-722-2065

May 29, 2018
Office of Regulatory and Management Services
c/o Michael Migliori
USDA Forest Service
Mailstop 1150
Independence Avenue SW
Washington, DC 20250

Re: Forest Service Directives Rule Change

Dear Mr. Migliori,

The Minnesota Timber Producers Association (MTPA) supports the above referenced rule change from the Forest Service that will modify existing regulations to include public notice and opportunities to comment on Forest Service Handbook directives.

MTPA is a trade association representing loggers, truckers, and sawmills in Minnesota. MTPA members are dependent on a reliable and predictable supply of timber from the Chippewa National Forest.

The proposed revision to broaden regulation 36 CFR 216, which specifies how the public comments on internal Forest Service policies, is supported by MTPA. By broadening the regulation to include more opportunities to review and comment on internal policies within the Forest Service Handbook, it gives the public greater transparency into the federal agency. This increased transparency for the public into Forest Service policies would benefit the relationship between the producer and consumer of forest products. Furthermore, allowing insight and opportunity to comment on changes to the Forest Service Manual or Forest Service Handbooks increases the trust between the two partners, which is vital to the success of both organizations.

Again, MTPA highly supports the action of changing regulation 36 CFR 216 to increase public review and comment on Forest Service Manual and Handbooks.

Sincerely,

Ray Higgins
Vice President for Operations
Minnesota Timber Producers Association

COLORADO TIMBER INDUSTRY ASSOCIATION

P.O. Box 5069 Woodland Park, CO 80866-5069 719-687-0587

Office of Regulatory and Management Services,
c/o Michael Migliori;
USDA Forest Service,
Mailstop 1150,
1400 Independence Avenue SW,
Washington, DC 20250.

36 CFR Part 216
PIN 0596-AC65

Via Public Participation Portal:

<https://cara.ecosystem-management.org/Public/CommentInput?project=ORMS-1893>

Dear Mr. Migliori:

Thank you for the opportunity to file comments on the Final Rule for Forest Service Directives (Federal Register Vol. 83, No. 62, March 30, 2018, 13646-13649).

The Colorado Timber Industry Association (CTIA) supports the decision to allow public comment on Forest Service directives intended for use in the Forest Service Handbook. As the preamble notes, the Forest Service "Handbook may contain directives subject to the notice and comment requirements of section 14(a) of FRRRPA." (FR 13647). CTIA agrees. We also agree with the approach of ensuring a centrally located repository on the web of all proposed handbook changes, and allowing both web based and postal based commenting processes. We strongly agree with the preservation of interim directives, which can go into effect upon publication, while still allowing public input.

CTIA urges the Forest Service to reach out to key stakeholders with accurate and timely information about changes to the Forest Service directives system, whether they are done as part of the Manual, Handbook, or other regulatory processes. We hope use of the web based notice and comment system does not replace thoughtful outreach to affected stakeholders. For instance, the Forest Service staff should share on a timely basis all correspondence (not just directives) sent out to Forest Service field units pertaining to the forest products program with timber purchasers and their designated association representatives. Doing so ensures timely and thoughtful response and better communication with Forest Service customers.

Thank you again for the opportunity to provide feedback on this final rule.

Sincerely,

Dan Casey

Dan Casey
President
Colorado Timber Industry Association



Office of Regulatory and Management Services
c/o Michael Migliori
USDA Forest Service
Mailstop 1150
1400 Independence Avenue SW
Washington, DC 20250

Submitted via email to directive_comments@fs.fed.us

May 29, 2018

Dear Mr. Migliori,

Please accept the following comments from The Wilderness Society (TWS) written on behalf of our million plus members and supporters on the final rule governing the Forest Service directives system at 36 C.F.R § 216, 83 Fed. Reg. 13647 (March 30, 2018). TWS is a leading conservation organization working to protect wilderness and inspire Americans to care for our wild places. Founded in 1935, TWS has extensive experience in utilizing the Forest Service Handbook and Manual to help guide our engagement in agency project and program planning and implementation, and in commenting on Forest Service Handbook and Manual sections when they are revised or developed.

We support the final rule because it increases transparency and accessibility of Forest Service policy-making. Specifically, we agree with expanding the mandatory requirement for notice and comment to the Forest Handbook. We also strongly support that proposed and interim directives must be posted on the Forest Service website through an established process and schedule, although urge the agency to also publish notice of comment periods for proposed and interim directives in the Federal Register. Finally, we support the requirement to publish all submitted comments on the Forest Service website.

The Federal Register notice states that the subsequent proposed directives governing the revised process for notice and comment on directives will establish a framework for Forest Service's response to comments. While we appreciate the forthcoming opportunity to comment on this aspect, we want to urge the agency to draft the proposed directives to require agency responses to all substantive comments in furtherance of transparency, communication, and accountability.

We thank you for this opportunity to comment and look forward to offering comments on the proposed directives governing the revised Forest Service notice and comment process.

Sincerely,

A handwritten signature in black ink, appearing to read "Vera Smith", with a horizontal line extending to the right.

Vera Smith
National Forest Planning and Policy Director
1660 Wynkoop Street, Suite 850
Denver, CO 80202



May 16, 2018

Office of Regulatory and Management Services
c/o Michael Migliori
USDA Forest Service, Mailstop 1150
1400 Independence Avenue SW
Washington, DC 20250

Re: 36 CFR 216 Public Notice and Comment for Forest Service Directives #ORMS-1893

The Arizona Game and Fish Department (Department) appreciates the opportunity to provide the U.S. Forest Service (FS) input on Forest Service Directives. The Department understands the FS is requesting input on updates to current regulations that establish procedures for public participation in the formulation of standards, criteria, and guidelines applicable to FS programs as required by the Forest and Rangeland Renewable Resources Planning Act of 1974, as amended (FRRRPA). The Department works closely with the FS regarding public land management in Arizona and frequently participates in the public comment process. Under Title 17 of the Arizona Revised Statutes, the Department, by and through the Arizona Game and Fish Commission (Commission), has jurisdictional authority and public trust responsibilities for the management of state fish and wildlife resources. It is the mission of the Department to conserve Arizona's diverse fish and wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations. The Department provides the following information and comments based on our agency's statutory authorities and public trust responsibilities.

Early Coordination with Partners

The Department appreciates that the FS is revising 36 CFR Part 216 to ensure adequate notice and opportunity for public comment with respect to the formulation of standards, criteria, and guidelines. The Department requests, however, that this regulation also outline a procedure for coordinating closely with state agencies during the development and review of these manuals in order to produce mutually supported guidance documents. Including coordination in the regulation, not just opportunities for public comment, will ultimately streamline project implementation and wildlife conservation on public lands. The Department also requests that agencies be directed to develop overarching procedures and implementation handbooks or guidelines collaboratively with state agencies and should require concurrence on end products involving joint management authorities. Such collaboration will minimize negative impacts to statutory authorities and the state's ability to fulfill state trust responsibilities. Specifically, guidelines should include how the individual agency will implement state/federal coordination in both the pre-planning stage and early in the planning process so as to identify and address areas of mutual interest, statutory/management authority, state trust responsibility, and state planning.

azgfd.gov | 602.942.3000

5000 W. CAREFREE HIGHWAY, PHOENIX AZ 85086

GOVERNOR: DOUGLAS A. DUCEY COMMISSIONERS: CHAIRMAN, JAMES R. AMMONS, YUMA | JAMES S. ZIELER, ST. JOHNS | ERIC S. SPARKS, TUCSON
KURT R. DAVIS, PHOENIX | LELAND S. "BILL" BRAKE, ELGIN DIRECTOR: TY E. GRAY DEPUTY DIRECTOR: TOM P. FINLEY

To avoid duplicating efforts and inconsistent analyses, the regulation should fully incorporate the legal authorities of local and state management agencies and direct the FS to align and adopt areas of overarching state and local planning efforts at the earliest stages of federal planning. A mutually developed and specific pre-planning coordination process should be identified by the regulation and carried forward in all implementation guidelines and handbooks. The Department is committed to improving effective federal land use planning coordination and collaboration with Arizona's FS offices to avoid costly and unnecessary administrative and legal appeals. The regulation should provide a specific designated timeline and process for:

1. FS and state wildlife agencies to collaborate on the preliminary development of all planning guidance that identifies state jurisdictional or shared jurisdictional wildlife species (i.e., species nomenclature, grouping, or lists, direction on assessing impacts to species or species management guidance);
2. Collaboration and conflict resolution between FS and state wildlife agencies before the release of any final planning documents with potential to impact state jurisdictional authorities and ability to manage wildlife on public lands;

Interim Directives

The revision to § 216.4 Interim directives reads "Upon a finding of good cause that an exigency exists, an interim directive may be effective in advance of providing notice and an opportunity for public comment. As described in § 216.3, opportunity will be given for public comment before the interim directive is made final. The basis for the determination that good cause exists for the issuance of an interim directive shall be published at the time the directive is issued."

The Department understands the need for issuance of interim directives in certain circumstances; however, the Department requests the regulation outline a process and timeline for coordination with State agencies and other partners and concurrence on the exigency prior to the issuance of interim directives.

Public Involvement and Comment Opportunities

The revision to § 216.3 Notice and an opportunity for public comment reads "(a) Prior to issuing a final directive subject to this part, the Forest Service shall: (1) Provide notice to the public of a proposed directive or interim directive and provide an opportunity to submit comments during a comment period of not less than 30 days in accordance with the requirements this section..."

Public participation is the cornerstone in determining the needs of Arizonans and the future of their public lands, and a short public comment period would almost certainly lead to reduced participation. Short public comment periods may appear to reduce the process timeline, but more often lead to additional conflicts, appeals, objections, and litigation, delaying future planning processes. The Department does not recommend maintaining short public comment periods as a means to reduce the timeliness of review.

It is noted in this final rule that "representatives from certain State agencies requested that the comment period for any directives involving an issue of overlapping State and Federal

jurisdiction be at least 60 days to provide States sufficient opportunity to explore the questions and formulate meaningful input. To support engagement of representatives of public agencies, as well as other communities of interest, the revised Part 216 notes that the Forest Service will maintain generally on a quarterly basis a schedule of pending and proposed directives in a centralized repository on the Forest Service website.”

Formal comment periods should provide adequate time to analyze and gather meaningful review and feedback. The Department believes the solution presented does not adequately meet the need to provide the public with opportunity to review and comment on guidelines. Nor does it show a genuine interest in public participation. The Department requests that in addition to maintaining a schedule of pending and proposed directives on the FS website, the regulation directs comment periods to be no less than 60 days, as previously requested by state agencies.

Continued Use of Federal Register

The final rule declares that the FS will reduce its use of the Federal Register (FR) for the release of public comment opportunities on directives and instead maintain a centralized FS website for public notice. The FS presented an analysis of cost benefits for implementing a website to replace FR publications. This analysis, however, does not address potential loss in public participation. The Department recommends that the FS continue to use the FR as the outreach method for notification or to request public involvement, including public review of documents and public meetings. It is especially necessary to publish appropriate notices to the FR when initiating any public involvement with a time limit and for providing a consistent message on the level of engagement being requested. The Department does support the FS initiative to maintain a reliable, updated, and publicly accessible planning site in addition to the FR. The Department believes this site proposed in the final rule will encourage participation, support transparency, and provide supplemental information. The FR, however, is the only established standard for publication of current, accurate notices, deadlines, and opportunities for public involvement, and is used by Department staff to ensure we provide comment on planning documents that affect our state trust responsibilities.

Thank you for the opportunity to provide input on the Forest Service Directives. For further coordination, please contact me at ccrowder@azgfd.gov or 623-236-7666.

Sincerely,



Clayton Crowder
Habitat, Evaluation, and Lands Branch Chief

CC:jc

M18-03292437



**DEPARTMENT OF AGRICULTURE
STATE OF NEW MEXICO**

**MSC 3189, Box 30005
Las Cruces, New Mexico 88003-8005
Telephone (575) 646-3007**

Susana Martinez
Governor

Jeff M. Witte
Secretary

May 23, 2018

Mr. Michael Migliori
Office of Regulatory and Management Services
United States Department of Agriculture
Forest Service
Mailstop 1150
1400 Independence Avenue, SW
Washington, DC 20250

RE: Forest Service Directives (Document No. FS-2018-0023)

Dear Mr. Migliori:

New Mexico Department of Agriculture (NMDA) submits the following comments regarding the final rule with request for comments on United States Forest Service (USFS) Directives that were promulgated in the *Federal Register* (83 FR 13646).

NMDA maintains a strategic goal to promote the responsible and effective use and management of natural resources in support of agriculture. NMDA supports management of National Forest System (NFS) lands under the principles of multiple use and sustained yield as congressionally mandated by the Multiple-Use and Sustained-Yield Act of 1960 (16 U.S.C. 528-531) and further codified by the National Forest Management Act of 1976 (16 U.S.C. 1601-1614).

NMDA is supportive of the proposed changes to 36 CFR part 216 referenced in the *Federal Register* notice. The expanded scope of directives along with the development of a centralized website system for the public notice and comment system could significantly enhance public access and participation in the formulation of directives.

However, NMDA is concerned about the possible policy implications of revising 36 CFR part 216 to require public notice and comment on the formation of standards, criteria, or guidelines applicable to USFS, regardless of whether they appear in the USFS Manual or Handbook. The revised language could become problematic within the regulated community when guidance found in the USFS Handbook is implemented with the force and effect of regulation. For example, when a USFS employee cites guidance as justification for the amendment or denial of a permit. To be clear,

Mr. Michael Migliori
Forest Service Directives, Document No. FS-2018-0023
Page 2
May 23, 2018

NMDA supports public notice and comments on standards, criteria, and guidelines; but this guidance should not be construed to have the same effect as regulation.

Many rural economies are dependent upon consistent access to NFS lands that, in many cases, contribute to the socioeconomic sustainability of communities and stewardship of the landscape. Local governments (including state, county, and soil and water conservation districts) have expertise regarding these activities. The Proposed Directives fail to adequately consider this expertise through coordination of future directives with local governments and affected parties.¹ The *Federal Register* notice states that the purpose of 36 CFR part 216 is to “ensure that Federal, State, and local governments and the public have adequate notice and opportunity to comment upon the formulation of standards, criteria, and guidelines applicable to Forest Service programs.” However, the current rule had removed the requirement that “Agency officials will give direct notice to Federal, State, and local governments and to the public known to be interested in the proposal...” and, instead, opts only to provide notice to the public. NMDA requests that language be reinserted into the final rule mandating direct notice to federal, state, and local governments and affected parties.

While NMDA appreciates the use of a centralized repository on the USFS website for notice and comment opportunities, it should be noted that in many rural communities, the use of Internet-based systems by the USFS may not be a sufficient means of notification. USFS is also encouraged to retain the use of other methods of notification such as local newspapers and direct mail.

In conclusion, NMDA supports the final rule on USFS Directives and requests our suggestions be addressed in the final rule. Thank you for the opportunity to comment on this proposal. We request to be kept informed of this and other relevant policy considerations regarding USFS. Please contact Mr. Marshal Wilson at (575) 646-4941 if you have questions about these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'JM Witte', with a stylized flourish at the end.

Jeff M. Witte

JMW/mw/ya

¹ Affected parties generally have a vested interest or right within the Forest System Lands and, therefore, differ from interested parties.

Date submitted (Pacific Standard Time): 4/1/2018 5:00:00 PM

First name: Mike

Last name: Hyde

Organization: Duchesne County

Title:

Official Representative/Member Indicator:

Address1: PO Box 317

Address2:

City: Duchesne

State: UT

Province/Region:

Zip/Postal Code: 84021

Country:

Email: mhyde@duchesne.utah.gov

Phone:

Comments:

Duchesne County, Utah (which contains some 716,702 acres of USFS land - about 34.6% of our county's total land area) is in full support of this proposed revision to 36 CFR 216 as it will provide county officials and citizens with more opportunities to review and comment on a broader range of forest service directives. Such opportunities will result in better informed citizens and agencies and hopefully, better consistency between USFS decisions and the policies of the Duchesne County Resource Management Plan.

Date submitted (Pacific Standard Time): 4/23/2018 10:42:12 AM

First name: Jacob

Last name: Hoberg

Organization:

Title:

Official Representative/Member Indicator:

Address1: 4130 Flintlock Circle

Address2:

City: Reno

State: NV

Province/Region:

Zip/Postal Code:

Country: United States

Email: jakemara@gmail.com

Phone:

Comments:

The Forest Service is responsible for a wide range of activities, including the creation of forest management programs that are often crucial to maintaining forest health (Auer et al., 2011). Whenever the Forest Service formulates or changes standards, criteria, and guidelines applicable to these programs, they must establish procedures, like public hearings, to allow for stakeholder commentary. The problem is that public hearings and other forms of in person public participation are often ineffective, inaccessible, and conflictual (King et al., 1998). Hearings are sometimes held at difficult times and locations making it challenging for the public to attend and input valuable feedback (Baker et al., 2005). Furthermore, one stakeholder often dominates the discussion and input is too tightly controlled by moderators (Middendorf & Busch, 1997).

These problems are amplified for the Forest Service. Citizen participation is often crucial in the implementation and acceptance of their management programs. Burby claims that citizen involvement can "generate information, understanding, and agreement on problems and ways of solving them. It can give stakeholders a sense of ownership" (2003). Without active public participation, Forest Service policies will be ineffective at promoting forest health; public acceptance of Forest Service policy is critical to ensuring programs are supported and implemented on the ground (Walters et al., 2000). In an attempt to remedy problems with in-person public participation, the Forest Service has proposed a new rule that would establish an internet-based notice and comment.

As a Nevada native and member of the Sierra Nevada Alliance, I fully support the implementation of an internet-based participation system. A digital notice and comment service would allow for the expansion of public participation in Forest Service regulation and management programs (Baker et al., 2005). An internet-based program that doesn't require in-person participation would be more accessible, more cost efficient, and less restrictive of public inputs (Danilovic-Hristic & Stefanovic, 2013). If more local stakeholders feel as though they have participated in the formulation of programs and policies, the Forest Service is less likely to conflict with governments, citizens, and nonprofits; management programs will be more readily accepted and face less opposition (Burby, 2003; Walters et al., 2000). This buy-in from local individuals is key to combating public sentiment against prescribed burns (Miller & Aplet, 2016). Prescribed burns have been successful at promoting healthy soil chemistry and species diversity and richness (Hubbard et al., 2004). However, many individuals are still fearful and skeptical of the effects of prescribed burns; allowing them to help craft the regulation and criteria for the burns means they are more likely to support the program (Walters et al., 2000).

Opponents to the internet-based comment system argue that establishing an entirely new system and software would be too costly. However, the Forest Service claims that the program will save \$72,000 to \$110,000 over the next 10 years (Forest Services Directive, 2018). Publishing physical directives currently costs the agency \$39,000; the internet-based system would reduce costs to \$24,766 (Forest Services Directive, 2018). Although there may be upfront costs, the money saved each year makes the system a sound financial decision.

As a constituent concerned about forest health, I urge the Forest Services to create an implement the internet-based notice and comment system under 36 CFR part 216. In addition, the Forest Service should supplement the online system with a text-based notification system regarding updates and changes to local forest management programs. Users could subscribe to receive these text message updates. This would enhance the comment and notification service, further increasing its accessibility and effectiveness with stakeholders.

Date submitted (Pacific Standard Time): 4/30/2018 2:57:07 PM

First name: Todd

Last name: Chaponot

Organization:

Title:

Official Representative/Member Indicator:

Address1: 611 N. Jefferson Avenue

Address2:

City: Sandpoint

State: ID

Province/Region: USA

Zip/Postal Code: 83864

Country: United States

Email:

Phone:

Comments:

The USDA Forest Service 36 CFR Part 216 Federal Register notice, published March 30, 2018, states (under Regulatory Certifications - Environmental Impact) the final rule presented updates how the FS implements section 14(a) of the Forest and Rangeland Renewable Resources Planning Act of 1974 (FRRRPA) via a CatEx (i.e. 36 CFR 220.6(d)(2)), and the notice states that a determination has been made that no extraordinary circumstances that would require preparation of an EA or EIS.

You also state, under the topic Federalism and Consultation and Coordination With Indian Tribal Governments, that "This final rule has been considered under the requirements of E.O. 13175," to include, "?a 120 day consultation period conducted by the FS Office of Tribal Relations which ended on May 31, 2016.

I encourage you to insure you consider whether your proposal to change how the Agency implements section 14(a) of the FRRRPA is consistent with the amended E.O. 13175 consultation requirements contained in the July 30, 2010 OMB guidance (1), that all Federal agencies include government-to-government consultation on federal policy, regulatory, or legislative actions that may have substantial effects on tribes, their relationship with the federal government, or the distribution of power between tribes and the federal government, to include consultation with Alaska Native corporations, "on the same basis as Indian tribes," (this is intended to include for-profit entities, Alaskan Native village corporations [who retain surface rights for their land], and regional corporation [responsible for sub-surface rights]).

Government-to-government consultation guidance is designed to satisfy tribal trust responsibilities, including tribal trust resources protections addressed in several statutes, such as Alaska Native subsistence rights to marine and other living resources, in particular through provisions that exempt Alaska Natives' subsistence harvest from prohibitions on take. Secretarial Order 3206 defines "tribal trust resources" as "natural resources, either on or off Indian lands, retained by, or reserved by or for Indian tribes through treaties, statutes, judicial decisions, and executive orders, which are protected by a fiduciary obligation on the part of the United States." (2)

Additionally, I believe the proposal to provide a physical mailing address option for submitting comments when notice of new directives is published online on the Schedule of Proposed Directives, as not all affected community members have access to online content on demand; additionally, I would encourage you to consider making such a Schedule of Proposed Directives available via postal delivery mail to individuals who specify they wish to receive such notification (similar to the existing postal delivery Schedule of Proposed Activity lists by unit, for those rural or remote households not connected to the internet and out of cell phone coverage).

Thank you for the opportunity to comment on the final rule.

Todd Chaponot,
Sandpoint, Idaho

1. Peter Orszag, Memorandum for the Heads of Executive Departments and Agencies, and Independent Regulatory Agencies on Guidance for Implementing E.O. 13175, "Consultation and Coordination With Indian Tribal Governments," 2-3 (July 30, 2010), pursuant to Pub. L. 108-199, 118 Stat. 452, as amended by Pub. L.

108-447, 118 Stat. 3267, OMB and all Federal agencies are required to "consult with Alaska Native corporations on the same basis as Indian tribes under Executive Order No. 13175." SEC. 161.)

2. Secretarial Order 3206, American Indian Tribal Rights, Federal-Tribal Trust Responsibilities, and the Endangered Species Act (June 5, 1997), issued by the Secretary of the Interior and the Secretary of Commerce.

Date submitted (Pacific Standard Time): 4/12/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Regulation Needs to be changed to help forest service to cut old growth The Equal Access to Justice Act (EAJA), enacted in 1980, allows the award of attorneys fees in suits by or against the United States in two situations. the ESA has no restriction that attorneys fees be paid only to prevailing parties, and no limit to the amount of attorneys fees that can be awarded. In determining attorney fees for Endangered Species Act cases, the courts use a lodestar approach in setting the rate of fees. In addition to filing lawsuits, litigious groups have filed increasing numbers of petitions under the ESA, seeking to list species as endangered or threatened under the Act. Under the Act, the FWS or NMFS must make a finding within 90 days of receiving a petition as to whether there is substantial information indicating whether the petitioned listing may be warranted. After this 90 day finding, there are many statutorily prescribed deadlines and decisions that the agency must make regarding each petition. While the statute may be well-intentioned in formulating a timeline for agency decision making, special interest groups attempting to list hundreds of species at a time was not what was intended and serves only as a vehicle for an award of attorneys fees, as the deadlines become impossible to meet. endless lawsuits do not serve the purpose of the statute. FWS show the incredibly broken system, with environmental groups filing notices of intent to sue if the government does not make species-specific findings on more than 400 species within a three month time-frame. timeframes provided currently under ESA are not feasible, and that groups are litigating not over whether a species ought to be listed, but that the federal government cant comply with rigid 90-day or 12-month timeframes set by ESA. As a result of FWS focus on listings, others have complained that opportunities for public comment and engagement, and accessibility to scientific data supporting significant ESA proposals have been short-changed, often with the federal agencies citing deadlines from the mega-settlement as the excuse. Even efforts by federal agencies to streamline the ESA consultation process for federal fire management plans have been challenged by environmentalists. In 2003, the Forest Service, Bureau of Land Management, FWS, the National Park Service, the Bureau of Indian Affairs and NMFS issued joint regulations that would expedite National Fire Plan actions not likely to adversely impact critical habitat. Activists groups filed suit under Endangered Species Act, and a federal district court first upheld the regulations, and then reversed itself. ESA shuts out states, tribes, local governments, and private landowners not only in key ESA decisions but in actual conservation activities to preserve and recover species.

Date submitted (Pacific Standard Time): 4/12/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

If we don't start managing our forests, the forests are going to start managing us. 50 million acres in the United States are currently at risk for catastrophic wildfire. California received record-breaking rains in the winter of 2016-2017, at the same time California has a historic and staggering 129 million dead trees on 8.9 million acres. The dead trees continue to pose a wildfire hazard to people and critical infrastructure, 2017 over 48,000 wildfires have burned millions acres across the country. National Forest Service first focusing on public safety by removing dead and dying trees in high wildfire hazard areas crews will be able to decrease overly dense stands of trees, reduce greenhouse gases, and protect communities .. more progress towards our common goal of healthier, more resilient forests. The wildland fire problems facing our nation continue to grow. The number of acres burned by wildland fires annually from 2000 to 2005 was 70 percent greater than the average burned annually during the 1990s, while appropriations for the federal government's wildland fire management activities tripled from about \$1 billion in fiscal year 1999 to nearly \$3 billion in fiscal year 2005. Experts believe that catastrophic damage from wildland fire probably will continue to increase until an adequate long-term federal response, coordinated with others, is implemented and has had time to take effect. agencies need to develop a cohesive strategy that identifies the available long-term options and related funding requirements for reducing excess vegetation that could fuel wildland fires. updating local fire management plans to better specify the actions needed to effectively address these threats; and assessing the cost-effectiveness and affordability of options for reducing fuels. prepare a tactical plan outlining the critical steps and associated time frames for completing a cohesive wildland fire management strategy. Administration needs to take a serious turn from the past and proactively work to prevent forest fires through aggressive and scientific fuels reduction management to save lives, homes, and wildlife habitat.

Date submitted (Pacific Standard Time): 4/12/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Wind Turbines are threatening populations of insectivorous bats in North America. Bats are voracious predators of nocturnal insects, including many crop and forest pests. There are no continental-scale monitoring programs for assessing wildlife fatalities at wind turbines, so the number of bats killed across the entire United States is difficult to assess. By 2020 an estimated 33,000 to 111,000 bats will be KILLED ANNUALLY by wind turbines in the Mid-Atlantic Highlands alone. Mortality from factors is substantial and will likely have long-term cumulative impacts on both aquatic and terrestrial ecosystems. The economic consequences of losing so many bats could be substantial. Loss of bats could lead to agricultural losses estimated at more than the value of bats may be as low as \$3.7 billion/year and as high as \$53 billion/year. These estimates include the reduced costs of PESTICIDE applications that are not needed to suppress the insects consumed by bats. Save More Money by helping with impacts of PESTICIDES on ecosystems, which can be substantial, or other secondary effects of predation, such as reducing the potential for evolved resistance of insects to PESTICIDES and genetically modified crops, bats can exert top down suppression of forest insects. For example, a single colony of 150 big brown bats (*Eptesicus fuscus*) in Indiana has been estimated to eat nearly 1.3 million pest insects each year, possibly contributing to the disruption of population cycles of agricultural pests. Other estimates suggest that a single little brown bat can consume 4 to 8 g of insects each night during the active season. published estimates of the value of pest suppression services provided by bats ranges from about \$12 to \$173/acre (with a most likely scenario of \$74/acre) in a cotton-dominated agricultural landscape in south-central Texas. The value of bats to the agriculture industry is estimated nearly \$23 billion per year, but may range from \$3.7 billion to \$53 billion a year. Brazilian free-tailed bats (*Tadarida brasiliensis*) form enormous summer breeding colonies, mostly in caves and under bridges, in south-central Texas and northern Mexico. Their prey includes several species of adult insects whose larvae are known to be important agricultural pests, including the corn earworm or cotton bollworm (*Helicoverpa zea*). We estimate the bats' value as pest control for cotton production in an eight-county region in south-central Texas. Calculations show an annual Bat value of range of \$121 000-\$1725000, on a \$4.6-\$6.4 million per year annual cotton harvest. That is money Farmers do not need to spend on Pesticides. Bats feed on some of the most damaging crop pests including the moths of cutworms and armyworms which helps to protect food crops naturally. Farmers appreciate the pest control provided by bats and many look forward to having bats return to their farms each year. Urgent efforts are needed to educate the public and policy-makers about the ecological and economic importance of insectivorous bats and to provide practical conservation solutions. North America are under severe pressure from major new threat. bats of several migratory tree-dwelling species are being killed in unprecedented numbers at wind turbines across the continent. Why these species are particularly susceptible to wind turbines remains a mystery, and several types of attraction have been hypothesized. Wind is Not clean If it removes important Bat that helps the environment, bats lower use of PESTICIDES, and cost to farmers are too great for use windmills that generating occur less than 30% of the time. There is NO market for electricity that cannot be delivered on demand. The demand that exists is nothing more than legislated policy artifact in the absence of mandated fines, penalties and/or endless subsidies the wind industry would have never got going at all. Endless streams of massive subsidies for a meaningless power source fits the unsustainable. taking billions from farmers to produce to give to wind farms is a waste money and totally nonsense.

Date submitted (Pacific Standard Time): 4/11/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

EPA Inspector Generals highly critical report investigating EPAs review of external data for the GHGs endangerment finding. On December 15, 2009, EPA published its Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act. As the primary scientific basis for EPAs finding, the Agency relied upon assessments conducted by other organizations. Agencies reliance on the IPCC is A VIOLATION of the Data Quality Act, (The DQA directs the Office of Management and Budget (OMB) to issue government-wide guidelines that provide policy and procedural guidance to Federal agencies for ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information) disseminated by Federal agencies. See Data Quality Act 515, 42 U.S.C. 502-504. IPCC is an international body outside the jurisdiction and oversight of the United States Congress. Moreover, EPA is the entity of the United States government that is seeking sweeping regulations on the basis that GHGs are increasing global temperatures. EPAs reliance on the IPCC violates the Agencys own internal policy. (see Peer Review Advisory Grp., Addendum to: Guidance for Evaluating the Quality of Scientific and Technical Information, EPAS SCI. AND TECH. POLICY COUNCIL (Dec. 2012),. IPCC relied on data from a University of East Anglia CRU , in England.

Note History : IPCC Established in 1988, IPCC stated working Group I, stated a Special Committee, Dr John Houghton prepared Scientific Assessments, First working group rely on the Carnegie Institution SCOPE 29 report of 1986 The Greenhouse Effect, Climatic Change and Ecosystems ; Scientific Assessment, Working Group I has built on this. First draft of Policy Makers in Edinburgh 1990, Meteorological office in Bracknell, England, was responsible for organizing , .Members of the team included CHINA , Professor Cac Hong Xing..AND , Financial support for the Bracknell, England core team was provided by the Departments of the Environment and Energy in the UK. The Staff of University of East Anglia CRU , England had been heavily involved in the IPCC assessments, and CRUs work has been used by IPCC in construction of future climate projections.

EPAs Technical support document Peer Review Methodology DID NOT Meet OMB Requirements for Highly Influential Scientific Assessments. EPA had the TSD Technical support document reviewed by a panel of 12 federal climate change scientists. EPAs disposition of the findings were NOT made available to the public as would be required for reviews of highly influential scientific assessments. EPA panel of scientists DID NOT fully meet the independence requirements for reviews of highly influential scientific assessments because one of the panelists was an EPA employee. DID NOT Include language in its proposed action, final action, or internal memoranda that identified whether the Agency used influential scientific information or highly influential scientific assessments to support the action. EPA Office of Air and Radiation also DID NOT certify that the supporting technical information was peer reviewed in accordance with EPAs peer review policy. EPA DID NOT contemporaneously document how it applied and considered the assessment factors in determining whether the IPCC and other assessment reports were of sufficient quality, objectivity, utility, and integrity. EPA DID NOT maintain a record of its response and disposition of comments for the two Technical support document that accompanied the proposed and final rules. EPA DID NOT discuss whether IPCC procedures required a description of the credentials and relevant experiences of each peer reviewer. In November 2009, subsequent to publication of EPAs proposed finding, approximately 1,000 e-mails were hacked from the servers of the University of East Anglia CRU , in England, and made public. CRU is recognized for its climate change research and, since 1978, had developed and maintained a land-based temperature record widely used by climate change researchers. According to CRU, its staff have been heavily involved in the IPCC assessments, and CRUs work has been used by IPCC in construction of future climate projections. The content of the e-mails caused some to challenge the work of CRU and the conclusions of the IPCC. Since EPA

relied heavily upon IPCCs AR4 in developing the TSD for its endangerment finding, concerns have been raised about EPAs acceptance and use of this information in light of federal and Agency information quality guidelines. April 2010 study, chaired by Professor Ron Oxburgh, examined; noted that there were unresolved questions relating to the availability of environmental datasets. Further, the Russell report found that both CRU scientists and the University of East Anglia failed to display the proper degree of openness regarding their research.

Date submitted (Pacific Standard Time): 4/5/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Earth Day: Green Socialism 1976 Stephen Schneider book warning that global cooling risks posed a threat to humanity, later changed that view 180 degrees when he served as a lead author for important parts of three sequential IPCC reports. 1965 Lyndon B. Johnson's Science Advisory Committee consequently, an increase of atmospheric carbon dioxide could raise the temperature of the lower air. 2012 Obama : temperature around the globe is increasing faster than was predicted. Under President Obama, EPA gave more than \$27 million in taxpayer-funded grants to major environmental groups. 2012 Bernie Sanders; Scientists do not attribute Hurricane Sandy storm or any single weather disturbance to global warming. 2008 Al Gore, The entire north polar ice cap will be gone in 5 years England ; Margert Thatcher; found climate science , has an "ugly ... anti-growth, anti-capitalistic, anti-American" political agenda had emerged around the issue. Anti-progress, , anti-poor is not the Answer to Humans on Earth, she called Gores a 'doomist' predictions." 2011 EU Emissions Trading Scheme (ETS) has cost their consumers \$287 billion for "almost zero impact" on cutting carbon emissions, according to a 2011 UBS study. 2012, A Senator wrote former Administrator Jackson: The actual temperature data show no significant change in global temperatures over the past decade and certainly less warming than the climate change models predicted, can you provide the best available data that EPA would rely upon to support the assertion. she did not provide any of the requested data 2013 EPA responded to a senators question: EPA has not produced its own analysis NOAA's data on sea level rise from 2005-2012, Accordingly, at the current rate of sea level rise, it would take approximately 25,000 years (around the year 27013) for the oceans to reach Hansen's 2006 prediction levels rather than something "we expect" to reach by the year 2100. 2014 IPCC Thousands of cities are undertaking climate action plans, but their aggregate impact on urban emissions is..... uncertain. 1975 Prediction , Climate seems to be cooling down. 1995 IPCC meeting There are inadequate data to determine whether consistent global changes in climate variability or weather extremes have occurred over the 20th century. to date it has not been possible to firmly establish a clear connection between these regional changes and human activities. Professor Judith Curry, chair of the School of Earth and Atmospheric Sciences concern that past climate models have not proven true. public debate seems to be moving away from the 15-17 year 'pause' to the cooling since 2002. 1938 a British engineer, Guy Stewart Callendar, presented evidence that both temperature and the CO2 level in the atmosphere had been rising over the past half-century. subject today is climate change. This has a number of attractions for them. First, the science is extremely obscure so they cannot easily be proved wrong. Matthew 7:15 - Beware of false prophets, which come to you in sheep's clothing, but inwardly they are ravening wolves. 1965 to 19797 articles predicting cooling....44 predicting warming... 1950s, more scientists were arguing that carbon dioxide emissions could be a problem, with some projecting in 1959 that CO2 would rise 25% by the year 2000, with potentially "radical" effects on climate. 2006 Magazine; From heat waves to storms to floods to fires to massive glacial melts, the global climate seems to be crashing around us. 1976 prediction: Newspaper: trend will reduce agricultural productivity for the rest of the century 1930-36 "Dust Bowl" years brought some of the hottest summers on record to the United States, especially across the Plains, Upper Midwest and Great Lake States. 1976 by Nicholas Shackleton and colleagues showed that the dominating influence on ice age timing came from a 100,000-year Milankovitch orbital change. Romans 16:18 - For they that are such serve not our Lord Jesus Christ, but their own belly; and by good words and fair speeches deceive the hearts of the simple. 1920-1930 were popular years to connect the solar cycle with climate cycles Respected scientists announced correlations that they insisted were reliable enough to make predictions. 2013, the U.S. Chamber of Commerce study examining air pollution rules dating from the 1990s. It reveals flawed analyses that do not take into account economy-wide impacts or negative impacts of the rules, raising significant concerns . 2011 Patrick Moore , "We do not have any scientific proof that we are the cause of the

global warming that has occurred in the last 200 years....2014 IPCC meeting : surface temperature reconstructions show, with high confidence, multi-decadal periods during the Medieval Climate Anomaly (year 950 to 1250) that were in some regions as warm as in the late 20th century. (a Non industrial period with fewer Humans)

Date submitted (Pacific Standard Time): 4/6/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Logging workers in the National Forest harvest thousands of acres of forests each year. They were a happy hard working group of Families. At such time the forest was growing, less fires, more birds and animals. Environmentalist obstructions activists are not helping our Forest Service dept protect the forest. Forest service could start schools to teach the old ways of the forest. The timber they harvest provides the raw material for countless consumer and industrial products that built this great nation . Logging workers would Cut down trees, Fasten cables around logs to be dragged by tractors, Operate machinery that drag logs to the landing or deck area , Separate logs by species and type of wood and load them onto trucks, Drive and maneuver feller-buncher tree harvesters to shear trees and cut logs into desired lengths, Grade logs according to characteristics such as knot size and straightness , Inspect equipment for safety, and perform necessary basic maintenance tasks, before using the equipment , The cutting and logging of timber is done by a logging crew. The following are examples of types of logging workers: Fallers cut down trees with hand-held power chain saws. Buckers work alongside fallers, trimming the tops and branches of felled trees and bucking (cutting) the logs into specific lengths. Tree climbers use special equipment to scale tall trees and remove their limbs. They carry heavy tools and safety gear as they climb the trees, and are kept safe by a harness attached to a rope. Choke setters fasten steel cables or chains, known as chokers, around logs to be skidded (dragged) by tractors or forwarded by the cable-yarding system to the landing or deck area, where the logs are separated by species and type of product. Rigging slingers and chasers set up and dismantle the cables and guy wires of the yarding system. Log sorters, markers, movers, and chippers sort, mark, and move logs on the basis of their species, size, and ownership. They also tend machines that chip up logs. Logging equipment operators use tree harvesters to fell trees, shear off tree limbs, and cut trees into desired lengths. They drive tractors and operate self-propelled machines called skidders or forwarders, which drag or otherwise transport logs to a loading area. Log graders and scalers inspect logs for defects and measure the logs to determine their volume. They estimate the value of logs or pulpwood. These workers often use hand-held data collection devices into which they enter data about trees. A logging crew might consist of the following members: one or two tree fallers or one or two logging equipment operators with a tree harvester to cut down trees one bucker to cut logs two choke setters with tractors to drag felled trees to the loading deck ,one logging equipment operator to delimb, cut logs to length, and load the logs onto trucks. They were Families that helped each other in times troubles in the Forest.

Date submitted (Pacific Standard Time): 4/10/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Americans have clean air and clean water, China and India have the worse. Why is the Agency hating the Poor and working class of America with unjust regulations., when China has passed United States in 2011 as the largest global GHG emitter and China, India, do not ascribe to international GHG reduction agreements.Reports on April 2018 ..

Traffs are needed against China and India, until they agree to the with same GHG standards.

INDIA Coal India will likely show growth in production year-on-year , Indian government Wednesday gave its approval to state-run Coal India Ltd. and its subsidiaries to extract coal bed methane from their coal fields areas without applying for a fresh lease. expedite the exploration and exploitation of CBM, enhance the availability of natural gas. , the Cabinet Committee on Economic Affairs said in a statement. state-owned Coal India buying more railway rakes to reliably supply coal to their customers and the Indian government's plans to allow private mining. The emission of the nitrogen dioxide pollutant has gone up significantly in the South Asia region, Chhattisgarh region of India, largest increases occurred over Jamnagar (India), Dhaka (Bangladesh) had the largest increase (79 per cent) of any world city. CHINA and INDIA, has the Unhealthy air and water BUT the USA has Good Air and Good Water Quality. CHINA The global seaborne thermal coal market is expected to grow by around 48 million mt from 2017 to touch 963 million mt in 2018, according to trading house Noble Group at the Coaltrans China conference in Beijing Tuesday. The demand is going to be mainly powered by a coal-hungry Asia led by China, India and the rest of eastern hemisphere countries accounting for an increase of 16 million mt, 11 million mt and 14 million mt respectively. Thermal power generation in China is up by 8.6%. Larger miners in China are becoming larger as they have better sales and logistics networks, Chinas National Bureau of Statistics, coal consumption in China increased 0.4 percent in 2017, and in 2016 Coal supplied 62 percent of Chinas energy. Shanghai, China air has an annual average of 52 g/m3 of PM2.5 particles. Thats 5.2 times worse than WHO safe level. in China, 6716 children die of air pollution-related diseases every year. Air pollution data from World Health Organization Info 2018. China, the worlds growing manufacturing hub, saw an increase of 20 to 50 per cent in nitrogen dioxide, South Korea's News: Imports, Coal which recently increased due to demand from power plants commissioned.

Where are the environmental activists, India and china has the worse air and water on the Plant.

Clean air in America: Think of the Billions each year, spent on regulations in USA on Fake water and air news, that could go to Schools, Health, Roads, infrastructure, Budget, Trade Balance. Wow looks at the air meters. TEXAS HOUSTON The air has an annual average of 10 g/m3 of PM2.5 particles. Thats at the WHO safe level. Healthy, GREENALABAMA, Birmingham The air quality has annual average of 11 g/m3 of PM2.5 particles. Thats 10% BETTER than WHO safe level. GREENKENTUCKY , Louisville annual average of 11 g/m3 of PM2.5 particles. Thats 10% BETTER than WHO recommended safe level. GREENPENNSYLVANIA, Pittsburgh, air quality has an annual average of 10 g/m3 of PM2.5 particles. Thats at the WHO safe level. GREEN

Date submitted (Pacific Standard Time): 4/3/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Agencies need to fix the ESA which tramples on private property rights more than any other statute, Of the more than 3,600 candidates proposed for listing by the Fish and Wildlife Service in 1993, there was insufficient scientific information to make a decision on about 3,000. Fix the ESA so that it fulfills the public's desire .The ESA's must definition of "harm" clearly by denoting actions that cause death or physical injury to listed species; Landowners must be compensated justly for government takings of their property to protect an endangered species; Agencies must use sound, objective, and unbiased science in determining listings of species. Incentives must be included to make landowners partners in the effort to save wildlife and plant species from extinction, so that landowners understand the consequences of their actions in making their decisions. Encourage citizens to play a part in the protection of endangered species is to give them an incentive to do so. Compensating them and rewarding them for acting as stewards of endangered species. ESA should be required the use of sound, objective, and unbiased scientific evidence that proves the actions of an individual caused death or physical injury to a physically identifiable endangered species present on the property.Reform the ESA so that it provides just compensation to landowners in exchange for becoming stewards of habitat for American species. Agency should not be offensive to local communities , and should not send the wrong message to landowners by taking control of all or part of a landowner's property without regard to the financial burden this places. Threatening landowners with the taking of their land without compensation is not the way America does business with their citizens. Many property owners feel compelled to agree to the agencies habitat conservation plans (HCPs), solely to mitigate or minimize a possible government, taking. Framers of the U.S. Constitution recognized that the right to own and make reasonable use of one's property is fundamental to freedom. The Fifth Amendment states, "Nor shall private property be taken for public use without just compensation." Under their Fifth Amendment rights, they should receive compensation for the economic loss they suffer by this confiscation of property, and it should come at fair market value. ESA is bad for species and bad for people. Endangered species receive better protection through voluntary conservation efforts than through the federal government's regulatory imposition of limits on the use of private land. Millions of dollars are lost from restricted or altered development projects; in agriculture production, timber harvesting, mining extraction, and recreation activities; the lost wages of displaced workers who went unemployed or became re-employed at lower wages; or the lower consumer surplus resulting from higher prices and lower capital asset value. The financial loss which prohibits private landowners from activities like farming, timbering, mining, building homes, or even enhancing their property, can be devastating.

Date submitted (Pacific Standard Time): 4/4/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Untethered regulation and rule making has been out of control the last few years, Activist would forget the cost of compliance of the regulations is also a regulation on the agency since the oversight might cost be more than benefit than the regulation is trying to impose, A double regulation. Regulations are an OVERREACH by bureaucracy and the administrative state may not only impede economic efficiency but also UNDERMINE health, safety, and environmental progress. Healthy government requires recognizing downsides to coercive intervention; it requires vigilant legislative and executive institutions and mindsets that seek reasons NOT TO ADD yet another rule or decree to the existing tens of thousands. Meanwhile the public has a RIGHT TO KNOW the ways federal agencies have harmed and harm that which they oversee, and how those negatives may propagate beyond the agency throughout the economy and society. Despite semi-formal central review of economic, environmental, and health and safety regulations and their accompanying paperwork since the late 1970s and the 1980s, a significant and escalating regulatory burden is apparent: 1 costs of regulation and realms subject to regulation have grown, while benefits remain ambiguous; 2 entire sectors of society experience regulation from independent agencies that get little scrutiny; 3 Federal Register page counts occupy record heights; 4 economically significant and major rules reviewed annually have increased notably over the past decade; 5 regulatory dark matter outside the normal notice and comment procedure lacks adequate scrutiny. It is no longer enough just to cut federal spending and balance the budget. The need to offset the march of bureaucracy and regulation and proposed ideas for doing that, even though the current reality assures us that the Constitution is not coming to the rescue in the near term. There is much about which to be optimistic; the ideas that created the American experiment in the first place remain "discovered", available in the public domain. Given today's economy, there should be bipartisan momentum for economic and regulatory reform, some animated new constituency for LIMITED GOVERNMENT. The regulatory process, therefore, itself needs more regulation. The executive and legislative branches may not agree on congressional reassertion of its authority with respect to making of law and regulation. While it would be preferable that Congress engage by implementing the Regulatory Improvement Act, the REINS Act, and other measures that directly LIMIT AGENCY AUTHORITY, those face the signing by this pro American presidency. Many recommendations can be implemented by executive action, by the same pen and phone now used to expand the state. If an expensive or burdensome regulation is enacted, elected representatives are on record for or against, and accountable to voters. The federal regulatory enterprise increasingly AFFECTS MANY BUSINESS AND TAX PAYERS, and changes are likely one way or another. With conventional options to restore liberties and elevate the rule of law exhausted or ignored, the states themselves may address the federal government's expansion by taking rightful powers back from Congress and the executive branch. The Constitution's Article V does provide for the states to call a convention to amend the Constitution and restore balance of power, and several states are pursuing that option (Brown, 2014). With respect to over-regulation possible a new , REGULATION FREEDOM AMENDMENT that would empower President to force agencies to propose said amendment. The amendment would stipulate that, in any given major rule, require House and the Senate to vote on a significant federal regulation, very much like the REINS Act legislation would do (Buhler, 2013).. The NEW GOVERNMENT AGENCIES primary task SHOULD be to double GDP, rather than to double spending or regulatory burdens, no matter the political party.

Date submitted (Pacific Standard Time): 4/2/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

In Past Administration the EPA Inspector General's highly critical report investigating EPA's review of external data for the GHGs endangerment finding. ENVTL. PROT. AGENCY, OFFICE OF INSPECTOR GEN., REPORT NO. 11-P-0702, PROCEDURAL REVIEW OF EPA'S GREENHOUSE GASES ENDANGERMENT FINDING DATA QUALITY PROCESSES (2011), The Information Quality Act (IQA), sometimes referred to as the Data Quality Act, was enacted in December 2000 as Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554). The act required the Office of Management and Budget (OMB) to issue guidance to federal agencies designed to ensure the "quality, objectivity, utility, and integrity" of information disseminated to the public. When agencies disseminate information related to the analysis of risks to human health, safety, and the environment, the OMB guidelines require agencies to "adopt or adapt" the "quality principles" that Congress established in the Safe Drinking Water Act Amendments of 1996 (42 U.S.C. 300g-1(b)(3)(A) and (B)). When basing actions under this act on science, the amendments require EPA to use "the best available, peer-reviewed science and supporting studies conducted in accordance with "sound" and "objective scientific practices" and to use "data collected by accepted methods or best available methods." When presenting risk information to the public concerning safe drinking water, the amendments also require EPA (where "practicable") to identify a "central estimate of risk" for specific populations, upper bound and lower-bound estimates of risk, and "each significant uncertainty identified in the process of the assessment." OMB said that through these amendments, "Congress adopted a basic quality standard for the dissemination of public information about risks of adverse health effects." OMB's data quality guidelines also generally describe the "administrative mechanisms" that agencies are required to establish to allow "affected persons to seek and obtain correction of information maintained and disseminated by the agency that does not comply with the guidelines." Specifically, the guidelines state that the mechanisms should be "flexible, appropriate to the nature and timeliness of the disseminated information, and incorporated into agency information resources management and administrative practice." They go on to say that the agencies must make decisions within "appropriate time periods" and must "notify the affected persons of any corrections made." Agencies also must establish an "administrative appeal process" to review requests for reconsideration, and must specify "appropriate time limits" for the resolution of such requests. The guidelines indicate that, to ensure objectivity, the office that originally disseminates the information does not have responsibility for both the initial response and resolution of a disagreement. The conference report on H.R. 2673, the Consolidated Appropriations Act of 2004, indicated that the conferees were "concerned that agencies are not complying fully with the requirements of the [IQA]," and directed OMB to submit a report to the House and Senate Committees on Appropriations by June 1, 2004, on whether agencies had been "properly responsive" to public requests for correction of information pursuant to the IQA.¹³ The conference report also said that OMB should suggest changes to the act or to OMB's guidelines to "improve the accuracy and transparency of agency science." It also required agencies to issue their own information quality guidelines, and to establish administrative mechanisms that allow affected persons to seek correction of information maintained and disseminated by the agencies that does not comply with the OMB guidance. In those guidelines, OMB noted that the act applies to virtually all federal agencies and established the broad scope of the guidelines by defining "information" as "any communication or representation of knowledge such as facts or data, in any medium or form." Similarly, the guidelines define "dissemination" as any "agency initiated or sponsored distribution of information to the public." OMB indicated that "quality" encompasses elements of utility, objectivity, and integrity, and said agencies can generally presume that data are "objective" if they have been subject to an independent peer review process. OMB said that agencies discovered that it took longer than expected to respond to correction requests and to implement the appeals process. In particular, OMB noted that some of the larger agencies

found it difficult to locate the correct specialist and ensure that he/she has enough time to devote to the request. EPA and the Departments of Agriculture, Health and Human Services, and Transportation) were "taking significantly longer to respond." In particular, OMB said it took the agencies more than five months to respond to eight of the requests.

Date submitted (Pacific Standard Time): 4/2/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Wildfires California Air Resources Board (CARB) and the California Department of Public Health (CDPH), BEFORE A FIRE all state public land officials and local public health officials must prepare for smoke events, to take measures to protect the public, and communicate with the public about wildfire prevention. Where roads have narrowed over the years as vegetation and trees have encroached, even into ditches and onto shoulders, they should have cleared this vegetation away. where California allowed the natural landscape to grow higher, they should have removed the fire threat to create defensible space. They should have cleared dead and dying trees that have become hazards that can carry fire across large areas, or into areas that are a threat to values-at-risk, state management must move aggressively to minimize that threat. All land managers across the state fire Departments. burnable vegetation, must think about fire in a new and aggressive way. implementing such a strategy is carrying out activities that address vegetation composition and structure and also alters fuel loads to reduce hazards. Such methods of fuel treatment safeguard public and firefighter safety and protect our landscapes, scenic vistas, and natural and historic objects; our neighbors, nearby communities, and infrastructure; and our own administrative and visitor service assets and facility, think about a different way of managing public lands to better incorporate fuels management into your resource-management planning. appropriate reviews and identification of resource needs and data gaps. California should ensure fire management plans are up to date and include the identified needs for a robust fuels-management program to support wildfire prevention and suppression efforts to be developed and implemented by both fire and other resource staff. Identify ways to address the realities we face in a safer and more effective manner.We simply cannot afford to continue business as usual.We must do everything we can to address the steady accumulation of fuels on our Nation's public lands and the resulting increased threats from catastrophic wildfires.

Date submitted (Pacific Standard Time): 4/2/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

The inability of the Forest Service to thin forests due to overly cumbersome and lengthy environmental processes, increasing frivolous lawsuits filed by certain litigious environmental activist , and a lack of sufficient agency focus on this challenge has led to nearly 60 million acres that are at high risk of deadly and catastrophic forest fires that endanger communities, hurt local economies, destroy land and water quality and release massive amounts of emissions into the atmosphere. the causes of catastrophic wildfire are complex of old trees, dead bushes, etc, the status quo of inaction has exacerbated present forest conditions, which now present a great risk to both communities and the environment. If managed wisely, and remove the environmental activists , America's national forests can provide clean water, wildlife habitat, recreational opportunities, and abundant domestic supplies of wood products and support rural communities and thousands of jobs in the timber industry. Unfortunately, this year's wildfire season like recent past wildfire seasons, produced several catastrophic fires that have destroyed more than 9 million acres, resulting in the tragic loss of life and property. In many cases, however, it's possible to reduce the risk of catastrophic wildfire through proactive, healthy forest management. While factors such as prolonged drought continue to raise the risk of wildfire, it is imperative that the federal government actively address the one issue within its control: hazardous fuels. Unnatural, overgrown, and unhealthy forests increase the risk and intensity of wildfires. Active management; e.g., thinning the forests, helps protect and restore forests while also helping local economies, and creating jobs. Congress should require the costs and benefits of a proposed forest project be weighed against the costs and benefits of doing nothing to address wildfire threats, disease and insect infestation, and their impacts on local water supply, air quality and wildlife habitat. The choice not to manage the forest is a management decision that directly impacts public health. Additionally, the USFS should expedite regulatory analyses for timber salvage after major wildfires and other natural disasters. This will provide the USFS with some of the revenue it needs to execute critical and time-sensitive post-fire reforestation work. improving forest health and reducing wildfire risk, increased active management will generate more revenue for the federal treasury and the critical services provided by counties, and promote job creation and economic growth in counties across the nation. a market-driven approach to forest management projects can work to achieve both forest management goals and increased forest production. The Equal Access to Justice Act (EAJA) must be reformed to ensure litigants are not able to exploit the law, and avoid legal caps on attorney's fees. EAJA's original intention was to compensate small business and individuals who do not have the financial means to challenge federal actions in court. ...LOOP HOLE; non-profit organizations are not subject to limitations. Additionally, some litigants suing to stop land management projects have successfully argued their expertise is specialized, and therefore not subject to the cap. EAJA should be reformed to prevent this abuse of a system designed to protect the vulnerable.

Date submitted (Pacific Standard Time): 4/2/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

American needs to Build more Dams for Clean Energy, For Wildlife, For Recreational, For Farmers, For miners, Helps prevent pollution , Help with Wildfires, so many benefits to all humans and wildlife and animals, Much more efficient and reliable than either solar or wind. And it works 100% of the time. Advantages of Hydropower: Hydropower is fueled by water, so it's a clean fuel source, meaning it won't pollute the air or water with Rare earth elements in wind and solar, it does not kill wildlife like wind and solar . Hydroelectric power is a domestic source of energy, allowing each state to produce their own energy without being reliant on international fuel sources. The energy generated through hydropower relies on the water cycle, which is driven by the sun, making it a renewable power source, making it a more reliable and affordable source than wind which only works 15 to 35 percent of time, or solar with no storage and dams are cost less for consumers electric bills. Impoundment hydropower creates reservoirs that offer a variety of recreational opportunities, notably fishing, swimming, and boating. Most water power installations are required to provide some public access to the reservoir to allow the public to take advantage of these opportunities. Some hydropower facilities can quickly go from zero power to maximum output. Because hydropower plants can generate power to the grid immediately, they provide essential back-up power during major electricity outages or disruptions. In addition to a sustainable fuel source, hydropower efforts produce a number of benefits, such as flood control, irrigation, and water supply. Many dams were built for other purposes and hydropower was added later. In the United States, there are about 80,000 dams of which only 2,400 produce power. The other dams are for recreation, stock/farm ponds, flood control, water supply, and irrigation. Hydropower plants range in size from small systems for a home or village to large projects producing electricity for utilities. Helps protect from run off of Pesticide Residues of Pesticide Chemicals in or on Various Commodities. turn unhealthy forests into thriving, healthy ecosystems, help the Groundwater-Quality Conditions.

Date submitted (Pacific Standard Time): 4/2/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Estimates of NO_x, formaldehyde, and glyoxal emissions from biomass burning events derived from enhancements measured by OMI (Ozone Monitoring Instrument). Emissions from biomass burning. The location of a particular point on the ozone isopleth is defined by the ratio of the VOC and NO_x coordinates of the point, referred to as the VOC/NO_x ratio. The VOC/NO_x ratio is important in the behavior of the VOC-NO_x-O₃ system. Moreover, it has a major effect on how reductions in VOC and NO_x affect ozone concentrations. The increase in peak ozone concentration at relatively low VOC/NO_x ratios that occurs when NO_x is reduced has been a major issue in the development of ozone control strategies. NO_x reductions will have significantly different effects depending on the particular VOC/NO_x ratio, which varies significantly within an air basin. Because NO_x generally reacts more rapidly than VOCs in air masses, NO_x is removed preferentially, and areas downwind of major VOC and NO_x sources, such as rural areas, often have relatively high VOC/NO_x ratios. isopleths are sensitive to the ambient concentrations of VOCs, NO_x, and ozone that are available for entrainment into the volume of air being studied, and the VOC and NO_x composition of emissions into the air volume, which change the VOC/NO_x ratio. All reactions of a certain class of VOCs may be represented by those of a single species, or VOCs may be segmented according to the kinds of carbon bonds in the molecules. Because different mechanisms use somewhat different approximations in lumping the VOC chemistry, the ozone concentrations predicted for a given set of initial conditions by different chemical mechanisms will not agree exactly, and the resulting isopleths can differ. Because different VOCs show widely varying reactivities in terms of ozone formation the peak ozone generated in a given VOC-NO_x mixture and hence the shapes of the ozone isopleths, particularly when the VOC/NO_x ratio is low, are sensitive to the initial VOC composition. Agency has wrong management plan this is backwards , most of fire budget should be for before fires not after fires. ,, Last year fire management alone consumed 56 percent of the USDA Forest Service's national budget. As fire suppression costs continue to grow as a percentage of the USDA Forest Service's budget, funding is shrinking for non-fire programs that protect watersheds and restore forests, making them more resilient to wildfire and drought. California received record-breaking rains in the winter of 2016-2017, historic levels of tree die-off. The Tree Mortality Task Force (TMTF), with support from the Governor's office and comprised of more than 80 local, state and federal agencies and private utility companies, continues to remove hazardous dead trees. To date, the TMTF members have collectively felled or removed over 1 million dead trees; this includes over 480,000 dead trees felled or removed by the USDA Forest Service. first focusing on public safety by removing dead and dying trees in high hazard areas. To further improve forest health, the USDA Forest Service And CAL FIRE have increased their pace and scale of prescribed fire. The USDA Forest Service has treated over 55,000 acres and CAL FIRE has completed over 33,000 acres in fuel treatment projects. By combining tree removal with prescribed fire, crews will be able to decrease overly dense stands of trees, reduce greenhouse gases, and protect communities across the state. Smoke from wildland fire is a significant source of air pollution emanating from National Forest lands. It can pose potential risks to health, visibility, safety, and general nuisance problems. Forest managers, fire managers, and air resource specialists must address these issues when and where appropriate to minimize smoke impacts to public health and welfare. National Forest lands contain ecosystems that have substantially departed from natural fire rules. . Decades of aggressive wildfire suppression and other land use practices have given rise to ecosystems with unnaturally heavy fuel accumulations and the proliferation of invasive exotic species both of which have more recently contributed to unnaturally large and severe wildfires. Large wildfires produce more smoke and air pollution annually than prescribed fires. Nationally, the restoration of fire-adapted ecosystems to effectively lessen the likelihood of large wildfires should be a high priority.

Date submitted (Pacific Standard Time): 4/2/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Electric Car fires take hours to put out and should not be allowed on roads in National and State Forest. they could cause major wildfires. 2011 Chevrolet Volt after it was crash tested at MGA Research, in Burlington, Wisconsin, in June 2011. The Volt's lithium-ion battery caught on fire 3 weeks after being subjected to an 18 mi/h side pole test as part of the National Highway Traffic Safety Administration's (NHTSA) New Car Assessment Program (NCAP). The fire quickly spread to three adjacent vehicles. An extensive post-fire investigation later determined that a small amount of battery coolant penetrated the high-voltage battery case after the crash, causing the battery to short and eventually leading to fire. 2012, Fisker Karma electric vehicles caught fire and were destroyed at a port in New Jersey after Hurricane Sandy. flooding caused a short circuit in one of the Karma's lithium-ion batteries, leading to a fire that spread, eventually igniting the 15 adjacent vehicles. 2013 ... Two Tesla Model S sedans caught fire while being driven in the United States. The first, in Washington State, occurred after the car struck a metal object in the road. The second occurred after the car ran over a trailer hitch lying on the road in Tennessee. In both cases, road debris punctured the floor and battery pack, leading to battery failure and thermal runaway. 2014, Fire : the car crashed at high speed, tearing the vehicle in two. The battery pack was ejected and caught fire.

Date submitted (Pacific Standard Time): 4/2/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Scientists at the National Center for Atmospheric Research (NCAR) and the University of California used satellite observations of fires and a computer model to estimate just how much carbon dioxide is released. study estimated that fires in the contiguous United States and Alaska release about 290 million metric tons of carbon dioxide a year. Fires that become large enough can release huge pulses of the gas into the atmosphere very rapidly. **FLAWED GREENHOUSE GAS REGULATIONS...FLAWED CPP, FLAWED Cross Street Air Pollution Rule. greenhouse gas (GHG) emissions , WILDFIRES DO MORE DAMAGE TO OZONE....REPORT** Impacts of the fall 2007 California wildfires on surface ozone: published 9 October 2008 , Integrating local observations with global model simulationsThe issue.....Many states, including California have not yet decided whether or not to include wildfire emissions when setting greenhouse gas targets And why was California Not a part of Cross-State Air Pollution Rule (original CSAPR) on August 8, 2011? ...BUT Wildfires can pump as much carbon dioxide into the atmosphere in just a few weeks as cars do in those areas in an entire year, a study suggests.Strange during the year of EPA green house gas studiesWildfires have been increasing in size and severity over recent decades because of many years of fire exclusion. Fire exclusion led to a buildup of fuels in ecosystem types that historically burned more frequently and less severely, such as ponderosa pine forests. To reduce Green house gas Forest managers need to use more underbrush treatments, including tree thinning and prescribed burning, to reduce the risk of high-severity fire. Underbrush treatments have multiple benefits for forests in addition to reduction of hazardous fuels, including higher understory biodiversity and a more heterogeneous habitat mosaic..... which has nothing to do with autos, or plants, or oil or gas . On average across the continental U.S., fires emit the equivalent of 4-6% of anthropogenic CO₂ per year However, at a state level, during particularly large fire years, fires can produce more CO₂ per year than fossil fuel burning. In California, in untreated portions of the forest that were burned in fire, most carbon (70%) was concentrated in decomposing wood (snags and surface fuels) compared to 19% of carbon stored in decomposing stocks in stands that had been treated before wildfire . Fire season lasting only one or two months can release as much carbon as the annual emissions from the entire transportation or energy sector of an individual state. which has nothing to do with autos, or power plants, or oil or gas issues. Study quantifies the impact of the fires in California in fall 2007 on regional air quality and especially on surface ozone by analyzing surface observations of ozone concentrations together with global chemistry transport model simulations. The findings demonstrate that intense wildfire periods can significantly increase the frequency of ozone concentrations exceeding current U.S. health standards, and might cause violations also during photochemically less active seasons. The study also demonstrates the far-reaching impact of ozone production from the fires. Wildfires are a significant direct source of atmospheric pollutants such as carbon monoxide (CO), nitrogen oxides (NO_x), volatile organic compounds (VOCs) and particulate matter. The gaseous pollutants are precursors for ozone (O₃) production and as a result, wildfires have been proposed to lead to substantial increases in tropospheric O₃ concentrations. California is one of the states with the highest wildfire activity. In 2007, about 13 million acres burned across the US with California accounting for 10% of the acres burned nationally

Date submitted (Pacific Standard Time): 4/2/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

11 bat species, out of the 45 that occur north of Mexico, have been found as fatalities at wind farms migratory tree bats, (hoary, red and silver-haired), Mexican free-tailed bats, Eastern pipistrelle Little brown bat, Why? Number of hypotheses proposed in Kunz et al 2007, Taller turbines, More of them on the landscape, Cryan 2007 flocking and mating hypothesis. 2008 Review of Bat Fatalities at North American Wind Energy Facilities, Fatalities heavily skewed toward migratory bats, specifically lasiurines, in most studies, Consistently reported peaks of fatalities in midsummer through fall Fatalities were not concentrated at individual turbines, FAA lighting (red strobes) did not influence bat fatalities, Fatalities were highest during periods of low wind speed, and were related to weather variables associated with passage of weather fronts. Arnett et al. 2008, Current research projects BVEC -Pennsylvania, PEIR -California, Canada

California Bats, 25 species in three families, -Phyllostomidae, -Vespertilionidae, -Molossidae. 12 special status species -1 federally endangered, -11 DFG species of special concern

Phyllostomidae; Mexican long-tongued bat, Lesser long-nosed bat, California leaf-nosed bat

Why these species? Hoary, red and silver-haired, Mexican free-tailed bats, Western mastiffs? there is limited information about bat migration and habitat use in California.

Sites of concern: -forested ridges -major river corridors -those within 500 feet of water bodies, riparian and forest edges, and major roosts or hibernacula -Migration routes (currently unidentified, other than river corridors)

Arnett, E.B., W. K. Brown, W.P. Erickson, J.K. Fiedler, B.L. Hamilton, T.H. Henry, A. Jain, G.D. Johnson, J. Kerns, R.R. Koford, C.P. Nicholson, T.J. O'Connell, M.D. Piorkowski, R.D. Tankersley, Jr. 2008. Patterns of Bat Fatalities at Wind Energy Facilities in North America. *Journal of Wildlife Management* 72(1):61-78. Cryan, P.M. and A.C. Brown. 2007. Migration of bats past a remote island offers clues toward the problem of bat fatalities at wind turbines. *Biological Conservation* 139:1-11. Cryan, P.M. 2003. Seasonal distribution of migratory tree bats (*Lasiurus* and *Lasionycteris*) in North America. *Journal of Mammalogy* 84(2):579-593. Kunz, TH, E.B. Arnett, W.P. Erickson, A.R. Hoar, G.D. Johnson, R.P. Larkin, M.D. Strickland, R.W. Thresher, and M.D. Tuttle. 2007. Ecological Impacts of Wind Energy Development on bats: questions, research needs and hypotheses. *Frontiers in Ecology* 5(6):315-324

Date submitted (Pacific Standard Time): 3/30/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

outreach efforts are good for the local community, included direct engagements with State natural resource agencies. Feedback provide conversations indicated broad support , public comment provide a high volume of very similar comments may need to be handled differently than a small number of very detailed comments. There may be situations where no comments are within the scope of the proposed policy so no Agency response is needed. The directives will ensure that the Agency's approach to responding to comments is consistent with FRRRPA requirements and supports transparency, public participation and collaboration. While the directives will provide a flexible approach to responding to comments, it should be noted that it is the Agency's intent that all comments received will be viewable through the Forest Service website. good idea so many local can provide comments to rule that are promulgated pursuant to section 14(a) of the FRRRPA (16 U.S.C. 1612(a)), which provides that the Secretary, in exercising his authority [under the Act] and other laws applicable to the Forest Service, by regulation, shall establish procedures, including public hearings where appropriate, to give the Federal, State, and local governments and the public adequate notice and an opportunity to comment upon the formulation of standards, criteria, and guidelines applicable to Forest Service programs. This provision of law has been implemented through 36 CFR part 216, published on April 23, 1984. The purpose of that provision is to ensure that Federal, State, and local governments and the public have adequate notice and opportunity to comment upon the formulation of standards, criteria, and guidelines applicable to Forest Service programs. Currently, 36 CFR part 216 only applies to directives published in the Forest Service Manual, which are policies and guidance for Forest Service staff. Part 216 reflects an Agency assumption that the Forest Service Handbook which contains detailed instructions on how to implement the Forest Service Manual is administrative or technical in nature, and does not include standards, criteria or guidelines. Over the past three decades, however, the complexity of management of the National Forest System (NFS) has increased, and the Agency has realized that the Forest Service Handbook may contain directives subject to the notice and comment requirements of section 14(a) of FRRRPA. More Taxpayers can comment on 216 by requiring the Forest Service to establish an internet-based notice and comment system, as notice of proposed changes to directives will be posted on a Forest Service-administered schedule on the agency's national website. While interim and final directives are available to the public on the internet, revision of part 216 will allow the public to have notice of, and ready access to, proposed, directives issued by the Forest Service. By utilizing modern technology, the public will be presented with several options for submitting comments, including at least one electronic means of submittal such as email or through a web form, as well as the traditional means of submitting comments by post-mailed letters. The process for submitting comments will be specified on the schedule. Several supplemental notification methods may also be employed in order to communicate about such notice to a broader segment of the public, including publishing notices of proposed, interim, and final directives in the Federal Register, issuing press releases, or holding public meetings. Other similar processes could also be utilized when appropriate. These revisions are issued as a final rule as provided for in 5 U.S.C. 553(a)(2) and 553(b)(3)(A) and (B) and (d)(1). The final rule does not impose additional burdens on any governmental entity or the public but significantly expands the opportunity for all parties to comment more readily on Forest Service policies set forth in Forest Service directives. These revisions maintain the public's right to participate in the formulation of internal standards, criteria, and guidelines and expands the options available to the Forest Service as it manages this procedural process. These revisions are intended to expand the public's awareness and ability to comment upon these directives. Since certain situations require implementation of standards, criteria, and guidelines applicable to Forest Service programs prior to completion of the public notice and comment process, this final rule continues to allow the use of interim directives that are effective upon publication. The same public participation process for proposed directives applies to interim

directives.comment opportunities results in both expanded capacity and actual savings The revision has many non-economic and non-quantifiable benefits. It will allow the Forest Service to reach a broader cross-section of the interested public when publishing notice of proposed directives, fostering robust public participation.

Date submitted (Pacific Standard Time): 4/16/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

America has lost more than 55,000 factories, 6,000,000 manufacturing jobs and accumulated Trade Deficits of more than 12 Trillion Dollars since Bush administration. 2017 Trade Deficit almost 800 Billion Dollars. 80 Billion spent By Obama climate Admin. .. based on dishonest reports. The problem was GHG Regulations 2009, Dec EPA published its Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act. As the primary scientific basis EPA relied heavily upon IPCCs AR4 ,in developing the TSD , concerns were raised about EPAs acceptance and use of this information .IPPC suffering heavy criticism for its use of information that had not been rigorously checked. And author of Jones of CRU showed asking Some to be deleted , The administers the Freedom of Information Act said the University of East Anglia had broken the rules in its handling of an FOI request in May 2008.2009, in Nov. subsequent to publication of EPAs proposed finding, approximately 1,000 e-mails were hacked from the servers of the University of East Anglia CRU , in England, and made public. The content of the e-mails caused a challenge the work of CRU and the conclusions of the IPCC. University of East Anglia CRU , in England staff have been heavily involved in the IPCC assessments, and CRUs work has been used by IPCC in construction of future climate projections.April 2010 study, chaired by Professor Ron Oxburgh, examined; noted that there were unresolved questions relating to the availability of environmental datasets. Russell report found that both CRU scientists and the University of East Anglia failed to display the proper degree of openness regarding their research.EPA inspector General, in 2011, Procedural Review , found Many issues EPA did not follow in EPAs Greenhouse Gases Endangerment Finding Data Quality Processes Report No. 11-P-0702 September 26, 2011NOTE: Few realize that the IPCC does not produce its own original scientific research on global warming so EPA Relied on reports that originated form a college staff in England. Sound national and international environmental policies must be based on a solid foundation of transparent scientific, technical, and economic understanding of the relevant facts. Regulation with back up reports using words such as if, might, could, probably, perhaps, expected, projected or modeled - and many involve such deep dreaming, or ignorance of scientific facts and principles, that they are akin to nonsense and a manufactured consensus and engineered science.

2011 July report by Government Accountability Office (GAO) is a government agency that provides auditing, evaluation, and investigative services Fostering Quality Science at EPA: Needs Reform; and found : EPAs laboratory activities remain fragmented and largely uncoordinated.EPA has not undertaken an agency wide, coordinated approach to managing its scientific efforts and related facilities as part of an interrelated portfolio of facilities. EPA had failed to implement the recommendations of five independent evaluations of EPAs scientific and laboratory management since 1992.GAO found that Testimony from a recent participant in CASACs particulate matter National Ambient Air Quality Standard panel stated that the CASAC process is flawed, narrow, and possibly ethically questionable.2012 Annual Plan of the EPAs Office of Inspector General OIG raises significant concerns about science and technology activities at the Agency, stating that questions exist as to whether EPA is collecting the right data, of sufficient quality, and is making that data available. In terms of EPAs regulatory process, the Inspector General (IG) further states that many policies are out of date or are based on outdated science and technology. GAO found As part of the update on its High-Risk Program, highlighting concerns about EPA politicization of science, saying that in recent years, concerns have been raised regarding the perceived politicization of science in agency decisions. In 2009, GAO added EPAs handling of toxic chemicals through the Integrated Risk Information System (IRIS) to its list of areas at high risk for waste, fraud, abuse, and mismanagement.EPA needs to better emphasize the development and use of environmental indicators and informationas a mechanism for prioritizing its allocation of limited resources, and that the lack of complete and comprehensive environmental information on air or water quality, for example,

makes it difficult for EPA to evaluate the success of its policies and programs. Several concerns have been raised about the make-up, transparency, and rigor provided by EPA advisory panels like the SAB and the Clean Air Scientific Advisory Committee CASA. GAO has found that many advisory committee members are not appropriately screened for potential conflicts of interest or points of view.

Date submitted (Pacific Standard Time): 4/15/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

We need to be smart and realistic about these polices. We must be honest with the American public and with ourselves. Families and workers would pay Trillions in to the system in the form of higher energy costs to get back an estimated \$802 billion in tax relief. That's a return of \$1.00 for every \$8.40 paid! It's time for the proponents of climate policies to be truthful. The use of untested, and non-transparent economic modeling issues will play a vital role in the debate on both energy and global warming policy, which have become unavoidably intertwined. Increasing our domestic energy production and lowering our dependence on foreign oil are two issues that are critically MORE important to America people. mandatory climate policies are unrealistic, extraordinarily expensive, and ill advised. what is the driver for these unrealistic proposals that seek to make unnecessarily abrupt and painful increases to our energy costs in the near term? It's all rooted in global warming science but latest science that has not been reported in the mainstream media, Science should not be viewed through any one frame. It is not partisan. It is not regional. Political process has largely engulfed the science behind climate change, the politicization of global warming science has become one of the most unfortunate developments of the last 8 years. Anytime one questions a hypothesis or a conclusion that does not fall in line with "the sky is falling" doom and gloom scenario of global warming alarmists, it is ridiculed, written off, denigrated, and not reported by the mainstream media. Yet a more severe interpretation or alarming statistic is related, it is headline grabbing.

Date submitted (Pacific Standard Time): 4/13/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Group of German scientists of "several scientific disciplines" has formed a new group :
the Group said;

There is no proven influence on climate by manmade emission of CO₂;

Scenarios on future climate change derived from computer models are speculative and contradicted by climate history;

There has been climate change in all times of Earth history with alternating cold and warm phases;

The trace gas CO₂ does not pollute the atmosphere, CO₂ is an essential resource for plant growth and therefore a precondition for life on Earth;

We are committing ourselves to an effective preservation of our environment and support arrangements to prevent unnecessary stress on eco systems; and

We strongly warn against taking action using imminent climate catastrophe as a vehicle which will not be beneficial for our environment and will cause economic damage.

Date submitted (Pacific Standard Time): 4/13/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

2009 December EPA published its Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act. BUT scientific basis for EPAs finding, assessments was conducted by other organizations. EPA reliance on the IPCC is an international body outside the jurisdiction and oversight of the United States Congress. is A VIOLATION of the Data Quality Act.

Flawed reports that created regulation cost in the Billions on Middle Americas Children, the poor, the Elderly, money that could have been spent on Healthcare, schools, infrastructure, Dams, Roads.

EPA Inspector Generals investigating DATA QUALITY PROCESSES (2011),Conclusions the endangerment finding Technical support document is a highly influential scientific assessment that should have been peer reviewed as outlined in Section III of Office of Management and Budget Final Information Quality Bulletin for Peer Review. EPA Office of Air and Radiation NEVER formally designated the document as either influential scientific information or as a highly influential scientific assessment in the preamble to the proposed and final endangerment findings or in its internal documentation. EPA did NOT consider the Technical support document to be a highly influential scientific assessment. EPA Office of Air and Radiation did not adhere to some of its internal processes established to guide Tier 1 actions. EPA did NOT complete some of these key requirements and recommended actions. EPA relied upon descriptions of other organizations information quality processes. NO contemporaneous documentation was available to show what analyses EPA conducted prior to dissemination of the information in its advance notice and proposed action. EPA guidance for assessing outside sources of data does NOT include procedures for conducting these assessments or require the Agency to document its assessments. EPA document does NOT identify specific steps or procedures EPA personnel should use in determining whether scientific and technical information is of acceptable quality, EPA does NOT identify the documentation requirements for these determinations. EPA did not contemporaneously document how it applied and considered the assessment factors in determining whether the IPCC and other assessment reports were of sufficient quality, objectivity, utility, and integrity. EPA did NOT conduct any independent evaluations of IPCCs compliance with IPCC procedures, EPA Did NOT document any specific processes it employed to evaluate the scientific and technical information included in IPCCs AR4 prior to EPA disseminating that information.

With respect to EPA accepting and disseminating data produced by other organizations,; Office of Management and Budget SAID If an agency uses another organizations data or analysis to support their policy, they are disseminating that information. As such, that information becomes subject to the Agencys Information Quality Guidelines and the Bulletin for Peer Review. Therefore, in evaluating whether to disseminate the information; EPA MUST determine whether the information complies with the Agencys Information Quality Guidelines. EPA determined that the IPCC assessment and other outside reports met EPAs information quality guidelines and were sufficiently peer reviewed. EPAs reasoning was described in its response to comments on the proposed rule. However; NO supporting analytical information was available to show how EPA made its determination PRIOR to disseminating the information. EPAs guidance for assessing the quality of externally generated information does NOT provide procedures or steps for assessing outside data or requirements for documenting such analysis. Since issuing its final findings in December 2009, EPA received 10 petitions requesting that EPA reconsider its findings. As part of their request for reconsideration, petitioners claimed that IPCC suppressed dissenting views during the development of its AR4, and some of the petitioners provided e-mails from University of East Anglia Climatic Research Unit (CRU) scientists as part of the evidence to support this claim. EPA provided in its response to comments document for the proposed findings, by referring to the IPCC procedures as a means of ensuring that all scientific views were considered during the development of the AR4. EPAs response to petitions document: EPA Office of Air and Radiation manager noted that a concern

was raised about improper edits being made to the second IPCC assessment report in 1995. Forest Service should provide their own transparent reports,.

Date submitted (Pacific Standard Time): 4/13/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Wildfires fires can produce more CO₂ per year than fossil fuel burning. Wildfires emit the equivalent of 46% of anthropogenic CO₂ per year. However, at a state level, during particularly large fire years, across the continental U.S., Wildfires in California, in untreated portions of the forest that were burned in fire, most carbon (70%) was concentrated in decomposing wood (snags and surface fuels) compared to 19% of carbon stored in decomposing stocks in stands that had been treated before wildfire. Wildfires are a significant direct source of atmospheric pollutants such as carbon monoxide (CO), nitrogen oxides (NO_x), volatile organic compounds (VOCs) and particulate matter. The gaseous pollutants are precursors for ozone (O₃) production and as a result, wildfires have been proposed to lead to substantial increases in tropospheric O₃ concentrations. Study quantifies the impact of the Wildfires in California in fall 2007 on regional air quality and especially on surface ozone by analyzing surface observations of ozone concentrations together with global chemistry transport model simulations. Scientists at the National Center for Atmospheric Research (NCAR) and the University of California used satellite observations of fires and a computer model to estimate just how much carbon dioxide is released. Study estimated that Wildfires in the contiguous United States and Alaska release about 290 million metric tons of carbon dioxide a year. Wildfires that become large enough can release huge pulses of the gas into the atmosphere very rapidly. The findings demonstrate that intense wildfire periods can significantly increase the frequency of ozone concentrations exceeding current U.S. health standards, and might cause violations also during photochemically less active seasons. The study also demonstrates the far-reaching impact of ozone production from the fires. California is one of the states with the highest wildfire activity. In 2007, about 13 million acres burned across the US with California accounting for 10% of the acres burned nationally (http://www.nifc.gov/fire_info/ytd_state.htm) Wildfires can also have a significant impact on air quality [Bravo et al., 2002]. Nationwide, extreme events like wildfires might still have significant impacts on air quality especially when they occur during periods conducive to ozone formation, Findings demonstrate a clear impact of wildfires on surface O₃ nearby and potentially far downwind from the fire location, and show that intense wildfire periods frequently can cause O₃ levels to exceed current health standards. Therefore, since EPA did not include wildfires, how can they do a complete report on source. REPEAL CPP, Clean AIR, Green house gas rules. And designed to hurt American Business and nothing to do with Air To reduce Green house gas Forest managers need to use more underbrush treatments, including tree thinning and prescribed burning, to reduce the risk of high-severity fire. Underbrush treatments have multiple benefits for forests in addition to reduction of hazardous fuels, including higher understory biodiversity and a more heterogeneous habitat mosaic. which has nothing to do with autos, or plants, or oil or gas.

Date submitted (Pacific Standard Time): 4/13/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Past agencies HAVE NOT prepared a tactical plan outlining the critical steps with a cohesive wildland fire management strategy that addresses these issues before a fire and required wildfires in California to limit NOx emissions to reduce ozone, and to limit annual NOx and SO2 emissions to reduce fine particle pollution.. The federal government and California, Washington and Oregon, are spending BILLIONS OF TAX PAYER DOLLARS, in attempting to address our nations wildland fire problems. BUT The wildland fire problems facing our nation continue to grow. GREENHOUSE GAS from wildfires is producing tons of pollutions to TAX PAYERS. The number of acres burned by wildland fires annually from 2000 to 2005 was 70 percent greater than the average burned annually during the 1990s, while appropriations for the federal government's wildland fire management activities tripled from about \$1 billion in fiscal year 1999 to nearly \$3 billion in fiscal year 2005. Experts believe that catastrophic damage from wildland fire probably will continue to increase until an adequate long-term federal response, coordinated with others, is implemented. ISSUE New research with New recommendations from agencies to develop a cohesive strategy that identifies the available long-term options for REDUCING EXCESS VEGETATION ON PUBLIC LAND THAT FUEL WILDFIRES and reducing excess vegetation that could FUEL WILDLAND FIRES . The last report "Protecting People and Natural Resources: A Cohesive Fuels Treatment Strategy," this document DOES NOT identify long-term options to REDUCE EXCESS VEGETATION AND FUELS ON PUBLIC LANDS. CONSIDER requiring the Secretaries of Agriculture and the Interior to develop a tactical plan outlining the key steps and time frames required to complete this cohesive strategy. If the agencies and the Congress are to make informed decisions about an effective and affordable long-term approach to the issue, they should have a cohesive strategy that identifies long-term options and needed funding for addressing these wildland fire problems BEFORE THEY HAPPEN. New scientific knowledge of how to reduce the fuels and vegetation on the public lands is required and less of biological and sociological factors. FIRST Government should provide new RELATIONSHIP WITH that conform with new ideas of cutting old growth, and allowing the sawmills and loggers back into the forest to do good things again, the loggers protected the forest. Activist ideas are destroying ; replace leaders of ; Wildland Fire Leadership Council (WFLC), National Strategy Committee (NSC) , Fire Executive Council (FEC) , National Cohesive Wildland Fire Management Strategy, Federal Land Assistance, Wildland Fire Implementation Plan (WFIP), Wildland Fire Situation Analysis, The Wildland Fire Situation Analysis process, Guidance for Implementation of Federal Wildland Fire Management Policy (2009), Land/Resource Management Plan (L/RMP), Management and Enhancement Act of 2009 (FLAME Act), WFLC was established in April 2002 by the Secretaries of Agriculture and the Interior to provide an intergovernmental committee to support the implementation and coordination of Federal Fire Management Policy. In April 2010, the Secretaries of Interior, Agriculture and Homeland Security authorized the continuation of the WFLC. Involved Agencies: U.S. Department of the Interior, U.S. Department of Agriculture, Forest Service, National Park Service, Fish and Wildlife Service, Bureau of Land Management, Bureau of Indian Affairs, U.S. Geological Survey, U.S. Department of Homeland Security/U.S. Fire Administration, Western Governors Association, National Governors Association, National Association of Counties, Intertribal Timber Council, National League of Cities, National Association of State Foresters, International Association of Fire Chiefs. On February 13, 2009, the Fire Executive Council (FEC) approved Guidance for the Implementation of Federal Wildland Fire Management Policy. This Guidance provides for consistent implementation of the 1995/2001 Federal Fire Policy, as directed by the Wildland Fire Leadership Council.

Date submitted (Pacific Standard Time): 4/23/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Billion reason not to over regulate GHG, We didnt create the UN to give us weather forecasts for 2100! The Unraveling of Global Warming is Accelerating. Shadow hanging over climate change and science. The idea that CO2, a trace essential gas in the atmosphere that humans exhale form their mouth, is the main climate driver is now being challenged by peer-reviewed studies, data and scientists from around the globe. when looking at global temperatures, it is the Sun, volcanoes, tilt of the Earths axis, water vapor, methane, clouds, ocean cycles, plate tectonics, albedo, atmospheric dust, Atmospheric Circulation, cosmic rays. The IPCC developed the Global Warming Potential (GWP) concept to compare the ability of each greenhouse gas to trap heat in the atmosphere relative to another gas. UNFCCC reporting guidelines for national inventories require the use of GWP values from the IPCC Fourth Assessment Report (AR4) (IPCC 2007). On October 30, 2009, the U.S. Environmental Protection Agency (EPA) promulgated a rule requiring annual reporting of greenhouse gas data from large greenhouse gas emissions sources in the United States. ISSUE EPAs reliance on the IPCC AR4 for GHG Regulations, which violates the Agencys own internal policy. See Inspector General and GSO reports . EPA. Review Panel did not fully meet the independence requirements for reviews of highly influential scientific assessments because one of the panelists. was an EPA employee. ISSUE: Congress Committee: the IPCC is an international body outside the jurisdiction and oversight of the United States Congress. Moreover, EPA is the entity of the United States government that is seeking sweeping regulations on the basis that GHGs are increasing global temperatures. ISSUE : Congress committee : 2014 Secret Science EPAs Playbook. ; from the US Senate 67 page reported 2014 within (EPA), some officials making critically important policy decisions were not remotely qualified, anything but neutral .ISSUE IPCC relied on data from a University of East Anglia, CRU , in England. College Students did research , More than two-thirds of all authors of chapter 9 of the IPCCs 2007 climate-science assessment are part of a clique whose members have co-authored papers with each other. CRU were accused falsification of findings .CRU were accused of manipulating/selecting data to exaggerate global warming. CRU were accused of hiding data flaws and research findings. CRU were accused of hiding climate data flaws .CRU were accused of refusing to release data requested, CRU were accused of losing primary station data.

ISSUE: Also the AR4 had many errors. More Than 1000 International Scientists Dissent Over Man-Made Global Warming Claims Scientists Continue to Debunk Fading Consensus in 2008 & 2009 & 2010.

ISSUE: Nations that made IPCC AR4 working Groups: NOT one represented USA in ANY working groups China, India, Pakistan , Largest Polluters on Planet: some of the countries are not friend with USA and did NOT agree to reduce current levels, to international GHG reduction agreements , Almost 200 nations affiliated to the 2007 IPCC only 12, or just 6%, were represented among the authors in chapter 9.

ISSUE Schlesinger at IPCC few year ago, acknowledged that 80 percent of the IPCC had no dealing with the climate as part of their academic studies.

ISSUE: WHO is making the rules against USA. IPCC work Groups I, II and III Nations like ; Russian ? Cuba ? Venezuela, ? Pakistan ? Sudan ? Ethiopia ? some are on Sanctions, Embargoes sanctions counties : china, Cuba, Russia, Central African Republic , Sudan Venezuela why is USA making regulations based on advise form these counties. ?? Current Chairman : South Korea since 2015 Past Chairman SUDAN Ismail El Gizouli was interim Chairman 2015 PAST Chairman INDIA 2002 -2015 Rajendra K. Pachauri.

ISSUE: AR4 continued the America has lost ; more than 55,000 factories, 6,000,000 manufacturing jobs and accumulated Trade Deficits of more than 12 Trillion Dollars since Bush administration. 2017 Trade Deficit almost 800 Billion Dollars. 80 Billion spent By Obama climate Admin. . Obama, EPA more than \$27 million in taxpayer-funded grants to major environmental groups.. based on flawed reports. Obama added more than \$80 billion of regulatory burden on the American economy in just 8 years of term, on nonsense, hurting the poor.

Billions based on Flawed reports.

Issue: Nations to Benefit from CO2 regulations in USA, is India, Asia, India is one of the largest beneficiaries of the total world carbon trade through the Clean Development Mechanism. 2011 EU Emissions Trading Scheme (ETS) has cost their consumers \$287 billion for "almost zero impact" on cutting carbon emissions, 2011 UBS study.

Issue : even the IPCC AR5 2014 reports are grounded in speculative conjecture based on well documented climate model analytical limitations instead of solid science .

Date submitted (Pacific Standard Time): 4/23/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Stop spending money on over regulations, and use the money for Education, Budget, Health, Dams, Roads.Etc.United States is one of the Cleanest Airs and Water on the Planet earth American Regulation are tremendous waste of taxpayer money since they are against the wrong Nation
it is china and India, see Air pollution in Beijing so impenetrable the U.S. Embassy's air quality measuring station can only call it "beyond index . Public outcry over thick blanket of toxic smog that covered Beijing earlier this year. According to the Environmental Protection Agency's air quality scale, air is unsafe to breathe. stay indoors with air purifier, according to U.S. Embassy Beijing guidelines.China has passed United States in 2011 as the largest global GHG emitter China, India, Pakistan , do not ascribe to international GHG reduction agreements.. Pakistan, with a population of almost 180 million urban air pollution in Pakistan causes thousands of adult deaths each year.Chinese cities like Urumqi, Lanzhou and Linfen on lists of the world's most polluted places.CHINA Beijing, Last update: March 2018Air pollution data from World Health Organization InfoPM10 at 108 Red , Bad(as of 3.28.2018) Very Unhealthy PM2.5 at 112 Red, Bad (3.28.18)PM10 Pollution Level: Very High , Red, BadPollution Index: 89.78 Bad, RedAir Pollution 85.26 Very High Bad, RedDrinking Water Pollution 70.45 High Bad, Red Water Pollution 73.65 High Bad, RedAir quality 14.74 Very Low Bad, Red Water Quality 26.35 Low Bad, Red China; in Yongledianzhen PM10 AQI 160 Very Unhealthy 3.28 .2018 PM2.5 AQI 147China ; in Langfang PM10 AQI 220 Very Unhealthy 3.28 .2018
China should be added to Conflict Minerals Law of 2010. and UN and international rights groups should apply conflict-sensitive approaches to imports from china. 300 million Chinese in rural areas lack access to safe drinking water. Thousands of dead wildlife floating down the river that supplies Shanghai with its drinking water. Chemical accident leaked benzene, into a tributary of the Huangpu River . Country's most industrial regions are some of the driest, with 45 per cent of the country's gross domestic product produced in water-scarce provinces such as Hebei, Shandong and Shanxi.
America has Good Air and Good Water,.(Air Apps are everywhere now showing American as GREEN..) .. agency needs to stop Fake report are inappropriate as they contain errors of omission and/or commission and are neither convincing nor authoritative. Many of the conclusions are incomplete, inaccurate, lack objectivity and consequently only serve to confuse the issue. Government initiate as a matter of priority thorough, should ban china imports, t engage across industry and community of real science , and include an advisory process representing the range of interests and concerns.
TEXAS HOUSTON The air has an annual average of 10 g/m3 of PM2.5 particles. Thats at the WHO safe level. Healthy, GREENALABAMA, Birmingham The air quality has annual average of 11 g/m3 of PM2.5 particles. Thats 10% BETTER than WHO safe level. GREENKENTUCKY , Louisville annual average of 11 g/m3 of PM2.5 particles. Thats 10% BETTER than WHO recommended safe level. GREENPENNSYLVANIA, Pittsburgh, air quality has an annual average of 10 g/m3 of PM2.5 particles. Thats at the WHO safe level. GREEN

Date submitted (Pacific Standard Time): 4/21/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Bats are the pesticide applications to Forest Farmers, but Wind Turbines are Killing unprecedented numbers of Bats. with 30-meter-long blades rotating at more than 80 kilometers per hour even in this light breeze. flying animals run into spinning blades, or the rapid decrease in air pressure around the turbines can cause bleeding in their lungs. Countless die at wind turbines elsewhere in the U.S. and Canada in the forests and fields of the Midwest and the windy prairies of the Great Plains. Much of this slaughter the greatest threat to animals that are a vital link in our ecosystem. The number of bats killed across the entire United States 2020 an estimated 33,000 to 111,000 bats will be killed annually by wind turbines in the Mid-Atlantic Highlands alone . Bats are particularly susceptible to wind turbines, when extrapolated to one million bats deaths, that would be between 660 and 1320 metric tons of insects are no longer being consumed each year. Value of bats to the agricultural industry is roughly \$22.9 billion/ year. as high as \$53 billion/year. These estimates include the reduced costs of pesticide applications that are not needed to suppress the insects consumed by bats . This will likely have long-term cumulative impacts on both aquatic and terrestrial ecosystems. single colony of 150 big brown bats (*Eptesicus fuscus*) in Indiana has been estimated to eat nearly 1.3 million pest insects each year, single little brown bat can consume 4 to 8 g of insects each night . The loss of bats in North America could lead to agricultural losses estimated at more than \$3.7 billion/year. Bats are important pollinators and help farmers through their pest-control capabilities and nectar-feeding acts. But declining bat populations from wind Turbines leave big impact. Corn farmers love winged mammals put more than \$1 billion back into your collective pockets, a new study suggests. value of pest suppression services provided by bats range from about \$12 to \$173/acre (with a most likely scenario of \$74/acre) in a cotton-dominated agricultural landscape in south-central Texas On the whole, bats increased crop yield by 1.4% a benefit that, on average and at current corn prices, adds up to a difference of about \$7.88 per hectare (\$3.18 per acre) and more than \$1 billion worldwide. The drop in damage could be attributed to bats, the researchers say. the loss of 6 million bats due to Windfarms can result in more than 1300 metric tons of insects escaping bat predation every year. A 2006 study found that just in the cotton fields of Texas, Mexican free-tailed bats saved farmers an annual average of \$724,000 in pest control costs and losses from insect-related damages. Extrapolating that to the country as a whole, a follow-on study in 2011 estimated that bats are worth around \$23 billion in pest suppression services. Agriculture feeds into many sectors of the nations economy, as a whole equaling \$992 billion in 2015, or 5.5 percent of the nations gross domestic product. Farm output alone contributed \$136.7 billion that year, or 1 percent of GDP. In that light, the economic services bats provide is a real and quantifiable sum. USDA meteorologist John Westbrook are looking at the seasonal movement of insects and how bats track and exploit them. Over three seasons in Uvalde, Texas, they found that bats were eating 44 different agricultural pests, 20 of which were migratory. Insect pests are threats to important agricultural crops including those in fruit farms, bats provide an important ecosystem service by eating and depleting pest populations. Bats feed on some of the most damaging crop pests just how many tons of insects the bats are eating mostly agricultural pests, And as they munch their way through 140 to 147 tons of insects nearly 300,000 pounds of bugs each and every night during the growing season bats provide a huge, yet mostly hidden, service to the United States agricultural communities. including the moths of cutworms and armyworms which helps to protect food crops naturally. Most of the farmers say the pest control and crop protection services they provide saves thousands. Many put up bat boxes on their farms to provide a home for them. In this region of Texas, bats nightly foraging occurs over huge tracts of land planted in corn, cotton and sorghum. Their prey: primarily moths, especially the adults of corn earworm and cotton bollworm moths. With each female moth capable of laying up to 1,000 eggs, every moth consumed by a bat represents a major reduction in the millions of dollars of potential damage that could occur. Bats control pests, eating up to 1,200 insects an hour. The bat is on the hunt for insects, and according

to new research, farmers have a billion reasons to be grateful for it. Research recently written by former graduate student Josiah Maine and his adviser at Southern Illinois University Carbondale shows that bats play a significant role in combating crop pests.

Date submitted (Pacific Standard Time): 4/18/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Presidential Executive Order on Promoting Energy Independence and Economic Growth Issued on: March 28, 2017 Sec. 5. Review of Estimates of the Social Cost of Carbon, Nitrous Oxide, and Methane for Regulatory Impact Analysis. (a) In order to ensure sound regulatory decision making, it is essential that agencies use estimates of costs and benefits in their regulatory analyses that are based on the best available science and economics.(b) The Interagency Working Group on Social Cost of Greenhouse Gases (IWG), which was convened by the Council of Economic Advisers and the OMB Director, shall be DISBANDED and the following documents issued by the IWG shall be withdrawn as NO LONGER representative of governmental policy:(i) Technical Support Document: Social Cost of Carbon for Regulatory Impact Analysis Under Executive Order 12866 (February 2010);(ii) Technical Update of the Social Cost of Carbon for Regulatory Impact Analysis (May 2013);(iii) Technical Update of the Social Cost of Carbon for Regulatory Impact Analysis (November 2013);(iv) Technical Update of the Social Cost of Carbon for Regulatory Impact Analysis (July 2015);(v) Addendum to the Technical Support Document for Social Cost of Carbon: Application of the Methodology to Estimate the Social Cost of Methane and the Social Cost of Nitrous Oxide (August 2016); and(vi) Technical Update of the Social Cost of Carbon for Regulatory Impact Analysis (August 2016).(c) Effective immediately, when monetizing the value of changes in greenhouse gas emissions resulting from regulations, including with respect to the consideration of domestic versus international impacts and the consideration of appropriate discount rates, agencies shall ensure, to the extent permitted by law, that any such estimates are consistent with the guidance contained in OMB Circular A-4 of September 17, 2003 (Regulatory Analysis), which was issued after peer review and public comment and has been widely accepted for more than a decade as embodying the best practices for conducting regulatory cost-benefit analysis.

Date submitted (Pacific Standard Time): 4/18/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Presidential Executive Order on Promoting Energy Independence and Economic Growth Issued on: March 28, 2017 Sec. 7. Review of Regulations Related to United States Oil and Gas Development. (a) The Administrator shall review the final rule entitled Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources, 81 Fed. Reg. 35824 (June 3, 2016), and any rules and guidance issued pursuant to it, for consistency with the policy set forth in section 1 of this order and, if appropriate, shall, as soon as practicable, suspend, revise, or rescind the guidance, or publish for notice and comment proposed rules suspending, revising, or rescinding those rules.(b) The Secretary of the Interior shall review the following final rules, and any rules and guidance issued pursuant to them, for consistency with the policy set forth in section 1 of this order and, if appropriate, shall, as soon as practicable, suspend, revise, or rescind the guidance, or publish for notice and comment proposed rules suspending, revising, or rescinding those rules:(i) The final rule entitled Oil and Gas; Hydraulic Fracturing on Federal and Indian Lands, 80 Fed. Reg. 16128 (March 26, 2015);(ii) The final rule entitled General Provisions and Non-Federal Oil and Gas Rights, 81 Fed. Reg. 77972 (November 4, 2016);(iii) The final rule entitled Management of Non Federal Oil and Gas Rights, 81 Fed. Reg. 79948 (November 14, 2016); and(iv) The final rule entitled Waste Prevention, Production Subject to Royalties, and Resource Conservation, 81 Fed. Reg. 83008 (November 18, 2016).(c) The Administrator or the Secretary of the Interior, as applicable, shall promptly notify the Attorney General of any actions taken by them related to the rules identified in subsections (a) and (b) of this section so that the Attorney General may, as appropriate, provide notice of this order and any such action to any court with jurisdiction over pending litigation related to those rules, and may, in his discretion, request that the court stay the litigation or otherwise delay further litigation, or seek other appropriate relief consistent with this order, until the completion of the administrative actions described in subsections (a) and (b) of this section.

Date submitted (Pacific Standard Time): 4/17/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Many states, including California have not yet decided whether or not to include wildfire emissions when setting greenhouse gas targets And why was California Not a part of Cross-State Air Pollution Rule (original CSAPR) on August 8, 2011? WILDFIRES DO MORE DAMAGE TO OZONE. Forest fires may produce as much co2 as half of all fossil-fuels burned report, 2007 said California wildfires pumped nearly 8 million metric tons of climate-warming carbon dioxide into the atmosphere , Another report from Scientists study estimated that Fires in US release millions metric tons of carbon dioxide per year. air pollution affects air quality in downwind states.

Date submitted (Pacific Standard Time): 4/17/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

March 28, 2017 EXECUTIVE ORDER PROMOTING ENERGY INDEPENDENCE AND ECONOMIC GROWTH, Sec. 2. Immediate Review of All Agency Actions that Potentially Burden the Safe, Efficient Development of Domestic Energy Resources. (b) For purposes of this order, "burden" means to unnecessarily obstruct, delay, curtail, or otherwise impose significant costs on the siting, permitting, production, utilization, transmission, or delivery of energy resources. Sec. 3. Rescission of Certain Energy and Climate-Related Presidential and Regulatory Actions. (a) The following Presidential actions are hereby revoked: (i) Executive Order 13653 of November 1, 2013 (Preparing the United States for the Impacts of Climate Change); (ii) The Presidential Memorandum of June 25, 2013 (Power Sector Carbon Pollution Standards); (iii) The Presidential Memorandum of November 3, 2015 (Mitigating Impacts on Natural Resources from Development and Encouraging Related Private Investment); and (iv) The Presidential Memorandum of September 21, 2016 (Climate Change and National Security). (b) The following reports shall be rescinded: (i) The Report of the Executive Office of the President of June 2013 (The President's Climate Action Plan); and (ii) The Report of the Executive Office of the President of March 2014 (Climate Action Plan Strategy to Reduce Methane Emissions). c) The Council on Environmental Quality shall rescind its final guidance entitled "Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews," which is referred to in "Notice of Availability," 81 Fed. Reg. 51866 (August 5, 2016) Sec. 5. Review of Estimates of the Social Cost of Carbon, Nitrous Oxide, and Methane for Regulatory Impact Analysis. (a) In order to ensure sound regulatory decision making, it is essential that agencies use estimates of costs and benefits in their regulatory analyses that are based on the best available science and economics. (b) The Interagency Working Group on Social Cost of Greenhouse Gases (IWG), which was convened by the Council of Economic Advisers and the OMB Director, shall be disbanded, and the following documents issued by the IWG shall be withdrawn as no longer representative of governmental policy: (i) Technical Support Document: Social Cost of Carbon for Regulatory Impact Analysis Under Executive Order 12866 (February 2010); (ii) Technical Update of the Social Cost of Carbon for Regulatory Impact Analysis (May 2013); (iii) Technical Update of the Social Cost of Carbon for Regulatory Impact Analysis (November 2013); (iv) Technical Update of the Social Cost of Carbon for Regulatory Impact Analysis (July 2015); (v) Addendum to the Technical Support Document for Social Cost of Carbon: Application of the Methodology to Estimate the Social Cost of Methane and the Social Cost of Nitrous Oxide (August 2016); and (vi) Technical Update of the Social Cost of Carbon for Regulatory Impact Analysis (August 2016). (c) Effective immediately, when monetizing the value of changes in greenhouse gas emissions resulting from regulations, including with respect to the consideration of domestic versus international impacts and the consideration of appropriate discount rates, agencies shall ensure, to the extent permitted by law, that any such estimates are consistent with the guidance contained in OMB Circular A-4 of September 17, 2003 (Regulatory Analysis), which was issued after peer review and public comment and has been widely accepted for more than a decade as embodying the best practices for conducting regulatory cost-benefit analysis.

Date submitted (Pacific Standard Time): 4/30/2018 5:00:00 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

U.S. hydropower could grow from hydropower in the United States 50 GW (from 101 gigawatts (GW) of capacity to nearly 150 GW) this is appropriately conservative. report underestimate the amount that can be achieved through equipment upgrade and modernization and powering of non-powered dams.2012 Department of Energy (DOE) of all non-powered dams (NPDs) in the United States determined that these dams could provide 12,000 MW of generating capacity. A mere 100 of them could provide 8,000 MW of generating capacity. there is little doubt that these dams could generate electricity at a lower cost than wind turbines. There are 80,000 dams in the U.S., and 97 percent do not produce electricity. There are only 2,500 dams that are actually retrofitted with hydropower. Of those 80,000, 54,000 could be retrofitted at a megawatt or more, according to Oak Ridge National Laboratory.

Equally important to increasing hydropowers competitiveness are continued improvement in mitigating adverse effects, protection of fish and wildlife, and increased public awareness of progress made in this regard. Addressing these objectives will require continued technical innovation, easurable and implementable environmental sustainability metrics and practices, increased planning at the basin or watershed scale, and access to new science and assessment tools. Currently USA has nearly 100 gigawatts (GW) of combined hydropower generation and PSH capacity 10% of all U.S. generating capacity the existing fleet has a tremendous national impact on the power system. Maintaining the existing fleet allows it to provide continued electricity system benefits under a wide range of electric sector futures. Improving hydropower economics is central to the growth. The powering of existing dams that previously lacked generation capabilities, or NPD, represents another way to expand hydropower production while making use of existing waterway infrastructure. Contemporary high-resolution resource assessments covering the continental United States have found technical potential for 12 GW of new capacity on NPDs. Upgrades are often the lowest-cost hydropower resource. Hydropowers system benefits are large and have historically underpinned the nations electric systems. Hydropowers growth is critically coupled with innovation that can enable hydropower resource opportunities to be economically competitive and environmentally sustainable in the context of other low-carbon energy options. Keys to improved competitiveness are continued technical innovation to reduce capital and operating expenses, improved understanding and market valuation of system-wide grid reliability and stability services, and recognition and valuation of societal benefits from avoided lower sector air pollution and GHG emissions. Dams exist for four purposes: recreation, commercial navigation, flood control and irrigation. But there should be a fifth purpose. If youre going to have a dam, why not get electricity out of it too? 1 upgrade and modernize plants that are already operating. The average age of those plants is nearly 50 years old. We have technology now that would allow these plants to easily generate more energy. 2 to would be powering dams that dont currently generate any power. Theyre there for flood control, navigation, recreation, irrigation. Theres tens of thousands that could be powered, and I think we should go power them. If you upgrade and power just the top 100 non-powered dams, youd probably add enough power to potentially green the entire U.S. government. The cost of building the dams has already been incurred, and since the dams are already built, there would be little environmental impact. For example, they wouldnt kill birds and bats as do wind turbines.

The electricity from the NPDs would be dispatchable, and would therefore have greater value to grid operators than electricity generated from wind farms. Its interesting to compare just 100 best NPDs with the over 8,000 wind turbines installed during 2011 and 2010. They also wouldnt require expensive gas turbine backup generators running 24/7, ready to step in when the wind stopped blowing.

Why this administration hasnt stressed generating electricity from the 100 NPDs having the greatest potential for generating electricity, rather than promoting subsidies for wind. The subsidies for wind can be eliminated

and we can still generate renewable electricity that's dispatchable, low cost and reliable and without building new dams.

Date submitted (Pacific Standard Time): 4/28/2018 5:00:00 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Provide ongoing resource assessment to provide economic feasibility of new energy from the 54,000 potential non energy sites, Potential of thousands of new jobs, potential to add up to 12.1 GW (12,100 MW) at NPDs in the US. Provide a big picture analysis of potential hydropower sites. Focus on moving the nation towards a cleaner energy economy that includes developing environmentally appropriate renewable energy projects involving hydropower. Maximizing existing infrastructure is lowhanging fruit to meet the goal of developing more, the federal hydropower system, and in particular Reclamation, has an important role to play in realizing this untapped potential; incentives for development can expand the universe of hydropower projects that are economically viable. Present the best information and most accurate picture of growth opportunities.U.S. renewable energy resources; Evaluate the potential of additional hydropower from non-powered dams (NPDs) that could contribute to the amount of renewable energy available across the nation. substantial hydropower potential exists at Reclamation sites. Some site analyses base on over 20 years of hydrologic data that indicate a high likelihood of generation capability. Sites that could be economically feasible to develop today, based on available data and study assumptions.Congress and the Administration, as well as the states, have set ambitious energy goals for the country, seeking the short and long term benefits of significantly increased renewable energy generation, such as reduced emission of greenhouse gases and air pollutants.Hydropower can and should play a leading role in meeting these goals by bringing significant new renewable energy generation online.As the federal system makes up about half of the hydropower generation in the United States today, and as there is significant existing nonpowered federal infrastructure that could be converted to generating resources, the hydropower industry believe Reclamation (as well as the Corps of Engineers) is uniquely situated to support the deployment of new hydropower resources to meet these goals. Given that mitigation costs for hydropower are highly site specific, it may not be appropriate to assume that these costs are dependent on the installed capacity of the project.Study a technical analysis and identify the 54,000 NPDs in a hydropower resource assessment effort. Estimate the maximum generation potentials of all NPDs in a nationally consistent manner. Make available to developers for use in focusing their attention on selected regions for more detailed site identification and analysis. Provide new technical ideas for water passing a facility to be converted to electrical energy and remove constant at facilities. Site-specific designs will (a) incorporate detailed monitoring of daily and hourly head and flow variations and (b) balance initial costs with energy revenue to yield site-specific designs of lesser capacity and production potential. Upgrade facilities and demonstrate new technologies at existing hydropower locations. Identify specific Federal facilities that are well-suited as sites for sustainable hydropower. Coordinate research and development on advanced hydropower technologies; Increase hydropower generation through low-impact and environmentally sustainable approaches; Assess the potential for developing new hydropower capacity and generation at existing Reclamation facilities. Determine the economic viability of hydropower production at existing Reclamation facilities. Document economically viable opportunities for future hydroelectric power development. Turbine types and efficiency specified for each site as indicated by the available hydraulic head and flow. Actual or estimated distances and costs of transmission lines. Calculation of the internal rates of return. Hydrologic data, including flow and net hydraulic head (net head), are necessary to calculate potential power generation at a site. Net head is the difference between head water and tail water elevations. Power generation can be estimated using the following formula: $Power [kW] = (Flow [cfs] * Net Head [feet] * Efficiency) / 11.81$ Flow, head water and tail water data are typically available from flow meter or gage measurements, reservoir elevations, and project design specifications. Efficiency is dependent on the turbine design capacity, operating capacity, and turbine type.The summary of Non-powered Dam Hydropower Potential by Federal Agency, US Army Corps of Engineers; # of NPDs 121; Bureau of Land Management, 657.0, Department of Defense 219.0, Forest

Service 2,531.0, Fish and Wildlife Service 297.0, National Park Service 96.0, Bureau of Indian Affairs 694.0. The Resource Assessment considers potential benefits related to water supply, fish and wildlife considerations, and effects on Native Americans, storage, water for wildfire fight, water quality, and recreation.

Date submitted (Pacific Standard Time): 4/27/2018 5:00:00 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Pay for Forest Tree cutting and logging, with more Oil and gas leasing , a benefit to Forest Service on Federal Lands, July 8, 2011, Deputy Chief, National Forest System U.S. Forest Service before the House Committee on Natural Resources Subcommittee on Energy and Mineral Resources report, He said, U.S. Forest has no policy nor do we have any plans to develop any policy to ban horizontal drilling and the associated hydraulic fracturing. The agencies follow Congressionally authorized mandates that allow for the responsible development of domestic energy and mineral resources. The Forest Service manages the surface of National Forest System lands while the BLM manages the subsurface. The BLM issues leases for exploration and development of energy minerals after receiving consent from the Forest Service for leasing those NFS lands. Oil and gas production on NFS lands approx.. 17 million barrels of oil and 194 million cubic feet of natural gas were produced in 2010 from almost 3,200 federal wells on NFS lands. Private and federal lands are located on the Allegheny National Forest in Pennsylvania and Ohio's Appalachian foothills , Federally owned minerals make up about 40 percent of the mineral ownership in the Wayne National Forest. In fiscal year 2010, production from federal wells generated an estimated \$361 million in bonus and royalty payments to the U.S. Treasury. A large portion of this revenue will be returned to states and counties, specifically 25% of the revenue from Acquired Lands, 25% of the revenue from National Grasslands, and 50% of the revenue from Public Domain Lands will be returned to the states and counties. The Forest Service provides these energy resources and their benefits to the American people in a way that is consistent with our mission to safeguard the health, diversity and productivity of our nations forests and grasslands. Therefore, this onerous and costly regulation should be rescinded so these mineral gifts to America can be used to help pay the 2018 budget.

Date submitted (Pacific Standard Time): 4/26/2018 5:00:00 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Dam restoration would benefit fish populations and their habitats, but the value of these investments goes far beyond recovering the salmon, birds, wildlife, habitat. The financial investments in habitat restoration contribute to local communities and their economies. In fact, the restoration economy in the United States employs approximately 126,000 workers and annually generates approximately \$9.5 billion in economic output. This activity indirectly supports an additional 95,000 jobs and \$15.0 billion in economic output through indirect (business-to-business) linkages and increased household spending. In Oregon alone, habitat restoration projects generated as many as 6,400 jobs and more than \$977 million between 2001 and 2010. Several studies indicate that a \$1.0 million investment in watershed restoration, of which PCSRF and State matching funds play a significant role, creates between 13 and 32 jobs and \$2.2 and \$3.4 million in economic activity. Every dollar invested in salmon restoration travels through the economy in several ways. PCSRF State and Tribal grantees contract with local watershed groups, conservation agencies, land trusts, and other entities to manage habitat restoration projects. In turn, those agencies contract with local businesses and suppliers to carry out the work. These partners contribute funding on top of PCSRF dollars. This cost sharing model increases the economic benefits realized in local communities. Investing in restoration also provides communities with longer-term economic stability, including future job creation in rebuilt fisheries and coastal tourism and higher property values.

Just think the money Non Profits Environment activists spent on studies, fight in courts and time with agencies, could be going to many benefits to all.

In-stream Enhancing stream habitat and function
Restoring riparian habitat function, enhancing and restoring native riparian vegetation
Improving wetland and estuarine habitat
Build more Hatchery areas to triple the populations
Build New Hatchery for each Tribe to run. Program for Volunteers to Restoring the flow of river water to the coastal systems and floodplains
Removing old trees and trash in rivers for better fish passage
.Make the river deeper to better passage.
Work with Farmers and Ranchers to managing agricultural water, juniper, and noxious weeds in river.

The jobs and economic benefits of salmon restoration activities are largely realized in the local and rural communities, many of which face economic challenges. Approximately 80 percent of habitat restoration investments are spent in the county in which the project sponsor is located, and over 90 percent is spent within the State. These economic benefits truly are localized and provide important stability to economically distressed communities.

Each dollar invested returns more than \$15 in long-term net economic benefit for the community.

Water is back, fish are back, April 2018 RECORD rainfall Friday, and flood warnings remained in effect Saturday
An atmospheric river of subtropical streaming from Hawaii pounded Northern California. STORM TOTALS (last 48 hours) San Francisco 3.38, Oakland 3.98, San Jose 1.06, Napa 2.98, Concord 1.84, Novato 2.48
2017 Jan California Sierra snowpack almost double the average for mid-January. National Weather Service in Reno said that this was the biggest snowstorm to hit the Sierra in six years. The onslaught of heavy rainfall from this atmospheric river, Medford's 115 days of rain since Oct. 1 shattered the previous record of 104 set in 1997-98, according to meteorologist Michelle Cohen of the National Weather Service. The 128 days of precipitation in Grants Pass in that span eclipsed the previous mark of 127 for the October-April span, set in 1982-83.
March 2018 The latest Pacific storm, the third in two weeks, had been expected to drench local mountainsides with up to 10 inches (25 cm) of rain, and some street flooding occurred in Montecito
As rains soaked parts of California, the East Coast was digging out from the fourth major snowstorm this month, which closed schools, grounded flights and halted bus and train service across the region
2017 The water content of Oregon's snowpack was above 150 percent in much of the state. In the Rogue-Umpqua basins combined it was

147 percent, same as the Klamath.

California received record-breaking rains in the winter of 2016-2017

Date submitted (Pacific Standard Time): 4/26/2018 5:00:00 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

FIRST Government should provide new RELATIONSHIP WITH that conform with new ideas of cutting old growth, and allowing the sawmills and loggers back into the forest to do good things again, the loggers protected the forest. Activest ideas are destroying ; replace leaders of ; Wildland Fire Leadership Council (WFLC), National Strategy Committee (NSC) , Fire Executive Council (FEC) , National Cohesive Wildland Fire Management Strategy, Federal Land Assistance, Wildland Fire Implementation Plan (WFIP), Wildland Fire Situation Analysis, The Wildland Fire Situation Analysis process, Guidance for Implementation of Federal Wildland Fire Management Policy (2009), Land/Resource Management Plan (L/RMP), Management and Enhancement Act of 2009 (FLAME Act), WFLC was established in April 2002 by the Secretaries of Agriculture and the Interior to provide an intergovernmental committee to support the implementation and coordination of Federal Fire Management Policy. In April 2010, the Secretaries of Interior, Agriculture and Homeland Security authorized the continuation of the WFLC. Involved Agencies: U.S. Department of the Interior, U.S. Department of Agriculture, Forest Service, National Park Service, Fish and Wildlife Service, Bureau of Land Management, Bureau of Indian Affairs, U.S. Geological Survey, U.S. Department of Homeland Security/U.S. Fire Administration, Western Governors Association, National Governors Association, National Association of Counties, Intertribal Timber Council, National League of Cities, National Association of State Foresters, International Association of Fire Chiefs. On February 13, 2009, the Fire Executive Council (FEC) approved Guidance for the Implementation of Federal Wildland Fire Management Policy. This Guidance provides for consistent implementation of the 1995/2001 Federal Fire Policy, as directed by the Wildland Fire Leadership Council. California Fires and Cross-State Air Pollution Rule, Wildfires can pump as much carbon dioxide into the atmosphere in just a few weeks as cars do in those areas in an entire year, a study suggests. . flawed EPA science used a two-step process to set limits on upwind states emissions. First, EPA determined whether a states emissions were projected to contribute significantly to air quality problems in a downwind area (making it hard for a downwind area to attain or stay in attainment with ambient air quality standards). Second, EPA determined the amount of emission reductions that in upwind states could make without exceeding a cost threshold. But EPA only used Power Plants, and autos, and Not Wildfire air quality problems.. Wildfires should be required to limit NOx emissions to reduce ozone, and to limit annual NOx and SO2 emissions to reduce fine particle pollution. Federal agencies having primary responsibility for managing wildland fire issues-- the Forest Service within the Department of Agriculture and the Bureau of Indian Affairs (BIA), Bureau of Land Management (BLM), Fish and Wildlife Service (FWS), and National Park Service (NPS) within the Department of the Interior RECOMMEND that the Dept. of Interior and Secretaries of Agriculture and complete a joint tactical plan outlining the critical steps before a Fires, for a NEW cohesive strategy like underbrush treatments, including tree thinning and prescribed burning to reduce the risk of high-severity fire. Underbrush treatments have multiple benefits for forests in addition to reduction of hazardous fuels, including higher understory biodiversity and a more heterogeneous habitat mosaic study should also demonstrates the far-reaching impact of ozone production from the fires. Wildfires are a significant direct source of atmospheric pollutants In responding to A NEW report, officials from Agriculture and Interior can produce an initial tactical plan. Agencies must complete prior to implementing such a strategy, including finishing data systems needed to identify the extent, severity, and location of wildland fire threats to the nation's communities and ecosystems; updating local fire management plans to better specify the actions needed to effectively address these threats; and assessing the cost-effectiveness and affordability of options for reducing fuels in the Forest and State and Federal Lands. Executive Order 13045: Protection of Children From Environmental Health and Safety Risks

Date submitted (Pacific Standard Time): 4/26/2018 5:00:00 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

California Fires and The Regional Haze Rule, Wildfire gaseous pollutants are precursors for ozone (O3) production. Millions of acres of forest and grassland have burned in recent months. wildfires are producing tons of pollutions more than autos, oil and gas or factories. Currently requires states to submit state plans for compliance, mainly affect Western states (the rule aims to improve visibility in national parks, which are located primarily in Western states). EPA needs to conduct a study on the formation of atmospheric ozone describing the extent to which wildfire sources of air pollution affect the ability of states to comply with federal pollution limits under the Clean Air Act. the Moderate Resolution Imaging Spectroradiometer (MODIS) sensor. the burned surface can be mapped using a recently developed algorithm that uses multitemporal land surface reflectance data. MODIS is a satellite that monitors, among other factors land surface changes on the Earth's surface every 24 to 48 hours. It is usefully employed to estimate regional biomass burning emissions from grassland and woodland fires for a number of trace gases and particulates. Mercury emissions from forest fires (QHg) (in kg of mercury per year) can be estimated following a bottom-up approach by the equation: contribute substantial emissions of gases and particles to the atmosphere. These emissions can impact air quality and even climate. Daily emissions of particulate matter and numerous trace gases from fires mercury emissions from major natural sources and their variations with meteorological conditions is considered one of the major priority in estimating the relative contribution of major natural sources compared to industrial sources and ultimately to evaluate the mercury flux released to the atmosphere on regional and global scale. estimate the contribution of wildfires to the total mercury released to the atmosphere, An accurate estimate of carbon fluxes associated with tropical deforestation from the last two decades is needed to balance the global carbon budget. Greenhouse Gas (GHG) from WILDFIRES IN FORESTS AND PUBLIC LANDS in California must be part of the Clean air or clean water standards of which EPA left out Flawed climate change and carbon tax has left out the Co2 from wildfires which is major causes not gas and oil industry, or mining, or factories .. AND STOP BLAMING OIL AND GAS AND AMERICA BUSINESS ON GREENHOUSE GAS Wildfire gaseous pollutants are precursors for ozone (O3) production. Millions of acres of forest and grassland have burned in recent months. Past agencies HAVE NOT prepared a tactical plan outlining the critical steps with a cohesive wildland fire management strategy that addresses these issues before a fire and required wildfires in California to limit NOx emissions to reduce ozone, and to limit annual NOx and SO2 emissions to reduce fine particle pollution.. The federal government and California, Washington and Oregon, are spending BILLIONS OF TAX PAYER DOLLARS, in attempting to address our nations wildland fire problems. BUT The wildland fire problems facing our nation continue to grow. GREENHOUSE GAS from wildfires is producing tons of pollutions to TAX PAYERS. The number of acres burned by wildland fires annually from 2000 to 2005 was 70 percent greater than the average burned annually during the 1990s, while appropriations for the federal government's wildland fire management activities tripled from about \$1 billion in fiscal year 1999 to nearly \$3 billion in fiscal year 2005. Experts believe that catastrophic damage from wildland fire probably will continue to increase until an adequate long-term federal response, coordinated with others, is implemented.

Date submitted (Pacific Standard Time): 4/26/2018 5:00:00 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

POOR FOREST MANAGEMENT HAS LESS WATER FOR WILDLIFE AND PEOPLE. Being thinned, trees create right-sized gaps in the canopy to allow snow to fall to the ground yet receive enough shade to be protected from melting too early, unlike closed canopies from too many trees where 15 to 60 percent of snow never reaches the ground and is lost to evaporation. Dave Schulz, Commissioner, Montana, in 2015 testimony, The consequences are a domino effect that results in forest management coming to a standstill. I think there are environmental consequences to any action we take, and if we were not cautious and careful and cooperative that can cause harm, Schulz reiterated during the hearing. At the same time, there is an environmental consequence to doing nothing, and that's what I'm concerned about. Economic depression of forest communities makes rebuilding more difficult. Lengthy and complex planning processes such as NEPA, CEQA, and the ESA must be complied with before any action is taken. CARB impedes prescribed therapeutic burns while promoting the unintended consequence of enabling larger, more damaging fires. Today, timber harvest in public forests is practically non-existent. Rather than a healthy 50 to 100 trees per acre, the west slope now averages 300-plus trees per acre. This concentration of trees and underbrush amounts to 45 tons of dry fuel per acre, or a potential for catastrophic fire. restoration is sorely needed for a return to healthy forests. environmental restoration program of unprecedented scale can alter the direction of current high-intensity wildfire trends many federally managed forests are dangerously overgrown and action need be taken to remove excessive growth and turn the resulting wood and biomass into products with economic value. Preserving dynamic ecosystems in a static state is just not possible. Many of the things causing forests to decline is an environmental disconnect and Build more dams.... overall number of high-hazard potential dams is increasing, with the number climbing to nearly 15,500 in 2016. Due to the lack of investment, the number of deficient high-hazard potential dams has also climbed to an estimated 2,170 or more. . . Stop wildfires build more dams, Infrastructure for dams, Report , overall number of high-hazard potential dams is increasing, with the number climbing to nearly 15,500 in 2016. Due to the lack of investment, the number of deficient high-hazard potential dams has also climbed to an estimated 2,170 or more. Fema web site The purpose of a dam is to store water or other liquid-borne materials for any of several reasons, to include human water supply, irrigation, livestock water supply, energy generation, containment of mine tailings, recreation, pollution or flood control. Many dams fulfill a combination of the above functions. There are now approximately 28,000 dams in the U.S. whose failure could cause property damage or a potential loss of life. More than 15,000 of these are considered high-hazard potential, meaning their failure would result in probable loss of life. To reduce the chances of a dam failing invest in repair and routine maintenance. DAMS that are more than 25 feet high, hold more than 50 acre-feet of water, or are considered a significant hazard if they fail. The NID is maintained and published by the U.S. Army Corps of Engineers with information from all 50 states, Puerto Rico, and 16 Federal agencies. 700 dams it operates and maintains, . effective manner within a constrained budget said in report, According to one survey, the number of people who believed that "government is run by people who don't know what they're doing" climbed from 27 percent in the early 1960s to 63 percent in 1980. lack of confidence in government and concerns about the environment generated opposition to water projects. Another problem was the federal budget. Discretionary programs, such as water resources, became one way of showing fiscal restraint in the face of demands for increased expenditures for other programs. Infrastructure development no longer automatically means large construction and maintenance operations. It means developing management techniques, new approaches, to use our resources more efficiently and to reduce resource depletion instead of building and maintaining. effective manner within a constrained budget

Date submitted (Pacific Standard Time): 4/26/2018 5:00:00 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

In 2015 USFS Chief Dave Bosworth Said, We Do Not Have A Fire Problem On Our Nations Forests; We Have A Land Management Problem LITIGATION has had a profound impact on mismanagement of our national forests, Need to update or repeal the Equal Access to Justice Act (EAJA) of 1980 , subsection of EAJA, codified at 28 U.S.C. 2412(d) section 2412(b). Ventura county fire Dec 2017, California Northern Wine county, 2016 fires, etc Million acres in California have burned in 2017, such wildfires will release thousands of tons of greenhouse gas emissions and other harmful air pollutants. impact of wildfires on the atmosphere. After smoke from the Chetco Bar Fire forced the Ashland Shakespeare Festival to cancel performances due to smoke and haze, when will California get to the real issue Enough is enough. Newspaper report, 2007 said California wildfires pumped nearly 8 million metric tons of climate-warming carbon dioxide into the atmosphere, Nov 29 2016 Wildfire smoke can result in significant air quality impacts to public health. Then we have 2017 wildfire again. Another report from Scientists study estimated that Fires in US release millions metric tons of carbon dioxide per year. Wildfires can produce more greenhouse gas (GHG) emissions than gas and oil , therefore we should manage forest better by stopping the regulations against clear cutting to help prevent co2 from mass wildfires in western states. US Forest service page; fuels buildup to unnatural levels and forests become overcrowded. This led to forests being more susceptible to insects and disease outbreaks, but also to unnaturally large fires on the landscape. Another report : , Forest fires may produce as much co2 as half of all fossil-fuels burned, US Forest Service page, 2015 Pacific Northwest wildfire season Washington 130,000 tons Oregon 90,000 tons of fine particulate matter The greenhouse gas emissions alone were equivalent to more than 8.5 million passenger vehicles driven for a year or heating 3.7 million homes. government charge or fine california for Co2 wildfire pollutants? US forest service page wildfire report on 2015 year reported on greatest threat to many endangered species and their habitat is catastrophic WILDFIRE leads to susceptible to insects and disease outbreaks MUST do thinning forest to protect habitat and more resistant to insect predation. concentration of trees and underbrush amounts to 45 tons of dry fuel per acre, potential for catastrophic fire Currently, even utility crews must receive Congressional approval before performing regular maintenance or the repairing of damaged power lines. When a right-of-way is not properly maintained, a tree can grow into or fall on to a power line, causing fires . 2017 Mr Secretary Zinke accumulation and thickening of vegetation exacerbates fuel conditions and often leads to larger and higher-intensity fires," .. particularly for at-risk groups and to safety, and to transportation through diminished visibility on roads and aviation corridors as well as impacts to fire personnel. In contrast, prescribed fires provide an opportunity to adjust the timing of fire and some ability to manage the amount of smoke and its path, thereby reducing the impact of fire emissions. Prescribed fire, managed using basic smoke management practices, can reduce the impacts on air quality while meeting fire-related objectives.

Review the fire protection regulations were primarily established with the issuance of Appendix R to 10 CFR part 50 in 1980 and the NFPA [National Fire Protection Association] 805 alternative regulations adopted in 2004. final rule in 1980 that issued appendix R to part 50 of title 10 of the Code of Federal Regulations (10 CFR) and revised 10 CFR 50.48 (45 FR 76602; November 19, 1980). The 2004 final rule (69 FR 33536; June 6, 2004) further revised 10 CFR 50.48 and added alternative fire protection regulations based on National Fire Protection Association Standard 805, Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants. California should provide compensatory measure guidance documents ensure protecting the public.

Date submitted (Pacific Standard Time): 4/26/2018 5:00:00 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

2017 This year, 8.5 million acres have burned nationwide, costing \$2.5 billion to suppress. We must address the impacts of catastrophic wildfire to guarantee the constitutional right . NEPA must be reformed as well as review. fire protection regulations were primarily established with the issuance of Appendix R to 10 CFR part 50 in 1980 and the NFPA [National Fire Protection Association] 805 alternative regulations adopted in 2004. Streamlining the process for projects with strong local support, collaborative support and support of local land management professionals should be categorically EXCLUDED FROM LITIGATION OF ENVIRONMENTALIST. We need to allow our professional land management agencies to get back to managing the land rather than managing litigation. the threat of wildfires in the West is a ticking time bomb that will negatively affect the economy and environment active forest management will reduce the threat of wildfire to our citizens and local communities in the West. By reducing the fuel loads on our national forests we can reestablish a healthy, thriving ecosystem that improves the economy and the environment. Healthy forests are essential to clean water supplies and clean air. Biodiversity increases when we manage our forests with practical, sound, and scientific practices. Local, state and national economies enjoy the benefits of both responsible resource use and recreation. Nobody loses when our forests are healthy and resilient. increasing commercial timber harvests from our national forests, reducing fuel loads through more mechanical thinning and controlled burns, reducing the red tape to get through the National Environmental Policy Act (NEPA) process, and combating frivolous special interest lawsuits that serve only to delay much needed management of our National Forest System. landscape-scale catastrophic wildfires in the national forests in Montana and other Western states have had a disproportionately large impact on the ecological, social and economic life of the County and our neighbors. Fire seasons last an average of 78 days longer compared to 40 years ago. As the USFS wrote in its 2015 fire budget report, The agency is at a tipping point. Every year, wildfire suppression eats up a greater share of the USFS budget. This, coupled with the approximately \$350 million a year the USFS spends complying with federal law, ultimately reduces funding for other forest management priorities. 1995, 16 percent of the USFSs annual budget went to fire suppression. Today, that number is well north of 50 percent, and by 2025 will likely amount to two-thirds of their annual budget. Nature and poor policy decisions have forced the agency to change its focus. In the past, the USFS spent the bulk of its dollars on forest management, such as commercial timber harvests and mechanical thinning, whereas today, suppression has become its major priority. Today, more staff is devoted to fighting fires than managing the forests. nightmare of red tape and regulation forces agencies to create long bullet proof NEPA analyses that can still be held up by frivolous litigation. Rather than managing resources, the agency is forced to manage paperwork and litigation. This contributes to the unsustainable growth in fuel loads, leading to the explosion in catastrophic fires over the past few decades. USFS has to pull money from management accounts to help combat catastrophic fires, a process known as fire borrowing. This further delays much needed timber harvests, mechanical thinning, and controlled burns, leaving the USFS with fewer resources to meet its management objectives. Solving the problem of fire borrowing must also be a component of any action taken by Congress to improve forest resiliency. Our once vibrant timber economy has been left in shambles, its infrastructure decimated and our scenic beauty scarred for decades to come. Our citizens live with severely diminished air quality for weeks or months at a time. Both our human and wildlife habitat have been, and will continue to be, negatively impacted unless Congress acts to address the problem. fire has devastated the landscapedestroying wildlife habitat, emitting smoke into the air, and jeopardizing the safety of residents. detrimental effect on local public health. Thick clouds of smoke billow into the air, and citizens breathe it in. This particularly impacts our children, sick people, and the elderly. Air quality is commonly in the unhealthy or hazardous Warm air in the daytime sometimes helps to lift smoke higher into the atmosphere, but when cooler weather sets in at night, the smoke

descends back into our communities.

Date submitted (Pacific Standard Time): 4/26/2018 5:00:00 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

The objectives of federal water agencies in the United States, such as the Army Corps of Engineers (Corps) and Bureau of Reclamation (Reclamation), FEMA, have forgot the core mission. These agencies were initially tasked with the water development role of building dams to expand navigable waters, control floods, and develop water supplies to encourage economic development. Today, many of the best sites from an engineering standpoint need improvements, and repairs. Dams for unappropriated water supplies are becoming increasingly scarce, the focus of these agencies should again be expanded to include dams for water management. Allocating water supplies between competing uses, including Farms , Ranches, Indian lands, Fishing, Boating, Recreation, power, energy, clean water, New Projects should be become an important objective of these agencies. Federal water development to focus primarily on new extractive or new consumptive, or non consumptive uses of the water. Elwha River of the Olympic Peninsula of Washington State and Glines Canyon Dams, Colorado River, Glen Canyon and Flaming Gorge, Snake River need to be restored for greater use of water. Inventory Dams for targeted recovery, More population requirements for all sources should encourage dam structural improvements and build new dams to increase the benefits for humans and wildlife. Significant effort and financial resources should be devoted for the next century. To reverse this trend of our system of dams, many believe that extraordinary efforts are required, suggesting that the only way to truly restore dams may be to managed state through dam Improvement rules . Their implicit assumption is that the general public would consider the return of these dams on rivers to help with water issues, the potential recovery, to be quite valuable even if they never intend to visit them. Estimation of these nonuse or passive use values are often required to justify dam. In addition to the local community, commercial, sport, and tribal fishers are also often supporters of dams . This is particularly true of river systems with fish, where dams have natural contributing factors to all populations. Indian Tribe may be allocated a significant share of a river dams systems allowable fish harvest for commercial, subsistence, and ceremonial purposes. From a recreation perspective, anglers may be supportive of dam given the potential for increased in fish populations. While most native fish populations would likely increase with more or expanded dams. Resident reservoir fisheries would also typically be increased. Furthermore, in certain naturally warm water river systems, such as the habitats have been stocked with trout, creating extremely valuable blue ribbon sport fisheries. Finally, resorts, vacationing and local residents boaters may also be interested in new dam with boating runs and increase seasonal enjoyment. Should also increase values for Famers and rancher for crops and animals. Low cost Energy for Cities and local towns will benefit. In the U.S., many dams were constructed in the early to mid-1900s. As dams age, maintenance and repair costs can be expected to increase substantially making current investments a high priority. Older dams need upgrading and or dredging to increase functional and water storage in reservoir as sediment accumulates . In addition, repair and maintenance may required structural stability of the dam, decreasing the potential for dam failure and associated losses in property damage and possibly human life. For privately owned dams substantial increase low interest loans for in the costs of repair. Expending money to build new facilities, makes economic sense to fix the old structure. As dams are determined to be improve based upon inspection, or come up for licensing renewal, proposals for dam repairs should undoubtedly increase benefits.

Date submitted (Pacific Standard Time): 4/26/2018 5:00:00 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Protect our Homes, Children , Wildlife, Crops, Water, Ecosystems and Forest from Wildfires, we can do more, much more to prevent wildfires before they start. Need to update or repeal the Equal Access to Justice Act (EAJA) of 1980 , subsection of EAJA, codified at 28 U.S.C. 2412(d) section 2412(b). Wildfire Carbons and Ozone Greenhouse gas coming from WILDFIRES destroy life , too many rules against America energy and no rules against states that do not do enough with wildfire prevention Extreme events of wildfires have significant impacts on Crops, and on air quality especially when they occur during periods conducive to ozone formation, Findings demonstrate a clear impact of wildfires on surface O3 nearby and potentially far downwind from the fire location, Wildfires were not in in the Flawed past administration EPA report for Greenhouse gas. US Forest Service page, 2015 Pacific Northwest wildfire season Washington 130,000 tons Oregon 90,000 tons of fine particulate matter . July 2016, EPA's 2013 guidance did not completely provide sufficient guidance to states to fulfill their oversight responsibilities. The greenhouse gas emissions alone were equivalent to more than 8.5 million passenger vehicles driven for a year or heating 3.7 million homes. Also see Cato institute web page at cato.org/publications/policy-analysis/case-against-us-carbon-tax Executive order, Roll Back Burdensome Regulations and Executive Order (EO) 13771, Reducing Regulation . these are not only Burdensome and costly but based on flawed Science. Forest service needs Americas help to stop environmentalist activist from lawsuits and fighting our forest service from doing a job that protects the people, the forest, the wildlife . Disasters from wildfires hurt health of all living things. should do more to cut and sell more timber, remove old dead trees, change the endanger species act to stop law suits against our forest service. It is well settled that the steady accumulation and thickening of vegetation in areas that have historically burned at frequent intervals exacerbates fuel conditions and often leads to larger and higher-intensity fires," said Secretary Zinke. "These fires are more damaging, more costly, and threaten the safety and security of both the public and firefighters. California wildfires pump millions metric tons of climate-warming carbon dioxide into the atmosphere over many states, Wildfire smoke can result in significant air quality impacts to public health. Review the fire protection regulations were primarily established with the issuance of Appendix R to 10 CFR part 50 in 1980 and the NFPA [National Fire Protection Association] 805 alternative regulations adopted in 2004. final rule in 1980 that issued appendix R to part 50 of title 10 of the Code of Federal Regulations (10 CFR) and revised 10 CFR 50.48 (45 FR 76602; November 19, 1980). The 2004 final rule (69 FR 33536; June 6, 2004) further revised 10 CFR 50.48 and added alternative fire protection Regulations based on National Fire Protection Association Standard 805, Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants. California should provide compensatory measure guidance documents ensure protecting the public. Start Logging, Remove trees, California catastrophic wildfire on forests directly and negatively impact lives and property and long and short term health effects of greenhouse gas over many states, which can hang in air for months, then end up in our waters ,lakes , and rivers causing additional harm. Wildfires can pump as much carbon dioxide into the atmosphere in just a few weeks as cars do in those areas in an entire year, a study suggests . Smoke is a complex mixture of carbon dioxide, water vapor, carbon monoxide, particulate matter, hydrocarbons and other organic chemicals, nitrogen oxides, and trace minerals. The individual compounds present in smoke number in the thousands. Particulate matter is the principal pollutant of concern from wildfire smoke. these particles are within the fine particle PM2.5 fraction and can be inhaled into the deepest recesses of the lung and may represent a greater health concern than larger particles. Another pollutant of concern during smoke events is carbon monoxide, which is a colorless, odorless gas produced by incomplete combustion of wood or other organic materials. Flawed climate change and carbon tax has left out the Co2 from wildfires which is major causes to earth Ozone, not gas and oil industry, or mining, or factories .. Wildfire gaseous pollutants are

precursors for ozone (O₃) production.

Date submitted (Pacific Standard Time): 4/26/2018 5:00:00 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

California received record-breaking rains in the winter of 2016-2017, historic levels of tree die-off. The Tree Mortality Task Force (TMTF), with support from the Governors office and comprised of more than 80 local, state and federal agencies and private utility companies, continues to remove hazardous dead trees. To date, the TMTF members have collectively felled or removed over 1 million dead trees; this includes over 480,000 dead trees felled or removed by the USDA Forest Service. first focusing on public safety by removing dead and dying trees in high hazard areas. To further improve forest health, the USDA Forest Service And CAL FIRE have increased their pace and scale of prescribed fire. The USDA Forest Service has treated over 55,000 acres and CAL FIRE has completed over 33,000 acres in fuel treatment projects. By combining tree removal with prescribed fire, crews will be able to decrease overly dense stands of trees, reduce greenhouse gases, and protect communities across the state. Smoke from wildland fire is a significant source of air pollution emanating from National Forest lands. It can pose potential risks to health, visibility, safety, and general nuisance problems. Forest managers, fire managers, and air resource specialists must address these issues when and where appropriate to minimize smoke impacts to public health and welfare. National Forest lands contain ecosystems that have substantially departed from natural fire rules. . Decades of aggressive wildfire suppression and other land use practices have given rise to ecosystems with unnaturally heavy fuel accumulations and the proliferation of invasive exotic species both of which have more recently contributed to unnaturally large and severe wildfires. Large wildfires produce more smoke and air pollution annually than prescribed fires. Nationally, the restoration of fire-adapted ecosystems to effectively lessen the likelihood of large wildfires should be a high priority. To put Wildfire emissions from combustion and decay into perspective, they are equivalent to adding an estimated 7 million more cars onto Californias highways for one year, each spewing tons of greenhouse gases out tailpipe. Stated another way, this means 50 percent of all cars in California would have to be locked in a garage for one year to make up for global warming greenhouse gas impact of these wildfires. Greenhouse gas emissions from decay are generally larger than combustion emissions. The reason is that 3.67 times the carbon content of biomass is released as CO₂ during decomposition. Therefore, forests emit more CO₂ when they decay than when they burn because large quantities of biomass remain in the forest after combustion. However, chaparral and brush fields burn more completely, so combustion emissions can exceed decay emissions. Combining combustion and decay emissions provides a more complete picture of the impact of wildfires on global warming. In general, CO₂ emissions from decay after a forest fire are three times the amount emitted during combustion. Timber sales are one big answer to compensate for greenhouse gas emissions from wildfires is to lower the amount of biomass available for decay. Removing dead trees and storing carbon they contain in solid wood products consumers need can reduce total CO₂ emissions by 15 percent. with interim harvests for wood products after planting, effectively reverses impact of wildfire emissions on global warming. illustrate an opportunity that is still available to remove dead trees from public forestlands and to manufacture solid wood products before the trees lose their economic value. The money could be used to help pay for planting. This would restore these forests at minimal cost to the public, reduce and recover greenhouse gases from these wildfires, protect nearby communities from another wildfire, and help fight global warming. it is essential to remove dead trees. Not only does it make it safe to plant, but it also reduces emissions from decay by storing CO₂ in solid wood products. Equally important, removing dead trees and replanting would help protect surrounding communities from a second wildfire, which is called a reburn, that often occurs in fire-killed forests that become brush fields filled with dead trees. Without money made available from harvesting and selling fire-killed trees, there is little chance that the Forest Service will be able to pay to remove dead trees, plant young trees, and manage the young forest by releasing overtopping brush to ensure that a brush field doesnt take over the area.

Date submitted (Pacific Standard Time): 4/26/2018 5:00:00 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Public exposure to wildfire smoke is a concern because a large proportion of wildland fire smoke emissions is fine particulate matter (PM_{2.5}) that can penetrate to the deepest parts of the lungs. are 2.5 micrometers in diameter or smaller, and can only be seen with an electron microscope. Fine particles are produced from all types of combustion, including residential wood burning, forest fires. December 11, 2017 The USDA Forest Service additional 27 million trees, died throughout California since November 2016, to an historic 129 million on 8.9 million acres. The dead trees pose a hazard to people and critical infrastructure. The number of dead and dying trees has continued to rise, along with the risks to communities and firefighters. Regional Forester of the USDA Forest Service. Californias trees remain vulnerable increased wildfire threat. The USDA Forest Service focus on mitigating hazard trees and thinning overly dense forests so they are healthier and better able to survive stressors like this in the future. Fires are very large and often severe in many ecosystems of the region. In 2004, more than 5.8 million ha burned in Canada and Alaska, one of the largest fire year on record for the North American. Forest Service needs to stop the environmentalist for doing their job to protect the lands and people.

Over the past 4 decades, there has been a doubling of the annual area burned across the North American regions which has ..resulted in an increase in the atmospheric emissions from fires. Fuel consumption in ecosystems with large organic deposits (peatlands and forests with deep duff layers) is highly variable, depending primarily on fuel moisture and layer thickness. Fire in these surface organic layers are subject to more carbon to combustion and often burn in residual smoldering combustion which results in less efficient burning and higher levels of non-CO₂ trace gasses than flaming fires. New evidence indicates wildfires in the forest regions generate substantial amounts of mercury emissions (2 to 7 mg Hg-m⁻² per fire event) due to the build-up in surface material over long time periods. To acquire a better understanding of the emissions generated by the fire, the source strength must be characterized. This requires explicit knowledge of the source including: (1) area burned; (2) fuel characteristics, (3) fuel consumption; and (4) pollutant-specific emission factors. Three approaches to estimating wildfire emissions the Boreal Wildfire Emissions Model (BWEM), CONSUME 3.0, Boreal Fire Effects Model (BORFIRE) the Canadian model. Analysis of atmospheric measurements of CO, O₃, and nitrogen oxides at the Pico Mountain station in the Azores (38.48 N, 28.40 W) provide evidence of the significance of these large events. Calculating total carbon released during biomass burning (C_t) is generally done by estimating the area affected by fire along with the amount of fuel (carbon) consumed during the fire. The emission of a particular gas species (E_g) is calculated from C_t using experimentally derived emission factors (E_{fg}), the ratio of gas released to total carbon released. Typically the amount of carbon dioxide CO₂ carbon monoxide (CO) and methane (CH₄) released from fires is estimated. By separating carbon pools and combustion type, these fundamental variables are accounted for within the model parameter set.

Date submitted (Pacific Standard Time): 4/26/2018 5:00:00 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

In 1630, the estimated area of U.S. forest land was 1,023 million acres or about 46 percent of the total land area. Forestry issues on Harvesting and sale should be considerable significance to the United States. In 1995 USA had 5 percent of the Earths population and consumes an estimated 28 percent of the Earths industrial wood products. Although domestic timber inventory is only 10 percent of the Earths total, 96 percent of U.S. consumption of industrial wood comes from domestic supplies. By 1910, the area of forest land had declined to an estimated 754 million acres, or 34 percent of the total land area. In 2012, forest land comprised 766 million acres, or 33 percent of the total land area of the United State. Forest area has been relatively stable since 1910, although the population has more than tripled since then. Of the total forest land, 10 percent are classified as reserved. This classification indicates that these forest lands are not managed for timber harvest, which is prohibited by law on these lands in most cases. Reserved forests have changed very little since 2007, with a very small (2 percent) reduction in area. Nationwide, reserved forest area is more than three times what it was only 59 years ago. Most reserved land is in the West, reflecting a larger proportion of publicly owned land in that region. In general, U.S. private forest land is classified as timber land by FIA, even if landowners do not intend to harvest timber. The South contains 40 percent of the Nations 521 million acres of timber land. In contrast, the West constitutes only 28 percent of national timber land, and the North 32 percent. Time for change to timber sales to stop fuel build. The South is often referred to as the woodbasket of the United States because of the extensive timber supply, (yet few fires). West is host to most of the Nations reserved forest and national parks. (time for change to timber sales to stop fires). Other woodlands, including scrub forests, are found in the highest concentrations in the West. U.S. forest ownership patterns are quite diverse with public forests dominant in the West. Federal Government predominantly owns public forest lands in the West and State and county governments own most of the public lands in the East. Of all public forest acres, 75 percent are in the West. Removals have shifted in recent years from public lands in the West to private lands in the East. Recent studies show that only 8 percent of the families and individuals who own U.S. forest land have a written management plan. Private forests provided 88 percent of the Nations timber harvest in 2011. In 2001, the forest industry owned 66 million acres (13 percent) of the Nations 504 million acres of timber land but supplied 29 percent of wood production. Recent changes in corporate strategies have shifted the traditional view of industrial forests. Age of timber, In the South, where more acres of short-rotation yellow pine trees are planted, 51 percent of timber land is less than 40 years old compared with 20 percent in the North and 22 percent in the West. In contrast, 56 percent of northern timber land is more than 60 years old, compared with 27 percent in the South and 69 percent in the West. In the West, hemlock-Sitka spruce forests and ponderosa pine have declined since 1977, while western pine forests have increased. In the West, planting is generally used to augment natural regeneration. In recent years, western U.S. forest planting has subsided, a trend that mirrors reduced harvesting in that region. U.S. timber land growing stock inventory, growth, removals, and mortality, by region. Inventory West in 1953 was 363,666 Million cubic feet, in 2012 inventory grew to 397,968 Million cubic feet. Removal in 1952 was 3,765 Million cubic feet in 2011 dropped to only 2,446 Million cubic feet, yet Mortality (dead trees) 1952 was 2,242 Million cubic feet and 2011 grew to 3,679 Million cubic feet. During the past 60 years, net growing-stock growth has consistently exceeded growing-stock removals in the United States. In terms of percent of standing volume, removals are at the lowest level in the past 60 years and growth has also slowed. The volume of annual net growth is currently 2 times higher than the volume of annual removals. Forest biomass consumption for energy has declined during the past several years. Mortality rates relative to inventory continue to rise in the West where mountain pine beetle affected millions of acres of forest between 2009 and 2010. Need for timber sale and clean the dead and dying for Root diseases, bark beetles, were the leading contributors to mortality risk in the coterminous United States.

Date submitted (Pacific Standard Time): 4/26/2018 5:00:00 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Forest Service needs money from congress to cut the old growth in our public lands, or Go back to logging to provide income to the Forest Service, More Drilling in National Forest for income, Over the past 4 decades, there has been a doubling of the annual area burned across the North American regions which has ..resulted in an increase in the atmospheric emissions from fires. Fuel consumption in ecosystems with large organic deposits (peatlands and forests with deep duff layers) is highly variable, depending primarily on fuel moisture and layer thickness. Fire in these surface organic layers are subject to more carbon to combustion and often burn in residual smoldering combustion which results in less efficient burning and higher levels of non-CO2 trace gasses than flaming fires. New evidence indicates wildfires in the forest regions generate substantial amounts of mercury emissions (2 to 7 mg Hg-m-2 per fire event) due to the build-up in surface material over long time periods. Estimates of NOx, formaldehyde, and glyoxal emissions from biomass burning events derived from enhancements measured by OMI (Ozone Monitoring Instrument). Emissions from biomass burning. The location of a particular point on the ozone isopleth is defined by the ratio of the VOC and NOx coordinates of the point, referred to as the VOC/ NOx ratio. The VOC/NOx ratio is important in the behavior of the VOC-NOx-O3 system. When local air quality administrators make decisions about which pollution control programs to implement they should consider factors such wildfires and the percentage of total pollution in the airshed that is caused by a specific activity or source, and costs and benefits of implementing a set of controls on these activities. Agriculture is practiced throughout the country using many different technologies on a variety of soils and in a variety of climates. Conditions, technology and practices, along with a number of other factors determine emissions. Agricultural emissions are highly variable within and across airsheds and must be evaluated careful. government policies that are based on sound scientific evidence; provide incentives to industries seeking to become more energy efficient or to reduce emissions of identifiable atmospheric pollutants; sect cooperation of organizations and governments, foreign and domestic, to develop better understanding and research on the implications of atmospheric pollution and the means of preventing it. The evidence is quite strong that conservation has been a priority for farmers and ranchers for many years. The money, time and resources California agriculture has spent attempting to meet the PM-10 ambient air quality standard should give agencies plenty of reasons to believe that agencies cannot jump immediately into a new air quality standard of which we know so little about. It is an absolute necessity to allow science surrounding PM-2.5 to develop so that intelligent, reasonable and justifiable decisions can be made but should not make faulty documentation that overestimates agricultural sources impacting of new air standard on the agricultural community. the National Ambient Air Quality Standard (NAAQS) for particulate matter hinder farms and poor taxpayers. Agency should allow the necessary time for the agriculture community and EPA to gain a more accurate understanding of agriculture emissions by adding wildfires to understand what extent the air quality standards and the impact from industry and nature for PM-2.5 standard if any.

Date submitted (Pacific Standard Time): 4/26/2018 5:00:00 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Wildfires are the toxic carbon polluters of emissions in air and water, Not oil or gas or Not agriculture, Not Mining, or Not farms, or Not industry, or Not cars. Humans and wildlife need the Local, State, Federal leaders to re think wildfire issues, Fight wildfires before they start; California Environmental activist must allow forest workers to reduce the fuel by cutting old growth and thin the brushes and dead trees. Many forests have had fires of unprecedented intensity and extent, and this situation is the result of forest management practices that have permitted decades of deadwood (fuels) to accumulate. Forests are over grown with dead trees in tinder-dry conditions more susceptible to intense fires. Must shifting fire policies from suppression to recognition that reducing fire fuel is an integral component of the landscape. Wildfire needs to be part of any Cross-State Air Pollution Rule (CSAPR) 2012 act which only cover 28 states but not California, Why ? since the act was to address air pollution from states that send pollution across state lines and affects air quality in other states. Per the CDC web site : Wildfire smoke can harm you in multiple ways. Smoke can irritate your respiratory system, and worsen chronic heart and lung diseases. Wildfire smoke is a mix of gases and fine particles from burning vegetation, building materials, and other materials. Fires can significantly increased toxic co ozone gas , and particulate levels during fire events. Analyses of observations to further probe the magnitude of ozone, ozone precursor, and particulate matter enhancements due to fires. Since the lifetime of CO is long, even the magnitude of the observed enhancement ratios of black carbon and NO_y are consistent with loss of less than one-half of the emitted black carbon and nitrogen oxides (i.e., very efficient long-distance transport of the fire emissions. For nitrogen oxides, it implies a potential for large-scale impacts on tropospheric ozone, since most of NO_y is believed to be peroxyacetyl nitrate, PAN_{52,53}, which thermally decomposes. If we are to protect wildlife and Humans, we must reconsider Wildfire Science has toxic chemical to the Ozone. California Wildfires are the result of decades of fire suppression, coupled with unprecedented fuel buildups due to a lack of forest management activity. Forests in the United States store an estimated 43,126 Tg carbon in live and dead biomass and soil organic matter. These catastrophic fires destroy valuable timber resources but also degrade many of the other uses of healthy forests. Because of the highly flammable nature of the understory vegetation as well as the canopy fuels, forest type represents a major portion of the area burned in a region. Due to the large amount of fuel stored in the organic soils of many forest stand types, forest floor fuel consumption can be very high. Typically the amount of carbon dioxide carbon monoxide (CO) and methane (CH₄) released from fires can be estimated. By separating carbon pools and combustion type, these fundamental variables are accounted for within the model parameter set. The following equations are used. where: A = area burned (hectares, ha) Ca = carbon density of the aboveground component (assumed to be 0.5 of biomass; t ha⁻¹), Cg = carbon density of the organic material found in the ground-layer, which is composed of the litter and duff layers (t ha⁻¹), a and g = proportions of the aboveground vegetation and ground-layer organic carbon, respectively, consumed in the burn, E_{fg} = emission factor for each of three gas species, CO₂, CO, and CH₄ (in units of gas released per unit of carbon consumed) The analysis using (2) is carried out for each gas independently. The f and s subscripts on the emission factor terms in (2) refer to blazing and smoldering combustion, respectively. The first step in calculating total stand fuel consumption is to determine surface fuel consumption, represented by the sum of fuel consumed in organic soil (or duff), surface litter, dead and downed coarse woody debris (logs), and dead and downed medium woody debris (branches). Each of these stand components has a separate fuel consumption algorithm. Surface fire intensity is calculated by applying the total surface fuel consumption and fire rate of spread to intensity equation. CO is a predictor of other fire emissions products (regression r² values were: 0.84, 0.98, 0.87 for CH₄, NMHC, and PM_{2.5} respectively). The CH₄ regression shows the characteristically high r² value for these gases that has been observed for most prescribed a wildland fires measured in the contiguous United States. The r² value of 0.98 indicates that

variation in CO concentration highly predicts NMHC concentration. Can help in interpretation of atmospheric measurements of pollutants.

Date submitted (Pacific Standard Time): 4/26/2018 5:00:00 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Agency needs to change the intra-agency process for reviewing a Timber Harvest Plans is complex, lengthy and costly, resulting in inconsistency and inequity. litigation by activists is the primary issue of achieving goals of health forest outcomes. Appropriate forest management can result in trees being removed from the forest and the timber and wood can generate income for forest management to fight wildfires. Efforts to maximize demand for removed wood, funding should be shifted from reacting to the consequences of poor forest management to preventative treatments that promote forest health and resilience. raise public awareness of forest health issues. collaborate with state colleges and universities to offer more forestry programs to increase awareness of forest health concerns in their communities, to educate the public. Water districts can play a greater role in educating their customers on the wildfires and pollutions of water. levels and attitudes toward forest health should be measured at the onset of educational campaigns, and policymakers should set clear goals for the changes they would like to see in those attributes. changing the culture surrounding fire and finding the right balance in wood processing infrastructure. We must hold the agencies accountable to its forest management goals against wildfires. With enough space, sunlight, nutrients and water, trees have the capacity to grow and thrive. They become stressed when lacking these elements. Century-old policy of putting out all fires, known as fire suppression, has created overcrowded forests. Before European settlement, naturally-ignited fires and those lit by Native Americans cleared the forest of debris that could cause severe fires. These events and practices also checked the growth of new trees that would compete with older, bigger trees. was a very diverse landscape of open, closed, young, and old forests. This diversity is essential to forest resiliency and helps forests survive a variety of threats. Wildfire has an especially negative impact on these critical watersheds. Soil erosion, particularly following a fire severely degraded water quality. watershed looks like a milkshake, and treating it costs millions of dollars. Small towns, the local rural areas that lack strong economies, lucrative tax bases and concentrated political power that are bearing the economic brunt of tree mortality crisis. Their lives, property and infrastructure are threatened by dead and dying trees and the consequences of massive wildfires. accumulated underbrush allows fire to overcome those defenses and burn hotter and climb into the tree canopy. Crown fires that burn at and move along tree-tops are the hardest to suppress due to an unlimited supply of fuel. Crown fire behavior is unpredictable, and kills most of the trees in its path. Water is negatively impact to downstream users, soils into hardpan, blocking their natural function of capturing water and replenishing aquifers at lower elevations Overgrown forests release less water for these needs. A Nature Conservancy report found that thinning forests to make them healthier could increase downstream water yields by up to 6 percent. The loss of diverse habitat under current management practices includes the loss of valuable meadows. Meadows absorb and hold water and release it. Overgrown forests also trap more of the annual snowpack in their higher branches, causing it to evaporate rather than reach the ground and flow downhill to water storage facilities later in the year when its most needed.

Date submitted (Pacific Standard Time): 4/26/2018 5:00:00 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Overgrown forests release less water for these needs. A Nature Conservancy report found that thinning forests to make them healthier could increase downstream water yields by up to 6 percent. The loss of diverse habitat under current management practices includes the loss of valuable meadows. Meadows absorb and hold water and release it. Overgrown forests also trap more of the annual snowpack in their higher branches, causing it to evaporate rather than reach the ground and flow downhill to water storage facilities later in the year when its most needed. Property damage and firefighting costs for local, state and federal governments run into the billions of dollars annually. Forest service mismanaging of our national forests has brought an unprecedented environmental catastrophe that impacts all taxpayers and with it, a rare opportunity for transform a culture change in forest management practices. rebuild healthy high-country forests by building dams for storing water, Investing upfront to create these healthier forests will pay dividends in the long run by curbing the spiraling costs of state firefighting and tree removal while building stronger recreational and sporting economies . Forests are reaching a breaking point. Poor management policies that interrupted the natural and historical cycle of fire. Needed to change a culture focused almost solely on emergency firefighting to one that supports long-term forest restoration and management. Forests largely restored to the less crowded natural conditions of through greater use of prescribed burning to replace unilateral policies of fire suppression and mechanical thinning to remove buildup of forest fuels, also will improve wildlife habitat, enhance environmental quality and add to the resilience of mountain landscapes, immediate crisis is visible to anyone who recently has traveled in the forest, where entire mountainsides are brown from wildfires with dying and dead forests. Rural counties are reeling from costs of removing and storing dead trees that threaten their public safety. Rural homeowners are having to tap their life savings to take down dead trees near homes and buildings. Government agencies are spending millions of dollars to remove dead trees near highways and other public infrastructure. Costs have risen year by year to battle as catastrophic wildfires during a lengthening fire season on millions of acres of the states dense, overgrown forests. energy providers are budgeting emergency funds to remove dead and dying trees near power lines. Water districts are spending their reserves to remove soils from reservoirs in the wake of catastrophic mountain wildfires. symptoms of a larger problem of forest mismanagement and neglect giving us a environmental disaster and communities need to see encouraging developing consensus around policy changes that will begin to resolve it. If forest service does not take appropriate action soon, National forest risk losing the priceless benefits provided by forests. healthier, less overgrown forests that enhance watersheds and wildlife, reduce the scale of catastrophic wildfires. Need to provide immediate, emergency consequences of its long-neglected forests. Forest are overrun with fire-intolerant trees and thick carpets of forest fuels that can turn even the smallest camp fire or sparking power line into a raging firestorm. Spending heavily to remove hazard trees as a result wildfires is a must. The costs of long neglecting and mismanaging forests have become an unsustainable burden on national forests. After devastating fires, local water districts pay millions more to remove tons of eroded soils from mountain reservoirs that supply downstream customers. Need to open mills and train new loggers since m many of the facilities that might have burned millions of dead trees for energy generate on have closed or are closing. A century of fire suppression remains firmly entrenched within federal and state firefighting agencies and has left forest floors deep in flammable groundcover. prescribed burning to rid the forests of dense groundcover are too often clash with regional activists that are confused with air quality regulations, even as emissions from catastrophic wildfires nullify carbon reduction on accomplishments. Wildfires can produce more harmful pollutions than cars on freeways. Environmentalists obstructing policy goals to thin overgrown forests to their original conditions. invest more for proactive forest management, including greater use of prescribed burning cutting and selling timber, remove old dead trees, and less reliance on reactive firefighting.

Date submitted (Pacific Standard Time): 5/5/2018 5:00:00 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Forest Service, America working class , the poor, ALL hurt on flawed reports , 2017 Trade Deficit almost 800 Billion Dollars. 80 Billion spent By Obama climate Admin. Obama, EPA gave more than \$27 million in taxpayer-funded grants to major environmental groups.. based on flawed reports. Obama added more than \$80 billion of regulatory burden on the American economy in just 8 years of his term, on nonsense science.

Billions based on Flawed reports from IPCC policymakers Nations in work in Groups I, II and III Nations like ; Russian ? Cuba ? Venezuela,? Pakistan ? Sudan ? Ethiopia ? Hundreds of billion dollars have been wasted with the attempt of imposing a Anthropogenic Global Warming (AGW) theory that is not supported by physical world evidences.

ISSUE: American hurt by EPAs 2009 reliance on the IPCC AR4 for GHG Regulations, which violated the Agencys own internal policy. See Inspector General and GSO reports in doing so.. America has lost ; more than 55,000 factories, 6,000,000 manufacturing jobs and accumulated Trade Deficits of more than 12 Trillion Dollars since Bush administration.

Issue: Nations to Benefit from CO2 regulations; India, China, Asia; India is one of the largest beneficiaries of the total world carbon trade through the Clean Development Mechanism. 2011 EU Emissions Trading Scheme (ETS) has cost their consumers \$287 billion for "almost zero impact" on cutting carbon emissions, 2011 UBS study.

Green planet advocates should be arguing for a CO2- fertilized atmosphere, not a CO2-starved atmosphere. the "uncertain science" and how "climate researchers have lost the public's trust" from a "cascade of scandals" from the UN IPCC. One large News outlet said, compared the leaders of the climate science community to "used-car salesmen. The IPCC assessment process had a substantial element of schoolyard bullies. once vaulted UN IPCC now become the object of ridicule and scrutiny. 80% of the UN IPCC membership has no dealing with the climate as part of their academic studies. More than 1,000 dissenting scientists from around the globe have now challenged man-made global warming claims made by the United Nations Intergovernmental Panel on Climate Change (IPCC). In a 321-page Climate Depot Special Report -- U.S. Senate Report of scientists who voiced skepticism about the so-called global warming consensus -- features the skeptical voices of over 1,000 international scientists, including many current and former UN IPCC scientists, who have now turned against the UN IPCC. The chorus of skeptical scientific voices grew louder in 2010 as the Climategate scandal -- which involved the upper echelon of UN IPCC scientists -- detonated upon on the international climate movement. "I view Climategate as science fraud, pure and simple," said noted Princeton Physicist shortly after the scandal broke. UN lead author grew disillusioned with the IPCC and lamented that it had been "captured" and demanded that "the Chair of IPCC and Chairs of the IPCC Working Groups should be removed." also publicly called for the "suspension" of IPCC Process in 2010 after being invited by the UN to participate as lead author again in the next IPCC Report. A South African UN scientist declared the UN IPCC a "worthless carcass" and noted IPCC chair is in "disgrace". He also explained that the "fraudulent science continues to be exposed." Former member of the UN Scientific and Technical Committee on Natural Disasters harshly critiqued the UN. A geologist, and professor of geology , December 3, 2010: "The corruption within the IPCC revealed by the Climategate scandal, the doctoring of data and the refusal to admit mistakes have so severely tainted the IPCC that it is no longer a credible agency."

52 scientists who participated in the 2007 IPCC Summary for Policymakers had to adhere to the wishes of the UN political leaders[ISSUE: WHO is making the rules against USA look at the IPCC work Groups I, II and III Nations like ; Russian ? Cuba ? Venezuela,? Pakistan ? Sudan ? Ethiopia ? some are on Sanctions, Embargoes sanctions counties : china, Cuba, Russia, Central African Republic , Sudan Venezuela why is USA making regulations based on advise form these counties. ?? Current Chairman : South Korea since 2015 Past

Chairman SUDAN Ismail El Gizouli was interim Chairman 2015 PAST Chairman INDIA 2002 -2015 Rajendra K. Pachauri.

130 German scientists urging German Chancellor to reconsider her climate views. 100 international scientists challenged President Obama's climate claims, calling them "simply incorrect. 166 scientists from around the world wrote an Open Letter to the UN Secretary-General rebuking the UN and declaring that the science is NOT settled. over 80 prominent physicists petitioned the APS revise its global warming position and more than 250 scientists urged a change in the group's climate statement in 2010.

Date submitted (Pacific Standard Time): 5/20/2018 5:00:00 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

There are 65 million to 82 million acres of National Forest Service land that need "restoration," which could include cutting away and removing trees and other overgrowth that contribute to fires. February 2012 U.S. Department of Agriculture report that suggests "hazardous fuel reduction" as one method of protecting the national forests. Sawmills and logging companies and lumber mills stand ready and eager to carry out environmentally responsible timber harvests, utilizing salvageable timber stands and creating jobs and revenues. thinning of overgrowth could protect the forests from devastating wildfires, Healthy forests provide vital habitat for wildlife, protect watersheds, provide for outdoor recreation and are a reliable source for a wide array of timber products which is a natural carbon sequestration system. Dead and dying forests lack the ability to adequately provide for any of these. Overgrowth within forests poses an unacceptable risk of exceptional, intense and catastrophic wildfires, which devastate the landscape, endanger watersheds and siphon off agency resources that are needed elsewhere.

directives.comment opportunities results in both expanded capacity and actual savings The revision has many non-economic and non-quantifiable benefits. It will allow the Forest Service to reach a broader cross-section of the interested public when publishing notice of proposed directives, fostering robust public participation.

Date submitted (Pacific Standard Time): 4/2/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Wildfires in calif must stop.... over Billion dollars in tax payer COST ,bad for budge, bad for wildlife, lives lost, time to tend your garden... Investigate and review policy of Environmentalist activists which seem to be causing more harm then good. REPORT 2007 said California wildfires pumped nearly 8 million metric tons of climate-warming carbon dioxide into the atmosphere; 2017 fire worse..... REPORT: from Scientists study estimated that Fires in US release millions metric tons of carbon dioxide per year; REPORT "Forest fires may produce as much co2 as half of all fossil-fuels burned . We have a clear and present danger of high-intensity fires on public lands in California , fuels buildup to unnatural levels ... Misguided Obama policy Suppress of Wildfire and Unwise ideas of environmentalist give too much power where environmental analyses were 60% of the costs . Manage forest BEFORE they start...OCT 2017 The Wildfire Prevention and Mitigation Act of 2017 will simplify forest management to help prevent & mitigate wildfires and protect wildlife by greatest threat to many endangered species and their habitat is catastrophic WILDFIRE ,leads to susceptible to insects and disease outbreaks ...MUST do thinning forest to protect habitat and more resistant to insect predation. concentration of trees and underbrush amounts to 45 tons of dry fuel per acre, potential for catastrophic fire.....2017 Mr Secretary Zinke accumulation and thickening of vegetation exacerbates fuel conditions and often leads to larger and higher-intensity fires," ... We Do Not Have A Fire Problem On Our Nation's Forests; We Have A Land Management Problem" Agencies need to review or change or appeal forest rules that are subject to NEPA and ESA and other federal regulations. Agency need to review update or repeal The law guiding Federal, State Forest , BIA and tribal management of forests. Need to update or repeal the Equal Access to Justice Act (EAJA) of 1980 , subsection of EAJA, codified at 28 U.S.C. 2412(d) section 2412(b).California fire Ozone regulations compliance costs could measure in the trillions of dollars.inability of the Forest Service to thin forests due to overly cumbersome and lengthy environmental processes, increasing frivolous lawsuits filed by certain litigious environmental groups, and a lack of sufficient agency focus on this challenge has led to nearly 60 million acres that are at high risk of deadly and catastrophic forest fires that endanger communities, hurt local economies, destroy land and water quality and release massive amounts of emissions into the atmosphere.POOR Forest Management provide less water for wildlife ... too many trees and underbrush creates a closed canopies where 15 to 60 percent of snow never reaches the ground and is lost to evaporation. Being thinned, trees create right-sized gaps in the canopy to allow snow to fall to the ground yet receive enough shade to be protected from melting too early. Millions of taxpayer dollars are spent on shuffling paper, over-analysis and ensuring process is followed. We currently estimate planning and environmental analyses are roughly 60% of the costs of forest management projects," All of us understand that significantly aggressive active management." 2015 Subcommittee Chairman Tom McClintock (CA-04), "The greatest threat to many endangered species and their habitat is catastrophic WILDFIRE..... Yet rather than thinning the forest to protect this habitat, we're spending millions upon millions on extraordinarily long, complicated, voluminous documents that IMPEDE our ability to properly manage the forests for the benefit of all species"..... the obama administration BAD policy of Forest Service instituted a strict policy of only suppression. Today, timber harvest in public forests is practically non-existent. Rather than a healthy 50 to 100 trees per acre, the west slope now averages 300-plus trees per acre. This concentration of trees and underbrush amounts to 45 tons of dry fuel per acre, or a potential for catastrophic fire..... The greenhouse gas emissions alone were equivalent to more than 8.5 million passenger vehicles driven for a year or heating 3.7 million homes.2017 Mr Secretary Zinke accumulation and thickening of vegetation in areas that have historically burned at frequent intervals exacerbates fuel conditions and often leads to larger and higher-intensity fires," Environmental Protection Agency (EPA) Proposed Rule: Air Quality State Implementation

Date submitted (Pacific Standard Time): 4/2/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Give Forest Service additional tools to remove dead trees after wildfires, creating new revenue to replant and rehabilitate burned forests. It would also enhance the ability to create young and mixed-age forest habitat to support wildlife. It would incentivize and fast-track forest projects developed by local collaboratives, usually consisting of conservationists, timber industry and elected officials. And it would provide an alternative to costly and obstructive litigation from special interest groups. would reduce project planning times and lower costs to American taxpayers. The RFFA provides Categorical Exclusions (CEs) under the National Environmental Policy Act will allow needed forest management projects to be more quickly prepared, analyzed, and implemented. Specifically, it authorizes a CE of to remove hazard trees and salvage timber to protect public safety, water supply or public infrastructure where forest management activities are permitted. The Act will also allow forest recovery projects to proceed more quickly, addressing a dire need created by recent wildfire seasons. The Forest Service has long experience with management techniques to reduce forest pests, thin hazardous fuels, create and maintain habitat for species, recover damaged timber and protect water quality. These projects mitigate risk and help create early successional forest habitat which is good for wildlife. Another provision that is crucial to forest health is the "Eastside Screens" fix in section 905 of the RFFA. The "Eastside Screens" were put in place administratively in 1995 to forbid harvest of trees above 21 inches in diameter in six National Forests in eastern Washington and Oregon. After more than 20 years, these screens have become a hindrance to effective forest management. Many forests in these areas have too little Ponderosa pine, the historically dominant and most resilient species. Instead, younger larger lodgepole pine is crowding them out. Good forestry and wildfire protection weighs in favor of selectively removing these lodgepoles, but the screens' blunt instrument prevents that. Courts have blocked efforts to relax the screens even in the context of well-designed forest management. As a result, Congressional action is needed to ensure the health of these Eastside forests. Forest Service can mitigate the horrific effects of catastrophic fire and restore the health of forests and rural communities. Now is the time for Congress to make effective active management a reality for the Forest Service to protect the lands and people and wildlife. Near Brookings, Oregon, the Chetco Bar Fire burned nearly 190,000 acres - an area four times the size of the District of Columbia. This fire started in a Wilderness Area where active management is prohibited, (what kind of policy is this). so the Forest Service did not immediately move to suppress it. The fire grew and spread to nearby federal lands. After burning for over two months, it was only 53% contained as of mid-September, at a cost to taxpayers of over \$57 million. This fire caused the ash clouds and haze to cover the coastal town of Brookings.

Date submitted (Pacific Standard Time): 4/22/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Dam Program Priorities for the agency
Fish Friendly: Refurbishment and reconstruction of fish pass
.Effectiveness may be measured through inspections and checks: visual inspection, trapping, video checks.
Wildlife friendly, New and old reservoirs could be landscaped. This includes forming fillets and adjusting the slopes of the dams to minimise its height, forming artificial islands so that birds can nest free from the predation of foxes, and forming lagoons along the foreshore to maintain shallow wetlands for wildfowl even during drawdown. woodland plantations near the margin. reservoirs can be stocked with fish, as a result otters and ospreys have been encouraged to breed increasing the bio-diversity. Extensive planting often screens car parks and facilities. one of the largest reservoirs in the Britain, is, in the words of Sir David Attenborough, one of the finest examples of creative conservation in Great Britain (Anglian Water, 1995). Dam Water attract thousand of birdwatchers a year. Many have quiet environmental areas where bird watching hides allow visitors to watch many species of birds.
Research and deploy innovative technologies and solutions on rebuilding and upgrading.
Provide continued training and education to dam maintenance professionals
Develop consistent standards and guidelines for all owners to follow.
Employ decision making processes and tools to assess with the upgrades,
Achieve better alignment of Federal programs that can improve dam rebuilding.
Manage program resources and prioritize investments on a fast tract .

Date submitted (Pacific Standard Time): 4/21/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Dams and the reservoirs they form, have provided considerable benefit to society from early times providing water for drinking, growing food, and power when it would not otherwise be available. They also provide an enhanced environment and recreation for many. Without dams and reservoirs the industrial revolution on which our wealth was based would have been much delayed. The population of our major towns would have been curtailed. Without hydropower green house gas emissions would have been greater, and hence climate change would have increased. Without reservoirs providing irrigation water more of our food would be imported. Society supports more reservoirs that provide overwhelming benefits they can bring. Dams reduce green house gas emissions to minimise the impact of climate change. Each kilowatt-hour generated by hydropower saves about 900 grams of carbon dioxide when compared to coal generated power. The hydropower generated between 1947 and 1980 therefore saved a total of 62 million tonnes of carbon dioxide in the atmosphere. (Bridle and Sims 1999). Internationally hydropower is the world's main source of renewable energy providing about 20% of the world's energy generation. (British Hydropower Association 2003.) Installed capacity is 674,000 MW. 54,000 dams in the United States that are higher than 5 ft., and do not currently have equipment installed for generating electricity. Only 3 percent of the nation's 80,000 dams currently generate power. Beneficial to use a kind of energy which is clean, dependable, efficient, and renewable. Dams are an important determinant of the socio-economic development of any country. Hydropower 100% American energy, compared to Wind Turbines toxic material comes from China, Chile and Africa, and Half the cost of Wind Turbines, Dams Provide many uses, not just one like wind. Without reservoirs, a population limitation of about 20 percent of the current levels. Without reservoirs, the total population of the country would have been appreciably constrained. Value of hydropower as a renewable energy resource. Dams showing the breakdown of the purpose/use for dams for Recreation (38.4%), Flood Control (17.7%), Fire and Farm Ponds (17.1%), Irrigation (11.0%), Tailings & Other (8.0%), Undetermined (3.8%), Hydroelectric (2.9%), Debris Control (0.8%), Navigation (0.4%). Source: National Inventory of Dams, February 2005. Provide a range of economic, environmental, and social benefits, including recreation, flood control, water supply, hydroelectric power, waste management, river navigation, and wildlife habitat.

Dams can also be formed in the sea where the tidal range is high and thus generate tidal power.

Environment, Many reservoirs constructed on ordinary farmland are now Sites of Special Scientific Interest. Nine reservoirs are now internationally registered under the Ramsar Convention (1971) as Wetlands of International Importance especially as Waterfowl Habitats (Ramsar Convention Bureau 1999). One of them (Abberton) is cited as a roost for the local estuarine population of wildfowl. It is outstandingly important as an autumn arrival point, moulting and wintering locality for wildfowl. Thirteen species of waterfowl occur in nationally important numbers, including Widgeon, whose winter numbers are of international significance, Mute Swan, Gadwall, Shoveler, Pochard, Tufted Duck, Goldeneye, Goosander and Coot.

New reservoirs could be landscaped. This includes forming fillets and adjusting the slopes of the dams to minimise its height, forming artificial islands so that birds can nest free from the predation of foxes, and forming lagoons along the foreshore to maintain shallow wetlands for wildfowl even during drawdown. Woodland plantations near the margin. Reservoirs can be stocked with fish, as a result otters and ospreys have been encouraged to breed increasing the bio-diversity. Extensive planting often screens car parks and facilities. One of the largest reservoirs in Britain, is, in the words of Sir David Attenborough, one of the finest examples of creative conservation in Great Britain (Anglian Water, 1995). Dam Water attract thousand of birdwatchers a year. Many have quiet environmental areas where bird watching hides allow visitors to watch many species of birds.

At Roadford freshets in England reservoirs release water downstream to mimic the natural river and bring

salmon up to the spawning beds. Exit channel fish pass, including an extension to the channel which will house the open channel electronic fish counter fish counter, Aquantic 1700A Logie-single channel,. During the refurbishment and reconstruction of the pass a temporary fish pass was fabricated in the historic canal, which by-passes the main weir structure. Both salmon and sea trout were observed using the temporary pass during the period. pass would be remain operational until the end of the salmon run season. temporary fish pass, fabricated with manually operated gate.

Date submitted (Pacific Standard Time): 4/19/2018 5:00:00 PM

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

protect our forest Toxic Turbines Just like a cow with lipstick and a bath is going to look much better than its unwashed fellow cow, but it is still a cow . How 'GREEN' is the FOOTPRINT of a WIND TURBINE? Less clean than Gas or hydroelectric plants energy and bad for environment, bad for wildlife, bad for Humans. Uses more earth minerals than any other energy. Only works 17 to 35% of time.

NOT SAFE, The wind turbine requires an astounding amount of toxic rare earth minerals, primarily neodymium and dysprosium, which are key components of the magnets used in modern wind turbines. most common uses is in the generators . Environmental damages, consider that mining one ton of rare earth minerals produces about one ton of radioactive waste, according to the Institute for the Analysis of Global Security. 13,131 MW of wind generating capacity means that between 4.9 million pounds (using MITs estimate) and 6.1 million pounds (using the Bulletin of Atomic Sciences estimate) of rare earths were used in wind turbines installed in 2012. 2 megawatt (MW) wind turbine contains about 800 pounds of toxic rare earths called neodymium and 130 pounds of dysprosium. mined by children in Africa and Chile..

NOT SAFE, Between 4.9 million and 6.1 million pounds of radioactive waste were created to make these wind turbines. That means the U.S. wind industry may create more radioactive waste in year than our entire nuclear industry produced in spent fuel. few are paying attention to the wind industrys less efficient and less transparent use of radioactive material via rare earth mineral excavation in China.

NOT SAFE, Not only do rare earths create radioactive waste residue, but according to the Chinese Society for Rare Earths, one ton of calcined rare earth ore generates 9,600 to 12,000 cubic meters (339,021 to 423,776 cubic feet) of waste gas containing dust concentrate, hydrofluoric acid, sulfur dioxide, and sulfuric acid, [and] approximately 75 cubic meters (2,649 cubic feet) of acidic wastewater. .

The wind industry is dependent on rare earth minerals imported from China, the procurement of which results in staggering environmental damages. not one step of the rare earth mining process that is not disastrous for the environment. That the destruction is mostly unseen and far-flung does not make it any less damaging. Wind energy poses serious environmental risks availability of REEs appears to be at risk based on a number of factors. Of particular significance, one country (China) controls 98% of current supply (production). Historically, much lower levels of market concentration have harmed manufacturing firms. in 1978 Zaire controlled 48% of the cobalt supply and yet political unrest in Zaire resulted in a disruption to global supply that became known as the Cobalt Crisis REEs have come under global scrutiny due to environmental and social conditions under which they are mined, further increasing their supply risk.

Each Turbine needs 45 tons of steel rebar and 630 cubic yards of concrete, cast iron, turbine contains more than 8,000 different components , 116-ft blades atop a 212-ft tower for a total height of 328 feet. The blades sweep a vertical airspace of just under an acre. Vestas V90 from Denmark has 148-ft blades (sweeping more than 1.5 acres) on a 262-ft tower, totaling 410 feet. The tallest wind turbines in the U.S. have been installed in Texas the Vestas V90 turbines are 345 feet high, Gamesa G87 from Spain, with 143-ft blades (just under 1.5 acres) on a 256-ft tower, totaling 399 feet. steel tower is anchored in a platform of more than a thousand tons of concrete and steel rebar, 30 to 50 feet across and anywhere from 6 to 30 feet deep. Shafts are sometimes driven down farther to help anchor it. Mountain tops must be blasted to create a level area of at least 3 acres. model, the nacelle alone weighs more than 56 tons, the blade assembly weighs more than 36 tons, and the tower itself weighs about 71 tons a total weight of 164 tons. The corresponding weights for the Vestas V90 are 75, 40, and 152, total 267 tons; and for the Gamesa G87 72, 42, and 220, total 334 tons. Health Hazards of Noise and vibrations are generated by these huge monster machines and topped with flashing lights.

Wind turbines are not safe, high-voltage electrical devices with large moving parts, estimated that for every 100 turbines, one blade will break off (see Larwood, 2005). In winter, heavy sheets of ice can build up and then fall

or be thrown off. Access to the land around wind turbines is usually restricted, even to the landowner. Wind require heavy government subsidies to be competitive with normal electricity generators so a Dutch word for Greenie power seems graphic : "subsidieslurpers" (subsidy gobblers).

the 5,700 turbines installed in the United States in 2009 required approximately 36,000 miles of steel rebar and 1.7 million cubic yards of concrete (enough to pave a four-foot-wide, 7,630-mile-long sidewalk).

Date submitted (Pacific Standard Time): 4/26/2018 5:00:00 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Wildfires in calif must stop. over Billion dollars in tax payer COST ,bad for budge, bad for wildlife, lives lost, time to tend your garden Investigate and review policy of Environmentalist activists which seem to be causing more harm then good. REPORT 2007 said California wildfires pumped nearly 8 million metric tons of climate-warming carbon dioxide into the atmosphere; 2017 fire worse REPORT: from Scientists study estimated that Fires in US release millions metric tons of carbon dioxide per year; REPORT Forest fires may produce as much co2 as half of all fossil-fuels burned . We have a clear and present danger of high-intensity fires on public lands in California , fuels buildup to unnatural levels Misguided Obama policy Suppress of Wildfire and Unwise ideas of environmentalist give too much power where environmental analyses were 60% of the costs . Manage forest BEFORE they startOCT 2017 The Wildfire Prevention and Mitigation Act of 2017 will simplify forest management to help prevent & mitigate wildfires and protect wildlife by greatest threat to many endangered species and their habitat is catastrophic WILDFIRE ,leads to susceptible to insects and disease outbreaks MUST do thinning forest to protect habitat and more resistant to insect predation. concentration of trees and underbrush amounts to 45 tons of dry fuel per acre, potential for catastrophic fire2017 Mr Secretary Zinke accumulation and thickening of vegetation exacerbates fuel conditions and often leads to larger and higher-intensity fires," .. We Do Not Have A Fire Problem On Our Nations Forests; We Have A Land Management Problem Agencies need to review or change or appeal forest rules that are subject to NEPA and ESA and other federal regulations. Agency need to review update or repeal The law guiding Federal, State Forest , BIA and tribal management of forests. Need to update or repeal the Equal Access to Justice Act (EAJA) of 1980 , subsection of EAJA, codified at 28 U.S.C. 2412(d) section 2412(b).California fire Ozone regulations compliance costs could measure in the trillions of dollars.inability of the Forest Service to thin forests due to overly cumbersome and lengthy environmental processes, increasing frivolous lawsuits filed by certain litigious environmental groups, and a lack of sufficient agency focus on this challenge has led to nearly 60 million acres that are at high risk of deadly and catastrophic forest fires that endanger communities, hurt local economies, destroy land and water quality and release massive amounts of emissions into the atmosphere.POOR Forest Management provide less water for wildlife too many trees and underbrush creates a closed canopies where 15 to 60 percent of snow never reaches the ground and is lost to evaporation. Being thinned, trees create right-sized gaps in the canopy to allow snow to fall to the ground yet receive enough shade to be protected from melting too early.

Date submitted (Pacific Standard Time): 4/26/2018 5:00:00 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Unfortunately, there are too many bureaucratic and legislative roadblocks tying land managers hands. Because of these roadblocks, forests have been burning before they have been treated. At least three major projects have been planned in recent years which burned before implementation. The 2014 Johnson Bar Fire in Idaho burned the area of an in-progress collaborative restoration project; when the Forest Service attempted to build on that work to conduct post-fire work. Yet a fringe group sued and obtained an injunction- resulting in the closure of a sawmill in Orofino, Idaho. In 2016, the Pioneer Fire destroyed the area of the Becker Project on the Boise National Forest, putting a whole years timber volume for southern Idaho at risk and resulting in severe environmental and recreational impacts. To its credit, the Forest Service used all available tools and put two post-fire projects together in only nine months. projects are the subject of MANY threatened litigation . but people, wildlife, and property are at risk. We need common-sense reforms to lighten the burden of redundant administrative process and continuous litigation. Forestry is traditionally an area of bipartisan progress, and it still can be. Should take quick action to advance forestry reform legislation to give us the best chance to mitigate future wildfire seasons. Give Forest Service additional tools to remove dead trees after wildfires, creating new revenue to replant and rehabilitate burned forests. It would also enhance the ability to create young and mixed-age forest habitat to support wildlife. It would incentivize and fast-track forest projects developed by local collaboratives, usually consisting of conservationists, timber industry and elected officials. And it would provide an alternative to costly and obstructive litigation from special interest groups. would reduce project planning times and lower costs to American taxpayers. The RFFA provides Categorical Exclusions (CEs) under the National Environmental Policy Act will allow needed forest management projects to be more quickly prepared, analyzed, and implemented. Specifically, it authorizes a CE of to remove hazard trees and salvage timber to protect public safety, water supply or public infrastructure where forest management activities are permitted. The Act will also allow forest recovery projects to proceed more quickly, addressing a dire need created by recent wildfire seasons. The Forest Service has long experience with management techniques to reduce forest pests, thin hazardous fuels, create and maintain habitat for species, recover damaged timber and protect water quality. These projects mitigate risk and help create early successional forest habitat which is good for wildlife. Another provision that is crucial to forest health is the Eastside Screens fix in section 905 of the RFFA. The Eastside Screens were put in place administratively in 1995 to forbid harvest of trees above 21 inches in diameter in six National Forests in eastern Washington and Oregon. After more than 20 years, these screens have become a hindrance to effective forest management. Many forests in these areas have too little Ponderosa pine, the historically dominant and most resilient species. Instead, younger larger lodgepole pine is crowding them out. Good forestry and wildfire protection weighs in favor of selectively removing these lodgepoles, but the screens blunt instrument prevents that. Courts have blocked efforts to relax the screens even in the context of well-designed forest management. As a result, Congressional action is needed to ensure the health of these Eastside forests. Forest Service can mitigate the horrific effects of catastrophic fire and restore the health of forests and rural communities. Now is the time for Congress to make effective active management a reality for the Forest Service to protect the lands and people and wildlife. Near Brookings, Oregon, the Chetco Bar Fire burned nearly 190,000 acres an area four times the size of the District of Columbia. This fire started in a Wilderness Area where active management is prohibited , (what kind of policy is this). so the Forest Service did not immediately move to suppress it. The fire grew and spread to nearby federal lands. After burning for over two months, it was only 53% contained as of mid-September, at a cost to taxpayers of over \$57 million. This fire caused the ash clouds and haze to cover the coastal town of Brookings.

Date submitted (Pacific Standard Time): 4/25/2018 5:00:00 PM

First name: Anon

Last name: Anon

Organization:

Title:

Official Representative/Member Indicator:

Address1:

Address2:

City:

State:

Province/Region:

Zip/Postal Code:

Country:

Email:

Phone:

Comments:

Ban Rare Earth from China, Of particular significance, one country (China) controls 98% of current supply (production) of neodymium. putting America mines out of business, Levels of market concentration are harming manufacturing firms. The gearbox of a two-megawatt wind turbine contains about 800 pounds of neodymium and 130 pounds of dysprosium -- rare earth metals that are rare because they're found in scattered deposits, rather than in concentrated ores, and are difficult to extract.

The wind industry is dependent on rare earth minerals imported from China, the procurement of which results in staggering environmental damages. not one step of the rare earth mining process that is not disastrous for the environment. That the destruction is mostly unseen and far-flung does not make it any less damaging.

Wind energy poses serious environmental risks availability of REEs appears to be at risk based on a number of factors. in 1978 Zaire controlled 48% of the cobalt supply and yet political unrest in Zaire resulted in a disruption to global supply that became known as the Cobalt Crisis REEs have come under global scrutiny due to environmental and social conditions under which they are mined, further increasing their supply risk.

NOT SAFE, in our Nations Forest, Wind turbine requires an astounding amount of toxic rare earth minerals, primarily neodymium and dysprosium, which are key components of the magnets used in modern wind turbines. most common uses is in the generators . Environmental damages, consider that mining one ton of rare earth minerals produces about one ton of radioactive waste, according to the Institute for the Analysis of Global Security. 13,131 MW of wind generating capacity means that between 4.9 million pounds (using MITs estimate) and 6.1 million pounds (using the Bulletin of Atomic Sciences estimate) of rare earths were used in wind turbines installed in 2012. 2 megawatt (MW) wind turbine contains about 800 pounds of toxic rare earths called neodymium and 130 pounds of dysprosium. mined by children in Africa and Chile..

NOT SAFE, Between 4.9 million and 6.1 million pounds of radioactive waste were created to make these wind turbines. That means the U.S. wind industry may create more radioactive waste in year than our entire nuclear industry produced in spent fuel. few are paying attention to the wind industrys less efficient and less transparent use of radioactive material via rare earth mineral excavation in China.

NOT SAFE, in our National Forest, Not only do rare earths create radioactive waste residue, but according to the Chinese Society for Rare Earths, one ton of calcined rare earth ore generates 9,600 to 12,000 cubic meters (339,021 to 423,776 cubic feet) of waste gas containing dust concentrate, hydrofluoric acid, sulfur dioxide, and sulfuric acid, [and] approximately 75 cubic meters (2,649 cubic feet) of acidic wastewater. .

Each Turbine needs 45 tons of steel rebar and 630 cubic yards of concrete, cast iron, turbine contains more than 8,000 different components , 116-ft blades atop a 212-ft tower for a total height of 328 feet. The blades sweep a vertical airspace of just under an acre. Vestas V90 from Denmark has 148-ft blades (sweeping more than 1.5 acres) on a 262-ft tower, totaling 410 feet. The tallest wind turbines in the U.S. have been installed in Texas the Vestas V90 turbines are 345 feet high, Gamesa G87 from Spain, with 143-ft blades (just under 1.5 acres) on a 256-ft tower, totaling 399 feet. steel tower is anchored in a platform of more than a thousand tons of concrete and steel rebar, 30 to 50 feet across and anywhere from 6 to 30 feet deep. Shafts are sometimes driven down farther to help anchor it. Mountain tops must be blasted to create a level area of at least 3 acres. model, the nacelle alone weighs more than 56 tons, the blade assembly weighs more than 36 tons, and the tower itself weighs about 71 tons a total weight of 164 tons. The corresponding weights for the Vestas V90 are 75, 40, and 152, total 267 tons; and for the Gamesa G87 72, 42, and 220, total 334 tons. Health Hazards of Noise and vibrations are generated by these huge monster machines and topped with flashing lights. Wind turbines are not safe, high-voltage electrical devices with large moving parts, estimated that for every 100 turbines, one blade will break off (see Larwood, 2005). In winter, heavy sheets of ice can build up and then fall or be thrown off. Access to the land around wind turbines is usually restricted, even to the landowner.

The 5,700 turbines installed in the United States in 2009 required approximately 36,000 miles of steel rebar and 1.7 million cubic yards of concrete (enough to pave a four-foot-wide, 7,630-mile-long sidewalk). Wind require heavy government subsidies to be competitive with normal electricity generators so a Dutch word for Greenie power seems graphic : "subsidieslurpers" (subsidy gobblers).