



**SOUTHEAST ALASKA
WATERSHED COALITION**
CONNECT - INFORM - PARTICIPATE

Earl Stewart
Forest Supervisor
648 Mission Street, Suite 110
Federal Building
Ketchikan, AK 99901-6591

Re: Cube Cove Restoration #59913

Dear Forest Supervisor Stewart,

Thank you for the opportunity to comment on the proposed interventions and scoping documents for the Cube Cove parcels on Admiralty Island National Monument, Cube Cove Restoration #59913.

The Southeast Alaska Watershed Coalition strongly supports this proposal, which includes the removal of culverts and bridges, the addition of large woody debris to impaired streams, and riparian forest treatments to prevent additional impairments to streams and lakes. The proposal is a relatively small-scale project as compared to standard restoration and road decommissioning work done on other parts of The Tongass National Forest. As designed, the project only addresses impacts where natural processes alone are not sufficient to recover functioning condition and wilderness character. For this reason, all the proposed interventions are necessary.

Southeast Alaska Watershed Coalition (SAWC) was formed by a collective of watershed councils in 2005. SAWC's core objective is to build a regional voice that promotes community watershed stewardship by bolstering the capacity of communities to implement local and collaborative approaches to the management, development, and stewardship of the region's watersheds. SAWC is a foundational member of the Southeast Alaska Fish Habitat Partnership (SEAKFHP) and holds a standing seat on the Steering Committee. SAWC is active in numerous restoration and stewardship projects in the region and was the recipient of the 2022 National Rise the Future Partnership Award from the US Forest Service (FS), and the 2021 Regional Outstanding Partner Award from the Alaska Region of the US Fish and Wildlife Service.

SAWC assisted the FS in initial reconnaissance-level field assessments of the Cube Cove area. SAWC also worked with the FS to engage the Angoon Youth Conservation Corps in a fish passage barrier removal in the Cube Cove area. By directly engaging Angoon youth in a restoration project, we helped foster a greater awareness and sense of stewardship among the corps members. Similarly, SAWC has met with the FS and Kootznoowoo, Inc. to discuss the opportunity for a tribally run work crew to assist with restoration activities. Such a crew could provide an avenue for meaningfully engaging community members of Angoon in management of Admiralty Island while at the same time providing benefit to a community with serious economic challenges.

The scope and scale of proposed interventions are appropriate.

The Cube Cove area was severely impacted by extremely aggressive industrial scale clear-cut logging and associated road building/development while in private ownership. Virtually every marketable tree was cut down on around 22,000 acres, severely impacted fish and wildlife habitat, hydrologic function, and Wilderness values in the Cube Cove area. The scale of impacts at Cube Cove are so severe that natural processes have been altered enough that intervention is needed to prevent further resource damage. Doing nothing at Cube Cove would be a failure in stewardship and land management. Such negligence would be contrary to the Tongass Land Management Plan and could have consequences that are in violation of state and federal resource protection standards and laws. Without intervention, ecological conditions will only degrade further due to the following:

- Logging occurred before standardized stream buffers were required, so no or minimal no-cut buffers were left on fish streams or lakes to provide important ecological functions like travel corridors for wildlife and sources of large woody debris critical to sustaining fish habitat and stream function. Legacy large woody debris will degrade over time, and it could take riparian forests several hundreds of years to gain the old growth characteristics necessary to support natural wood recruitment. During the intervening years, stream function will continue to decline. These impacts will have negative consequences for coho salmon, other fishes, and wildlife.
- Thousands of cubic yards of road material was placed in wetlands, impounding water and altering natural flow paths. Wetlands provide many ecological services, including holding, storing, and slowly releasing water, providing a buffer to large rain events and drought. Watersheds with healthy wetlands are therefore more resilient to climate change and other stressors. If left alone, alders may grow on these roads, but the ecological function of the wetland will remain impaired. Intervention is necessary to recover these lost functions, which maintain watershed health and support fish and wildlife habitat.
- Numerous culverts and bridges were left in place at Cube Cove. Failure to remove these structures will harm streams when bridges (containing creosote-treated decking and rails) eventually fail and fall into streams, or road culverts on steep slopes degrade and impound water, resulting in saturated soils that greatly increase landslide risk. Just last year in this area, several large landslides occurred initiated at a road or in a former clear cut. Failure to remove culverts could result in more landslides, scouring streams to bedrock, and resulting in potentially irreparable impairment to soil and forest health.

Elsewhere in the region, unneeded infrastructure is removed from timber lands as a best management practice intended to protect the land. These projects are often considerably large in scale and heavier handed/aggressive in technique. The decision to only take action in situations where natural processes alone are not sufficient to recover functioning condition and wilderness character means that Cube Cove will see less intervention than a Development LUD would. It seems counterintuitive that an impacted wilderness area would be less of a priority than an impacted development LUD. This said, we support the FS decision to intervene at Cube Cove.

The F.S. proposal strikes an appropriate balance between intervention and allowing natural recovery.

The interventions proposed at Cube Cove are not true “Restoration.” Restoration would involve a considerably more heavy-handed approach to accelerate the return of old growth conditions and aquatic function. Such an approach would include large-scale wildlife thinning and the creation of wildlife travel corridors in dense young-growth stands, full road removal and recontouring, full removal of roadbed and structures in the upper parts of the watershed, and aggressive stream restoration projects involving the use of heavy equipment and helicopters to harvest transport and place trees into streams. While we feel these actions help to fully restore the Cube Cove area, we appreciate and acknowledge that the Forest Service has designed the project to address only those areas where natural processes are not expected to recover functioning condition and wilderness character.

Accordingly, doing less than what is being proposed will fail to recover properly functioning watersheds and wilderness character.

As mentioned above, SAWC removed a culvert in the Florence Lake watershed of Cube Cove by hand as a pilot project. With a crew of 4 adults and 5 youth it took us almost 5 days to fully remove the culvert and remediate the site with native vegetation (*It was backbreaking labor!*). Based on our experience, the same work could be completed with one hour of machine time and 1 hour of manual planting time. This culvert had less than a foot of fill material over it. There are over 50 culverts in Cube Cove, some with dozens of feet of fill material over the top of them, and some of them over a dozen miles from the nearest plane/boat accessible location. It is infeasible and impractical to conduct culvert removal by hand at Cube Cove. Further, machines are needed to remove the bridges. The Ward Creek Bridge is 100-ft long with two 8ft steel girders and is covered by heavy creosote covered wood decking. Machines are needed to remove the decking. Further, creosote is a hazardous substance that must be removed from the site and properly disposed of. It is impractical to remove the decking and carry it 12 miles to the Cube Cove barge landing by hand.

Explosives could be used to remove culverts in some cases, and we support the use of explosives where FS practitioners have decided they are the least damaging option. But it should be noted that explosives have a host of impacts, including noise from helicopters used to sling in the explosives and noise and unintended damage from the blast.

Relying on hand work or explosives instead of heavy equipment would be illogical considering the road work identified in the scoping document is entirely concentrated along, or adjacent to, the “Mainline Road.” SAWC walked the Mainline Road in 2019 from Florence Lake to the LTF at Cube Cove. Aside from a few alders that would need to be cut, the road was passable by heavy equipment and equipment could be brought into the areas proposed for treatment with minimal environmental impact (*We understand a recent landslide near Peanut Lake may needs to be investigated*). Machines would be brought in to the LTF at Cube Cove and travel to the Ward Creek area along the Mainline Road. Little or no road improvements would be needed. The machines would then remove infrastructure and place breaches in the road where necessary, closing the road out as they return to the LTF. Such an operation is simple, cost effective, and it does not rebuild roads to access areas already closed out. Further, scarifying the road on the way out will accelerate natural revegetation of the roadbed and repair any of minor damage done by trimming in very little time. Further, the use of heavy equipment would also be the fastest option, reducing the amount of time that activities could impact public use and solitude. We applaud the FS for designing a project that makes a lot of sense logistically.

Similarly, the FS has limited riparian thinning to only areas that would benefit from such a treatment and that, without intervention, would continue to degrade in aquatic function. The use of chainsaws is required for thinning. Hand tools would make the laborious process impractical and cost prohibitive.

We support hand tool restoration of streams to improve fish habitat that would otherwise continue to degrade over time. The hand tool restoration proposed by the FS is already a minimalist approach to instream restoration. This type of restoration uses simple winches, pulleys, and blocks to move large woody debris into the stream. The wood is generally the by product of riparian thinning, so few trees are wasted. This work is necessary to prevent further degradation of hydraulic condition and fish habitat. The materials and equipment listed by the Forest Service are necessary.

Community Benefits and Engagement

As stated above, SAWC is working with Kootznoowoo to support a tribal work crew that could complete thinning and stream restoration work. Admiralty Island National Monument and Kootznoowoo Wilderness Area were established in large part due to the foresight and persistence of the leaders and Elders of Angoon, who wanted to protect and preserve their traditional lands. However, since their establishment, Angoon's people and local economy have struggled, and the Forest Service's success in integrating Angoon into the management of the Wilderness Area has been mixed at best. Employing locals to do this thinning and restoration work is a direct effort to engage the community in the stewardship and management of the Wilderness Area with the hopes that it builds capacity for continued engagement. We want to thank both the Forest Service and Kootznoowoo for their commitment to work together to steward Cube Cove, and we look forward to engaging others in the community in the effort.

The fact that such a partnership is even being discussed is a sign that FS has taken their job of informing and engaging the public and interested stakeholders seriously, and we thank the FS for doing a good job in hosting pre-scoping meeting and publicizing the work. I'll note that similar scale of road decommissioning work often happens on timber land with categorical exclusions and little public engagement. The FS decision to complete a full Environmental Assessment and their dedication to public engagement on such a small-scale project is going above and beyond the minimum requirements.

SAWC supports the proposed interventions in the Cube Cove area. SAWC is committed to helping engage the community of Angoon in stewardship at Cube Cove, and we will continue to offer technical and fundraising assistance in support of interventions that improve watershed condition in this area.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Cadmus", with a stylized, flowing script.

Rob Cadmus

Executive Director