Data Submitted (UTC 11): 10/25/2017 12:00:00 AM
First name: Lisa
Last name: Von Bargen
Organization: City and Borough of Wrangell
Title: Borough Manager
Comments: Re: Wrangell Island Project Draft ROD

Dear Messrs. Stewart & Dalrymple:

The City and Borough of Wrangell (CBW) have provided comments at length throughout the entire public process for the Wrangell lsland Project. The complexities associated with developing a timber sale are many and varied. The CBW appreciates the years-long effort that has gone into this process. Despite choosing Alternative 2 which provides for the maximum amount of timber harvest of all the alternatives at 56 million board feet (mmbf) of saw log and utility timber; the decision fails to meet the goal outlined in the 2012 Notice of lntent to " .. . help provide a reliable, long-term supply of timber that will support local jobs and facilitate the transition to a sustainable wood product industry based on young-growth management." initially, the Wrangell Island Project was proposed at 150-200 million board feet at 15-20 mmbf per year over ten years. This level of harvest would have allowed for the development of a small to medium sized mill in Wrangell. There are some in the community who believe the alternative presented is not financially feasible.

In 2016 the CBW responded during the comment period for the Draft EIS supporting Alternative 2. That support has not changed, given the alternatives from which to choose. Disappointingly, Alternative 2 falls short of providing any substantive economic benefit for Wrangell. As part of a six -part, diversified Comprehensive Economic Development Strategy, the CBW hoped the Wrangell Island Project would facilitate a renewed forest Products Initiative for opportunities including:

I) Establish long term timber supply plan for small mills and value added manufacturing:

2 ) Develop infrastructure to maximize value-added local wood manufacturing:

3) Create and market Tongass wood brand:

4) Support "Buy Local" campaign for wood products;

5) Recruit timber manufacturers: and

6) Enhance workforce development and opportunities for youth skills development.

The CBW appreciates the opportunity to comment and hopes to continue strengthening the partnership relationship with the Forest Service. The USFS comprises 93% of the Wrangell Borough area. Economic development opportunity is severely limited given the vast land holdings by the Forest Service. It is imperative timber sales programs reflect a recognition of this and establish long-term, sustainable harvest numbers that provide minimums worthy of private sector investment necessary to re-establish a small/medium value added forest products industry. Alternative 2 doesn't get there.

Sincerely,

Lisa M. Von Bargen

Borough Manager