

Data Submitted (UTC 11): 2/25/2025 3:19:33 AM
First name: Rob
Last name: Cadmus
Organization: Southeast Alaska Watershed Coalition
Title: Executive Director
Comments:

[ATTACHMENT COPIED BELOW. NOTE PDF CONVERSION AFFECTS FORMATTING. SEE ATTACHMENT FOR ORIGINAL.

Tongass Forest Plan Revision Assessment 02/24/25

Dear US Forest Service,

Thank you for providing an opportunity to comment on the Tongass Forest Plan Revision Assessment.

The Southeast Alaska Watershed Coalition (SAWC) was founded by community and tribal watershed groups to provide resources and share capacity. Our mission is to foster partnerships and inspire Southeast Alaskans to steward our watersheds and support communities through participatory projects, research, and learning. SAWC works directly with the Forest Service on stream and habitat restoration on the Tongass National Forest, including partnering with tribally run stewardship crews and community forest partnerships to complete on-the-ground work. We have provided technical capacity, project coordination, and financial support to restoration projects across the region, including Forest Service priorities at Margaret Creek, East Ohmer, Skannaxheene, Shorty Creek, Cube Cove, Trout Creek, and others.

Salmon.

Our five species of Pacific salmon are keystone species in Southeast Alaska and are also a major economic driver for the region. While salmon are mentioned in several chapters of the assessment, we suggest that there should be a salmon specific chapter that covers ecology, habitat, economics, culture importance, trends, and anthropogenic impacts. Such a chapter will highlight the importance of salmon to the region and is critical for the development of standards and guidelines to protect salmon habitat, riparian condition, and water quality.

A standalone salmon chapter is necessary because salmon are not fully covered in the other chapters. The Watershed Condition chapter, for example, does a great job of providing useful facts and figures about the status of watersheds and restoration on the Tongass, but it falls short of properly putting those facts into the context of salmon. The reason that organizations like SAWC are focusing so heavily on salmon stream restoration is that historic logging and road building focused on big tree floodplains, the type of habitat that produces great salmon streams. Further, the assessment fails to mention that there are active efforts to list Chinook salmon through the Endangered Species Act. A final example, salmon are not listed as a Species of Conservation Concern because of the narrow definition used in that chapter, but what species is the most important for the Forest Service to conserve? We are confident that

scientists and the public would answer, "SALMON!"

Community Forest Partnerships, Stewardship Crews, and Restoration Workforce.

SAWC has partnered with the Forest Service on numerous watershed restoration projects that engage and employ tribal and community run stewardship crews. We have also worked with the Forest Service to jointly hire local contractors for stream restoration and wildlife enhancement. This restoration workforce has played a major role in the Southeast Alaska Sustainability Strategy and is widely viewed as the future of the Tongass by many communities, tribes, decision makers, and agencies. While community forest partnerships and stewardship crews are briefly mentioned in several sections, we feel that the impact, need, and outputs of these efforts are not well covered in the assessment document. Like salmon, we suggest a standalone chapter.

For example, while the "Tongass as an Indigenous Place" chapter does an admirable job of trying to cover a huge amount of information and topics, we request that SAWC's and the Ketchikan Indian Community's work on the Margaret Creek Watershed and Ward Creek Watershed be added to the list of community forest partnerships/tribal restoration projects. Similarly, the Yakutat Tlingit Tribe and Yakutat Salmon partners have actively worked on restoration projects in their region since the 1990s, including recent projects in partnership with SAWC. In short, these community run restoration and stewardship projects are a regional priority. Practically every community in Southeast Alaska is involved or wants to be involved in this type of work. We have copied some links with useful information below this letter.

If community forest partnerships, tribally run stewardship crews, and the development of a restoration workforce is a priority for the Tongass National Forest, then we need a better understanding of the impacts, opportunities, and constraints of this work. Without this information, it is challenging for practitioners like SAWC to properly focus our efforts, and it is impossible for the Forest Service to develop a forest plan that encourages and fosters this work. We suggest a standalone chapter.

Draft Aquatic Ecosystems Resource Assessment chapter:

Comments from Rebecca Bellmore, SAWC Science Director. Additional detailed comments are included in the attachment, but the two main issues are:

- 1.) I created Figure 1 for the Tongass CCVA Aquatic Resources chapter, and I don't believe that it is appropriate in the glacier section to convey expected/projected glacier loss. There is no spatially explicit information available about the rate and extent of glacial loss for southeast Alaska, other than the Juneau Icefield (Zieman et al, 2016). The scenario in this figure was generated based on the Juneau Ice field study and applied to all other glaciers to provide context for stream temperature projections (with the caveat that glacial loss rates are highly uncertain). I don't think this should be used to convey that expected glacial loss has been characterized across the region. Secondly, the figure's caption misrepresents the source of the data (see comment in document).
- 2.) Many of the paragraphs are lifted word for word from a draft of the Aquatic Resources chapter of the Tongass CCVA without attribution. Additionally, that chapter was still under review, so I would recommend revisiting those when that review is completed.

Thank you for considering these comments.

Sincerely,

Rob Cadmus
Executive Director

Stories on Ketchikan Indian Community and Yakutat Tlingit Tribe Forest Partner efforts
<https://www.fs.usda.gov/inside-fs/delivering-mission/deliver/partnerships-priorities-bring-back-historic-fish-returns>

<https://www.krbd.org/2022/08/12/restoration-work-comes-to-an-end-on-margaret-creek-heavily-logged-bear-viewing-spot-north-of-ketchikan/>

<https://www.krbd.org/2022/06/30/ketchikan-indian-community-taking-on-local-stream-restoration/>

<https://www.fishalaskamagazine.com/nature-knows-best/>

<https://storymaps.arcgis.com/stories/3f4723c970b74b0f84e4cc247a818cbd>