

April 26 2012

Tongass National Forest, c/o Tim Piazza
United States Forest Service
648 Mission Street
Ketchikan, AK 99901

RE: Wrangell Island Project Draft EIS

Dear Mr. Piazza,

Please accept the following comments on behalf of the Southeast Alaska Conservation Council (SEACC) and the Wrangell Resource Council (WRC) on the Corrected Notice of Intent for the Wrangell Island Project as you develop alternatives in the draft Environmental Impact Statement. These comments are intended to supplement the comments we submitted on January 25, 2011.

SEACC is a coalition of volunteer citizen organizations based across Southeast Alaska. SEACC's membership includes commercial fishermen, Alaska Natives, small-scale timber operators and value-added wood product manufacturers, tourism and recreation business owners, hunters and guides, and Alaskans from many other walks of life. SEACC is dedicated to preserving the integrity of Southeast Alaska's unsurpassed natural environment while providing for the balanced, sustainable use of our region's resources

The Wrangell Resource Council is comprised of residents of Wrangell Island who work to make Wrangell a viable, livable community through sustainable use of all of the natural resources that we depend on in Southeast Alaska. Our members' livelihoods range from commercial fishing and small timber mill operations to local business and health care.

We are confused by changes in the statement of the project's purpose and need as stated in the Corrected NOI. On the one hand, the Forest Service dropped mention of its intent to align this project with the Tongass Transition Strategy and USDA's Strategic Plan FY 2010-2015 from the "corrected" purpose and need. On the other hand, the Corrected NOI retains the statement that this project is intended to "provide a reliable, long-term supply of timber that will support local jobs and

facilitate the transition to a sustainable wood product industry based on young-growth management? Was this an oversight, or does the “corrected” Purpose and Need indicate that the Tongass National Forest has somehow backtracked from repeated statements made by the Tongass personnel and USDA in correspondence related to the Tongass Transition Framework, that “[o]ur overarching goal is to work with members of the communities to create jobs in Southeast Alaska” and provide “community economic stability”? See 77 Fed. Reg. 14727-28 (Mar. 13, 2012). Will these differences complicate the retention of receipts from the sale of products produced in stewardship projects in the Wrangell Ranger District?

We take this opportunity to reaffirm our continued support for the Tongass Transition Strategy and the collaborative planning opportunities that underlie its successful implementation. In the spirit of collaboration, we request the Forest Service develop an alternative that provides the greatest economic benefit to the community of Wrangell while maintaining a healthy ecosystem for fish and wildlife. This alternative should also recognize the importance of customary and traditional hunting, fishing, and gathering on Wrangell Island and the recreation and tourism economy that relies on intact watersheds and landscapes.

While the initial scoping documents described a proposal logging 91mmb from more than 7,400 acres, the current proposal includes 80 mmbf from approximately 6,500 acres. We believe a reduction in the volume of suitable and economical timber from Wrangell Island is responsible and less, rather than more, a more accurate reflection of the true amount of timber suitable on Wrangell Island for logging.

An alternative that accomplishes the above goals would include the following:

Provide a Reliable, Long-Term Timber Supply that Supports Local Jobs and Facilitates the Transition to Young-Growth Management

We support using timber on Wrangell Island to provide a long-term supply to existing and potential new small mill operators. Offering one large sale over a 10-year timeframe or less would quickly liquidate nearly all of the suitable and economical timber on Wrangell Island. In turn, this will create even more dependence by local small mill operators on large logging companies and large timber sales further from Wrangell.

A significant issue relating to the relationship between the Forest Service’s goal of using timber available on Wrangell Island to “seek to meet” market demand for timber in the short term and assuring the community of Wrangell with a reliable, long-term supply of timber is informing the public of a general timeline for when young-growth volume available on Wrangell Island will come on line for commercial purposes. This information is essential for determining the length of time residents of Wrangell will want to stretch out the remaining supply of old growth available for timber production, while also meeting the needs of other resource users. The timeline should explain the amount of acres and volume associated with the

timeline. The timeline should also identify short-term restoration and stewardship priorities in natural LUDs, especially old-growth reserves, beach fringe, and riparian management areas. Such a strategy would benefit local residents by accelerating wildlife habitat objectives in these LUDs as quickly as possible and provide a supply of young growth to facilitate the development of a variety of young-growth wood products at the same time.

Separate Logging from Log Selling

We understand that accessing timber in certain areas requires equipment and personnel that is often out of the reach of the small mill owners. We request an alternative that uses Integrated Resource Service Contracts (IRSC) and possibly with indefinite-delivery and indefinite-quantity (IDIQ) to separate the logging and delivery of logs to a sort yard, from the sale of logs to small mills.

Such a model could incentivize a permanent local logging operation based in Wrangell, but will require significant coordination with the City and Borough of Wrangell to accomplish.

We recommend the Wrangell Ranger District review the collaborative restoration stewardship contracts on the Malheur, Ochoco, Umatilla, and Wallowa National Forests, where such contracts have been implemented.

Maintain Old Growth Reserves

We object to logging old-growth within the roaded portions of any Old-Growth Reserves established as part of an integrated habitat conservation strategy for the entire Tongass National Forest. According to the Corrected NOI, “[a]ll proposed activities must meet the standards and guidelines of the Tongass Forest Plan. Consequently, we expect the DEIS to indicate how such significant modifications to Old-Growth Reserves (OGRs) affect connectivity, size and shape of the reserves, as well as basic assumptions behind the location of the reserve. The DEIS also needs to compare effects in the function of existing and modified OGRs using all the reserve design criteria to identify the biologically preferred location of the OGR. The DEIS will also need to document the rationale for why adjustments of any medium OGR boundaries within the Wrangell Island Project does not trigger an overall review of the conservation strategy, or at least an assessment of how the changes affect the efficacy of the conservation strategy across the Wrangell Ranger District.

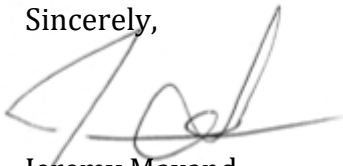
The habitat conservation strategy adopted in TLMP replaced an earlier strategy that lacked any permanent guidance as to size, distribution, or quality of habitats to retained and which was found to possess a low likelihood for maintaining viability and distribution of old-growth dependent wildlife. The definitiveness and designation of specific old-growth refugia

across the forest in TLMP contributed significantly to the U.S. Fish and Wildlife Service's decision not to list the goshawk or wolf on the Tongass. Consequently, to meet TLMP requirements and assure long-term protection for Tongass wildlife, the DEIS should identify and evaluate the addition of replacement old-growth of equal habitat value into each OGR that may be adjusted.

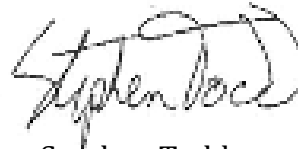
As noted above, we support the Tongass Transition Plan and the move to sustainable timber manufacturing, habitat restoration, and recreation enhancements. We believe there is a better way that will sustain jobs for the long-term while preserving areas that are important for existing industries, such as recreation, and for wildlife and fish habitat that currently contribute to the economic success and quality of life in our community and region.

Thank you for the opportunity to comment and we look forward to working with you as we develop a plan that meets the long-term needs of Wrangell.

Sincerely,

A handwritten signature in dark ink, appearing to read 'J. Maxand', with a stylized, sweeping flourish at the end.

Jeremy Maxand
Grassroots Community Organizer
Southeast Alaska Conservation Council

A handwritten signature in dark ink, appearing to read 'Stephen Todd', with a large, circular flourish at the end.

Stephen Todd
Board Member
Wrangell Resource Council