



United States Department of the Interior

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July 18, 2016

Andrea Slusser
Wrangell Ranger District
525 Bennett Street
P.O. Box 51
Wrangell, Alaska 99929

Subject: Notice of Availability of the Draft Environmental Impact Statement for the Wrangell Island Project, Tongass National Forest, Alaska

Dear Ms. Slusser:

The U.S. Department of the Interior (Department) has reviewed the subject Draft Environmental Impact Statement (EIS) for the proposed Wrangell Island Project, located in the Tongass National Forest in Southeast Alaska. We provide the following comments and recommendations in accordance with our authorities under the National Environmental Policy Act and the Fish and Wildlife Coordination Act for your use in developing a Final EIS and Record of Decision.

The purpose of the project is to provide timber and economic opportunities for the local and regional economies of Southeast Alaska. The Department has reviewed the various alternatives, which differ primarily by location of harvest units, how individual units are harvested (clearcut vs. partial harvest), and how specific roads would be managed following harvest. Below, the Department provides additional information and recommendations on the Draft EIS.

General Comments

In scoping comments provided March 3, 2011, the Department's U.S. Fish and Wildlife Service (USFWS) requested that the U.S. Forest Service (USFS) modify two Medium Old Growth Reserves (OGR) as part of the timber sale project to better comply with Tongass National Forest Land and Resource Management Plan standards. The USFWS also requested that the USFS evaluate and minimize impacts to subsistence harvesting, wetlands, fisheries, and habitat for several wildlife species. The scoping comments described potential timber harvest methods and road management strategies to help reduce impacts of existing and future timber harvest.

On September 12, 2013, the USFWS responded to a second scoping notice for a modified version of the Wrangell Island Project. The 2013 letter provided additional recommendations on minimizing impacts to deer and wolves. The USFWS also worked with the USFS and the Alaska Department of Fish and Game to review OGRs in the project area to identify alternative locations for OGRs that could provide for additional timber harvest while providing additional protection for forest habitat within Inventoried Roadless Areas. Timber harvest is currently not allowed in these roadless areas.

The Draft EIS generally addresses each of the topics discussed in the previously submitted USFWS scoping comments. In the enclosure, we provide additional information and recommendations to strengthen the Final EIS and reduce impacts to terrestrial and aquatic resources. Staff with the USFWS are available to discuss these recommendations and to assist the USFS with planning for this important project. Contact information is provided below.

In addition, the Department's U.S. Geological Survey (USGS) Alaska Science Center has conducted additional studies on marbled murrelets and yellow-billed loons. We recommend that the Final EIS include information on these species provided in the Specific Comments (below) to make the EIS more complete and accurate.

Specific Comments

The yellow-billed loon is listed as one of the USFS sensitive species in the Draft EIS. Chapter 3: Affected Environment and Environmental Consequences, Issue 2 – Wildlife Habitat, includes a section on yellow-billed loons on page 74. The following citation could be added at the end of the last paragraph regarding anthropogenic disturbances, as the research specifically tested the influence of observer visits on nests.

Uher-Koch, B.D., J.A. Schmutz, and K.G. Wright. 2015. Nest visits and capture events affect breeding success of Yellow-billed and Pacific Loons. *Condor* 117(1):121-129. Doi:10.1650/CONDOR-14-102.1.

The marbled murrelet is included on a list of species of interest in the Draft EIS. Chapter 3: Affected Environment and Environmental Consequences, Issue 2 – Wildlife Habitat, includes a section on marbled murrelets on page 83. The citation listed below could be added to the sentence: "Marbled murrelets spend most of their lives in the coastal marine environment in sheltered bays, fjords, leeward sides of islands, and island passes (**Arimitsu et al. 2010**, Kuletz 2005, Piatt and Nashlund 1995), but come onshore for nesting (Hobson 1990)."

Arimitsu, M.L., J.F. Jiatt, M.D. Romano, E.N. Madison, and J.S. Conaway. 2010. Kittlitz's and Marbled Murrelets in Kenai Fjords National Park, south-central Alaska: At-sea distribution, abundance, and foraging habitat, 2006-08. USGS Open-File Report 2010-1181, 68p.

Thank you for the opportunity to comment on this Draft EIS. For further information regarding the attached recommendations, please contact Steve Brockmann, Southeast Alaska Coordinator for the USFWS, at (907) 780-1181 or steve_brockmann@fws.gov. If you have any questions

regarding marbled murrelets or yellow-billed loons, please contact John Pearce, Supervisory Wildlife Biologist for the USGS, at jpearce@usgs.gov or 907-786-7094.

Sincerely,

A handwritten signature in blue ink that reads "Philip C. Johnson". The signature is written in a cursive style with a long, sweeping underline.

Philip Johnson
Regional Environmental Officer – Alaska

Enclosure

Enclosure: U.S. Fish and Wildlife Service Recommendations for the Draft Environmental Impact Statement for the Wrangell Island Project

I. Alexander Archipelago Wolf and Sitka Black-tailed Deer

Work on nearby Prince of Wales Island has demonstrated that wolf mortality from trapping and hunting can reach unsustainable levels (leading to wolf population declines) where road densities are high. Person et al. (1996), for example, documented a two-fold increase in reported wolf harvests where road densities exceeded 0.7 miles per square mile below 1,200 feet elevation. Road density below 1,200 feet on Wrangell Island is currently 0.98 miles per square mile on U.S. Forest Service (USFS) managed lands and 1.3 miles per square mile across all ownerships (Draft Environmental Impact Statement (EIS), pp. 92-93), exceeding the Tongass National Forest Land and Resource Management Plan (Forest Plan) guideline of 0.7 to 1.0 miles per square mile for areas where wolf mortality concerns have been identified.

The U.S. Fish and Wildlife Service (USFWS) recommends that additional road closures be considered to maintain road densities below the Forest Plan guideline of 0.7 to 1.0 miles per square mile, at least on Forest System lands. Among the action alternatives considered, only Alternative 5 would result in road densities lower than 1.3 miles per square mile. As currently configured, even Alternative 5 would exceed the guideline, resulting in 1.1 miles per square mile.

Deer habitat capability (a theoretical carrying capacity for deer, based on GIS modeling) on Wrangell Island also falls short of the 18 deer per square mile guideline specified in the Forest Plan for areas where deer are prey for both wolves and human hunters (Draft EIS, pp. 91-92). The USFWS notes that many of the scoping letters submitted for the project requested that deer habitat be protected or improved to provide for subsistence hunting.

Past management has reduced deer habitat capability on Wrangell Island across all ownerships from 12.9 deer per mile in the year 1954 (when industrial-scale logging began on the Tongass) to 10.9 deer per square mile in 2015, highlighting the need for proactive management to sustain and improve deer habitat for wolves and human hunters. Instead, the alternatives evaluated in the Draft EIS would reduce habitat capability further. The proposed alternative would result in habitat capability of 10.4 deer per square mile immediately following implementation, with further declines as second growth forest eliminates deer forage produced in new timber harvest units. Ultimately, the Draft EIS predicts that deer habitat capability would decline to 9.9 deer per square mile by 2042. Other action alternatives would result in habitat capability ranging from 10.1 to 10.2 deer per square mile in 2042 (Draft EIS, p. 93).

The USFWS recommends the USFS minimize impacts to deer habitat capability by avoiding harvest of forest stands that are the most critical to deer during deep snow winters. High-volume forest stands on low-elevation, south-facing slopes are widely understood to provide the best combination of accessible forage and protection from deep snow and prolonged cold. The USFWS recommends the alternative selected exclude the following units from timber harvest because they include deep snow winter habitat: 579, 638, 666, 711, 713, 811, 814, 816, 818, 854, 855, 866, 879, 955, and 958. These exclusions will minimize impact on the very limited amount

of deep snow winter habitat that remains on Wrangell Island. If harvest in these stands is deemed necessary, the USFWS recommends very light selection cuts of individual trees or small patches of trees to create small openings that replicate natural regeneration of these old growth stands. The USFWS also recommends that other forest stands known or believed to support wintering deer, but that are not identified as deep snow habitat, should also be protected from timber harvest or treated with very light selection cuts to help maintain the local deer populations relying on these stands.

II. Aquatic Resources

Emergent wetlands, ponds, sloughs, watercourses, and riparian areas are high value habitat types where disturbance should be avoided or minimized. To avoid and minimize impacts to these aquatic and riparian habitats, the USFWS recommends that stream crossings span the full floodplain where possible. This approach provides long-term dynamic channel stability, retention of existing spawning habitats, maintenance of food (benthic invertebrate) production, and reduced risk of structural failure. To accommodate fish passage and to maintain the existing hydrology, culverts should be sized and installed to allow for establishment of pre-existing substrate, grade, and channel width. Alternatives may include bottomless arch culverts or embedded round or oval pipes.

All crossing designs should be based on site specific information, such as estimate of peak discharge, flow velocities and patterns, channel stability, suspended sediment and bedload transport, flooding regime (50-year to 100-year flood frequency and magnitude), cross-section profiles of channel morphology, and surface water elevations.

The USFWS recommends that all new construction, maintenance, or decommissioning of roads associated with this timber sale be performed utilizing techniques and best management practices that lower the risk of erosion and reduce the amount of materials entering streams, that reduce or eliminate disturbance to stream channel morphology, and that minimize or eliminate changes or alterations to slope drainage and runoff patterns.

The USFWS also recommends identifying opportunities to restore degraded streams to productive capacity. Practices to restore degraded streams may include recreating the geomorphic structure and sediment-storage capacities through various methods and techniques, including instream placement of wood (e.g., creating natural jams), augmenting off channel habitats, and restoring riparian vegetation.

III. Old Growth Reserves

A previous version of this Draft EIS included action alternatives that would have increased timber availability or improved wildlife habitat protection through modification of Old Growth Reserves (OGRs). Such alternatives have been eliminated from detailed study in this Draft EIS because modifying OGR boundaries would require a minor Forest Plan amendment, and the Forest Plan is currently being amended to accelerate transition to primarily second growth harvest. An amended Forest Plan (USFS 2016a) and draft Record of Decision (USFS 2016b) are currently available for public review. The amendment is narrowly focused and does not consider

modifications to OGR boundaries (although it does propose to modify how second growth stands within OGRs may be harvested).

Many timber sale decisions since 1997 have modified OGR boundaries to improve compliance with Forest Plan guidance. As part of the environmental analysis for the Wrangell Island Project, an interagency team of biologists from the USFS, Alaska Department of Fish and Game, and USFWS reviewed OGRs in the project area and identified potential modifications to two Medium OGRs to bring them into compliance with Forest Plan standards for size and composition.

Based on this interagency review, the USFWS recommends that the Final EIS evaluate modification of the Thom's Medium OGR in Value Comparison Units 4780 and 4790, as described in the wildlife resource report for the Wrangell Island Project (USFS 2016c). This reserve is currently deficient in size, lacking approximately 700 acres of the required 2,500 acres of high-volume old growth (USFS 2016c, Table 15, p. 40). The recommended modification would add the necessary acres of high-volume forest south and east of road 6299 adjacent to the existing OGR.

The USFWS also recommends that the Fool's Medium OGR be modified to correct deficiencies in both productive old growth acreage (1,086 acres short) and high-volume old growth (572 acres short) (USFS 2016c, Table 15, P. 40). The USFWS concurs with interagency team recommendations for this OGR, which would connect the Fool's Medium OGR to the Earl West Small OGR along Fool's Creek. This modification would preserve existing habitat connectivity and low-elevation, deep snow deer habitat (Draft EIS, Figure 14, p. 81).

The USFWS recommends that the selected alternative include both of these Medium OGR modifications to help protect remaining habitat for deer and other species on Wrangell Island, portions of which have been previously logged.

References

Person, D. K., M. Kirchhoff, V. V. Ballenberghe, G. C. Iverson, and E. Grossman. 1996. The Alexander Archipelago wolf: a conservation assessment. USDA Forest Service, Gen. Tech. Rept. PNW-GTR-384.

U.S. Forest Service. 2016a. Land and Resource Management Plan. United States Department of Agriculture, Forest Service Alaska Region, Tongass National Forest. R10-MB-769g. June 2016.

U.S. Forest Service. 2016b. Draft Record of Decision. Tongass Land and Resource Management Plan. United States Department of Agriculture, Forest Service Alaska Region, Tongass National Forest. R10-MB-769i. June 2016.

U.S. Forest Service. 2016c. Wrangell Island Project, Draft Wildlife Resource Report. Wrangell Ranger District. Tongass National Forest.