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This is to comment on the Draft EIS for the Wrangell 10-year timber sale. The comments are directed at Alternative 2 of the Draft. None of the the proposed alternatives are economic. In order for the Forest Service to fulfill its obligation to meet demand there must be alternatives in the draft that are economic. The following comments provide ideas for modifying alternative 2 so that it will not be deficit.

The changes proposed address road cost by building System roads to a linear grading standard. The linear grading standard for system roads was established several years ago but has not been used recently. This change can reduce cost by at least $600,000. The helicopter logging is all under the single tree selection prescription, a minimum average selling value of $850/MBF will provide flexibility for meeting the STS prescription while maintaining enough value to keep the sale out of deficit. The same approach used for helicopter logging is applied to Shovel logging under the STS prescription, the minimum selling value is $700/MBF.

There will be a camp cost as the Wrangell logging work force is gone because of the lack of logging jobs with the reduced timber sale program. The same is true for the long shore work force which will result in the need to move the export logs to an active export area. This would likely be Klawock or perhaps Tolstoi or Ketchikan. The 50058 road has been dropped as it is not necessary for logging the timber. If this road is built it should not be funded by the timber sale. The Spruce and Red Cedar will be barged to Klawock. The fifty percent export is all hemlock.

The appraisal data used to develop the above is Base Year 2013 updated to the 2nd quarter of 2015. A summary of the results of the above changes is attached

Sincerely,

George Woodbury