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8/23/2017

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Beth:

This is to comment on the Wrangell Island Project Draft ROD. I have attached an appraisal that shows that the project is deficit over $90+ This means that there is little to no margin after base rate stumpage, a purchaser would lose money buying this project. Analysis of the units would indicate that only 10MMBF-15MMBF of this project would appraise positive.

Given this and other failed projects it should signal to the Forest Service that the current Tongass Plan requirements, Roadless Rule, Tongass 77 watershed withdrawals, premature transition to second growth harvest and phase out of old growth sales are making it impossible to produce economic timber sales. This will dry up the timber supply for the remaining industry which will result in the loss of the remaining forest products infrastructure and the ability of the Forest Service to manage the Tongass. The only way to reverse this is to modify the prescriptions and requirements such as the Roadless Rule the Tongass 77 watersheds, Old Growth Reserves and using the State Forest Practice Act as the guide line for producing economic timber sales. While modification is being implemented the attached Tree Farm LUD (Land Use Designation) should be applied to the current LUD's that permit timber harvest.

The only options for the failed Wrangell Island Project is to offer the 10-15 MMBF of economic units and start the process over or simply redo the entire project, selling the 10-15 MMBF of economic timber will make it more difficult to come up with a viable new project. A redo of the project must be done with a modified forest management approach or an incremental process that immediately modifies prescriptions that will make it possible to not only protect other uses but be flexible enough for producing economic timber sales.

Evaluations of the volumes, marketing and timber supply are continuing and other ideas and adjustments may result. A meeting to discuss the issues during the 45-day objection review period is requested.

Sincerely,

George Woodbury