



THE STATE
of ALASKA
GOVERNOR BILL WALKER

Department of Natural Resources

DIVISION OF FORESTRY/CENTRAL OFFICE

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July 18, 2016

Robert Dalrymple, District Ranger
Tongass National Forest, Wrangell Ranger District
P.O. Box 51
Wrangell, AK 99929

RE: Wrangell Island Project Draft Environmental Impact Statement

Dear Mr. Dalrymple:

The Alaska Department of Natural Resources welcomes the opportunity to review and comment on the U.S. Forest Service's (USFS) Draft Environmental Impact Statement for the proposed Wrangell Island Project. Previously the State of Alaska was a Cooperating Agency for implementation of the 2008 Tongass Land Management Plan and associated project level work during the Scoping phase for this DEIS in 2011, and we submitted consolidated scoping comments on February 14, 2011. That input took place under at least three Memoranda of Understanding (MOU) (08MU-11100500-109; 08MU-11100500-110; and 09MU-11100500-030). Subsequently, these earlier MOUs were replaced with 14-MU-11100500-022. The purpose of this 2014 MOU is "to maintain an established framework of cooperation between the U.S. Forest Service and the State of Alaska related to implementing and monitoring the Tongass Land and Resource Management Plan." The Forest Service requests the State of Alaska to act as a cooperating agency; however, the State of Alaska will accept such requests on a case-by-case basis. To date, the State has chosen not to accept any requests to be a cooperating agency.

Nonetheless, the Alaska Department of Natural Resources supports continued close cooperation with the U.S. Forest Service and the Wrangell District on timber management issues of mutual concern. One example of this cooperation is the 'Wrangell Island Road Use Agreement' between the Alaska Department of Natural Resources and the Forest Service's Regional Forester. This forest road right-of-way construction and use agreement was entered into by both parties on September 15, 1998. We request the Forest Service acknowledge this agreement in the Final EIS.

The State of Alaska remains committed to maintaining a Southeast Alaska timber industry. In 2011, the Alaska Legislature expanded the new Southeast State Forest to nearly 50,000 acres. The Commissioner of the Alaska Department of Natural Resources adopted the Southeast State Forest Management Plan on February 29, 2016. While relatively modest in size, the Southeast State Forest is managed as a 'working forest' and it plays an important role in helping support the region's timber industry with key timber sales.

The Division of Forestry prefers Alternative 2 of the Wrangell Island Project DEIS because it is best suited to provide a reliable, long-term supply of "bridge" timber that would support local jobs and the timber industry during the transition to a sustainable wood product industry based

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on future young growth management on the Tongass National Forest. In addition, the Division of Forestry prefers Alternative 2 because it provides for more new, improved, and long-term forest road access to the industry and public than do the other alternatives. It is also critically important that Alternative 2 is designed to provide for both large and small timber sales, as the continued well-being of Alaska's timber industry needs both. We note that Alternative 2 calls for 66 percent of the harvested area to be cut using "single tree selection." This results in less impact on scenic values.

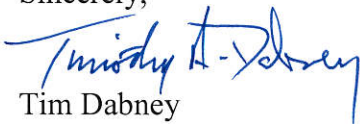
A major concern we shared in our scoping comments of February 14, 2011, remains, that "by not offering sufficient volume of timber – consistent with the Tongass Timber Reform Act – while finalizing the Transition Framework, the USFS ensures it will not meet its stated goals of sustaining the remaining timber industry to allow for a transition to a young-growth dominated industry." This shortcoming is emphasized when comparing the Gate 1 Committee's recommendation in 2009 for a proposed action with 185 MMBF of timber harvest over 11,040 acres within Wrangell Island's Phase 1 land base with Alternative 2's proposed harvest of only 65.1 MMBF on 5,309 acres. A related concern is whether the overall economics of the proposed sale, considering low wood quality and current market conditions, will be positive or not.

Alternatives 2 through 5 call for the harvesting of old growth timber using a mix of harvest types. There will be no harvest of second or young-growth timber during the planning period because no commercially viable young-growth timber is available. It is important to consider key issues, such as scenic values, within the overall larger landscape context for these harvest alternatives. For example, there is an Old-Growth Reserve network on Wrangell Island, along with riparian management areas and beach buffers, plus additional areas affected by the Roadless Rule. All of these special areas are closed to timber harvesting.

We support in principle a number of the potential stewardship-related opportunities described in the DEIS. While we recognize these stewardship opportunities are not covered by this DEIS, and will require going through their own NEPA-DEIS/FEIS process, they are dependent to a large degree on timber revenues produced by sales resulting from the Wrangell Island Project. Among these, the Pats Lake area restoration, improvements to the Pats Lake road and Forest Service right-of-ways, and the completion of the north Wrangell loop road are viewed as being beneficial to the Wrangell Island community as well as timber operators. Recognizing that the State of Alaska resources are limited, there may be indirect ways for the State to support these future stewardship opportunities.

The Alaska Department of Natural Resources recommends that the U.S. Forest Service ensure that the final Wrangell Island Project contributes to sustaining the remaining timber industry during the transition to a young-growth dominated industry. We prefer Alternative 2, since it is the alternative that comes closest to sustaining the timber industry, even though it still falls short of meeting demand.

Sincerely,



Tim Dabney
Regional Forester

cc: Chris Maisch, State Forester
Greg Staunton, Southeast Area Forester