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The Nature Conservancy would like to take this opportunity to comment on the proposed Wrangell Island Project. The project has the potential to play a role in supplying the 'bridge timber' called for under the Tongass Advisory Committee's recommendations, but it is worth noting that much of the timber in the sale area is of marginal value and volume, as is evidenced by the fact that the preliminary appraisal for each alternative is negative.

We are pleased that the majority of the sale area in the Preferred Alternative (3,500 acres) would have a silvicultural treatment that will minimize negative impacts to wildlife habitat and aesthetics.

The Conservancy recommends that the following be considered for inclusion in the final plan:

- It is important that the local community be involved in the scheduling of individual sales within the project area. A collaborative process should be established on Wrangell Island in the interests of giving local residents a say in how the project is implemented.
- Specific focus should be placed on scheduling and designing those units most easily accessible to a smaller operator (limited initial infrastructure investment needed, shovel logging, etc.) to be useful to local mills. There are 40 units totaling 396 acres within 400 ft. of an existing road that are shovel-operable in the preferred alternative; the scheduling and size of these sale units in particular should be designed to benefit local operators.
- Approximately 530 acres of the sale are located within the Thoms Creek TNC/Audubon Conservation Priority Area and TU77 watershed, including 370 acres designated to be clearcut. According to the planned TLMP Amendment Record of Decision due to be signed in December, these areas will not be suitable for harvest. In expectation of this impending change, and in the interests of maintaining the habitat value of this landscape, we recommend removing these units from the preferred alternative.

We share the interests of many in southeast Alaska in seeing the maintenance of a viable timber industry. Involving local communities in land management planning, and scheduling harvests at a scale that the landscape can support, is key to the sustainability of local industry, and we hope that the Wrangell Island Project meet both these criteria in its final form.

Thank you for your time, we look forward to working with you in the future.



Conor Reynolds, Conservation Forester