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July 18th, 2016

Robert Dalrymple
District Ranger, Wrangell Ranger District,
PO Box 51
Wrangell, AK 99929
comments-alaska-tongasswrangell@fs.fed.us

Dear Mr. Dalrymple,

After reviewing the Wrangell Island Project DEIS, my view is that the alternatives offered would be very poor stewardship of the accessible old growth forest that remains on Wrangell Island by the US Forest Service. This project, as proposed, is extremely shortsighted in that it cuts a high volume of timber in a short amount of time. All of the alternatives in the DEIS will diminish deer habitat, and will harm subsistence deer hunters abilities to hunt in areas that they have traditionally used. The proposals in the DEIS will prevent small, local mills or aspiring specialty wood businesses from having a sustainable, long-term supply of accessible old growth timber in the form of small sale offerings or microsales.

Comment 1 - The WIP FEIS must offer alternatives that do not harm deer populations, as well as do not harm subsistence deer hunters ability to hunt in areas that they have traditionally used. I deer hunt on Wrangell Island and depend on healthy populations of deer here. The WIP will harvest trees on approximately 5,300 acres of old growth habitat. While some of the acres are in helicopter units, many of these acres are proposed clear-cuts, which are of particular concern, as the wintering habitat for deer in these units will be lost. This could result in diminished deer populations, which in turn will affect deer hunters by reduced bag limits and shortened hunting seasons. Some of the areas that are proposed to be clear-cut in the preferred alternative that I hunt in are units: 552, 553, 551, 557 and 610 in the Middle Ridge area, as well as units 682, 666, and 665 in the High Bush Lake area. All of these proposed clear-cuts are in areas that I depend on to provide habitat for the deer that I hunt. These units are also in areas that I traverse during deer season to access hunting. These stands of trees being clear-cut will greatly reduce my ability to walk and hunt in the places that I have come to depend on. In the preferred alternative the Forest Service is proposing clear-cuts, and logs that will mostly leave the island unprocessed, in exchange for diminished deer populations and habitat.

Comment 2 - The WIP FEIS must offer alternatives that focus on the needs of small mills and specialty wood businesses in the form of long-term, small timber sales and microsales. The Forest Service failed to offer any viable alternatives in the WIP DEIS that focused on local, small mills or stewardship contracts. Over the past 12 years, I have bought lumber from small, local mills when I could, and depend on these products as I upgrade and remodel my home on Wrangell Island. The expected timber development in the WIP will take place in 3 to 5 years and appears to cut the majority of the existing accessible old growth on and near the road system. Small mills that create local jobs, would be much better served by an alternative that has small offerings and microsales over the course of 30 years or more. Stewardship contracts should be included in this alternative. An

alternative in the DEIS that focuses solely on small mills over a long period of time would be a much more sustainable approach to this project, and would foster longevity in some of these businesses, as well as attract more specialty wood businesses to this area. Cutting approximately 65 mmbf of timber in a few years and having most it leave this island unprocessed, while creating few long-term jobs is an abysmal attempt at managing our public lands and old growth forest resources.

As a resident that chose to make Wrangell Island my home over 17 years ago, I am deeply disappointed in the alternatives in WIP DEIS. The Wrangell Island Project would sacrifice the remaining, accessible old growth on the island that local deer hunters and businesses will rely on for generations to come, in exchange for an export-driven project that is unsustainable. This project, as proposed, will harm the long-term viability of the community of Wrangell both environmentally and economically. For these reasons, please consider and respond to the comments above.

Sincerely,

A handwritten signature in black ink that reads "Stephen Todd". The signature is written in a cursive, flowing style with a large, stylized 'S' and 'T'.

Stephen Todd