



CITY AND BOROUGH OF WRANGELL

INCORPORATED MAY 30, 2008

P.O. BOX 531 (907)-874-2381
Wrangell, AK 99929 FAX (907)-874-3952
www.wrangell.com

September 16, 2019

Carey Case
Project Leader for Central Tongass Project
Petersburg Ranger District
PO Box 1328
Petersburg, AK 99833

Re: Public Comments for the Draft EIS Central Tongass Project

Dear Ms. Case:

Thank you for the opportunity to comment. The City and Borough of Wrangell supports a multiple use Tongass National Forest that strives to help communities develop and maintain sustainable economies through a variety of forestry uses, while also being stewards of the land to maintain healthy ecosystems, wildlife, and support subsistence uses. The Borough supports Alternative 2 as it provides the greatest number of initial opportunities and land area for all multiple use activities to occur from which future site specific analysis will either allow use or not.

Points of interest for comments:

Access Management

The Borough supports the proposed Travel Management Changes as described in the three bullets on page 2-21. The Borough's own Cluster Initiative and Timber Plan 2012 supported an increase in roads in the ATV Status in order to continue to provide public access for recreation and subsistence use, and to potentially develop a premier ATV Trail, avoiding additional road closures. By converting closed roads or roads scheduled for closure to an ATV status, the road will remain useable for a variety of mixed uses and the Borough supports that effort. The Borough has not had adequate time in this 45 day comment period to consult with the public regarding other roads proposed for closure and would like to reserve the right to provide additional comments upon additional conversations with the public regarding certain road usage.

Maintaining the marine access facilities for cabins and other special use sites in remote areas is important not only for the recreational use, but also from a safety and safe haven need for vessels caught in inclement weather or with emergency repair needs.

Vegetation Management:

The Borough supports the opportunities in Alternative 2 to provide additional harvest opportunities through out the project area and above and beyond what the Wrangell Island Sale

approved for Wrangell Island. The Borough recognizes that more site specific analysis will need to occur for each proposed area and wants to be a partner with the USFS and part of those conversations to make sure any impacts to watersheds, wildlife and recreation are minimized, but opportunities for jobs, business development and sustainable economic growth are possible.

Invasive Plant Treatment:

The Borough supports the inclusion of adjacent nonfederal properties in invasive plant treatment and eradication plans. The Borough has little expertise and is often not aware of certain invasive plants and welcomes the opportunity to partner as possible with the USFS to learn more about the issue and receive assistance with treatment, especially in remote parcels adjacent to USFS activities.

Recreation:

The Borough supports trail improvements and deck replacement at Anan Wildlife Observatory. Anan is a critical facility for bear viewing and provides positive economic impact to Wrangell's Visitor Industry and businesses providing services (Wrangell Visitor Industry by the Numbers, Raincoast Data, 2018).

Middle Ridge Cabin has been a wonderful asset to Wrangell District. The location of the cabin, accessibility and amenities make it a popular location. The Borough encourages another cabin on the road system but toward the south end of the island to provide additional access and subsistence opportunities.

The Borough is attempting to improve the road surface of the road to the trailhead of the North Country Trail starting on the Spur Road extension. Some funding was received through the Federal Land Access Program. The award was just received. But it has been five years since application and the road has seen additional erosion of the surface. An ongoing partnership with the USFS to maintain the road and trail provides an important recreation opportunity that is currently underutilized and under maintained. The trail itself from Rainbow Falls and up is already seeing the boardwalk in a state of disrepair and often a safety issue due to cracked and broken boards and steps. The Borough supports maintenance of the road and trail.

Recreation opportunities on the road system that provide scenic views, and that are easily accessible (such as the Nemo Campsites) provide easy day trips for elderly or individuals with accessibility needs. More small stops and pull outs on existing or new roads would be a welcomed addition.

Under the heading, When Would We Implement a "Recreation Facility" or "Trails" Activity, all of the bullets seem to be for modifying/improving existing facilities. There needs to be a bullet specifically mentioning creating new facilities when new activities occur and a new recreation use would be appropriate and the public commented on the desire (i.e. a new cabin somewhere, a picnic area next to a new LTF, a new trail from an existing road to a scenic overlook or fishing stream, or a new day use area at an existing LTF, or new picnic areas in scenic locations).

Pats Lake and Land Transfer Areas:

The Borough wants to make sure that the new areas transferring to the USFS through the Mental Health/USFS land trade agreement will be included to be considered for appropriate activities (i.e. most of the areas will be eligible for recreational activities). A couple of primary areas of concern is the land surrounding Pats Lake and the land surrounding the Rainbow Falls Trail. Recreational enhancements and improvements and expansion in these lands to be newly

acquired by the USFS is fully supported by the Borough and would be a needed improvement. Watershed restoration of the Pat Creek and Pats Lake are also important, and thus the Borough wants assurance that the land being traded to the USFS is part of the draft EIS and activities may occur within those areas.

Plan Amendment:

The Borough supports seeking a plan amendment for the areas described in the Scenic Integrity Objectives Map for Wrangell Island and Zarembo Island to modify the objectives. However, additional input is necessary by the Borough when a specific project is identified such that the full implications of the activity to the scenic view can be understood. Allowing an opportunity for activities in those areas that currently is not permitted due to the excessive restriction from the objective is supported until further analysis is conducted.

Log Transfer Facilities:

The Borough supports the maintenance and reconstruction of the proposed Log Transfer Facilities as well as the proposed new construction. The Borough does want to ensure that the LTFs can be multiple use areas when the area is not needed for timber transfer. The existing LTFs are currently utilized for access, recreation, and subsistence, but it may not always be officially authorized. The Borough would like to see formal acceptance that these additional uses are permissible and will continue and that multiple use facilities may also be developed adjacent.

The Borough had been in conversation with the State Division of Forestry and the USFS regarding an in-water log storage area near Shoemaker Bay area or Woronkofski Island. Should that need arise again, the Borough specifically requests consultation of the selected area either there or in any other location within the Borough boundaries, as before there were conflicts of some of the suggested anchorages and the Borough would like to minimize those conflicts.

Implementation Framework:

The Borough wants to make sure that the implementation phase remains flexible to add activities that might not be considered for a location now, but become appropriate over the 15 year life of this plan. In the eight-step implementation framework and discussion, nowhere does it talk about the flexibility the public is being assured can happen. How does it fit into the eight-step process? What are the time components for each step? There is discussion about annual meetings to determine the implementation of activities, but then there is discussion about approvals prior to the annual meeting. Are notices sent out annually to solicit activity proposals? Or is it an open ended solicitation notice? How far in advance will residents know the USFS is planning certain activities in specific areas? Why are public workshops scheduled AFTER the 30 day public notice for recommendations on proposed activities? Wouldn't it make more sense to hold workshops during the notice period so individuals can ask questions about the proposals and suggest changes. Additional public workshops for scheduling, event sequencing etc could be held after the public review time period.

The Draft EIS discusses tribal consultations throughout the proposal development and implementation phase. The City and Borough of Wrangell requests ongoing consultation with Borough staff as well through out the out-year implementation planning, proposal development, and implementation phases. If that has to happen through a Cooperative Agency agreement, then the Borough would request the agreement. The Borough had one during the initial planning of the Wrangell Island Sale, however the USFS did not maintain their consultations

with the Borough. Please advise how the consultation will occur and if a Cooperative Agency Agreement is necessary.

Socio Economics:

In the discussion of the mills and the mill survey within the region on page 310, the USFS acknowledges that Table 98 is not a comprehensive list of mills, and that an additional 22 mills are in SE Alaska, four of which are located in Petersburg. Since this is the Central Tongass Study, we request that you add to that sentence 'and one is located in Wrangell'. It appears that the USFS only searched the NAICS code 333243, however there are other operations that are listed under other NAICS codes milling wood products. The USFS currently has, or recently had, a contract with Mike Allen Enterprises LLC using NAICS 115310 Support Activities for Forestry. How many other mills and data associated those mills are not included in the USFS analysis because of a different NAICS code?

When discussing cruise ship visitation, it needs to specify that Table 100 is only representative of the larger cruise ships. In sentence one of the Small Cruise Market, Wrangell has more visitation from the small and midsize cruise ships than the large, so Wrangell along with Petersburg should also be included as a location they frequent.

A very broad comment: Throughout the documents of Vol 1 and Vol 2, the USFS refers to Figure #. Yet it is not always very clear where that figure can be found. A few times the Figure was from the Forest Plan, sometimes from the Appendices, or in Vol 1. There were some figures staff reviewing the documents were never able to locate.

Again, thank you for this opportunity to comment. Unfortunately, the distribution of this DEIS is at a time when so many people are unavailable to review due to the seasonality of jobs. As the Borough continues to review the DEIS and have discussions with the public, additional comments may be forthcoming.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lisa Von Barga', with a stylized, flowing script.

Lisa Von Barga
Borough Manager