



November 15, 2023

USDA Forest Service, Tongass National Forest
Prince of Wales Ranger District
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Submitted electronically via portal: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=50337>

Based in Juneau, Alaska (Tlingit/Áak'w K̓wáan 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 thanks the Forest Service for the opportunity to comment on the proposed changes to the Prince of Wales Landscape Level Assessment (POWLLA). Our main concerns about the proposed changes hinge on the dilution of public processes. The Forest Service is proposing to subtract one of two annual workshops for the public, which address the management activities planned for the next year and longer-term. Additionally, the Forest Service has proposed shortening the comment period to two weeks after the workshop and eliminating the requirement to publish notice about the workshop in a local newspaper. Instead, the proposed changes state that notice will be advertised through online mechanisms and "on community bulletin boards within the project area at least 2 weeks prior to when a workshop will happen."¹ Two weeks is not enough time for members of the public to plan ahead to attend a meeting, perhaps *especially* on POW, given a distributed geography, and certainly not enough time to make informed public comments. These proposed changes would make it more difficult for people in an area with many disadvantages to participate fully in the planning process. People on POW are seasonally employed at a high rate and participate heavily in seasonal subsistence activities. Workshops can be made available during "down times" and having two per year ensures more opportunity for participation. The Forest Service should not propose any change that takes away opportunities or shortens time for the public to respond to planned management activities on public lands.

¹ USDA Forest Service. 2023. *POW LLA Implementation Plan review* at 7.
<https://www.fs.usda.gov/project/?project=50337>



While the Forest Service has briefly outlined the legal requirement for Tribal and Native Corporation consultation, it has not identified any additional methods it will adopt to reach out to and meaningfully communicate with Tribes. Too often, SEACC has heard testimony about Tribal members not knowing what is being planned or done on public lands. What additional, proactive methods will the Prince of Wales district use to communicate clearly and in a timely fashion with Tribal entities? Shortening public response time frames and subtracting public process opportunity is not indicative of a culturally responsive agency.

SEACC did not see any proposed changes to the Invasive Plant Management section of the POWLLA. While we do not necessarily suggest any changes, we have been disappointed by the lack of direct response to our concerns regarding use of herbicides to control invasive plant populations on POW. We commented on June 13, 2023, and asked for a meeting with the District Ranger regarding some of the planning activities. We never received a response to that request. On August 1, 2023, we sent another comment specifically addressing herbicide use to treat invasive plant management. Again, we asked to meet with local and/or regional managers. Our comment asked for Forest Service managers to respond to questions about groundwater depth, evidence of specific training that is required to apply herbicides and with some information on how they will inform the public of the areas they are treating, such as signage. We also asked for more details about methods of application. We received no response from the Forest Service about any of these topics. The email response we did receive addressed only the topic of watershed restoration and is cited in this document.

Another proposed change of concern for us is the change (p.7) to the following section:

The national Watershed Condition Framework (USDA Forest Service, 2011, Watershed Condition Framework FS-977) guides our approach to implementing watershed restoration. A 2015 assessment identified about thirty watersheds in the project area with known restoration needs that are high-potential candidates for restoration (High Potential Restoration Watersheds spreadsheet in the project record). Public input to the POW LLA Project supported restoration in these watersheds and identified additional watersheds to be considered for restoration. (emph. added)."

The proposed change is this paragraph, which eliminates the underlined section above:



The national Watershed Condition Framework (USDA Forest Service, 2011, Watershed Condition Framework FS-977) guides our approach to implementing watershed restoration. Following national guidance (USDA Forest Service, 2011, Watershed Condition Classification Technical Guide FS-978), spreadsheets were developed to assign Watershed Condition scores for attributes that link management activities (e.g., riparian harvest) and other indicators to watershed function. These spreadsheets identified 30 watersheds in the project area with known restoration needs. Public involvement recommended stream restoration activities in twenty of these watersheds.

The proposed change eliminates any mention of what was a significant public planning effort that involved communities, Tribes, agencies and federal partners and scientists, including the Forest Service, and produced a publicly driven guidance document for watershed restoration on POW. The result of this proposed deletion is an inaccurate picture of how watershed assessment, evaluation, and prioritization for restoration has, and should, proceed on Prince of Wales. In 2014, as referenced in the first paragraph, a major effort involving the public, watershed scientists, and federal guidance resources identified watersheds of concern on POW through the Prince of Wales Island Unified Watershed Assessment.² The document prioritized the watersheds most in need of restoration according to federal guidelines, using local input from communities and Tribes. It would be logical to assume that this guidance was produced specifically for the POW Forest Service managers. However, when SEACC recently asked why watershed restoration was being planned outside of the recommendations made clear in this document, the agency responded by stating that the 2011 guidance they use to assess and prioritize watersheds is different from the methods used to develop the 2014 guidance document. Here was the response we received:

“This letter responds to comments made by the Southeast Alaska Conservation Council on the POW LLA long-term plan on August 1, 2023. This letter specifically addresses comments related to watershed restoration on Prince of Wales Island. The Forest Service appreciates SEACC’s involvement in implementation of POWLLA and resources such as the Prince of Wales Island Unified Watershed Assessment which were developed through collaborative community efforts. The Forest Service regularly uses such resources in watershed restoration prioritization and

² Prince of Wales Watershed Association. 2014. *Prince of Wales Island Unified Watershed Assessment*. National Forest Foundation Community Capacity and Land Stewardship Grant, Southeast Alaska Watershed Coalition. https://www.alaskawatershedcoalition.org/wp-content/uploads/2015/01/POWWA_UWA_FINAL_Dec_11_14.pdf



improvement. However, the system that the Forest Service uses nationally differs from the framework used in the Prince of Wales Island Unified Watershed Assessment (*pers.comm. H. Harris*)."

This statement is very confusing considering the fact that the Unified Watershed Assessment was produced in partnership with the US Forest Service (p.6). SEACC must ask how and why a watershed assessment would be produced, with the managing organization as a partner and intended audience, that wouldn't adhere to the—already existing—2011 Forest Service watershed assessment guidance. For the Forest Service to now claim that it uses a different system, thus invalidating the 2014 Unified Watershed Assessments guidance, is preposterous. What seems clear is that in the particular case SEACC had questions about, the former Forest Supervisor independently decided that the Shaheen Creek area would become a priority for restoration, even though the Unified Watershed Assessment identified numerous other watershed areas with higher needs. The exact answer SEACC received about how Shaheen Creek was designated a priority watershed for restoration stated:

"Shaheen Creek was designated as a Priority Watershed by the Forest Supervisor in 2018...(pers. comm. H. Harris)."

No clarification of exactly *how* or *why* this watershed was designated as a priority for restoration has been made by the Forest Service.

Essentially, the Forest Service on Prince of Wales is typically unresponsive to public efforts to advise, guide and participate in management decisions. Even when the public engages fully at multiple levels, as during the watershed assessment effort, the Forest Service seems to find ways to invalidate those suggestions at some point. SEACC predicts that the Forest Service will respond to our criticism of the erosion of public processes proposed with these changes by citing low participation numbers for the workshops and/or comment periods associated with the POWLLA. One has to look no further than Forest Service actions associated with issues such as this watershed assessment to understand why public participation on POW tends to be low and apathetic. Even when the public engages, the Forest Service ends up invalidating that engagement, diluting it, or changing the rules at some point to accommodate what managers want to do rather than what the public has recommended or even demanded. Instead of eliminating opportunities and shortening timelines for public response, the Forest Service on POW should be making more efforts to meaningfully engage and show people that it is



following public recommendations rather than fighting them. Participation might significantly improve if that were the case.

The Forest Service should not remove or curtail any public opportunity for comment and engagement on the Prince of Wales Island Landscape Level Assessment. The proposed changes—eliminating one of two annual workshops, eliminating publishing notice in the newspaper and shortening the notice time to two weeks, and continuing allowing only two weeks for written comment—are culturally and socially tone-deaf and contrary to discussion we heard regarding SASS implementation and increasing agency responsiveness to the public. These proposals should be rejected and the Forest Service should instead propose ways it will increase public engagement and agency responsiveness. Methods to drive up public participation should be sought, proposed and tested. In particular, recreation work and proposals should be highlighted through the POWLLA mechanism, as it is now a priority for Tongass management.

SEACC opposes all the proposed changes to the POWLLA regarding public process, and opposes other specific changes as discussed in this comment. The Forest Service should come back to the table prepared to show us ways it will work to increase public engagement on POW as it moves forward into the new era of Tongass management.

Respectfully,

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