August 1, 2023
US Forest Service, Tongass National Forest
Thorne Bay Ranger District
Attn: POW LLA Long-term Plan
P.O. Box 19001, Thorne Bay, Alaska 99919-0001
Submitted electronically via portal: https://cara.fs2c.usda.gov/Public/CommentInput?Project=50337

District Ranger Pentecost,
SEACC thanks the Forest Service for the opportunity to comment on the draft 2023 Prince of Wales Island Invasive Plant Treatment Plan. Based in Juneau, Alaska (Tlingit/Áak'w Ḵwáan lands), Southeast Alaska Conservation Council (SEACC) is a regional grassroots organization with over 7,000 supporters. For over 50 years, SEACC has been bringing together diverse Alaskans from our region's communities to protect the natural resources of Southeast Alaska, ensure sound stewardship of the lands of the region, and protect subsistence resources and traditional ways of life side-by-side with fishing, tourism and recreation.

SEACC has attended each Prince of Wales Landscape Level Assessment planning workshop for the past several years. During the most recent workshop, it was stated that using herbicides to control invasive plants required specific training in terms of application. In the 2023 plan, it says that training is being *planned* for applying treatments at the Thorne Bay Ranger District compound, but does not clarify if the required training has already been accomplished by staff who will be applying herbicides this season in other areas identified in the plan. Please identify the training that was used to prepare Forest Service staff for herbicide application in 2023.

Residents of POW have historically pushed back against the use of herbicides, particularly those such as glyphosate, which has been shown to increase the risk of certain cancers.[1] Concerns about application near roadside areas, recreation areas, and waterways have been raised. In particular, glyphosate adheres well to soil particles, increasing the risk of contamination of water sources in the area.[2]

The POW treatment plan cites R10 guidelines for invasive management. SEACC could not immediately find a final version of the R10 draft invasive management plan from 2006.[3] When

[1] Rana, I., Shaffer, R.M., Sheppard, L., Taioli, E., & Zhang, L. 2019. *Exposure to glyphosate-based herbicides and risk for non-Hodgkin lymphoma: A meta-analysis and supporting evidence.* Mutation Research/Reviews in Mutation Research, v. 781, pp. 186-206. https://doi.org/10.1016/j.mrrev.2019.02.001.
[2] *Id.*
[3] US Forest Service, Alaska Region. 2006. *Invasive Species Strategy 2006-2010.* https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5269751.pdf

we looked at similar plans in Alaska, we found the US Fish and Wildlife Service's Environmental Assessment for invasive plant management.[4] This document contained some of the details SEACC was looking for in the POW plan. For example, in this document, two herbicides planned for use on POW are described, with specific cautions and details about how to use and apply:

Aminopyralid: Do not apply to water, to areas where surface water is present, or to intertidal areas below the mean highwater mark. Do not use broadcast on permeable soils (sandy, sandy loam, gravel) and where distance to groundwater is <10 feet. Use only spot treatments in these areas. Potential for travel to groundwater is high (GUS = 4.8).

Glyphosate: Do not treat within 25 feet of surface water because of aquatic plant toxicity unless specifically using a product labeled for aquatic use. Use caution where sensitive non-target plants are present. Apply aquatic labeled glyphosate formulations to aquatic habitats and to riparian habitats within 25 feet of surface water resources; ensure that surfactants are classified as practically non-toxic or slight acute toxicity (LC 50 >10 ppm) to aquatic organisms. Slight acute toxicity surfactants include LI-700, AgriDex, Activate Plus, Big Sur 90, Sil Energy, Dyne-Amic, Freeway, Cygnet Plus, Sun-Wet, Hasten Modified Vegetable Oil, Kinetic or Class Act Next Generation.[5]

In many of the areas proposed for treatment in the draft POW plan, surface water is or could be expected to be present. Has the depth to groundwater been established for any of the areas where aminopyralid is planned for use? SEACC hopes to see more of such site-specific details in the final version of this plan. For example, in the draft POW plan, it is stated that aquatic-based formulations of glyphosate and imazapyr may be applied up to the water's edge using hand application methods.[6] The draft POW plan describes two types of application: backpack and hand sprayers. Please add descriptive details about methods of application for each site (or group of sites) to the final version of this plan.

After discussing this issue with several POW residents, SEACC wants to make sure that the Forest Service also puts signs at treated areas immediately following treatment through at least a week, or longer if warranted by weather conditions or any other specifics, warning people that the area has been treated, naming the chemicals used, and including warnings about

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[4] US Fish and Wildlife Service–Alaska Region. March 2022. *Programmatic Environmental Assessment: Terrestrial Invasive Plant Management Strategy.* https://www.fws.gov/sites/default/files/documents/Alaska%20Region%20EA_Terrestrial%20Plants%20Management_031022_w%20Appendices%28sn1%29_508.pdf

[5] *Id.* at 12, Table 2.

[6] US Forest Service, Alaska Region, Prince of Wales Island District. July 2023. *Draft Prince of Wales Invasive Plant Treatment Plan.* https://usfs-public.app.box.com/s/wajxoik1jztq9xrmis9x51nn3fpgeoq3.

gathering subsistence resources in the immediate area until the chemical can reasonably be assumed to have been absorbed and dissipated.

SEACC spoke with a representative of the Southeast Alaska Watershed Coalition to gain more understanding of the chemicals being used to control invasive plants and any human risks associated with those chemicals, as well as information about Best Management Practices of application. These chemicals are water-soluble and do not remain long in the environment. It seems unlikely for deer or most other smaller animals to ingest levels of active ingredients of these herbicides that could cause harm in humans. SEACC and concerned residents of Prince of Wales nonetheless want to ensure that the utmost care is taken with the application of these chemicals, and that large areas of NFS lands are *not* treated with herbicides. Wind speed and direction, temperature, chemical concentration, and other variables are discussed briefly in the activity card from the POW Landscape Level Assessment included in the Draft Invasive Treatment Plan. It is important for those in the field to use very careful application methods and to document weather conditions during application, as well as shortly before and after application. This documentation will also help the Forest Service and the public better understand the efficacy of these treatments, given certain conditions, when the sites are re-evaluated.

Watershed Restoration on POW– a side note:

SEACC still does not fully understand how and why Shaheen Creek watershed has been prioritized so highly for not only invasive treatments, but road re-construction and water management restoration (road crossings), to the degree that all other POW locations are being sidelined in terms of restoration work in the near future. SEACC researched the POW 2014 Watershed Assessment, a document produced by Prince of Wales communities with funding from a National Forest Foundation land stewardship grant. Guidelines for categorization of watersheds were formulated using a categorization process developed by the Environmental Protection Agency (EPA) for conducting watershed assessments. Shaheen Creek is discussed as a significant watershed in terms of subsistence value for both fish and deer; however, it is listed as only the ninth highest priority watershed in this assessment in terms of restoration work, given the needs of other watersheds on POW which contain more anadromous fish habitat, are closer to communities, or have other issues or values.[7] Staney Creek watershed, in comparison, was described as more of a priority and ranked fifth in this assessment.[8] Given this information, it is unclear why the Forest Service continues to put all of its POW watershed

[7] Prince of Wales Island Watershed Association. December, 2014. *Prince of Wales Island Unified Watershed Assessment, Version 1.0.* https://www.seakfhp.org/wp-content/uploads/2013/03/POWWA_UWA_FINAL_Dec_11_14.pdf.
[8] *Id.* at 152.

restoration resources into Shaheen Creek, seemingly ignoring the 2014 document created by POW communities that should help guide its activities. This document is a shining example of terms such as stewardship and co-management, yet appears to have been largely ignored by the Forest Service in relation to current management activities. Pursuant to SASS efforts, this should be exactly the type of effort that is produced, applauded and, most importantly, put to use by Federal land-management agencies, as they plan and orchestrate restoration projects on NFS lands in concert with public input and as part of co-management and stewardship efforts.

SEACC would like to address these issues with POW restoration work planning directly with regional and/or local watershed restoration planners at their convenience.

Respectfully,

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