

Date submitted (Pacific Standard Time): 2/2/2020 11:17:47 AM

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Organization:

Title:

Comments:

I provide below my comments to "Proposed Directive FSH 1109.12 Ch. 30.pdf" document.

According to the email with the subject: "Comment on Proposed Notice and Comment System for Forest Service Directives," regarding the proposal, the proposed updates, "[ ] to the regulation -- 36 CFR 216 -- and the proposed changes will allow the agency to broaden public engagement in how we manage national forests and grasslands. This move also increases transparency by expanding the types of policies for public review and ensures that proposed policy changes are easily accessible on the agency's website."

Further, the Federal Register Public Notice page indicates, "The [USDA] is affirming the final rule that appeared in the Federal Register on March 30, 2018." with technical corrections and removal of an inapplicable phrase.

My concern remains that federal agencies need to hear from "non-special interest groups, permittees, lessees, business entities set to profit from USDA rules, regulations, directives long before the proposed directive is 30 days from becoming final. The very purpose and governing principles of NEPA were focused on balancing environmental impacts with economic growth and human welfare; a concept at the time that optimistically was seen as possible without sacrifice to any. However, and simultaneously, there was a clear appreciation that the federal government held a responsibility to reduce environmental problems plus a clear recognition that unfettered economic growth, while perhaps supported by certain business segments of America, could be very much in conflict with human welfare and environmental protection. Rather, the law holds the importance of creating "and maintaining conditions under which man and nature can exist in harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans."

I believe it is NOT possible for "each person [to] enjoy a healthful environment and that each person has a responsibility to contribute to the preservation and enhancement of the environment," when decisions are controlled at the agency level by input on NEPA from the consultants hired by the permittee/leasee, or other business entity, rather than a neutral entity interested in truly balancing the economic and other environmental impacts.

Failing to evaluate requests in the light of prior requests and consider cumulative impacts merely games the system because actions can be presented incrementally in a piecemeal fashion so as not to approach the acreage size which would trigger mitigation or prevent the very proposal in the first place. Subsequently, another piece is presented, and so on and so forth such that individual steps do not trigger mitigation but the total, if offered as one package, would so trigger mitigation or the proposal being denied altogether due to the significance of the impacts.

As we have seen lately portions of the federal government which were formerly considered "nonpartisan," are now acting at the direction and directive of a much more "octopus-like" administration. I believe it can be short-sided and potentially environmentally devastating for the decision whether or not a "directive" is designated as a "significant guidance document," to be made by the OMB, rather than a non-political branch is a mistake.

And finally, I suggest in this age of social media and internet, requiring interested citizens to periodically check the USDA/ Forest Service website for possible Federal Register notices of proposed directives is outdated and designed not to inform, but rather to dissuade public engagement. I recommend in addition, that notices related to particular forests, parks and systems, be posted on that forest's website and notice provided to individuals and organizations that have affirmatively indicated interest in receiving notices from that agency.

I sincerely hope my comments will be considered and lead to a more active and public centered policy where environmental concerns and human welfare are at the heart of the decisions, rather than merely short-term economic growth.

Thank you for the opportunity to comment on the proposed changes.