



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

**Department of Natural Resources**

OFFICE OF PROJECT MANAGEMENT AND PERMITTING

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Juneau, AK 99811-1030  
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January 20, 2023

Ronald Milton  
Thorne Bay Ranger District  
P.O. Box 19001  
Thorne Bay AK 99919-001

Re: Prince of Wales Landscape Level Analysis Project Draft Fall 2022 Out-Year Plan

Dear Mr. Milton,

Thank you for the opportunity to provide comments on the US Forest Service's (Service) proposed activities in the Prince of Wales Landscape Level Analysis Project Draft Fall 2022 Out-Year Plan. The proposed project activities include recreation, stream restoration, fish crossing/aquatic organism passage (AOP), and invasive plant management activities. It is acknowledged that no timber sale activities are included in the current Plan.

I have coordinated with the Alaska Departments of Health, Law, Fish and Game (ADF&G), Environmental Conservation, Natural Resources (DNR), and the Statewide Alaska National Interest Lands Conservation Act (ANILCA) Implementation Program on the review of this proposal. In general, the State supports efforts by the Service to increase recreational opportunities, while managing for invasive species as well as stream bank restoration projects. The State provides the following specific comments:

**State of Alaska Management Authorities**

The State would like to take this opportunity to work with the Service, through DNR, to identify State-owned navigable waters and submerged lands on Prince of Wales Island. It is important for the public to understand the land ownership and responsible management agencies while evaluating the proposed projects. Maps and other project documents should acknowledge State ownership and management of navigable waters and those submerged lands that are within project areas, so the Service and the public understand land ownership and possible permitting authorities.

The State considers numerous water bodies and portions of water bodies on Prince of Wales Island to be navigable for title purposes. More information can be found at the DNR Navigability Project website: <https://dnr.alaska.gov/mlw/paad/nav/>. Additionally, a map of waters the State considers navigable can be found here by opening the *Navigable Waters* map in the left menu: <https://mapper.dnr.alaska.gov/map#map=4/-16632245.12/8816587.34/0>

### **Sustainable Recreation and Stream Restoration Projects**

Several proposed projects have the potential to make improvements to or otherwise impact waterways that are navigable for title purposes or are submerged tidelands below ordinary high water (e.g., Neck Lake boat launch improvements; El Capitan Recreation Area improvements; any activities within the tidal portion of the Shaheen; mooring and buoy repair/replacement). The State requests consultation and we look forward to working with the Service to plan projects where State authorization may be required.

### **Invasive Plant Species Treatment**

The State supports the Service's efforts to remove and manage prohibited and restricted noxious weeds<sup>1</sup> on Service lands. The Service should continue to prioritize this work as persistent monitoring and treatment is key to successful control of invasive plants.

### **Cabins, Shelters, Trails, and Wilderness**

The State continues the strong support for the Service's intent to construct new cabins and shelters and to increase the number of recreational opportunities and facilities available to the public on Prince of Wales Island. These projects all support our State's hunters, anglers, and other recreational users of public lands in Alaska.

In advance of public dissemination, we request an opportunity for the State of Alaska's Statewide ANILCA Implementation Program to review and provide comments on the draft trail maps and Subalpine Snowmachine Trails document titled "Over the Snow Policy and Procedures" as well as any draft documents pertaining to the Karta Wilderness project. We strongly support both projects as they will support the Service in meeting Congressional intent in ANILCA to allow traditional activities, including recreation, to continue on Alaska public lands.

### **Fish Crossing/Aquatic Organism Passage**

The AOP portion of the project includes 11 locations where existing crossing structures have been determined to be undersized in relation to stream widths thereby reducing or eliminating AOP. Existing structures will be replaced with larger culverts or bridges designed to allow for AOP. Based on the information provided ADF&G concurs with the chosen locations and supports the improvement of AOP.

In reviewing the summary of AOP and restoration work conducted in FY23, follow-up treatments comprised of post-implementation monitoring surveys were completed for all the restoration locations however, follow-up treatments are listed as not applicable for the AOP locations. Follow-up treatments are also listed as not applicable for AOP projects to be completed in FY24. Post-project monitoring is an invaluable tool required to ensure that a project is constructed as planned, the desired outcome is achieved, or if the project needs modification. For this reason, ADF&G recommends that the Service conduct post-project monitoring of all AOP projects.

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<sup>1</sup>Prohibited and restricted noxious weeds are defined in State of Alaska Administrative Code 11 AAC 34.020

Restoration projects for FY24 are a continuation of the FY23 Shaheen Creek watershed restoration project and include six separate locations. Two of the locations (MS4 and SF5) are scheduled for 2023 with the other four locations schedule for 2024-2026. The purpose of the restoration is to restore large wood, increase habitat diversity, and improve channel connectivity. ADF&G has worked closely with the Service on previous restoration projects, including Shaheen Creek, and agrees with the proposed projects and methods used.

ADF&G looks forward to working with the Service through the *Memorandum of Understanding (MOU) Between the USDA Forest Service and the Alaska Department of Fish and Game Regarding Fish Habitat and Passage* (19MU-11100100-108) during the design and installation of the new AOP structures, and the restoration work.

Again, thank you for the opportunity to provide input. The State looks forward to working with the Service on this project as we could achieve mutual goals in efficiently managing this area for the benefit of the public. Please contact me if you have any questions or would like to discuss the State's comments further.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sylvia A. Kreel", with a long horizontal flourish extending to the right.

Sylvia A. Kreel  
Large Project Coordinator

cc: State Review Team