

Data Submitted (UTC 11): 4/30/2018 8:00:00 AM

First name: David

Last name: Beebe

Organization:

Title:

Comments: Central Tongass Landscape Level Analysis

Please accept the following comments and documents as they are pertinent to the Central Tongass Landscape Level Analysis (CTLaLA) scoping and planning record.

Do you have an idea for a project on the Central Tongass?

A: Yes, restoration and stewardship of the public trust within the Petersburg Ranger District.

The Central Tongass landscape level analysis cannot be conducted with any sense of professional or institutional credibility unless and until, the Petersburg Ranger District publicly acknowledges the Findings of the Washington Office Activity Review addresses its lack of personal and professional accountability. Quoting from the introduction of the Activities Review:

Need for Review

"Preparation and administration of timber sale and stewardship contracts are key areas of resource management and critical for the attainment of resource objectives. National Environmental Policy Act (NEPA) disclosure, decision implementation, and theft of timber from National Forest System land continues to attract National attention."

(snip)

"This Review concluded with a call for "an independent review [to] inform solutions and prevent similar issues in future timber and stewardship contracts."

Such a review has not occurred years after the fact.

The District Ranger of the Petersburg Ranger District (PRD), the Tongass National Forest (TNF) Supervisor, and the R-10 Regional Forester are obligated to fully address questions which the local news media (nonprofit CoastAlaska, and for-profit weekly Petersburg Pilot) of Petersburg failed to ask.

Left unaddressed were details of Findings of the Washington Office Review. That Review revealed evidence of systemic failures of agency protocols, sale maladministration, failures of contract enforcement, and systematic subversions of environmental law in regards to the Tonka Timber Sale conducted in the Petersburg Ranger District. These systemic failures were also evident in the integrated resource timber contract (IRTC) of the Big Thorne Timber Sale.

The Tonka timber sale was the pilot project of the IRTC. I, along with many members of the gullible public attended several workshops in good faith, directed by District Ranger Jason Anderson under the guise of "Stewardship and Restoration" projects and objectives paid for by sale revenues generated by the IRTC. The purpose of the Stewardship workshops Ranger Anderson claimed, was to involve the public in the various aspects of "stewardship and restoration" management objectives, as terms and prescriptions in the sale contract. The Washington Office Review revealed evidence of systematic maladministration, destruction of records, and failures monitoring and enforcement of the IRTC.

I, along with many members of the public continue to have, very serious concerns about the planning, administration, and execution of the Tonka timber sale. From the beginning, the way in which the NEPA analysis was conducted, then duplicated in a one hundred plus page, "Change Analysis"(CA), there were many irregularities.

1) The CA reconfigured all the post-Record of Decision-approved NEPA prescriptions of all the units; and executed the phenomenal taxpayer boondoggle associated with the reconstruction of the Tonka marine access facility LTF dock and log sort yard.

There were official assurances that the planned clearcutting would have no meaningful impact on deer winter survival and other old-growth dependent species such as marten, wolves, Northern goshawk, and other management indicator species.

Even while there were units still left to be logged, an emergency closure of deer season and bag limits on the Lindenberg Peninsula occurred with direct consequences to the capability of Petersburg Borough residents to safely access and fulfill their subsistence deer meat for the year.

In April 2017, a press release by the Public Employees for Environmental Responsibility (PEER) published a series of documents which included official findings of a 10 member Washington Office investigation team. The Review Findings in part, exposed evidence of systemic maladministration and possible corruption on the PRD in the execution of the Tonka IRTC.

There has been only one official agency response to this Washington office Activities Review and two brief news accounts. The initial coverage lasting all of one minute and 45 seconds, omitted several findings of fact. Consequently, a widespread lack of awareness of local harms by members of the public occurred.

The second news account was produced locally which credulously accepted the premise of a "mistake" in the haul cost calculation as a transparent cover up in response to the Washington Office reviews findings. Within that second public radio news story, the listeners were led to believe there was a 12 million board ft. error in the Big Thorne Timber Sale which was also an IRTC.

That the Washington office review findings of fact might be explained away as a mere accounting error stretches credulity beyond rational limits.

Please find attached referenced documents for inclusion in the CTLaLA public scoping responses and planning record.

[https://www.peer.org/assets/docs/fs/4\\_3\\_17\\_Post\\_Harvest\\_Monitoring.pdf](https://www.peer.org/assets/docs/fs/4_3_17_Post_Harvest_Monitoring.pdf)

[https://www.peer.org/assets/docs/whitepapers/1996\\_stealing\\_tongass.pdf](https://www.peer.org/assets/docs/whitepapers/1996_stealing_tongass.pdf)

Thank you for this opportunity to comment.

David Beebe