

February 11, 1974

Mr. James S. Watson  
Area Manager  
U.S. Department of Agriculture  
Stikine Area  
Tongass National Forest  
P. O. Box 309  
Petersburg, Alaska 99833

Dear Mr. Watson:

Subject: East Bradfield Timber Sale;  
Draft Environmental Impact Statement  
State I. D. No. 73113001

The Alaska State Clearinghouse has completed review on the subject project.

The following agencies were invited to review and comment:

State of Alaska

Department of Community & Regional Affairs  
Department of Highways  
Department of Economic Development  
Department of Environmental Conservation  
Department of Fish & Game - Southeast  
Department of Natural Resources  
Division of Parks - Anchorage  
Department of Public Works  
Department of Law

Seven of the above agencies responded.

The Department of Community & Regional Affairs stated:

The Department of Community & Regional Affairs has reviewed the proposed project. There is no indication that the project, as proposed, will have an adverse effect on this agency's operations.

There are two observations that should be pointed out. The first refers to the statement that the impact on fish resources will be positive and beneficial. The second point concerns the siting of roads within the sale area.

First, on page 15 in the section entitled "Favorable Environmental Effects," is the statement that "The salmon spawning value of the East Bradfield would be improved by the opportunity to remove natural logjams. Such removal would be facilitated by a road along the river." However, material on page 9 indicates that the salmon spawning potential of the East Bradfield is very limited. The stream bed consists of poorer quality gravel with fewer usable segments. In addition, it is stated that a velocity block to fish passage exists at the lower end of the sale area and a falls considered impassable is located two miles further upstream. Thus, only roughly one-tenth of the total length of the stream within the sale area could support an anadromous fish population. The beneficial effect of removing logjams, then appears to be overstated and required further analysis or explanation.

Secondly, as the location of the road (also mentioned as a means of removing the logjams) has not been determined, the actual effect of that road on drainage and sedimentation cannot be predicted. The final impact statement should indicate more precisely the location of the road, bridges and culverts.

**The Department of Highways stated:**

The draft EIS furnished this Department has been reviewed and we do not believe that the proposed action will in any way affect our present or future operations. We have no comments that would be pertinent to this action.

**The Department of Economic Development stated:**

The proposed timber sale will contribute significantly to Southeast Alaska's economy through employment in logging, log transport, and log processing. Although not mentioned, the State of Alaska will benefit directly through income tax revenues (personal and corporate) and a 25% share of the national forest stumpage receipts from timber harvested in the proposed sale area.

As part of the out-of-court settlement last year with the Sierra Club, the U.S. Forest Service agreed to prepare environmental impact statements (EIS) for major actions (including timber sales) planned on all national forest roadless areas of 5,000 acres or more. In Southeast and Southcentral Alaska, this means that virtually all new timber sale offerings must be preceded by an EIS. The proposed East Bradfield timber sale is one example. Many more environmental impact statements on proposed timber sales can be expected in the future. The timber sale program of the Forest Service is not new; only the EIS requirement is new.

A major response by this department of each individual timber sale EIS is not justified. If, for example, compelling reasons delayed or blocked the East Bradfield sale offerings to industry, albeit with the delays involved in additional field work, preparation and advertisement.

A more comprehensive analytical effort can be justified, however, in reviewing Forest Service long-term timber sale plans, land-use management plans, etc., where major decisions are being made that can be difficult or impossible to reverse.

The Department of Environmental Conservation stated:

The Department of Environmental Conservation's review on this document indicates that there are areas where a more thorough discussion would help the final report. We do not believe this statement will be complete until the following items are more adequately treated.

- 1.) It is almost impossible to evaluate the environmental impact of a logging operation in a given area without a proposed plan. A proposed operations plan should be included.
- 2.) The document should include future timber sale plans. Does the agency plan to utilize additional timber from the area in five, fifteen or fifty years? The future harvest plans would have significant effect on the road development.
- 3.) What is the Petersburg-Wrangell working circle? A map of the working circle with a definition would be an aid to understanding.
- 4.) We believe that the environmental objective of timber harvest is not only to enhance the environment for human use while utilizing a renewable resource but must also protect wildlife resources and long range ecological cycles. The logging operation may do this, but their environmental objectives does not say so.
- 5.) There should be some authoritative research referred to which can substantiate the statement that after harvesting nearly twice the volume of the original stand will result.
- 6.) An alternative that should be discussed would be the impact of a change in the dimensions of the timber harvest area. That is, one which would include forests farther up the slope of the hillside and a shorter distance along the stream bottoms.
- 7.) There seems to be some paradox in the discussion of tree growth in the valley bottoms. Since the total sale is in the valley bottoms and regeneration is, according their statement, slower in this area, perhaps a hundred year cycle is inappropriate.
- 8.) They mention that there will be no effect on water flow from this proposed sale, at the camps, airstrips, temporary roads, log dumps will all be in tidal grass flats. This would indicate that some impact was possible, if only minor.
- 9.) There is only a passing mention of herbicide and fertilizing projects and possibilities. If they have such plans in the future, they should be discussed and any past experiments mentioned.
- 10.) We have to reject their statement that the timber harvest is not expected to cause any significant air or water pollution. We believe the milling, transportation, log dumps and storage areas and other satellite operations are a part of this operation and should be considered.
- 11.) The plans for the road beds in the area should be more thoroughly discuss-

ed. An actual statement of what will be done with the roads after the timber is harvested would clarify the report. "Putting the roads to bed" and then reconstructing them for subsequent sales means additional borrow pits and environmental impact.

12.) The discussion of increasing the browse for wildlife needs to be clarified. Browse in cutover areas is obviously of little use to deer in the winter time when the snow is deep, the critical period of subsistence.

13.) A more thorough discussion of the irreversible and irretrievable effects of the logging should be made. There is a change in the forest ecology from an even aged forest to an uneven aged forest in such an operation. There is, thus, some effect on the total forest ecology.

14.) We feel it would be of benefit to the Forest Service to cover the issues which are controversial at this time, such as, barging versus rafting, chipping in the field, water storage and total utilization of the timber.

The Department of Natural Resources-Division of Parks stated:

Regarding the proposed timber harvest in the East Bradfield timber sale area we find no recorded sites in the vicinity. However, the absence of records is in part a result of limited studies by archaeologists in this area. Surveys along the waterways would be the best testing areas and as a matter of policy we recommend that the Forest Service conduct archaeological surveys in advance of all timber sales in any area, however, in this case, it is certainly an important step.

Petroglyph stones are found in the vicinity, but not reported in the area designated for this sale. We recommend that care be exercised to avoid damaging them if they are found and we would appreciate being advised of their location in that same event. We will be available to coordinate any study effort with the Forest Service representatives if they will follow our suggestion to conduct an archaeological survey.

The Department of Fish and Game stated:

The subject draft environmental statement has been carefully reviewed by ADF&G staff; resulting concerted staff comments indicate that the document needs critical revisions, redrafting, reappraisal of environmental impacts and objective formulation of a management and action plan that will also insure a long term "sustained yield" for the rich biological resources of the area.

ADF&G comments shall stress substance rather than format:

1.) A major underlying failing of the document revolves around the recurrent statements stressing the unworthiness of "uneven age", "over-mature" botanical make up of the present natural forest. From a zoological standpoint, the diversity of age and kinds of the complex of botanical entities of the natural forest reflects a high quality of balanced ecosystem sustaining thriving, rich and varied assemblage of zoological entities, a fact repeatedly stressed by various testimonies presented during the 1971 Senate Hearings on "clear-cutting" practices on national timbers

To that effect, ADF&G strongly recommends that the statement under "Purpose" (p. 1) be critically reassessed and rewritten to reflect that, under the intent of the Multiple Use Act timber harvesting must be performed in consonance with balanced husbandry of zoological resources.

2.) A discussion of the manner by which the forest of Bradfield River Valley is integrated with the Petersburg-Wrangell working circle to: "determine the volume of commercial timber available, the amount of new growth, the effect of multiple-use consideration, and the number of years required to produce new stands, following harvest" for the determination of the calculation of "allowable cut" is essential to provide the reader with an appreciation of reasoning behind the 5 year and long term plans for timber harvest in the area.

3.) The subject matter under description, items 5 (page 4) through 11 (page 10) is mostly descriptive. The section on wildlife is very general. The entire section, from page 4 to page 10, should be redrafted to: a) indicate the kinds of ecological relationships between the bio-physical and botanical entities of the area, b) discuss the ecological role played by the Natural Forest in the sustenance of streams, waterfowl and game habitat, c) describe the main types of habitat encountered along the entire drainage (i.e., braided vs. non-braided stream channels, presence and extent of beaver ponds, nature of vegetative cover along various reaches of stream beds), d) discuss constraint imposed upon ecological consideration on logging practices, e) discuss and define the extent of natural forest that must be set aside to protect and maintain the sustain yield of zoological resources.

4.) It is ADF&G's position that environmental impact statement should discuss in detail:

- a) road system, location of material sources and required volume of various types of road building material
- b) permanency and non-permanency of road system
- c) location and extent of sites to be used for land storage and cold decking of logs
- d) various alternatives for log dump sites, rafting and temporary log storage area

The existing tideland permits and Corps permits shown in Appendixes C and D must be modified and updated. The present location of the dump pad, rafting pond, in the upper region of the tide flat is unsatisfactory. The present document should discuss in detail the impact of the past utilization of the site for dumping and rafting.

In ADF&G's opinion the indicated dump and rafting site requires a Corps permit in addition to the tideland permit.

5.) On page 13 under Marine Organisms, reference is made to: "a Corps of Engineers Permit (Appendix C) contains clauses which are designed to keep possible adverse effects (of dumping and raft building, storage) to minimum." Except for very general references in Items "d" and "s" on environmental control requirement, nowhere, in the language of the permits, are specific instructions as to the manner and kinds of controls the operator must abide by to insure State and Federal requirements for control, prevention, mitigation and redress of environmental damage.

6.) Under the section: Consultation with others, reference is made to ADF&G participation and implication that the Department: "has inspected and reacted favorably to all requests in the proposed area."

ADF&G personnel has and will continue to cooperate with the Forest Service in matters relating to fish and game inventories, habitat and resource management in the area.

ADF&G participation in specific assessment and recommendations for bridge locations, road siting and designs, "borrow areas as they might affect production" must not, however, be construed as being a tacit agency endorsement of the U. S. Forest Service planning, management actions and content of the Draft Environmental impact statement.

For example, ADF&G has repeatedly requested that not less than 1,000 ft. leave strips be left on each side of streams for stream protection; as such request usually require curtailing timber harvest, such recommendations are usually set aside.

The statement: "the salmon spawning values of East Bradfield would be improved by the opportunity to remove natural log jams," cannot be supported by this Agency, as the impacts of such an action can also have serious deleterious impacts upon indigenous and rearing juveniles through elimination of pools. Nothing in the document supports that such an action would be beneficial.

The inclusion of a comprehensive bibliography indicating basic sources and extent of background information would greatly enhance the substance of the content of the Environmental Impact Statement.

ADF&G is most willing to discuss, in detail, any or all of the points raised, as well as any other technical matters.

In summary, ADF&G finds the draft environmental impact statement on the "proposed timber harvest in the East Bradfield timber sale" to be deficient in:

- 1) Overlooking the environmental-ecological values of the natural "overmature" forest to the sustenance of rich, high quality, varied fish and game entities providing economic and recreational benefits to the citizens of S.E. Alaska.
- 2) Omitting discussion of the impacts of roads and the extent and location of road building material borrow sites.
- 3) Omitting discussion on the alternatives for log dumps, rafting and storage site in relation to selection of sites for least environmental impacts.
- 4) Omitting discussion on the relationships of what can be defined as "allowable cut" in terms of the long-term balanced, sustained yield management of the zoological resources associated with the forest, as intended under the Multiple Use Act.

The Department of Public Works stated:

This Department has reviewed the subject Environmental Impact Statement. It is well proposed.

Mr. James S. Watson

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February 11, 1974

We have no adverse comments on the proposed sale. Our Buildings, Aviation, Marine Transportation and Water and Harbors Division would be very beneficially affected.

The State Clearinghouse hopes these comments will be of assistance to you in the development of a final environmental impact statement.

Sincerely,

Raymond W. Estess  
State-Federal Coordinator

cc: C.A. Yates

RWE/vj

## MEMORANDUM

State of Alaska

TO:  Raymond W. Estess  
 State-Federal Coordinator  
 Division of Planning and Research  
 Office of the Governor

DATE : January 25, 1974

FROM:  M.P. Wennekens, PhD *MPW*  
 Regional Habitat Coordinator  
 Department of Fish and Game

SUBJECT: Draft environmental statement, East  
 Bradfield Timber Sale. State I.D.  
 # 7311 3001

The subject draft environmental statement has been carefully reviewed by ADF&G staff; resulting concerted staff comments indicate that the document needs critical revisions, redrafting, reappraisal of environmental impacts and objective formulation of a management and action plan that will also insure a long term "sustained yield" for the rich biological resources of the area,

ADF&G comments shall stress substance rather than format:

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To that effect, ADF&G strongly recommends that the statement under 'Purpose' (p. 1) be critically reassessed and rewritten to reflect that, under the intent of the Multiple Use Act timber harvesting must be performed in consonance with balanced husbandry of zoological resources.

2. A discussion of the manner by which the forest of Bradfield River Valley is integrated with the Petersburg-Wrangell working circle to: 'determine the volume of commercial timber available, the amount of net growth, the effect of multiple use consideration, and the number of years required to produce new stands, following harvest' for the determination of the calculation of 'allowable cut', is essential to provide the reader with an appreciation of reasoning behind the 5 year and long term plans for timber harvest in the area.

3. The statements in paragraphs 5 and 6, page 3, are somewhat disconcerting. To the reader, the U.S. Forest Service seems to imply that, as a result of present unfavorable shipping costs to the 'lower 48', as for example compared to obtaining timber from Canada, it is highly desirable and rewarding to get rid as quickly as possible, through foreign markets, of 'overmature, diseased' timber. By the time the home market becomes attractive, the: 'deteriorating overmature stands of trees that existed previously will have been converted to healthy stands containing nearly twice the volumes of the original stands.'

To ADF&G, as an agency responsible for the husbandry and protection of very high quality zoological resources for the long term economic and recreational benefits of the citizens of the state, such an implied downgrading of the present values of the National Forest resources somewhat borders on the blasphemous.

4. The subject matter under description, items 5 (page 4) through 11 (page 10) is mostly descriptive. The section on wildlife is very general. The entire section, from page 4 to page 10, should be redrafted to: a) indicate the kinds of ecological relationships between the bio-physical and botanical entities of the area, b) discuss the ecological role played by the Natural Forest in the sustenance of streams, waterfowl and game habitat, c) describe the main types of habitat encountered along the entire drainage (i.e. braided vs. non braided stream channels, presence and extent of beaver ponds, nature of vegetative cover along various reaches of stream beds), d) discuss constraint imposed upon ecological consideration on logging practices, e) discuss and define the extent of natural forest that must be set aside to protect and maintain the sustain yield of zoological resources.

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**MEMORANDUM****State of Alaska**  
DEPARTMENT OF FISH & GAME

TO:  Pat Wennekens  
Regional Habitat Coordinator

DATE : January 29, 1974

FROM:  Bob Armstrong  
Regional Research Supervisor  
Division of Sport Fish

SUBJECT: Food for Thought

I liked your approach in the memo to Estess concerning the environmental statement on the Bradfield Timber Sale.

I wonder if our comments would be even more useful if we were to show how their impact statement is deficient. In other words rather than state that they have overlooked the environmental - ecological value of the natural "overmature" forest - tell them about the values of "overmature" (or is there such a thing as over mature) forests to the fish and game resources - giving examples and showing what would be lost to harvest.

Supposedly we are the experts concerning the ecological relationships of our fish and game resources. Hence, I feel we should point out these relationships, especially as timber harvesting may affect them, to others.

A further example is we tell them to discuss and define the extent of natural forest that must be set aside to protect and maintain the sustained yield of zoological resources. I feel we would be more effective in our comments if we defined the amount of natural forest that must be set aside to protect our zoological resources.

*Let's discuss this -  
Bob*

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In ADF&G's opinion the indicated dump and rafting site requires a Corps permit in addition to the tideland permit.

6. On page 13 under Marine Organisms, reference is made to: ' a Corps of Engineers Permit (Appendix C) contains clauses which are designed to keep possible adverse effects (of dumping and raft building, storage) to a minimum.' Except for very general references in Items 'd' and 's' on environmental control requirement, nowhere, in the language of the permits, are specific instructions as to the manner and kinds of controls the operator must abide by to insure State and Federal requirements for control, prevention, mitigation and redress of environmental damage.

7. Under the section: Consultation with Others, reference is made to ADF&G participation and implication that the Department: 'has inspected and reacted favorably to all requests in the proposed area.'

ADF&G personnel has and will continue to cooperate with the Forest Service in matters relating to fish and game inventories, habitat and resource management in the area.

ADF&G participation in specific assessment and recommendations for bridge locations, road siting and designs, 'borrow areas as they might affect production' must not, however, be construed as being a tacit agency endorsement of the U.S. Forest Service planning, management actions and content of the Draft Environmental impact statement.

For example, ADF&G has repeatedly requested that not less than 1,000 ft. leave strips be left on each side of streams for stream protection; as such request usually require curtailing timber harvest, such recommendations are usually set aside.

The statement: 'the salmon spawning values of the East Bradfield would be improved by the opportunity to remove natural log jams,' cannot be supported by this Agency, as the impacts of such an action can also have serious deleterious impacts upon indigenous and rearing juveniles through elimination of pools. Nothing in the document supports that such an action would be beneficial.

The inclusion of a comprehensive bibliography indicating basic sources and extent of background information would greatly enhance the substance of the content of the Environmental Impact Statement.

ADF&G is most willing to discuss, in detail, any or all of the points raised, as well as any other technical matters.

In summary, ADF&G finds the draft environmental impact statement on the 'proposed timber harvest in the East Bradfield timber sale' to be deficient in:

- 1) Overlooking the environmental-ecological values of the natural 'overmature' forest to the sustenance of rich, high quality, varied fish and game entities providing economic and recreational benefits to the citizens of S.E. Alaska.
- 2) Omitting discussion of environmentally as damaging as logging, of the impacts of roads, extent and location of road building material borrow sites.
- 3) Omitting discussion on the alternatives for log dumps, rafting and storage site in relation to selection of sites for least environmental impacts.
- 4) Omitting discussion on the relationships of what can be defined as 'allowable cut' in terms of the long-term balanced, sustain yield, management of the zoological resources associated with the forest, as intended to under the Multiple Use Act.

STATE  
of ALASKA

# MEMORANDUM

TO: 

Dr. Pat Wennekens  
Regional Habitat Supervisor  
Department of Fish & Game

DATE : December 3, 1973

FROM:

Raymond W. Estess *RW*  
State-Federal Coordinator  
Division of Planning & Research  
Office of the Governor

SUBJECT: East Bradfield Timber Sale  
State I. D. No. 73113001

The subject project has been submitted to the State Clearinghouse for review. Your agency is invited to review and comment on the attached information concerning the project.

Pertinent comments might include how the project could affect your agency's present and future operations, and the project's potential impact on those environmental concerns that fall within the responsibilities and expertise of your agency.

The Clearinghouse has assigned State I. D. No. 73113001 to the project. Please use this number in all future correspondence concerning the project.

To be considered, your comments should reach this office by December 26, 1973.

RWE/vj

Attachment

**MEMORANDUM****State of Alaska**  
DEPARTMENT OF FISH & GAME

TO:  Pat Wennekens  
Regional Habitat Coordinator  
Habitat Section

DATE : January 8, 1974

FROM: Rick Reed  
Fishery Biologist  
Sport Fish Division

SUBJECT: East Bradfield Timber Sale E.I.S.

Since I do not have first hand knowledge of the area in question, my comments concerning the impact statement will have to be limited and of a general nature.

(I.) In our departmental input into the South Tongass Management Plan of 1972 we requested 1,000 foot leave areas on all king salmon streams due to the precarious status of the king salmon runs in southeast Alaska. I found no reference to this management plan in the impact statement. Consequently, I feel we should recommend a "non-disturbance" zone of 1,000 feet along the East Bradfield River as king salmon have been verified in it.

(II.) On page 13, section C, the statement is made "Because of abundant natural glacial silt throughout much of the year, the East Bradfield River does not appear to be prime habitat for freshwater or anadromous fish." Since we know little about our glacial rivers, I feel such a statement has no basis and should be eliminated. Instead it should be merely stated that the actual value of glacial systems as fish habitat is unknown at the present time.

(III.) If timber harvest does occur within the area, then all the guidelines presented in the attached pamphlet "Logging and Fish Habitat" should be rigidly enforced by the sale administrator.

cc: Armstrong

~~Attachment~~

**MEMORANDUM****State of Alaska**TO: Dr. M.P. Wennekens  
Juneau

DATE : December 20, 1973

FROM:

Bradley Brahy  
Wrangell

B.B.

SUBJECT: E.I.S. - East Bradfield Timber  
Sale

Enclosed for your information is a copy of a letter I sent to Joe Blum in 1970, regarding the East Bradfield. I would like to expand the part about keeping the road 100' from the stream. 100' is probably O.K. on level ground; but, as the slope increases, the distance from the road to the river should also increase.

As I stated in my October 21, 1971, letter to Gary McCoy (included in E.I.S.) I don't think that many fish, if any at all, use the East Bradfield river above the gorge. The prime consideration above the gorge is in preventing additional, unnecessary siltation.

cc: John Edgington

# MEMORANDUM

# State of Alaska

TO: [ Joe Blum, Chief  
Habitat Development  
Department of Fish and Game  
Juneau

FILE NO:

DATE : Nov. 30, 1970

FROM: Bradley Brahy *B.B.*  
Ass't. Area Mgmt. Biologist  
Commercial Fish Division  
Wrangell

SUBJECT: Road building at Bradfield  
Canal logging show.

The enclosed map shows proposed road locations and areas where gravel will be taken from exposed river bars, in the upper east fork of the Bradfield River which is at the head of the Bradfield Canal (about 30-40 miles SE of Wrangell). Four bridges crossing sites are also shown. The Sykes Logging Company is operating in both the east and north forks of the Bradfield River. The area shown in this map will be the terminal section of the east fork. My comments on this area are as follows:

1. Road Location: The roads should be kept a minimum of 100 feet from the river wherever possible to keep silt from washing into river (see page 268, California Fish and Game Bulletin, Volume 56, No. 4, October 1970). In most places on this map the road location looks O.K. In a few spots it gets close to the river where topography necessitates such construction. Where possible, though, a 100' minimum distance is good planning.
2. Bridge Locations: All O.K.
3. Gravel Removal Areas: All O.K. providing that if gravel is removed from the bars below the level of the stream, a margin of the bar be left between the stream and the area where gravel is removed to act as a dike to prevent silt laden water from entering the stream. In addition, tractors, dozers, loaders, and trucks should not be operated in the stream. Such operations initiate streambank erosion, and kill eggs and fry by crushing them.

I flew over this area in a helicopter with the Forest Service this summer. This river is difficult to survey because when the fish are running the river water is turbid from glacial run-off. The river does have good runs of coho and some kings, however. In its lower reaches the valley floor widens to about a mile or so, and the main channel of the river does some wandering from year to year.

*cc: to Norman Johnston*

# MEMORANDUM

# State of Alaska

TO:

Pat Wennekens  
Habitat  
Juneau

FILE NO:

DATE : December 19, 1973

FROM:

Robert T. Baade *RIB*  
Sport Fish Biologist  
Ketchikan

SUBJECT: Critique of Draft Environmental  
Statement

East Bradfield Timber Sale

State ID No. 7311 3001

## Summary

- III - Even-Aged management is a fact after clear cutting and a poor silvicultural practice.
- IV - Since when is there an advantage to removing large old growth trees in exchange for young faster growing poor quality trees with a 125 year interval to the next harvest of poorer quality wood? Wildlife would be adversely affected.
- V - 4. Selective cutting to preserve the present forest environment over a period of 100 year rotation.
- VI - Why is the list of commenting agencies so heavily overloaded with timber harvest oriented groups?

Organizations contacted and response - why so few environmentally conscious groups?

## Page 1 Why clearcut?

According to Stewart Brandborg, U.S.F.S. Ret., this is not the best logging. Also, it is now illegal. Clearcut in no way protects or enhances the environment or the renewable resource of the economic objectives listed, all are untrue or at best only half truths.

Since when is sustained yield one cut every 125 years? Also, it does not provide optimum compatibility between wood fiber demands and other land uses.

## Page 2

Selective cutting disrupts the environment and ecology of a timbered area less than clearcut. Why do we have to disregard all other surface uses for single purpose clearcut?

The 100 year rotation period is a myth.

Is there no other plan of timber management than via the chain saw? How about nutrient manipulation and resulting increased vigor of the forest?

Page 3

How can this opinion be justified in the face of the timber shortages in the U.S.?

Page 4

I would say that a chain saw in operation is scarcely a slight noise pollution. The effect of chain sawing is, over 100 years, scarcely minimal.

Page 5

No statement of soil slopes, stability or potential leave strips.

Page 6

What about the clear water tributaries, the fish use after the silt load ceases in the fall and winter.

Page 6

Why were those areas of poor regeneration logged?

Page 7

Why should the land be disturbed or, if so, why no rehab?

Wildlife -

a - untrue - needs confirmation if true.

With a logging camp wildlife either leaves or suffers lead poisoning.

Page 8

Considerable goat hunting is done out of Tye Lake.

The clearcut is the end of Marten, Mink, Squirrel, and other populations.

What about ptarmigan, grouse?

No study on clearcutting and waterfowl use except that a lot go into the pot during the cutting.

Page 9

What about leave strips on salmon streams?

Why aren't the logs stored on dry ground above tide? Who authorized the log pond?

Page 10

What about the blot on the scene of clearcuts!

Why not grade roads back to original contour?

What plan was used on previous developments?

Clearcut logging never contributed anything beneficial to any recreational area.

"Lack of quality sport fishing" by whose word?

Page 11

"Distance from population centers, inaccessibility and shortage of quality hunting and fishing limit the recreational potential of the valley" - purely timber beast logic. It actually enhances the recreational potential.

Page 11

Transportation

With the roads built at taxpayers expense, why will the public never get a chance to use them? Or, if the cost of building road to the timber is too costly in view of the timber made available to support a road construction, why go ahead with it?

Silviculture! We have never had any in the Tongass National Forest.

Fire

So with lack of access we have made it a pulp - wood preserve - is this what we exchange virgin forest for?

### Economics

Since when do we have to feed destructive industry on false economic standards? This timber belongs to the public - not the Japanese! Raw materials for the adjacent communities is a lie of the worst sort! There are no local wood products available.

### Page 12

Why must local terrain be modified?

One word from the soils specialist and the logging goes on as before and the soil goes to sea.

Revegetation - no help via nutrient boost, planting of sod blankets or trees?

### Wildlife

This paragraph is a complete farce. During logging the animals are destroyed or driven off, their winter range is destroyed and this is justified for Japanese logging?

### Page 13

Birds - what study is this based on? No truth at all!

Fish - again - what study by whom? Where is provision for adequate leave strips along the streams?

### Page 13

Marine organisms - no excuse for bark pollution or inter-tidal land degradation. Store logs on the uplands.

The character of the area can be largely preserved by selective logging - why clearcut? Even-aged stands are highly subject to insect and rodent damage, provide no winter range for fur or game animals, destroy bird habitat and do nothing good for the hydrology and fish habitat.

### Page 14

### Recreation

All the forest attributes are destroyed by clearcut logging. Even the Smokey Bears avoid the cut-over areas for recreation.

Transportation

Purely warped thinking on the part of single purpose timber harvest oriented motivation.

Economics

This needs careful honest study.

Favorable Effects

This whole section is from the timber harvest aspect only. Where does multiple use get consideration?

Even-aged stands are poor silviculture.

Wildlife suffers loss of winter range resulting in reduction of numbers.

Page 15

Very few natural log jam removal programs have been beneficial to fish. It is the jams resulting from poor watershed use are detrimental. Why should these be allowed to form?

Recreation in a stump lot - who is kidding who?

The public is denied road use during sale harvest and the roads closed afterwards. Public benefits?

Page 15

Economics

This is strictly lumber industry logic. Who is representing the U.S. public in this?

Adverse Environmental Effects

Every logging show in the Tongass National Forest has resulted in irreparable soil damage. It is expected this will be no different.

The influence of clearcutting on the hydrology of a watershed by clearcutting is proven disastrous.

Wildlife has always come out second best either by loss of habitat or high velocity lead.

Marine degradation by drop of toxic bark and wood leachates is proven and disregarded as such in this statement.

Page 16

Only to the pulp industry and Smokey Bear (minority groups) is a stump lot beautiful.

Alternatives

1. The balance of payments argument is completely invalid.

The domestic demand gets none of this lumber now.

Since when is the U.S. Forest Service influenced by local needs?

Page 17

2. No way!

Page 19

3. Partial harvest by selective logging merits implementations.

a. Even-aged management - no way.

Page 20 B

Clearcutting - no way!

Page 21

Why should landscape management have to ease the impact? Selective cutting would not create impact.

Page 21

- (1) Vegetation - This is like the army's decision to destroy a town to save it.
- (2) Wildlife - The effect would be disastrous through loss of winter range and destruction of hydrology.
- (3) Clearcut - old growth contrast is good?

- (4) Recreation - even the Smokey Bears don't recreate in stump lots!
- (5) Fire - mostly you can't make it burn!
- (6) Economics - the greatest good for 125 years is not clearcutting now. 5% reservation for resource conflict is thievery of the worst sort.

#### Harvest Technique

Without the government subsidy to build the roads and the other income tax deductions, it is questionable whether it would be economical to harvest this timber at the present time. Also, seeing as how it never meets the U. S. consumer, why cut it? The surface and soil degradation that goes with clearcut louses up the hydrology too and is a plague on the resident and anadromous fish. The present waste of wood is a shame in the clearcuts. Also, the fluctuating demand for wood is not reflected in what the sale of the forests does for the U. S. taxpayer.

#### VI page 25

No state or national timber demands are met. Recreation in the harvest area is destroyed. Game and fur animals and birds and fish environment is destroyed. The benefits of present harvest do not warrant the destruction.

Over mature timber is a myth. The new growth does not measure up quality-wise to the old growth. Why produce twice as much if it isn't as good and it destroys the valuable pristine environment?

#### VII

Where is the value of wilderness given proper consideration?

Some animal species would suffer mortalities because of loss of range due to clearcutting.

If the effects of clearcutting span 5 human generations, irreversible or irretrievable effects are substantially a fact.

#### VIII

The cooperative agreements with other agencies have been ignored where they interfered with clearcutting. Contrary

Pat Wennekens

8

December 19, 1973

fact not withstanding, the timber harvest goes on unrestricted. There is no open bidding for timber - K.P.C. and A.L.P. control all bids. The public meetings on the 5 year plan have been loaded with company stooges and Smokey Bears.

CC: Roger Wadman

## MEMORANDUM

State of Alaska

TO: Raymond W. Estess  
 State Federal Coordinator  
 Division of Planning and Research  
 Office of the Governor

DATE : January 25, 1974

FROM: M.P. Wennekens, PhD *MPW*  
 Regional Habitat Coordinator  
 Department of Fish and Game

SUBJECT: Draft environmental statement, East  
 Bradfield Timber Sale. State I.D.  
 # 7311 3001

The subject draft environmental statement has been carefully reviewed by ADF&G staff; resulting concerted staff comments indicate that the document needs critical revisions, redrafting, reappraisal of environmental impacts and objective formulation of a management and action plan that will also insure a long term "sustained yield" for the rich biological resources of the area.

ADF&G comments shall stress substance rather than format:

1. A major underlying failing of the document revolves around the recurrent statements stressing the unworthiness of 'uneven age', 'overmature' botanical make up of the present natural forest. From a zoological stand point, the diversity of age and kinds of the complex of botanical entities of the natural forest reflects a high quality of balanced ecosystem sustaining thriving, rich and varied assemblage of zoological entities, a fact repeatedly stressed by various testimonies presented during the 1971 Senate Hearings on 'clear-cutting' practices on national timbers.

To that effect, ADF&G strongly recommends that the statement under 'Purpose' (p. 1) be critically reassessed and rewritten to reflect that, under the intent of the Multiple Use Act timber harvesting must be performed in consonance with balanced husbandry of zoological resources.

2. A discussion of the manner by which the forest of Bradfield River Valley is integrated with the Petersburg-Wrangell working circle to: 'determine the volume of commercial timber available, the amount of net growth, the effect of multiple use consideration, and the number of years required to produce new stands, following harvest' for the determination of the calculation of 'allowable cut', is essential to provide the reader with an appreciation of reasoning behind the 5 year and long term plans for timber harvest in the area.

3. The statements in paragraphs 5 and 6, page 3, are somewhat disconcerting. To the reader, the U.S. Forest Service seems to imply that, as a result of present unfavorable shipping costs to the 'lower 48', as for example compared to obtaining timber from Canada, it is highly desirable and rewarding to get rid as quickly as possible, through foreign markets, of 'overmature, diseased' timber. By the time the home market becomes attractive, the: 'deteriorating overmature stands of trees that existed previously will have been converted to healthy stands containing nearly twice the volumes of the original stands.'

To ADF&G, as an agency responsible for the husbandry and protection of very high quality zoological resources for the long term economic and recreational benefits of the citizens of the state, such an implied downgrading of the present values of the National Forest resources somewhat borders on the blasphemous.

4. The subject matter under description, items 5 (page 4) through 11 (page 10) is mostly descriptive. The section on wildlife is very general. The entire section, from page 4 to page 10, should be redrafted to: a) indicate the kinds of ecological relationships between the bio-physical and botanical entities of the area, b) discuss the ecological role played by the National Forest in the sustenance of streams, waterfowl and game habitat, c) describe the main types of habitat encountered along the entire drainage (i.e. braided vs. non braided stream channels, presence and extent of beaver ponds, nature of vegetative cover along various reaches of stream beds), d) discuss constraint imposed upon ecological consideration on logging practices, e) discuss and define the extent of natural forest that must be set aside to protect and maintain the sustain yield of zoological resources.

5. It is ADF&G's position that <sup>TNC</sup> environmental impact statement should discuss in detail:

- a) road system, location of material sources and required volume of various types of road building material
- b) permanency and non permanency of road system
- c) location and extent of sites to be used for land storage and cold decking of logs
- d) various alternatives for log dump sites, rafting and temporary log storage area

The existing tideland permits and Corps permits shown in Appendices C and D must be modified and updated. The present locations of the dump pad, <sup>new</sup> rafting pond, in the upper region of the tide flat, <sup>is</sup> unsatisfactory. The present document should discuss in detail the impact of the past utilization of the site for dumping and rafting.

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