

## Prince of Wales Landscape Level Analysis Project #50337

<https://cara.ecosystem-management.org/Public//CommentInput?Project=50337>

The Prince of Wales Landscape Level Analysis Project #50337 proceeds apace despite scandalous improprieties documented in two previous Integrated Resource Timber Contracts, on the Tongass — the Big Thorne and Tonka Timber Sales. They remain shrouded in agency secrecy, coverup, and obfuscation. Until an adequate restoration of public confidence gets assured through an independent forensic audit accompanying a rigorous application of personal, and professional-level accountability, and until a full NEPA Analysis is conducted, the POWLLA Project #50337 cannot proceed with any shred of legitimacy.

This is because the Big Thorne Timber and Tonka Timber Sales were investigated by the USFS Washington Office Activity Review (“WOAR”) team during June 12-20 2016. (Five months later, the POWLLA Scoping Letter was issued.)

The WOAR is a leaked agency document never intended for public exposure. It was first disclosed by PEER (Public Employees for Environmental Responsibility) and reported on in 2017 by CoastAlaska Public Radio news media. To my knowledge, no regional nor statewide for-profit news coverage occurred at all, at the outset of this breaking news scandal.

Unfortunately, CoastAlaska’s (then, Regional News Director) Ed Schoenfeld violated the Public Media Code of Integrity by choosing to limit his coverage of this bombshell disclosure of agency malfeasance and maladministration to a mere 1 minute and 45 seconds-long, 346 word, radio news story. Of that, over 90 words were provided by a timber industry lobbyist for “balance.” The original news piece never mentioned either timber sale by name nor the extent of the monetary losses imposed on the region.

Schoenfeld’s indiscretions were further magnified by using a misleading story headline: *“Group says Forest Service mishandled timber sales;”* and his lede: *“A Washington, D.C., environmental group is accusing the Tongass National Forest of breaking its own timber-sale rules.”* Further, Schoenfeld’s coverage was completely reliant upon his highly truncated quoting of PEER’s interpretive statements, instead of quoting the actual references in the WOAR.

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Contrary to Schoenfeld's coverage, the Washington Office investigation team of the USFS is certainly not an "environmental group," and their report certainly listed no "accusations" but rather, investigative Findings of fact after reviewing the formal and necessary documentation of records required in every other federal timber sale. Unfortunately, many standard documents were not available nor many records documenting the normal processes required to validate timber sale administration.

This singular public radio coverage was not only fatally brief and deliberately misleading, it relied upon listeners of public radio to get the facts elsewhere. Unfortunately, no other mention in the regional news media occurred on the breaking story, other than a brief rebroadcast on APRN.

Schoenfeld's propaganda piece relied upon members of public radio to access the briefly-aired story online, but which could only be found under the "Southeast" news heading (rather than "local news," such as where the KFSK news reported many other stories related to the Tonka timber sale.) When KFSK news director, Joe Viechniki, who, when asked to adequately cover this news event locally, he refused. (No other reporting occurred on the matter until several months later.)

Of the few member stations of CoastAlaska which actually posted Schoenfeld's story on their website, they also relied upon viewers with on-line access using hyperlinks to understand this scandalous story's implications instead of fulfilling the professional responsibilities of journalists to distill and explain the USFS Washington Office's technical information.

This provides an explanation as to why Southeast Alaska's residents were deliberately deprived of vitally-important, and newsworthy information during a concurrently occurring and still on-going state fiscal crisis.

The WOAR's ten member investigation team's findings of fact revealed an agency pattern of missing, or incomplete formal public documents, and systematic contract maladministration on these two separate large timber sales in two separate Ranger Districts. This constitutes the possibility of high-level, Regional Office involvement and oversight (or lack thereof) in the pattern, rather than such occurrences by mere coincidence.

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The WOAR findings noted failures to abide by federal laws such as NEPA, NFMA, MUSYA, as well as agency protocols of the Forest Service Handbook, and Forest Service Manual. These failures included following protocols designed to prevent timber theft. Absent protocols put in place to prevent large-scale timber theft, these losses could well total in the several tens of millions of dollars beyond the investigator's accounting of nearly \$4 million in revenue losses.

Now, three years after the report, the R-10 has produced zero evidence of institutional reform in Freedom of Information Act requests, nor any official agency actions taken for ascertaining personal or professional accountability in the maladministration of these "Stewardship" Contracts. Instead, multiple line officer "retirements," transfers, and promotions ensued, rather than providing evidence of initiating WOAR investigators' recommendations of conducting an independent audit of these IRTC sales.

If anything, the agency silence, after months of no responses at all to the Petersburg Borough Assembly's several requests for official explanations, are ominous in their implications. Agency failures to demonstrate corrective actions taken while POWLLA Project's large scale, long term contract Decision Memo has been signed, constitute acts of agency impunity and disregard to abide by federal laws.

Instead of initiating investigations of personal and professional accountability, there have been simultaneous retirements of the Regional and Deputy Foresters, transfer of Tongass Forest Supervisor, replacement of District Rangers and later, retirements of other key line officers, and staff involved in the oversight and administration of these IRTC Projects. Other key players in the maladministration of these contracts have been either subsequently promoted, retired with pensions intact, or transferred elsewhere off-District.

By these agency failures alone, there exists no agency legitimacy nor sufficient bases of public trust to execute the Prince of Wales Landscape Level Analysis (POWLLA) Project #50337.

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This grossly accelerated, and heavily manipulated Public Relations project pitched as a “living document” constitutes a writ of execution. It is a Trojan horse designed to reduce what remains of the “Hammered Gems” of POW into a third world export colony and tree plantation, while its foregone conclusions have been marketed to the public dishonestly by the now, safely evacuated, Tongass line officers.

The POWLLA Project is clearly in violation of the National Environmental Policy Act (NEPA) for its failures to take the necessary "hard look" of the potential irretrievable and irreversible negative environmental consequences of this high volume, long term timber contract. The negative environmental, social, and economic impacts will be effected on spatial and temporal scales from entire watersheds to entire landscape levels of degradation. These additional impacts will be imposed on the already existing degraded conditions of decades of previous clearcutting and roading impacts. That the full scale of impacts remain undisclosed constitutes continuing systemic and systematic agency malfeasance.

Besides NEPA, this project is also in violation of ANILCA (Alaska National Interest Lands Conservation Act) Section 810, for agency failures to fully examine the inevitable impacts upon rural communities and their access to subsistence resources. Failures to disclose those impacts, failures to provide public hearings to identify concerns, and failures to identify a full range of alternatives to avoid such impacts are further evidence of agency impunity and disregard for environmental law and institutional integrity.

This project is also in violation of the National Forest Management Act (NFMA), through failures to provide specific unit locations and impacts caused by roads, and by failures to comply with the Tongass Land Management Plan (2016 amended).

In conclusion, the regional news media’s collusion in coverup with the USFS Region 10 of our National Forest System has contributed to an atmosphere of public distrust and cynicism of federal agencies and local and state government. R-10 leadership has clearly chosen to maintain disregard of public trust with a breathtaking level of naked impunity demonstrating it is a captured agency unworthy of the public trust.

Thank you for this opportunity to comment—-David Beebe.

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