Summary and Response of Public Comments Received

2025 POW LLA Long-term Plan and Invasive Plant Treatment Plan

The Forest Service held a public meeting on April 30, 2025 at the Craig Ranger District to present the Draft 2025 POW LLA Long-term Plan and the Draft 2025 Invasive Plant Treatment Plan. The meeting was followed by a 30-day public comment period. Below is the summary of comments and responses from the district. Comments were received via online submission, mailed, hand delivered, or spoken during the public meeting. The Forest Service received a total of 9 comments, 8 from the public and 1 from NOAA. Feedback was used to amend the POW LLA draft plans where necessary.

1. Recreation Improvements and Maintenance

Install a kiosk for the Sarkar Canoe Route.
The Forest Service currently has a basic kiosk at the Sarkar recreation site. Improvements to current information will be considered.

One duck trail should remain non-motorized only.
One duck trail is currently designated as non-motorized trail and there are no plans to change this designation.

Rebuild stairs and fix kiosk at Canoe Point.
The stairs at Canoe Point have been rebuilt under GAOA partnered with NFF. Last year significant blowdowns occurred along the trail which have been cleared by the recreation staff. No kiosk exists at this site.

Maintain trail and viewing platform at Hatchery Creek and assess for rot.
The Forest Service has current plans for engineering to inspect recreation site viewing platforms on Prince of Wales Island. Maintenance to the Hatchery Creek trail is performed by the district on a bi-monthly rotation.

Maintain Honker Divide Canoe route.
Honker Divide Canoe route may receive maintenance once maintenance of higher use recreation sites is addressed.

Why was El Cap prioritized over other deferred maintenance on island?

El Cap recreation area improvements were implemented under a separate funding source and completed through contracts. Forest Service personnel continued to maintain other recreation sites during this period.

Maintain signage at Luck Lake, Dog Salmon, Trocadero Trail, Hatchery Creek, Cable Creek, Staney Creek, Polk Road, Eagle Creek, Balls Lake, and Salt Chuck.
The Forest Service inspects and completes routine maintenance or replacement of signage. New interpretive signs will be installed this year at Dog Salmon, Hatchery Creek, Balls Lake, Big Lake, and Cable Creek. New signs for multiple day use sites, campgrounds, cabins, and trails were put in an agreement to be purchased and installed within the next 2 years.

Consider upgrading the toilet at Harris River campground.
We considered replacing all three toilets at Harris River; however, the cost was too substantial to fix all of the toilets that did not have any human health and safety concerns with them.

Maintain non-motorized trail access and reduce conflict between motorized/non-motorized users.
The Forest Service plans to maintain adequate access for both motorized and non-motorized recreation.

One Duck trail and Sunnahae Trail should remain non-motorized.
These trails are currently designated as non-motorized and are planned to remain as such.

Utilize Volunteers to support reduced workforce.
The Forest Service welcomes and values the help of volunteers. Currently we have volunteer agreements with individuals to help with routine maintenance at campgrounds. A volunteer group is scheduled to complete trail maintenance at Sunnahae Trail in June 2025.

2. Restoration Monitoring/Effectiveness

Make Watershed Condition Framework surveys publicly available to show effectiveness of restoration investments.

This data is available on this website: https://www.fs.usda.gov/naturalresources/watershed/condition_framework.shtml Note: here are some more resources that are not on a public facing website but could be provided: https://usdagcc.sharepoint.com/sites/fs-tong-fwr/SitePages/Home.aspx.

Provide evidence that AOP projects improve fish passage.

Upstream migration is essential for many fish species in the Tongass National Forest. Anadromous fish (fish that migrate from the ocean to freshwater to spawn) require access to spawning habitat. Juvenile anadromous fish migrate during their freshwater life stage, seeking seasonal habitats. Resident fish (fish that spend their entire life in freshwater) also may migrate seasonally in response to food, shelter and spawning needs. Improperly located, installed or maintained stream crossing structures can restrict these migrations, thereby adversely affecting fish populations. These structures can present a variety of potential obstacles to fish migration. The most common obstacles are excessive vertical barriers, debris blockages, and extreme water velocities that can inhibit fish passage, especially smaller or juvenile fish.

Culverts that constrict the stream channel may cause excessive water velocity, excessive bedload deposition or rapid change in water surface profile at the inlet. Culverts installed at a gradient significantly different than the natural stream grade can induce stream head cutting upstream or excessive deposition of bedload at the culvert inlet. Culverts that do not retain adequately sized bedload may lead to excessive water velocities within the culvert. Culverts with excessive water velocities within them may release energy by eroding the outlet control, leaving the outlet perched.

A standardized method developed for use in Alaska by an interagency group of State and Federal agencies is used to categorize passage conditions. This is a coarse sieve to determine if a culvert can pass the weakest-swimming fish (coho at 55 mm) at flows up to the Q2D2 as required by the State of Alaska.

The Forest Service prefers a stream simulation design approach for Aquatic Organism Passage (AOP) culverts. The assumption of stream simulation is that if the stream through the culvert matches a reference reach in the natural channel in bedwidth, bankfull width, gradient, and stream features, fish will be able to pass as they would in the natural stream channel. By matching the natural stream, stream gradient and water velocity inside the culvert will mimic the stream outside of the culvert and constrictions and vertical barriers will not form. Stream simulated pipe are sized based on bankfull width and size of rocks needed for stream banks within the culvert. By upsizing to meet bankfull width and allowing for stream banks in the pipe, the pipe will pass debris better than an undersized pipe and also will pass flood flows up to the Q100 (hundred year flood). Not only do AOPs improve fish

passage, but they also improve flood resiliency at road crossings since most culverts that were installed in the past were undersized.

A memorandum of agreement (MOA) between Alaska Department of Fish and Game and Alaska Department of Transportation and Public Facilities was recently signed for the design, permitting, and construction of culverts for fish passage. The recommended minimum culvert width is 1.2 times bankfull width, similar to Forest Service design standards, allowing for banks within the culvert for a stream simulation designed crossing. Thus, State and Federal AOP design and construction approaches in Alaska are highly congruent.

https://dot.alaska.gov/stwddes/desenviron/assets/pdf/procedures/dot_adfg_fishpassage_041625.pdf

See https://www.fs.usda.gov/biology/nsaec/fishxing/aop_pdfs.html for more information on Forest Service fish passage and stream simulation design method.

Fish passage case studies are available at:
https://www.fs.usda.gov/biology/nsaec/fishxing/streamsim.html

Alaska-specific resources are available at:

https://www.adfg.alaska.gov/index.cfm?adfg=fishpassage.studies

Of interest is the case study on a tributary to Big Creek near Petersburg, Alaska. This barrier site used a stream simulation design for the AOP project. Anadromous Dolly Varden were documented upstream of the crossing the year after project completion.

More information on Tongass monitoring of fish passage structures can be found online at:
https://www.fs.usda.gov/sites/nfs/files/r10/tongass/publication/Biennial%20MonitoringReport20202021.pdf

3. Concerns with Invasive Plant Treatment Plan

General opposition to herbicide use.

The Forest Service is authorized to apply specific herbicides through the POW LLA Final Environmental Impact Statement (FEIS) and the POW LLA Record of Decision (ROD). The effects of application have been analyzed. The Forest Service is required to follow state and federal laws regulating pesticide use and the design features within the FEIS during implementation. The Forest Services utilizes targeted spot treatments not broadcast spraying. The minimum effective amount is utilized, and treatment areas are signed so the public is aware.

Herbicides use can be a human health concern.

Herbicides are toxic chemicals to plants, and it is recommended to minimize human exposure. With Forest Service application methods, the risk to the public is very low. We are applying very small amounts of these chemicals. Last year we applied 5 oz glyphosate and 5.6 oz aminopyralid. Treatment areas are signed to alert public when herbicide treatment is being used. Also, the chemicals contain a dye additive, so targeted plants are easily identified.

***Herbicide use could impact subsistence resources and foraging*.**
The invasive plants that we treat are typically not animal forage (thistle, knotweed, and knapweed) so it is unlikely that chemicals are ingested by animals. Glyphosate is bound tightly to soil and typically does not move around. Aminopyralid can leach through soil and move from where it's been applied, however, as it leaches it is diluted, so the risk of these chemical getting into the subsistence food system is low.

***Consider alternative methods such as manual pulling, mechanical treatment, vinegar/salt/dish soap solution, or foam stream*.**
The Forest Service utilizes manual pulling or mechanical treatment of plants when these treatments are effective control methods. The POW LLA Record of Decision authorizes application of aminopyralid, glyphosate and imazapyr to efficiently control invasive infestations. The effectiveness of vinegar/salt/dish soap solution or foam stream has not been studied and may be analyzed in future environmental assessments.

4. Other Comments

***Staff the front office in Craig and Thorne Bay*.**

This comment is not relative to the POW LLA.

***Make GIS data publicly available*.**

The Forest Service offers an Avenza map package that covers Prince of Wales Island.

https://store.avenza.com/collections/us-forest-service-r10?query=&page=0