Chichagof Conservation Council

Box 621 Tenakee Springs AK 99841 February 2007

Tongass Land Management Plan Draft threatens Seal Bay, Long Bay and Goose Flats We have until April 10, 2007 to comment on the Tongass Land Management Plan (TLMP). The document is available as a CD or at http://tongass-fpadjust.net. The Tenakee library has one paper copy.

The "proposed action" (Alternative 6) puts all upper Tenakee Inlet watersheds in the "Intensive Development" category, with the priority use defined as "Timber production - Manage the area for industrial wood production."

Tenakee has a long, long history of support for protecting Seal Bay, Long Bay, and Goose Flats, but that's not enough. YOUR COMMENTS ARE VITALLY IMPORTANT. Here are a few ideas to start with:

Excellent salmon spawning /rearing habitat in Seal Bay, Long Bay and Goose Flats is the foundation of subsistence, sport, commercial and guided fishing in Tenakee Inlet. Coho salmon rear in vulnerable fresh water streams, ponds and wetlands up to three years.

Last summer Southeast pink salmon numbers were very low. A likely explanation for low pink numbers in 2006 was the extremely hot, dry summer two years before, which could have affected spawning success and/or egg survival in streams. Tenakee Inlet was one of the few places with nearly normal numbers of pinks in 2006. Perhaps Tenakee's intact watersheds shield streams from hot weather, and the deeper, longer-lasting snow up the Inlet helps keep streams cool longer. As climate warming continues, it is even more important to protect the watersheds that still have intact forests and give spawning salmon every possible advantage.

High volume old growth is essential for deer survival in deep snow winters. Big old trees keep enough snow suspended that deer can forage throughout the winter. Second growth timber does not admit enough light for forage plants to grow. The conditions that provide prime deer habitat in SE Alaska do not return to a clearcut forest for <u>at least</u> 150 years.

The USFS acknowledges the "significant possibility of a significant restriction" on future availability of deer due to existing clearcuts, and projects total habitat capability decreases of 25%- 38% in Tenakee areas—open to industrial strength logging under the proposed alternative. The TLMP draft contends subsistence needs will be met by curtailing future sport hunting. (Sport hunting was severely restricted here in 1992, after the hard winter of 1990-91. Both sport hunting season and bag limits were reduced.)

What is the potential loss of long term, sustainable local income from guided recreation and fishing? What will be the loss of local business income when sport hunting is restricted? What is the potential loss of local income from tourists seeking wildlife and wild country?

The USFS should address the potential impacts of log dumps and log rafts on herring spawning areas and crab habitat, as well as potential conflicts between log rafts and commercial pot/longline fisheries. What are the potential impacts of log rafts, barges, and increased boat traffic on endangered humpback whales?

In 1989 the US House of Representatives recognized the value of Seal Bay, Long Bay and Goose Flats by passing HR 987 (the House version of the Tongass Timber Reform Act) which would have provided permanent legislative protection for those areas. The 1999 version of TLMP protected upper Tenakee Inlet until it was overturned in 2001.

The head of Tenakee Inlet connects Seal Bay, Long Bay and Goose Flats with the legislatively protected Lisianski LUD II area and the West Chichagof Wilderness. Future generations will marvel at our foresight if we keep this continuous block of temperate rain forest intact.