



Dixon Entrance Chapter Southern Southeast Alaska

June 28, 2016

Robert Dalrymple, District Ranger
Wrangell Ranger District
P.O. Box 51
Wrangell, AK 99929

RE: Wrangell Island DEIS

Dear Mr. Dalrymple;

The Dixon Entrance Chapter of the Society of American Foresters is providing the following comments on the Wrangell Island Draft EIS:

Considering the tight supply of readily available and positively appraised USFS timber in southeast Alaska, it is encouraging to see that the Forest Service has selected Alternative 2 as the "proposed action" for this EIS. It allows the commercial harvest of 65 million board feet of timber while adequately protecting other resources considered in the Forest Plan. However, we do have a couple of qualifying comments concerning the DEIS.

There is a very large portion of the prescribed acreage that is designated as uneven-aged management (partial harvest) that will no doubt be predominately helicopter logged. In fact, 66% of the total project acres are designated for this type of harvest. What is the long term management goals for areas designated by this logging prescription? As we know, partial cutting does not allow for the rapid regrowth of young trees that is typical of clearcuts in Southeast, while the Forest Service is beginning the initial phases of their "transitioning to young growth" program. These partial cut acres, then, cannot be counted on to help meet the future base acreage needed to help maintain a sustainable young growth harvest program. Is it the Forest Service's intent for these areas to eventually be removed from the commercial base? Or perhaps put them on a 200 year rotation in order to allow sufficient regrowth to occur before reharvest? It seems that perhaps the intent of providing a sufficient future supply of feasible young growth timber would be better met by allowing more clearcut acres now, and less partial cuts, into the final Wrangell Island timber sale program.

Secondly, the 65 million board feet designated in Alternative 2 will be meted out in both "large and small sale" over a 10-year span. At best, then, and even if ALL of the designated volume was sold under a large sale format, which equates to only 6.5 MMBF per year. That small amount of annual volume makes it very difficult, if not impossible, for an operator to economically mobilize men and equipment onto Wrangell Island for an amount of volume that can realistically be logged in a matter of 2-3 months, and then repeat this procedure for a number of consecutive years. Hopefully, the Forest Service has considered this and will make a large portion of the 65 MMBF available in one or two individual timber sale offerings so as to maximize the economy of scale for mobilization.

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Finally, to help make ANY sizable timber sale offering from the Wrangell Island appraise positive, and especially since it's well removed from the most likely successful bidder, Viking Lumber on Prince of Wales Island, there needs to be due consideration given to a suitable proportion of exportable timber from the sale area as well. Although this amount does not have to be the majority of the volume, it should be appropriate to help cover the high cost of transporting the logs to Prince of Wales for manufacturing.

Thank you for the opportunity to comment on your proposed project.

Sincerely,

Jim Tuttle FOR STAN MCCOY

Stan McCoy
Chapter Chair