



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Fish and Game

DIVISION OF HABITAT
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Andrea Slusser
NEPA Planner
US Forest Service, Wrangell Ranger District
PO Box 51
Wrangell, AK 99929

Dear Ms. Slusser:

Biologists from the Alaska Department of Fish and Game (ADF&G) Habitat, Wildlife Conservation, and Sport Fish Divisions reviewed the Draft Environmental Impact Statement (DEIS) and Aquatic and Wildlife Resources Reports (ARR; WRR) for the Wrangell Island Timber Sale. We acknowledge your effort to address ADF&G concerns raised during scoping and present alternatives that limit clearcut harvest to 50% or less of the total harvest area offered. ADF&G appreciates participating in the nearly decade long development of this sale. Please consider the following when selecting an alternative for implementation.

Wildlife Corridors and Old Growth Reserves (OGRs)

Alternatives 2 and 5 mostly avoid placing clearcut units in wildlife travel corridors identified in Figure 13 of the WRR. After reviewing GIS imagery and discussing with US Forest Service Wildlife Biologist Joe DelaBrue, slight adjustment of the remaining clearcut units positioned in corridors could result in uninhibited wildlife migration.

Project documents acknowledge that Thom's and Fools Medium OGRs do not meet Forest Plan criteria for minimum acreages and that conveyance of the selected parcel within Thom's Medium OGR to the state would further reduce its size. Please adopt the recommendations of the Interagency OGR Review Team (2013 Addendum interagency biologist review of the old-growth reserves in the Wrangell Island timber sale project area, unpublished document) into the FEIS.¹ If this is not feasible, consider removing the areas highlighted by the team for inclusion in the OGR network from the selected alternative, so they may be incorporated in the future along with acreage to make up for the conveyance, should it occur.

¹ This was recently accomplished with a minor Forest Plan amendment for OGRs on the Big Thorne Timber Sale.

Harvest of Productive Old Growth Forest (POG)

The DEIS considers how POG harvest may affect deer, wolves, goshawks, and martens, and that there is no abundance data for these species on Wrangell Island. Proposed harvest of remaining high value POG in a given VCU ranges from 0-26% under the action alternatives. Focusing harvest on high value POG will continue to isolate and diminish ecological communities. Wrangell Island populations of martens and other less vagile species cannot be augmented by immigration. Since the marten habitat resource surveys recommended during scoping were not carried out, we recommend limiting the clearcut harvest of POG until the status of the marten population is better understood.

Marten

ADF&G telemetry and harvest data from Chichagof Island and data gathered by the US Forest Service on Mitkof Island (G. DeGayner and J. Doerr, 1995, US Forest Service, Tongass National Forest, unpublished data) demonstrated that martens with home ranges intersecting roads are vulnerable to trapping. In a 2007 letter to US Forest Service staff, Wildlife Biologist Rich Lowell highlighted GIS-based analysis shows marten habitat more than a mile² from a road on Wrangell Island comprises only enough area to support about a dozen animals. ADF&G prefers maintaining unroaded marten habitat capable of producing a harvestable surplus over the management options suggested on page 66 of the WRR. We recommend removing this list of management options since closing the season by emergency order is the only option ADF&G can enact. Since marten are easily captured in traps set for other species, a marten closure would also require a closure for other furbearers.

Road Construction and Access Management

The alternatives presented seek to limit density of open roads on National Forest lands to 0.7-1.0 linear miles per square mile with the goal of maintaining wolf and marten harvest at sustainable levels. Prince of Wales Island Landscape Level Assessment field observations indicate many roads marked as closed in the Forest Service database are not functionally closed, allowing human access and harvest (T. Schumacher, Wildlife Conservation Biologist, ADF&G, Juneau, personal communication). To ensure current and predicted densities of open roads are accurate, we recommend a ground-based assessment to determine functional status.

Deer Abundance and Habitat Capability

The DEIS acknowledges Wrangell Island deer habitat capability is below the Forest Plan Guideline of 18 deer per square mile and that recommended by Person (1997) for areas where deer are the primary prey of wolves. The DEIS also acknowledges that continued harvest of POG will further reduce deer habitat capability. Please consider that the public, through the Board of Game process, has expressed a desire for a level of deer harvest, 900 deer from GMU 3, that has not been met since 2004. The highest level of harvest since 2010 was 533 deer.

Young-Growth Management

Alternatives range from 936 to 1,781 acres of even-aged management with 1,250 acres of thinning planned in the next 10 years. The information contained in the DEIS could be strengthened by discussing where, when, and how thinning will occur and how research suggests Wrangell Island management indicator species will be affected.

² The average marten home range size (Flynn and Schumacher 2001).

Wolves

The WRR suggests immigration will help maintain the Wrangell Island wolf population. Though wolves are capable of swimming to Wrangell Island, ADF&G advocates for maintaining a harvestable population by providing habitat sufficient to support a prey base for at least one resident pack and some transient wolves. Please update the WRR and DEIS to include recent information for wolves and deer in the attached Species Status Assessment for the Alexander Archipelago Wolf (USFWS 2015) and the ADF&G report on estimating wolf abundance in GMU 2 (Roffler et al. 2016).

Consideration for Sensitive Streams

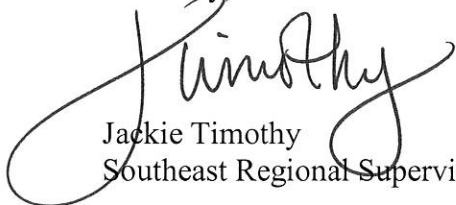
During scoping, ADF&G raised concern for the risk of sedimentation in Thom's, Fools, and Salamander Creeks, which stand out as drainages with a high proportion of low gradient flood plain channel types. This concern was not addressed in the DEIS. Please ensure the provisions in the Forest Plan and Forest Service Handbook 2509.22, and other reasonable site specific measures to reduce ground disturbance when logging in the headwaters of these streams, are outlined in the Final EIS and unit cards.

Fish Passage

The ARR lists 39 red and 3 gray culverts in Table 29. The table on page 98 of the appendix ranks these crossings by remediation score, but the road and milepost numbers do not align with Table 29, the stream and culvert classes are not listed, and only 40 crossings are shown. Please reconcile these two tables. Red culverts need to be replaced as a component of the Wrangell Island timber sale. Where available upstream habitat does not warrant culvert replacement, the district biologist can work with ADF&G Habitat Division to obtain concurrence to not provide fish passage and eliminate red culvert status.

Thank you for the opportunity to review and provide comments on the proposed action. Please contact Habitat Biologist Greg Albrecht at (907) 465-6384 or greg.albrecht@alaska.gov with any questions you may have.

Sincerely,



Jackie Timothy
Southeast Regional Supervisor

Enclosures submitted electronically:

IOGR 2013
Roffler, et al. 2016
USFWS 2015

Email cc:

Al Ott, ADF&G Habitat, Fairbanks
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Patrick Fowler, ADF&G SF, Petersburg
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Tom Schumacher, ADF&G WC, Juneau
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Steve Brockmann, USFWS, Juneau
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Literature Cited

- Flynn, R. W., and T. V. Schumacher. 2001. Ecology of martens in Southeast Alaska. Alaska Department of Fish and Game, Division of Wildlife Conservation, Federal Aid Final Research Performance Report 1 July 1990-30 June 2001, Federal Aid in Wildlife Restoration Study 7.16, Juneau.
- Person, D.K. 1997. Review of the status review for the Alexander Archipelago wolf. Letter to US Fish and Wildlife Service. April 2, 1997.
- Roffler, G. H., J. N. Waite, R. W. Flynn, K. R. Larson, and B. D. Logan. 2016. Wolf population estimation on Prince of Wales Island, Southeast Alaska: A comparison of methods. Alaska Department of Fish and Game, Final Wildlife Research Report ADF&G/DWC/WRR-2016-1, Juneau.
- USFWS (U.S. Fish and Wildlife Service). 2015. Species status assessment for the Alexander Archipelago wolf (*Canis lupus ligoni*). Version 1.0, December, 2015. Alaska Region, Anchorage, Alaska.