



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

**Department of  
Environmental Conservation**

DIVISION OF WATER  
410 Willoughby Ave., Ste 303  
P.O. Box 111800  
Juneau, AK 99811-1800  
Main: 907.465.5180  
FAX: 907.465.5177  
dec.alaska.gov

June 27, 2016

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

Dear Mr. Dalrymple:

The Department of Environmental Conservation has reviewed the Draft Environmental Impact Statement (DEIS) for the U.S. Forest Service's proposed Wrangell Island Project. Specifically, this project proposes to harvest between 42.8 and 65.1 MMBF of timber from approximately 3,184 to 5,309 acres, and to construct up to 17.2 miles of new National Forest System (NFS) roads, up to 16.2 miles of temporary roads, and to recondition up to 5.8 miles of existing roads, depending on alternative. All temporary roads would be decommissioned and 5.8 to 12.5 miles of new NFS roads would be closed to motor vehicle traffic upon completion of project activities. Associated with this project is the use of the existing permitted log transfer facilities at Pats Creek and Earl West Cove.

The DEIS identified Alternative 2 as the Forest Service's preferred alternative for this project. This alternative proposes to harvest approximately 65.1 MMBF of timber from an estimated 5,309 acres, and would involve the reconditioning of 5.8 miles of existing roads, and the construction of 17.2 miles of new NFS road and 14.9 miles of temporary road. It also proposes to close 6.1 miles of new NFS roads and 10.0 miles of existing roads after project activities are complete.

We are pleased to see the relatively large amounts of uneven-aged management prescriptions and helicopter yarding that were incorporated into each action alternative, as such prescriptions should minimize the potential for detrimental effects to soil and aquatic resources. However, we are somewhat concerned with the potential for cumulative watersheds effects as a result of the amount of existing and proposed timber harvesting and road construction within several watersheds in the project area.

The Tongass National Forest uses an analytical threshold of concern for cumulative watershed effects of 20 percent of watershed basin area consisting of young growth less than 30 years old. Watersheds at or exceeding this threshold may be experiencing increased peak flows and attendant sediment recruitment from stream channel erosion and bed scour. According to the DEIS (Table 60, page 161), none of the 24 7<sup>th</sup> level HUC watersheds in the project area currently exceed this threshold, with Watershed 19010209010304 and the McCormack Creek Watershed having the highest existing cumulative harvests at 18 percent and 15.5 percent, respectively. Implementation of the Wrangell Island Project would increase the cumulative harvesting percentages above the threshold within these two watersheds and three others, depending on alternative. These include the following:

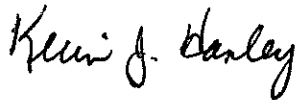
<u>Watershed</u>	<u>Alt. 1</u> Harvest Since 1984 (%)	<u>Alt. 2</u> Basin Area Harvest	<u>Alt. 3</u> Basin Area Harvest	<u>Alt. 4</u> Basin Area Harvest	<u>Alt. 5</u> Basin Area Harvest
McCormack Creek	15.5%	<b>27.35%</b>	<b>26.80%</b>	<b>28.49%</b>	<b>25.0%</b>
19010209010102	7.0%	<b>29.34%</b>	12.92%	12.75%	12.10%
Kunk Creek-Frontal	12.5%	<b>23.59%</b>	0.0%	19.82%	19.30%
Zimovia Strait-E					
Kunk Creek-Frontal	12.9%	18.6%	15.1%	<b>23.7%</b>	<b>26.9%</b>
Zimovia Strait-C					
19010209010304	18.0%	<b>20.83%</b>	19.80%	<b>22.75%</b>	19.80%

In addition, according to Tables 68, 71, 74, and 77 (DEIS pages 171-175), predicted peak flow increases as a result of the proposed timber harvesting and road construction within these watersheds are also significant, especially within the McCormack Creek Watershed, which shows predicted peak flow increases of greater than 22 percent under all the action alternatives.

Given the increased level of harvesting that is being considered within these watersheds, particularly within the McCormack Creek watershed, channel condition assessments should be completed, not only for determining existing channel conditions relative to the amount of timber harvesting and road construction proposed for the Wrangell Island Project, but also to establish a baseline for future monitoring.

We appreciate the opportunity to comment

Sincerely,



Kevin J. Hanley  
Environmental Program Specialist