

Data Submitted (UTC 11): 7/17/2016 8:00:00 AM

First name: David

Last name: Rak

Organization:

Title:

Comments: Wrangell Island DEIS Comments

My comments are also attached:

To: Bob Dalrymple, District Ranger July 17, 2016

Wrangell Ranger District

P.O. Box 51

525 Bennett Street

Wrangell, AK 99929

Re: Written Comments on the Wrangell Island Project DEIS

My name is David Rak. I have lived in Wrangell and worked for the Forest Service here since 1980. In his letter I represent myself as a Wrangell resident and subsistence hunter. No Forest Service equipment, supplies or time were used in the preparation of these comments or this document. My participation is as a private citizen interested in proper management of National Forest System lands on Wrangell Island near my home.

Comment 1 - Subsistence Deer Harvest.

My wife and I harvest almost all the meat we eat, and I prefer Sitka Black Tail Deer. The Forest Service Wrangell Island Project will harm my opportunity to harvest deer on Wrangell Island. At the public meeting I attended for the Wrangell Island Project, Forest Service officials stated that the "project purpose was to get the timber out". The Alaska National Interest Conservation Act requires a subsistence priority for resources on federal lands. The Forest Service preferred alternative in the Wrangell Island Project fails to provide that subsistence priority. The FEIS needs to address the priority for subsistence deer harvest on Wrangell Island.

When I arrived on Wrangell Island, the McCormack Creek road 6265 had just been extended past Basin Creek. I have witnessed firsthand the road building and timber harvests over most of Wrangell Island. Through a significant period of that time there has been an overall decline in the availability of deer to harvest. Deer populations on Wrangell Islands have declined, and the DEIS explains they are thought to be well-below carrying capacity.

The Forest Service preferred alternative for the Wrangell Island Project would harvest trees on approximately 5,300 acres over the projected life of the project. In comparison, from 1954 to the present trees have been harvested on approximately 7,200 acres of National Forest on Wrangell Island. The Wrangell Island Project preferred alternative would harvest timber on almost as many acres in the expected tenure of the project as have been have been harvested in the 62 previous years. (The expected tenure for the Wrangell Island Project would be 3 to 5, but no longer than 10 years.) At a public meeting for the Wrangell Island Project I was told that every

alternative will reduce the number of deer. The loss of that much deer habitat promises future reductions in season length and/or bag limits on Wrangell Island. The level of impact to habitat in the DEIS is too great and would harm my access to subsistence deer harvest. The FEIS must be more forthcoming about the realistic consequences on subsistence deer hunting.

Comment 2- Consistent, long-term supply of economic timber to Wrangell small mills from small sales over a 30-year time frame.

Ensuring a consistent, long-term supply of economic timber to small mills in Wrangell from small sales over a 30-year transition time frame was one of the desired outcomes of the Wrangell Island Project. An alternative needs to be developed to better achieve this need. All National Forest System lands on Wrangell Island that are available for harvest are impacted in the DEIS preferred alternative 2. No areas are held for future timber harvest actions under current OGR and Roadless regulations.

Sixty-six percent (3,528 acres) of the timber harvest in the preferred alternative would be single tree selection. At public meetings for the Wrangell Island Project, Forest Service officials explained that helicopter logging is the expected harvest system for acres with the single tree selection prescription, and that helicopter logging requires a large amount of timber volume to be economically feasible. The expected tenure for the Wrangell Island Project would be 3 to 5, but no longer than 10 years. The outcome of the Wrangell Island Project would be a short term, large volume, pulse of timber from National Forest lands on Wrangell Island. The Forest Service officials explained economic security for the community of Wrangell is not embedded into any of the alternatives. The FEIS needs to include an alternative that ensures a consistent, long-term supply of economic timber to small mills in Wrangell from small sales over a 30-year time frame.

These comments are submitted subject to a Pre-Decisional Administrative Review Process (36 CFR 218) to maintain eligibility to file an objection to the associated draft decision notice.

Thank you.

/s/David Rak

David Rak

Wrangell Resident