



# Southeast Alaska Conservation Council

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**Sent via Email**

November 27, 2015

Tongass National Forest  
c/o Andrea Slusser, IDT Leader  
PO Box 51  
Wrangell, AK 99929  
*wrangell\_island\_project\_eis@fs.fed.us*

Re: Comments on 4<sup>th</sup> Notice of Intent for Wrangell Island Project

Dear Ms. Slusser:

Please accept the following comments on behalf of the Southeast Alaska Conservation Council (SEACC) and the Wrangell Resource Council (WRC) on the October 27, 2015 updated 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 previous NOIs, on January 25, 2011, April 26, 2012, and October 9, 2013.

We take this opportunity to reaffirm our continued support for the Tongass Transition 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. We previously submitted an alternative which we believe achieves these objectives, the "Small Mill and Wildlife Alternative," on July 25, 2011.

In a recent story on KSTK, Ranger Dalrymple informed the public that the most recent proposal contains "[less acreage and less volume](#)." We found this statement puzzling. Although this project is smaller than the 91 mmbf first proposed in 2010, when compared to the most recent project description offered in 2013, this proposal increases both the volume proposed, from 60 mmbf to 73 mmbf, as well

as the number of acres involved, from 4,500 to nearly 5,300 acres. Consequently, we believe the NOI needs to better explain the evolution of this project proposal and clarify the basis for the Ranger's conclusion that "we reduced the amount of acreage that we are proposing."

For the record, we applaud the Forest Service's decision not to propose project-specific modifications to the old-growth reserve. We are disappointed, however, that the agency kept the focus of this project on meeting timber supply objectives under the 2008 TLMP, particularly since the agency has consistently ignored the significant gaps between planning cycle demand projections and subsequent actual cutting levels. This failure skews the balance the agency must strike between logging and providing for multiple use of other forest resources, including wildlife and outdoor recreation. Given the recent release of the proposed TLMP amendment, and accompanying updated planning cycle demand scenarios (Daniels, et al. 2015), we hope the agency fully accounts for significant recent changes in Tongass forest policy, the Alaska forest sector, and trends in markets for Alaska timber products instead of outdated projections as it moves forward with this project.

Best Regards,



Seth Ballhorn  
Tongass Blueprint Project Organizer  
Southeast Alaska Conservation Council



Stephen Todd  
President  
Wrangell Resource Council