



## CITY AND BOROUGH OF WRANGELL

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September 24, 2018

Carey Case  
Central Tongass Project Leader  
P.O. Box 1328  
12 North Nordic Drive  
Petersburg, AK 99833

Re: Central Tongass Landscape Level Analysis (CTLLA) Comments

Dear Ms. Case:

The City and Borough of Wrangell offers the following comments to the Notice of Intent for the Central Tongass Landscape Level Analysis (CTLLA) that was issued in August of 2018. Some of the comments are specific to an activity, some are generic comments for consideration and inclusion where appropriate.

One of the Project Needs is "supporting community resilience through economic development opportunities." The Borough strongly supports that this is a top Priority Need the USFS should consider and use for any planning documents. How the proposed activities identified in the plan benefit the communities located in the planning area by providing multiple uses for multiple economic opportunities is important to community resiliency. Access to resources, access to public lands for recreation and subsistence uses, helping facilitate a sustainable workforce and opening up new opportunities for individuals and business is a high priority of the Borough and activities approved should reflect this.

One of our concerns is whether this document is NEPA approving activities for very site-specific locations, or generally. For example, are you approving six cabins for specific areas, or six cabins that could be located dependent on the specific opportunity? We ask the same question regarding trails, roads, shelters, culvert replacement, etc. Back in March 2018, the USFS asked for comments of activities, but there was not a clear understanding of what was happening or expected, or what the end product would be. As we get a better handle of what this project is trying to accomplish, new site-specific activities could be proposed depending on the conversations and activities. Our understanding of NEPA is that NEPA reviews and a determination is made for site specific activities. If this plan is approved, and an activity is required to have further analysis, is the additional review still a NEPA process, or how is that review handled? Does this CTLLA actually streamline the process by preapproving general activities per the implementation plans, or is NEPA still required later? Is there flexibility because of general approval, or are these site-specific approvals? Please clarify this process in

the draft EIS. The Borough requests to continue regular conversations with the USFS during the development of the Draft EIS in order to provide more site-specific comments or to assist with public feedback generally.

The Borough would also like to understand better how the Roadless Rule review will impact this document. It is our understanding that as the project moves forward, it is under the guide of the current Forest Plan which adopts all the requirements of dealing with Roadless lands. Should Alaska become exempt under the Roadless Rule, it may be that there will be some existing lands within the Planning area that already have roads through them that could then be incorporated into planning elements of this document for certain activities. The Borough would support this and requests that there is language in the CTLLA that addresses how lands and activities will be dealt with should Roadless Rule requirements be changed.

As mentioned above, a concern of the Borough is whether this plan reviews and approves site specific activities, or general activities. In a 15-year time period, economics, demand, opportunities, and landscape itself can change dramatically. The Borough is concerned about the flexibility of this document to allow new opportunities not specifically identified now. Can new ideas for an area be proposed if an activity is generally approved? For example, if the USFS is planning for a timber sale in an area, but a recreational opportunity (of an approved activity) presents itself as a post-sale benefit, could it be considered if it is not listed in the current paperwork or draft EIS? Due to the extended time period of the planning document, the Borough would like assurances within the document that it will provide flexibility for activities that meet the criteria during annual reviews of activities and in planning processes.

Implementation is a critical component of any activity review. In some of the implementation descriptions it is unclear if every condition must be met before an activity can be considered, or if only some of the conditions can be met. That should be clarified. By requiring all conditions to be met in some of the activities, it is restricting flexibility to address opportunities.

The Borough requests consultation when any USFS activities are being planned near remote Borough owned parcels. The Borough has in the past discussed access modifications with the USFS in preplanning timber sales but there could be other opportunities that might allow us to work together on contracts or even extending USFS activities within the Borough owned lands. Thus far, I am not aware of Boroughs or Cities participating in the All Lands Group that has been meeting with participation from the State, USFS, University of Alaska and Sealaska. Should activities be near Borough-owned land we request to be a part of any conversation.

The Borough requests that the USFS consider site specific plan amendments if the change in standard could provide economic benefits for communities. Specifically, dropping the visual priority route designations and the T77 LUDS that were placed over development LUDS.

The Borough is interested in working cooperatively with the USFS on this plan to provide regular feedback and comments during the draft EIS preparation. It is frustrating to us because of the distance between the team leaders, as well as the communities directly involved in this planning document. This makes it difficult for collaboration on this effort as they were able to do for the POWLLA. We encourage regular and open dialog with the Borough on updates, issues and questions that arise during the Draft EIS preparation.

Activity Cards:

Regarding the Activity Cards, the Borough wants to ensure that the criteria for an approved activity is broad enough to provide flexibility of options and potentially new opportunities that could arise in the next 15 years. Not all rules fit all locations and since it is our understanding that additional detailed site-specific analysis will be required, we want to ensure that this document does not foreclose opportunities.

### Watershed Restoration and Improvement

#### Activity 1: Stream Restoration

To be so specific as to the number of logs or root wads used and miles of stream, there has to be a map available that shows the top priority Streams for restoration or improvement at this time. The Borough would like to look at these maps now, rather than wait for a Draft EIS. Why are any streams proposed for restoration limited to only those areas harvested prior to 1990? What if a more recent harvest shows degraded stream conditions, would you be able to do any restoration within those areas or are you limiting access? Under the Integration Opportunities section, you identify a number of other related activities, yet the Description or the Implementation may not provide the flexibility to incorporate those activities.

#### Activity 2: Fisheries

Implementation methods seem to be very specific when new or other options might also become available. Virginia Lake on the mainland by Wrangell has had Fisheries improvement projects in the past working cooperatively with Wrangell Cooperative Association. The Tribe is building their capacity and it may be something of value in the next 15 years and should be added to Treatment Rationale and Assumptions as potential future opportunity.

#### Activity 3: Invasive Species

The Borough supports cooperative efforts of Invasive Treatments near and on remote Borough lands. Discussion of methodology, timing, and locations is requested of any opportunity.

### Sustainable Recreation Management

#### Activity 4: Recreation Facilities

The Borough is also tracking the Sustainable Cabin Management planning process that is ongoing simultaneous with this planning process and are wondering how the two processes will impact each other's outcome as we are not clear on the timeline results of each plan. This document states that the cabin effort will inform the prioritization of cabin project in the project area, when it may need to be the other way around. More commenters within our project area may provide greater insight for this project since the public input on the regional cabin project seems to be primarily Facebook oriented. Comments for each plan process should be considered.

Depending on where new timber sales may occur or other activities that could warrant the construction of new recreation sites, the Borough again requests the flexibility in the plan to allow opportunities that might not be immediately identified. The goal specifically mentions facilities that can be maintained by district staff. The document mentions that implementation would occur if there are staffing resources available, and a series of five bullets. The way the statement is currently written seems to indicate that all five bullets must occur before implementation is allowed. It may be that only one of those bullets is valid, but the opportunity is

worth consideration. The 'and' should be changed to an "or" or to a statement that clarifies not all five bullets are required before consideration of a project.

The first bullet under Implementation identifies the need might have a partnership for long term maintenance. But the goal and other statements within the document only identify if the USFS has staff and resources available. No discussion or opportunity for commercial participation as a partner is identified. With ever decreasing budgets and staff, it only makes sense that commercial partners be participants to facilities if it also benefits the community and allows for long term sustainability of facilities and local economic development opportunities. Other organizations may also be interested in assisting. Likewise, the document states that recreation facilities may be decommissioned if costs are not affordable. However, no acknowledgement that commercial or other partners are approached or considered prior to a decision is identified and the Borough believes that this is an opportunity to benefit the USFS, public and economic development.

When decommissioning facilities, the Borough requests that the USFS add another method which is to allow the removal of a facility by a bidder for personal reuse, as long as they follow removal parameters.

The Middle Ridge Cabin has been incredibly popular because of its relatively close proximity to town on the road system, allowing individuals that may otherwise not have easy access to cabins a place to camp. The Borough encourages additional recreation facilities further south on the road system near fish streams to encourage a remote experience at an accessible facility.

In 2012, the City and Borough of Wrangell completed a Sustainable Outdoor Recreation Plan which identified 12 priority projects. Four of those priority projects directly involving USFS are: 1) South Mitkoff Boat Dock improvements; 2) Kayak routes around Wrangell Island with onshore facilities; 3) Improve Pats Lake area (once the land trade with AMHT is complete); and 4) develop a premier ATV Trail System on Wrangell Island. If the USFS already has compiled a map or list of potential new, improved, or for removal recreation facilities, the Borough would like to see a copy.

Pats Lake at 10 Mile Zimovia Highway will be added to the USFS land area once the land exchange with the Alaska Mental Health Trust is completed. The Borough wants to make sure that this area is specified within the CTLLA for recreation management, development, and improvement – including the road, recreation facilities, and trails surrounding the lake, and for watershed restoration.

#### Activity 5: Trails

The Borough's 2012 Sustainable Outdoor Recreation Plan as described above is also relevant for this activity. If the USFS already has compiled a map, or list of potential new or improved trails as part of this project, the Borough would like to see a copy. There are different levels of trail development, but this document indicates trails will only be considered if there are resources through partnerships and grants. I think you are limiting the options of various trails. For example, a trail that might be developed because of the previous use of heavy equipment with only minimal surfacing required to complete. The statement should reflect that it encourages partnerships and grants but is not limited to.



## Vegetation Management

### Activity 6: OG Timber Harvest

The City and Borough of Wrangell just finished working with the USFS during the Wrangell Island Timber sale where 76 mmbf was initially available, and the preferred alternative provided 56mmbf. In the end only 5 million board feet was approved in the Record of Decision. Since then, national policy has changed, efforts to increase timber production are underway, timber needs within Southeast communities is changing, but economic diversity for communities is still a critical sustainable growth requirement. The Borough requests that all stands of NEPA cleared timber from the Wrangell Island Sale be included within the area available for harvest under the CTLLA. By having additional harvest area, it could provide a more economic sale on Wrangell Island that could provide economic benefits to the community. It is important to have this volume available and ready to offer should market conditions allow.

The Borough also recognizes that all roads on Wrangell are visual priority routes. During the Wrangell Island Sale, the Borough requested some of the lesser used roads not on the mainline loop be considered for a site-specific plan amendment. The Borough again makes this request throughout the project area in order to provide additional economic opportunity and packaging of potential sales for economic purposes. Timber sale economics need to be presented in the draft EIS so communities and the USFS will know if supporting community resiliency and economic opportunity is being achieved in the plan.

### Activity 7: YG Timber Harvest

### Activity 8: Silvicultural treatments

## Access Management

The Borough's 2012 Sustainable Outdoor Recreation Plan as described above is also relevant for this activity. Converting a road to an ATV trail requires less maintenance but still allows access for recreation and subsistence use.

Access management for Zarembo Island should be an enormous task because of the heavy use of the island for recreation and hunting. There seems to be hardly any public awareness or understanding that access management is part of this Landscape Level Analysis project. The Borough fully believes that much more public discussion is necessary with users of the road system on Zarembo to obtain public feedback on what roads are proposed for being closed, reconstructed, maintained or constructed. The Borough requests maps and other information as to what is currently being considered by the USFS for Zarembo roads specifically.

### Activity 9: Road Construction

The Borough requests that any NEPA-approved roads from the Wrangell Island Analysis be included in the CTLLA. The Borough requests maps and other information as to what is currently being considered by the USFS for Zarembo roads specifically.

### Activity 10: Road Reconstruction

The Borough requests that any NEPA approved roads from the Wrangell Island Analysis be included in the CTLLA. The Borough requests maps and other information as to what is currently being considered by the USFS for Zarembo roads specifically.

#### Activity 11: Temporary Road Construction

The Borough requests that any NEPA approved roads from the Wrangell Island Analysis be included in the CTLLA. Borough requests maps and other information as to what is currently being considered by the USFS for Zarembo roads specifically.

#### Activity 12: Aquatic Organism Passage

The Borough supports this activity but wants to make sure that economic considerations are included within the analysis.

#### Activity 13: Marine Access Facilities

In 2012 and 2013, the Borough worked with Clarence Clark to identify a marine storage area and boat loading area near Shoemaker Bay. There were discussions to locate an anchorage and or boat loading area near East Point or Sandy Beach off Woronkofski Island, as well as in front of Shoemaker Bay Harbor. After discussion locally with the fishermen, the Port Commission and Stevedoring, their concern primarily was how the in-water facility would conflict with crabbing, shrimping, gillnet fishing and other boat activities entering or leaving the harbor, as well as the time and expense to transfer crews. The Borough's understanding is that such a moorage area would be anchors and buoys with a stiffleg. Storage was discussed along the Wrangell shoreline closer to the former mill property area, in protected waters but not so close to the harbor to conflict with boat traffic. Loading had been discussed near East Point. The Borough requests that any further consideration for permanent installation of in-water mooring system for log storage or boat loading in this area or within Borough boundaries be discussed and determined in cooperation with the Borough in order to minimize impacts to the fisheries.

The Borough requests LTF's or other marine access points become positive recreational sites and access points after industry has completed their business.

The Borough has commented several times regarding the need to allow onshore facilities for mariculture activities to support regional economic growth opportunities. Conversations with the team leaders indicated that this use would be provided in this section, however the Scoping Report is silent on this. Based on the provided description of marine access facilities, this language needs to be modified to include on shore support areas for mariculture. This could include shore tying rafts and lines as well as construction of small facilities for storage of equipment and to process shellfish for shipping.

#### Supporting Actions

The Borough's comments above regarding road management is applicable to the Road Storage, Decommissioning and Maintenance actions. More public involvement is requested by the Borough for public review and input on the road's issues.

Sincerely,



Lisa Von Barga, Borough Manager  
City & Borough of Wrangell, Alaska