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DEPARTMENT OF AGRICULTURE  
DEFORESTATION SERVICE  
COCONINO NATIONAL FOREST

In the Matter of the

4FRI RIM COUNTRY PROJECT

Attention: 4FRI  
1824 S. Thompson Street  
Flagstaff, AZ 86001

#### COMMENTS OF ARTHUR FIRSTENBERG

I submit this response to the scoping letter of June 21, 2016.

The Four Forests Ruination Initiative (4FRI) is a planning effort designed to remove 95% of the trees from over two million acres of Arizona's forests and destroy forest resiliency for the benefit of timber, oil and gas, mining, geothermal and cattle grazing interests, as well as the prescribed burning industry and others wishing to exploit public lands for private profit.

The Deforestation Service is no longer hiding its real agenda or pretending any more that this has anything whatever to do with ecological restoration or fire prevention. It is about removing as many trees as possible and setting as many fires as possible. This is stated right out front in Senate Bill 1691, introduced in the U.S. Senate on June 25, 2016. S. 1691 defines "restoration" as "timber harvesting, thinning, prescribed fire, or other vegetation manipulation in the National Forest System." The bill also mandates a minimum of one million acres of burning per year and 400,000 acres of timber sales per year.

The Deforestation Service also no longer pretends that public comments will have any effect on its plans, or that Environmental Impact Statements are anything more than a charade. S. 1691 and House Bill 2647, which was passed by the House of Representatives on July 9, 2015, will make it impossible for private citizens to ever again challenge an EIS in court. Both bills contain language requiring any person who wishes to challenge a deforestation plan in court to post a bond equal to the Deforestation Service's estimated costs, expenses and attorneys' fees in defending the lawsuit.

If H.R. 2647 is passed by the Senate and signed into law, Environmental Assessments and Environmental Impact Statements won't even be required any more. H.R. 2647 will categorically exclude prescribed burning projects from environmental review.

Another Senate bill, S. 2012, has already passed the Senate and the House and is in conference committee. This bill awards categorical exclusions to "vegetation management" plans in the rights-of-way of electric power lines "and adjacent Federal lands."

The Deforestation Service awarded the contract for the first million acres of 4FRI to an international land and timber broker called Good Earth Power, a company based in the Sultanate of Oman, with partners in England and China. Little or none of that lumber is staying in the United States. International Forest Products, LLC, a subsidiary of The Kraft Group, is marketing the lumber harvested by Good Earth Power from Arizona's forests (340 million board feet per year) on the international market.

After most of the trees are gone, the National Forests will have lost their reason for being. Real estate

developers are already salivating over what may soon be the former Coconino, Kaibab, Apache-Sitgreaves, and Tonto National Forests.

There isn't a word of truth in the 32-page scoping document describing the 4FRI Rim Country Project.  
August 9, 2011 For the Earth,

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