

Data Submitted (UTC 11): 9/12/2019 12:27:54 AM

First name: Dick

Last name: Artley

Organization:

Title:

Comments: Mr. Stewart, on August 21, 2018 I submitted 12 pages of scoping comments. I identified the laws you would violate if you implemented the Proposed Action for the Central Tongass timber sale and how you might change the proposed project to reduce the resource damage and make it "ecosystem friendly." Your IDT ignored my comments, therefore I won't waste my time providing specific comments on your DEIS because they will ignore those too. I mistakenly assumed there were professionals on your IDT.

Below you will find a summary of my assessment of how the recreation and fisheries resources will be affected by this sale. I also identify the people who will be negatively affected.

I worked with a District Ranger in the early 1990s who was clinically obsessed by the need to generate volume like you to assure future promotions to positions with more power and pay. She resigned. The rumor was her resignation occurred after a meeting with the R-1 director or personnel management. Her resignation announcement came shortly after her trip to the RO in Missoula, Montana.

In those days the USFS really tried to serve the American public and respond to their wishes. Today, at least in Alaska, the USFS goes out of their way to serve the natural resource extraction corporations with whatever they want from land owned by 324 million Americans.

The entire world knows about your ham-handed treatment of the Tongass. Here's a recent article from the Guardian (the primary newspaper in the UK)

A piece of Alaskan paradise is at risk. Here's why we must save it

Link: <https://www.theguardian.com/commentisfree/2018/jul/31/alaska-tongass-national-forest-at-risk-logging-perdue>

This type of information distributed around the world will assure your infamy.

Recreation

The Central Tongass, South Revilla, Wrangell Island and Prince of Wales timber sales will clearcut many, many acres of old-growth trees in the rainforest. Some of the old-growth trees that will be clearcut are 400 to 600 years-old. They were mature when Columbus discovered America. This is what the tourists from many locations around the world pay good money to see. Here is information describing the Proposed Actions from the EISs, a ROD and Scoping Package for the sales. They each describe the level of old-growth destruction.

Central Tongass

"Timber offered for purchase is expected to total a maximum of 150 MMBF of old-growth timber and 80 MMBF of young-growth timber for a total volume of 230 MMBF over 15 years over the entire project area." (DEIS Volume 1 pg iv)

"As part of this analysis, the Forest Service is analyzing a project-specific Forest Plan Amendment Figure 2). 1 that responds to Issue 1. The amendment would lower adopted Scenic Integrity Objectives (SIOs) (USDA Forest Service 2016a, p. 4-54) to allow more efficient even-aged management on a greater number of acres within selected portions of Timber Analysis Areas." (DEIS Volume 1 pg 2)

"To support harvest and other activities, approximately 22 miles of NFS road construction, 82 miles of temporary road construction, and up to 70 rock quarries are proposed. An estimated 71 miles of closed NFS roads could be

improved for haul. These access improvements may include up to 37 new stream crossing structures, such as culverts and bridges. (DEIS Volume 1 pg 25)

Link: https://www.fs.usda.gov/nfs/11558/www/nepa/108304_FSPLT3_4667093.pdf

South Revilla

"The proposed action would authorize the harvest up to 46 million board feet of timber from up to 5,500 acres of old-growth forested land"

Roads

- * 10 miles of new National Forest System roads

- * 80 miles of reconstruction or reconditioning of existing National Forest System roads

- * 45 miles of new temporary roads

- * 14 miles of temporary reconstructed or reconditioned roads" (Scoping Information pg 1)

Link: https://www.fs.usda.gov/nfs/11558/www/nepa/108739_FSPLT3_4659829.pdf

Wrangell Island

"Alternative 2 would produce an estimated 56 MMBF of old-growth saw/utility timber volume from approximately 4,767 acres. Silvicultural prescriptions include approximately 3,359 acres of uneven-aged management (implemented using the single-tree or group-selection harvest method) and 1,408 acres of even-aged management (implemented using clearcut or clearcut with reserves harvest methods)" (FEIS at pg iv)

"require the construction of approximately 16.8 miles of National Forest System (NFS) roads, the reconditioning of 4.4 miles of road and construction of approximately 9.9 miles of temporary road. (FEIS at pg ii)

Link: https://www.fs.usda.gov/nfs/11558/www/nepa/75452_FSPLT3_4034552.pdf

Prince of Wales

Log "up to an average of 25 million board feet (MMBF, volume measurement) of old-growth timber annually from suitable timber lands may be offered during the first 5 years of implementation, and up to an average of 15 MMBF of old-growth timber annually during the next 5-year period. An evaluation of the amount of old-growth timber remaining within the project area would occur 10 years after the decision, to determine if economical offerings are still available from the suitable timber land base during this last 5-year time period. This evaluation would be conducted using the Implementation Plan process (Appendix 2). Based on this evaluation, up to 10 MMBF of old-growth timber may be offered for years 10 and 11 of the project and up to 5 MMBF of old-growth timber for the final 3 years." (ROD at page 2)

Link: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd615347.pdf

There are businesses that depend in undeveloped rainforest beauty that guide tourists (see below).

Sitka Excursions

Link: <http://www.cruiseportinsider.com/siex26.html>

Ketchikan Rainforest Hike Excursion Reviews

Link: <https://www.cruisecritic.com/memberreviews/shore-excursions/excursion/316/>

Ketchikan Rain Forest Island Adventure Excursion

Link: <https://www.travelagenciesfinder.com/US/Ketchikan/1004223799617196/Ketchikan-Rain-Forest-Island-Adventure-Excursion>

Tongass National Forest Tours

Link: <https://www.viator.com/Ketchikan-attractions/Tongass-National-Forest/d942-a13619>

Tongass National Rainforest Guided Hiking Tour

Link: <https://www.shoreexcursionsgroup.com/tour/hiking-tongass-national-rainforest/AKKTONGASSHIKE>

Tongass Rainforest Expedition

Link: https://www.tripadvisor.com/Attraction_Review-g31030-d8389008-Reviews-Tongass_Rainforest_Expedition-Ketchikan_Alaska.html

3-Hour Alaska Rainforest Hiking Tour in Tongass National Forest from Ketchikan

Link: <https://www.viator.com/tours/Ketchikan/Tongass-Rainforest-Hiking-Expedition/d942-25297P1>

SITKA PREMIUM SCENIC TOUR: RAPTOR CENTER, FORTRESS OF THE BEARS, & TOTEM VILLAGE

Link: <https://alaskashoreexcursions.com/sitka/premium-scenic-tour-raptor-center-fortress-of-the-bears-and-totem-village>

KETCHIKAN RAINFOREST WILDLIFE CENTER AND EAGLE SANCTUARY TOUR

Link: <https://alaskashoreexcursions.com/ketchikan/rainforest-wildlife-center-and-eagle-sanctuary-tour>

KETCHIKAN RAINFOREST SANCTUARY WALK & CRAB FEAST

Link: <https://alaskashoreexcursions.com/ketchikan/rainforest-sanctuary-crab-feast-tour>

TONGASS RAINFOREST WALK

Link: <https://www.shoretrips.com/excursion/region-pnw-ket-009193/ketchikan-alaska/tongass-rainforest-walk>

Tongass Nat'l Forest Day Tours & Excursions

Link: <https://www.alaska.org/destination/tongass-national-forest/day-tours>

Rainforest Canoe Adventure & Nature Trail

Link: <https://alaskashoretours.com/excursions/ketchikan/rainforest-canoe-adventure-nature-trail/>

SEA KAYAKING IN ALASKA: TONGASS RAINFOREST KAYAK TOUR

Link: <https://www.sea-quest-kayak.com/sea-kayaking-alaska/glaciers-whales-alaska-kayak/>

Rainforest Island Adventure

Link: <https://www.alaskatraveladventures.com/day-tours/ketchikan/rainforest-island-adventure/>

Tours and Tickets by Tongass Rainforest Expedition

Link: https://www.tripadvisor.com/Attraction_Review-g31030-d8389008-Reviews-Tongass_Rainforest_Expedition-Ketchikan_Alaska.html

Rainforest Canopy & Zipline Expedition

Link: <https://alaskashoretours.com/excursions/ketchikan/rainforest-canopy-zipline-expedition/>

Wild Wolf Tours offers Ketchikan Tours perfect for cruise passengers

Link: <https://www.wildwolftours.com/>

Ketchikan Off Road Buggy Rainforest Family Adventure Excursion

Link: <https://www.travelagenciesfinder.com/US/Ketchikan/1611509452471029/Ketchikan-Off-Road-Buggy-Rainforest-Family-Adventure-Excursion>

Your timber sales will devastate these businesses.

Fisheries

Mr. Stewart, your proposed old-growth timber sales will construct 363.7 miles of new road!!!! The Tongass NF is one of the few places in the world where wild salmon and trout still thrive. No sane person would trade this away to supply volume to natural resource extraction corporations.

I wish Ms. Darr, Mr. Cross, Mr. Hutten, Ms. Jacobson, Ms. Mahara and Mr. Martin knew about the information below. Its too bad they don't know about the information in Opposing Views Science Attachment #4

The Tongass is America's salmon forest

Link: <http://www.americansalmonforest.org/>

Tongass Nat'l Forest Salmon Fishing

Link: <https://www.alaska.org/destination/tongass-national-forest/salmon-fishing>

Why Roadless matters on the Tongass

Link: <https://www.tu.org/blog/why-roadless-matters-on-the-tongass/>

Leave Tongass trees be

Link: <https://www.tu.org/blog/leave-tongass-trees-be/>

Keep the Tongass wild and roadless

link: <https://ak.audubon.org/press-release/keep-tongass-wild-and-roadless>

Preserve the Tongass

Link: <https://alaskaconservation.org/2019/05/preserve-the-tongass/>

Conclusion

It's obvious you don't care.

The resource specialists on the IDT are obedient. The public pays them to take action to protect and conserve the resources they represent. Your IDT members are more interested in pleasing you which requires them to assume the timber sale enabler role.

Mr. Stewart, there are other websites that identify you and describe your ransacking and looting of the unique natural resources in the Tongass. Indeed, you will have to live with your infamy for many years. Future generations of kids will lose the rainforest viewing opportunities available now on the Tongass. Are you proud?

The public must become aware of this atrocity. Therefore a much shorter version of these comments will be mailed to the AP.

It will also be necessary explain the situation in LTEs to the Ketchikan Daily News, the Juneau Empire and the Seattle Times.

These actions will happen early next week unless I receive verifiable (emphasis added) news that the following changes will be made.

Change #1 --- the fisheries resource will remain viable and strong by significantly reducing the miles of new road that will be constructed ... especially sediment producing temporary road, and

Change #2 --- no old-growth will be logged.

Sincerely,

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

Dick Artley (retired forest planner, logging systems specialist, FEI instructor, NEPA legal compliance reviewer, forest NEPA coordinator, and forest appeals/litigation coordinator)

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