



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Natural Resources

OFFICE OF PROJECT MANAGEMENT AND PERMITTING

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June 14, 2023

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

Re: Prince of Wales Landscape Level Analysis Project Spring 2023 draft Long-Term 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 (POW) Landscape Level Analysis (LLA) Project Spring 2023 draft Long-term Plan. The proposed project activities include recreation, stream restoration, fish crossing/aquatic organism passage, 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, 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:

DNR Management Authorities

DNR has management authority for state lands (including the land, water, tidelands, and shorelands of navigable waters within the State). This authority includes management of navigable waters, tidelands, and shorelands within and adjacent to the boundaries of federal lands. DNR would like to work with the Service to identify State-owned navigable waters and submerged lands on Prince of Wales Island. 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>

It is important for the public to understand 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.

Sustainable Recreation and Stream Restoration Projects

Some 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., El Capitan Recreation Area improvements; any activities within the tidal portion of the Shaheen). DNR requests consultation and we look forward to working with the Service to plan projects where State authorization may be required.

Invasive Plant Species Treatment

DNR supports the Service's efforts to remove and manage prohibited and restricted noxious weeds¹ on Service lands. The Service should continue to prioritize this work as persistent monitoring and treatment is key to successful control of invasive plants. The Service is invited to consult with agronomists at the Alaska Plant Material Center,² who can provide relevant expertise and assistance.

Request for Additional Information

The Project Plan does not identify projects involving road construction or reconstruction, reforestation (hand tree planting), pre-commercial tree thinning (PCT) or harvest of either old growth or young growth timber. The State of Alaska understands previous actions by the court(s) in response to litigation brought against the Service's environmental document, the POW LLA Final Environmental Impact Statement (FEIS) and Record of Decision (ROD), have prevented the Service from implementing any of the PCT, old-growth and young-growth timber harvest projects originally planned in the POW LLA FEIS and ROD.

Due to the ruling by the court(s), the State of Alaska understands all new PCT and timber harvest projects planned by the Service to occur on POW will be NEPA-cleared under project specific Environmental Analyses tiered to the current Forest Plan.

For reasons stated above, the DNR Division of Forestry requests the Service develop and make publicly available POW-specific project schedules, including map and spreadsheet components, identifying:

- The locations and timber volumes contained in old-growth and young-growth timber sales planned to be offered on POW over the next 5-10 years.
- The locations and acreage of PCT projects planned on POW over the next 5-10 years.
- The locations and miles of roads planned for construction or reconstruction on POW over the next 5-10 years necessary to access young growth timber sales and resource restoration projects.
- The locations and trees/acres planned to be hand planted in areas of recent timber harvest on POW over the next 5-10 years.

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

² <https://plants.alaska.gov/>

Project schedules for these activities will help the Division of Forestry better understand when and where those activities will occur on the landscape. The information will help to identify instances where coordinating similar state projects to occur nearby, especially through shared use of roads for PCT projects and commercial timber sales, would create additional forest management opportunities and efficiencies.

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 black ink, appearing to read 'Sylvia A. Kreel', written over a horizontal line.

Sylvia A. Kreel
Large Project Coordinator

cc: State Review Team