

Data Submitted (UTC 11): 7/12/2016 4:47:58 PM

First name: Dan

Last name: Sarles

Organization:

Title:

Comments: Wrangell Island Project

District Ranger Dalrymple,

I visited SE Alaska and the Tongass in early June and met with a number of different people - timber mill operations, native corporation heads, native town mayors, conservation groups and so on - and in doing so discussed challenges of old-growth logging in the area. I came to believe that a number of approaches to logging in SE Alaska are based upon "the good old days" of the 1970s and 1980s when 500 million board feet of lumber were logged.

Those days are not returning, no matter how many rose colored glasses are used to look at the current timber industry. Timber is no longer the dominant industry in the region: salmon and other fisheries (both commercial and subsistence), tourism and even arts have risen to prominence in locations like Sitka, Ketchikan and Prince of Wales. Irresponsible timber harvesting is not only a danger to the environment but, perhaps more critically, threatens the larger, more sustainable sectors that undergird the 2016 SE Alaska economy.

The Forest Service's Preferred Alternative - Alternative 2 - proposes logging 65 million board feet of old-growth from 5,309 acres and bulldozing 32 miles of new road. The new roads will cost nearly \$5.5 million dollars. High road development costs means more old growth habitat must be clearcut to pay for the new roads.

According to the Forest Service's own data, all the action alternatives are economically infeasible. That means that under every scenario considered the American public would be paying companies to log the ancient trees on Wrangell Island.

Current export policies allow 100 percent of Alaska Yellow Cedar plus up to 50 percent of the hemlock and spruce to be exported without local processing, further denting the local economy. If the Preferred Alternative is selected, more than 10 million board feet of Alaska Yellow Cedar and nearly 5 million board feet of Western Red Cedar could be logged and sent out of state or overseas without local, value-added manufacturing.

Without explanation, the Forest Service failed to consider at the "Small Mill and Wildlife Alternative" submitted by the Wrangell Resource Council and SEACC in 2011. The citizen's alternative proposal wouldn't require new roads and would meter out up to 2 MMBF per year of timber to supply local mills:

\*Ensuring a consistent, long-term supply of economic timber to small mills in Wrangell from small sales along the existing road system over a 30-year period

\*Maintaining Wrangell Island's deer population

\*Integrating wildlife and fish habitat restoration, recreation, and stewardship activities into the project based on

the "Good for Services" model

#### Loss of More Important Deer and Salmon Habitat

The Preferred Alternative hammers the largest remaining block of intact old-growth on Wrangell Island above Rainbow Falls and Shoemaker Bay. This means significant reductions in deer habitat - a figure that already falls far below the existing Tongass Forest Plan guideline of 18 deer per square mile. This guideline reflects the habitat needed to maintain sustainable wolf populations and human deer hunting. Under the Preferred Alternative, deer habitat capability will drop to 11.7 deer per square mile on national forest land by 2042. Loss of this much deer habitat promises future reductions in season length and/or bag limits on Wrangell Island; local hunters will be punished by this plan.

Thoms Creek (VCU 4790) is the most productive salmon stream on Wrangell Island; it supports an important sockeye fishery. All the action alternatives call for logging productive old-growth in Thoms Creek VCU even though this area would be off-limits to logging under the proposed Amendment to the Tongass Land Management Plan, which is under review now and slated for implementation later this year.

Please reconsider other alternatives that are more in line with 21st century priorities and that seek to balance environmental and economic concerns and work with the local economy rather than against it. Thank you for your time and consideration.

-Dan Sarles, Boston, MA, regular Alaska visitor