

# STATE OF ALASKA

**FRANK H MURKOWSKI**  
**GOVERNOR**

## **ANILCA IMPLEMENTATION PROGRAM**

550 W. 7<sup>TH</sup> AVENUE, SUITE 705  
ANCHORAGE, ALASKA 99501  
PH: (907) 269-7529 / FAX: (907) 334-2509  
[susan\\_magee@dnr.state.ak.us](mailto:susan_magee@dnr.state.ak.us)

October 17, 2006

Jeff Heys  
Exotic Plant Management Team Liaison  
National Park Service  
240 W. 5<sup>th</sup> Ave. #114  
Anchorage, AK 99501

Dear Mr. Heys:

The State of Alaska reviewed the Scoping Newsletter for the Exotic Plant Management Plan for Alaska Parks/Environmental Assessment (EA). The following comments are compiled on behalf of various state agencies.

### Alaska Department of Environmental Conservation

The Alaska Department of Environmental Conservation (ADEC) is very supportive of entry prevention and management of invasive species because of their devastating effects on the environment, native species, agriculture, human health, tourism, economic and aesthetic values, and the overall wellbeing of the State.

If the Service proposes chemical control methods, the following actions are required:

- Use of State-registered pesticides
- Proper training for personnel in the safe use, storage, transport and disposal of pesticides
- Maintenance of records of all purchases and treatments
- Monitoring plans for the affected environment (i.e., water quality)

An authorization from ADEC may be necessary under certain circumstances, such as aerial application of pesticides or application on state right-of-ways and waters. Please contact the ADEC Pesticide Program (376-1870) to determine the permitting requirements for the project, including whether the permitting process requires a public review.

We recommend the Service pre-notify the public of all planned pesticide applications and post on-site notices for any restricted-entry areas. We recommend notification methods also accommodate those who cannot read English, since national parks typically host families and international visitors. This could also be a prime opportunity to offer education and outreach to the public regarding invasive species and their management.

For example, providing visitors with species lists and identification techniques and allowing those able and willing to recognize invasive species the opportunity to report sightings to park officials during their visit could be valuable.

We further recommend the EA evaluate and clarify what is involved in implementing particular control methods. One issue worthy of consideration is the potential for biological controls to have greater impacts than certain chemical controls. Also, including a list of potential chemical controls and detailed species-specifics will help identify potential environmental impacts. The following are additional species-specific issues for consideration:

- Does removal/herbicide application adhere to a particular life-cycle phase?
- Does the species require a specific herbicide or subset of herbicides?
- Will broad-spectrum herbicides be used in areas of multi-species infestation?
- Are there times of year that removal/herbicide application could be detrimental to other organisms, i.e. pollinators, herbivores, salmon, park visitors, or native/migratory resident species?
- Will application technique vary with species, degree of infestation, nature of the environment and/or proximity to water?

Lastly, regardless of selected control method, we recommend conducting a pilot study. Implementing management strategies on a smaller scale provides an opportunity to evaluate the economics, efficiency, and potential effects (i.e., environmental and health effects, long and short term) of a larger scale removal operation. A pilot study can be used as a case evaluation, which could serve to inform interested parties and the public of the project's associated benefits, costs and/or risks. It would also allow for project fine-tuning with on-the-ground assessments.

#### Alaska Department of Transportation and Public Facilities

The Alaska Department of Transportation and Public Facilities (ADOT&PF) encourages the Service to pursue an examination of all feasible methods for control of exotic plant species in Alaska's national parks. This would include hand and mechanical cutting or removal, as well as thermal, chemical, and biological methods. The ADOT&PF is currently developing its own statewide integrated management plan (IVM), primarily focused upon removing or controlling tall growing woody species along its roadways and airports. The Department is examining a similar mix of methods to develop a safe, effective, and economic IVM plan for lands under ADOT&PF management. Although, unlike the Service, ADOT&PF is not primarily focusing upon exotic plant species, the general strategy will presumably parallel that of the Service.

In addition to examining potential ecological impacts of proposed control methods, ADOT&PF also encourages the Service to consider performing cost analyses of treatments and economic impacts, both pro and con, of controlling or not controlling exotic species in Alaskan parks. ADOT&PF would be particularly interested in any data on pathways for exotics (especially relating to road and air travel) and in control method effectiveness.

Mr. Jeff Heys  
October 17, 2006  
Page 3

ADOT&PF already coordinates with the Service when it seeks input for road and airport construction projects adjacent to Alaska's national parks. We encourage the Service to similarly solicit input from ADOT&PF for specific exotic plant control efforts that are adjacent to State roads and airports. In this manner, both agencies may be able to increase the effectiveness for controlling exotic species through such means as coordinated timing and location of control efforts. As Service and ADOT&PF refine their vegetation control methods in Alaska, a coordinated effort and shared research will benefit both agencies.

Alaska Department of Fish and Game

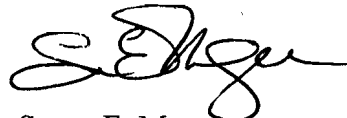
The Alaska Department of Fish and Game has worked closely with the Service on this issue and is supportive of efforts to consider alternatives and analyze potential impacts and issues through the preparation of an Environment Assessment. The Department looks forward to reviewing the document at various stages during its development.

Office of Project Management and Permitting/Alaska Coastal Management Program

If the proposed plan includes any activities that could affect the coastal zone, it must be consistent to the maximum extent practicable with the Alaska Coastal Management Program per Section 307(c)(1) of the Federal Coastal Zone Management Act and 15 CFR 930, Subpart C regulations. Questions regarding the program and review requirements can be directed to the Alaska Department of Natural Resources, Office of Project Management and Permitting (Anchorage 269-7478 or Juneau 465-2142).

Thank you for the opportunity to comment. Please contact either me or the referenced state agencies directly if you have any questions.

Sincerely



Susan E. Magee  
ANILCA Project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator