



December 19, 2019

Thorne Bay Ranger District  
1312 Federal Way  
P.O. Box 19001  
Thorne, AK. 99919-001  
<https://cara.ecosystem-management.org/Public//CommentInput?project=50337>

Re: POW LLA Project Out-year Plan 2020

Thank you for the opportunity to provide comments on the Prince of Wales Landscape Level Assessment (POW LLA) Out-year Plan. Trout Unlimited has participated throughout the POW LLA planning process and we appreciate the work of the agency and other stakeholders in developing a comprehensive approach to implementing management practices that will improve fish and wildlife habitat and diversify the economy on POW while realizing the economic efficiencies of an integrated plan.

With those goals at the forefront Trout Unlimited supports the following projects:

1. Aquatic Organism Passage

The AOP project map for 2020 indicates there are seven red pipe culverts slated for remediation in 2020 and another 21 red pipes awaiting future action, for a total 28 culverts in need of repair within the project area. However, we are concerned this number may in fact be higher. A 2017 USFS Fish Passage Monitoring Report, notes that 33 percent of Tongass road/stream crossings, 1,217 in total, have been determined not to meet State of Alaska fish passage standards. Although we fully support the remediation of red pipe culverts, it's hard to believe only 28 of some 1200 red pipe culverts occur on POW. We therefore suggest a thorough review of POW culverts be conducted to assure all red pipes are included in the LLA work plan. Trout Unlimited looks forward to continuing our partnership with the Forest Service, the Southeast Alaska Fish Habitat Partnership, U.S. Fish and Wildlife Service and other interested parties and assisting in the eventual remediation of all red pipe culverts and substandard bridges on the Forest.

2. Recreation

We support the 2020 recreation infrastructure work, which includes two trail improvement projects and, given the work noted at 12 Mile appears to require construction of a road, we recommend that any red pipe/instream restoration opportunities nearby be scheduled for completion when heavy equipment will be on hand.

We support all of the deferred recreation maintenance projects.

3. Invasive Species

Although Trout Unlimited supports the plan to control invasive knotweed at 12 Mile Creek, we strongly encourage the Forest Service to use methods that inject the herbicides into the knotweed directly, thereby reducing the amount of herbicide needed, increasing precision and limiting impacts to other plants, fish and wildlife. If direct herbicide injection is not an option, mechanical or hand-removal should be undertaken. Additionally, we encourage the agency to exercise extra care in insuring that all equipment used for road construction and toilet upgrades are free of knotweed to curb the potential spread of the plant to other locations.

4. Instream Restoration

Trout Unlimited fully supports the placement of large woody debris at sites noted at Shaheen, Buster, Flicker and Nahania creeks in 2020. We recommend that any adjacent culvert remediation work and transport of large wood for future out-year instream projects in the area be completed when helicopters or heavy equipment are on site.

5. Conclusion

While Trout Unlimited fully supports the aforementioned projects, we believe that given the importance of fisheries, tourism and recreation to both the local and regional economies, a much more aggressive approach to completing projects that support those industries should be undertaken. Funds spent on fisheries, tourism and recreation projects generally pay immediate dividends, improve experiences for locals and visitors alike and are a wise use of public dollars. Trout Unlimited remains available to partner on these types of projects and recommends the Forest Service utilize our organization, the Southeast Alaska Fish Habitat Partnership and other NGO's to promote and complete an accelerated scope of projects within the POW LLA.

Thanks again for the opportunity to comment on this plan.

Sincerely,



Austin Williams  
Trout Unlimited