

Data Submitted (UTC 11): 12/16/2019 9:00:00 AM

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Title:

Comments: My Name is David Beebe and I support Alternative 1 No Action Alternative as a 35 year resident of Southeast AK. Throughout that history, I have documented egregious harms perpetrated by the State of Alaska authorizations of wholesale asset stripping in full disregard of environmental consequences of state and Native Corporate forests resulting in functionally permanent landscape level harms which have resulted in killing entire wild runs of salmon, herring, oolichan, and myriad other species. The state must not be allowed oversight in destroying what remains of our old growth forests.

Recent peer reviewed research findings of Buotte, Law, and several others have documented the highest and best purposes of public forests should be conserved for carbon sequestration. An international consensus of climate scientists recognise we have a decade to bring our greenhouse gas emissions under control or risk irreversible, catastrophic climate forcing feedbacks.

Our commercial fisheries require intact ecosystems to function.

The several 1000s of miles of existing roads which have already resulted in devastating impacts. Federal failures of oversight and funding are commonplace.

The Alaska specific Roadless Rule DEIS cannot be completed with any sense of professional or institutional credibility unless and until, R-10 Regional Forester publicly acknowledges, and fully responds to the findings of an independent forensic audit recommended by the Washington Office Activity Review (WOAR) of the Tonka and Big Thorne Timber Sales. The WOAR was conducted in June 2016 but as yet, has failed to disclose audit findings and the agency holds accountable the perpetrators of fraud revealed in the WOAR Findings. Quoting from the introduction of the Activities 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 requisite review and response has not occurred in the 3 years after the WOAR Investigation team Findings.

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 has failed to ask.

Left unaddressed, are manifold 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, and federal contract 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 (then) 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 public records, and failures monitoring and enforcement of the IRTC.

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.

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

No Action is the only reasonable alternative here.

[Position]