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Alaska Roadless Rulemaking #54511

October 15, 2018

RE: Alaska Roadless Rulemaking #54511

Keep Protections for Inventoried Roadless Areas Especially the Tongass 77 watersheds

I have lived, worked and played in Southeast Alaska for 43 of the 46 years I have called Alaska my home. I retired from the Department of Fish and Game after a 25 year career as a fisheries biologist. My first job working for the department was doing salmon pre-emergent stream sampling work on Prince of Wales Island. What a privilege it was to work in the wet and wild Tongass rainforest. My next job with the department was working as a habitat biologist in Ketchikan. I worked with logging companies, other state agencies and the Forest Service to try to design and implement practices that would protect salmon producing streams and old growth forest habitats so critical to wildlife. It is discouraging to return to areas that 43 years ago were pristine and productive but now are neither. It is also frustrating to find the need to comment once again on the habitat values of the Tongass Rainforest especially so soon after a new Tongass Land Use Management Plan was finalized. Changes in the current Roadless Rule will certainly impact and require new amendments to or rewrite of TLUMP. That plan was the result of the efforts of many people and organizations to come to consensus. Like any consensus it was hard fought, probably made no group was 100% happy but in the end was widely supported. Why then are we required to rehash essential the same issues again? Yet another group, the Roadless Rule Citizen Advisory Committee, was hastily appointed and is tasked with coming up with its recommendations including three alternatives in an arbitrary and very short period of time. It seems this process is never ending.

The current roadless rule and the Tongass Land Use Management Plan of 2016 provide a level of protection for watersheds (including the Tongass 77 streams and watersheds) that support sport and commercial fishing interests, subsistence hunting and fishing, eco-tourism, recreation and most importantly habitat for birds and other wildlife. These things are the backbone of the southeast way of life and our economy. TLUMP-2016 was a step toward transitioning from large-scale, heavily subsidized, clear-cutting of old growth timber to harvesting young growth logs. Modification of the current Roadless Rule will certainly lead to opening large roadless tracks of the Tongass to roadbuilding and logging. The current rule now allows exemptions for safety, hydropower, utility corridors and mining. There does not seem to be a need to change this rulemaking process. Most likely any change will put fish, birds, wildlife and a treasured way of life at risk.

As a resident of Tenakee Springs I am especially concerned about future protections for the now roadless and protected watersheds of Tenakee Inlet including Little Goose Flats, Goose Flats, Seal Bay, Sallery Bay and Crab Bay. The fragile economy of our very small community is dependent on a productive inlet. Commercial fishermen, a charter operator, hunting guides, small lodges catering to recreational fisherman and eco-tourists, a small-scale logging/wood product operator depend on what these protected watersheds produce. Almost all protein feeding Tenakee's families comes from fish and shellfish caught in the inlet and game shot in the forests. Any decrease in the productivity of the inlet would severely impact nearly all the residents of Tenakee and our few remaining services. We rely on our healthy forests to sustain the salmon populations we fish, to

provide an ecosystem needed by wildlife and birds to thrive and to sustain an environment, the planet's last, large, intact temperate rainforest, that people from all over the world pay thousands of dollars to visit. The best use of old growth forests is to leave them standing and roadless.

Thank you for your consideration.

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