

Data Submitted (UTC 11): 7/1/2016 8:00:00 AM

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Organization:

Title:

Comments: Wrangell Island Project

Drop the proposed unsustainable, money-losing alternatives that sacrifice the remaining old growth on Wrangell to support an export-driven timber program.

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.

What's worse is that 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. 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. (See DEIS, Table 12 at p.66.)

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. If you count on filling your freezer with deer hunted on Wrangell Island you may need to look for new hunting grounds in the future.

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.

Sincerely,

Line Ringgaard