



THE STATE  
of **ALASKA**  
GOVERNOR SEAN PARNELL

**Department of Natural Resources**

OFFICE OF PROJECT MANAGEMENT & PERMITTING

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September 13, 2013

Tim Piazza  
Tongass National Forest  
648 Mission Street  
Ketchikan, AK 99901

Re: Wrangell Island Project

Dear Mr. Piazza,

The State of Alaska (State) has reviewed the Corrected Notice of Intent (NOI) (Federal Register, Vol. 78, No. 158, Aug. 15, 2013) for the Wrangell Island Project proposed on the Wrangell Ranger District, Tongass National Forest. These consolidated scoping comments are in addition to the State's previous scoping comments for this project submitted on February 14, 2011 (enclosed). Please consider our combined consolidated scoping comments in your decision.

**Modified Purpose and Need**

According to the NOI, the purpose for proposing this project is to contribute to a long-term supply of timber for the timber industry on Wrangell Island, and on the Tongass National Forest in general, in a manner that is consistent with the multiple-use goals and objectives of the Tongass Land and Resource Management Plan (Forest Plan). This would contribute to the timber supply that would help sustain the current timber industry while transitioning to a sustainable forest industry based on young-growth management.

The need is to provide an economic timber supply that meets market demand annually and for the planning cycle. An additional need identified by this NOI is to develop and manage roads in the project area to support resource management activities.

**Modified Proposed Action**

The Proposed Action for the Wrangell Island Project has been modified from proposing timber harvest on approximately 6,500 acres, or 80 million board feet (MMBF) of volume, to approximately 4,500 acres, or 60 MMBF of volume, to reflect better timber volume information gathered from additional field work.

The modified Proposed Action is one of several alternatives being considered for this project. Another alternative proposes 125 MMBF of volume. The statement in the NOI that the Proposed Action was modified "to reflect better timber volume information gathered from additional field

work” may mislead the public to provide comments based on an incorrect assumption that the entire project has been reduced in size.

### **Lead and Cooperating Agencies**

The NOI states that “...the Alaska Department of Natural Resources... [has] agreed to participate as [a cooperating agency].” To clarify, the Alaska Department of Natural Resources (DNR), Office of Project Management and Permitting (OPMP) coordinates with multiple divisions within DNR and with the departments of Fish and Game, Environmental Conservation, Transportation and Public Facilities, Law, and Commerce, Community, and Economic Development during the National Environmental Policy Act (NEPA) review process for proposed development activities on the Tongass National Forest. The State of Alaska participated as a cooperating agency in all phases of the planning process for the Forest Plan, and continues to work in that capacity with the Forest Service as they implement their Forest Plan.

### **Preliminary Issues**

Road access and management is identified in the NOI as a preliminary significant issue, but the NOI lacks sufficient information to understand how road access and management may affect the design of alternatives being considered. The project scoping letter (July 31, 2013) states “Our primary purpose for the [sic] proposing this project has not changed substantially, but we are including some language addressing road management for all National Forest System roads within the project area in response to scoping comments.” However, the NOI only states “An additional need identified by this NOI is to develop and manage roads in the project area to support resource management activities.” What specific actions are being proposed regarding road management? Why is road management being incorporated within a project whose primary purpose is to “contribute to a long-term supply of timber for the timber industry”? Would it be more appropriate and effective to address the issue of road access and management at a district scale through an amendment to the Wrangell Ranger District Access and Travel Management Plan rather than at the project level scale for an individual timber sale?

### **Forestry**

As described in the NOI, part of the purpose of this project is to contribute to the timber supply that would help sustain the current timber industry while transitioning to a sustainable forest industry based on young-growth management. It is important for the Forest Service not only to sustain the current timber industry, but provide for the young-growth dominated industry of the future. This can be done by incorporating criteria during project planning that increases the future supply of fiber while reducing the cost of harvesting that fiber.

When further developing alternatives for the Wrangell Island Project, the State recommends that the Forest Service consider how the following criteria and recommendations could be used to sustain an industry in transition, while meeting the purpose and need for this project:

- Develop infrastructure that supports present and future timber harvest. The Wrangell Project should construct a sort yard and marine access facility at Fools Inlet.
- Construct road systems to maximize ground based mechanical harvest. Where a cable harvest system is necessary, locate roads to maximize the amount of uphill yarding.
- Maximize acres of timber harvest on land less than 35 percent slope.
- Maximize acres of even-aged harvest systems while minimizing acres of uneven-aged systems. Intensive silvicultural systems that employ even-aged prescriptions will lead to production of significant volumes of high quality timber in the shortest time frame, and

significantly increase total forest yields over time (Stocker, 2003). Uneven-aged systems generally do not result in increased total yields over time, nor do they substantially improve quality of timber for future harvest entries (Stocker, 2003).

- Minimize helicopter harvest. Volume that needs to be harvested by helicopter and/or by using an uneven-aged silvicultural system should be deferred to provide fiber for high value niche markets in the future.
- Provide an economic timber supply using long-term contracts. At a minimum, an economic timber supply should meet annual market demand.
- Plan projects based on the goals, objectives, management prescriptions, and standards and guidelines contained within the current Forest Plan. Minimize project driven Forest Plan amendments.

### **In Closing**

The State of Alaska appreciates the opportunity to provide additional scoping comments for the Wrangell Island Project. If you have any questions or would like to discuss our comments in more detail, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kyle Moselle', with a stylized, flowing script.

Kyle Moselle  
Large Project Coordinator

### **References:**

Stocker, Neil. 2003. An Argument for Intensive Forest Management. Submitted to the XII World Forestry Congress, 2003. Quebec City, Canada. 6 pp.

### **CC:**

State Tongass Team  
Bob Dalrymple, Wrangell District Ranger

### **Enclosures:**

State of Alaska scoping comments on Wrangell Island Project, February 14, 2011