



United States Department of the Interior  
FISH AND WILDLIFE SERVICE  
Juneau Fish & Wildlife Field Office  
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Juneau, Alaska 99801-7100  
(907) 780-1160



9/12/2013

Tongass National Forest  
c/o Tim Piazza  
648 Mission Street  
Ketchikan, Alaska 99901

Re: Wrangell Island Project EIS,

Dear Tim:

This letter responds to the July 31, 2013 scoping notice for the Wrangell Island Project which includes the following modifications: 1) the notice of intent to prepare an environmental impact statement has been corrected because new administrative review procedures have been established, 2) the purpose of the project has been expanded to include management of roads in the project area, and 3) the proposed action has been modified to reduce the proposed timber harvest volume from 80 million to 60 million board feet and the area affected from 6,500 to 4,500 acres.

Our scoping comments of March 4, 2011 recommended modifications to improve the locations and values of Old Growth Reserves; timber harvest methods to protect important elements of wildlife habitat; second growth management to restore habitat values (especially for deer); protection of roadless area values; management of roads to minimize spread of invasive plants and reduce impacts to fish, wildlife, and water quality; protection of subsistence resources; evaluation and mitigation of impacts to wolves, goshawks, bald eagles, marten, fisheries, and wetlands; and assessment of cumulative impacts. These comments and recommendations remain applicable to the project in the July 31, 2013 scoping notice. We ask that you ensure that they are addressed as you move forward with the Wrangell Island Project.

Our review of the project area suggests that clearcut harvest of old growth forest over the last fifty years has substantially reduced deer habitat capability across much of the project area. This impact results primarily from conversion of old growth forest stands on south-facing slopes and in valley bottoms (which intercept snow and provide high-quality forage during winter) to densely-stocked young growth stands (which do not effectively intercept snow or provide forage).

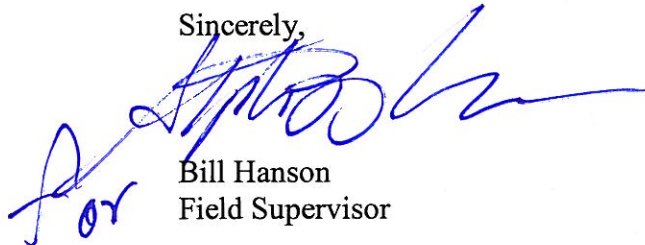
We note that a large proportion of the scoping comments submitted to date have requested that remaining deer habitat be protected to the extent possible to preserve subsistence and general hunting opportunities. Deer are also the primary prey of the Alexander

Archipelago wolf. The Fish and Wildlife Service is currently considering a petition to list this endemic subspecies of wolf as threatened or endangered. One of the threats identified by the petitioners is loss of winter habitat for deer, which decreases availability of deer for both wolves and humans. This can result in increased trapping effort for wolves to reduce perceived competition for deer. Where road densities are high, as they are in parts of the Wrangell Island Project area, wolf harvests can become unsustainable. The environmental impact statement should evaluate alternatives that maintain road densities below 0.7 miles per square mile, as described in the Tongass Land and Resource Management Plan.

Forest management options that conserve deer habitat can reduce impacts to deer, wolves, and subsistence hunters. Timber harvest methods that preserve canopy closure over most of a stand, but create small openings to stimulate forage production, may be compatible with conservation of deer habitat. Alternatively, treatments that create large openings in important deer wintering areas will further reduce deer habitat capability. Specific treatments with the greatest chance for success will vary depending on aspect, slope, landscape position, stand age, and timber harvest history in the surrounding area. Isolated stands of old growth forest surrounded by second growth may be particularly critical if a large portion of the local deer population rely on those stands as winter habitat or migration corridors. We would appreciate the opportunity to work with the Forest Service as a cooperating agency to develop an action alternative that responds to the need for economic timber harvest opportunities while minimizing impacts to deer and other wildlife. We specifically request that such an alternative be evaluated in your environmental impact statement for the project.

We look forward to working with the Wrangell Ranger District and Tongass National Forest staff on the Wrangell Island Project. Please contact Steve Brockmann (907) 780-1181 if you have any questions concerning the above comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bill Hanson", is written over the typed name. To the left of the signature, the word "for" is handwritten in blue ink.

Bill Hanson  
Field Supervisor

cc: Jackie Timothy, ADFG, Douglas  
Clarence Clark, ADNR, Juneau