



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

## ANILCA Implementation Program

OFFICE OF PROJECT MANAGEMENT AND PERMITTING

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October 7, 2021

Aaron Martin  
Invasive Species Program Coordinator  
USFWS, Alaska Region  
Fisheries and Ecological Services  
1011 East Tudor Road  
Anchorage, AK 99503

Dear Mr. Martin:

The State of Alaska reviewed the draft Environmental Assessment (EA) for the management of terrestrial invasive plants in the Alaska Region, which considers a comprehensive Integrated Pest Management (IPM) approach to address emerging infestations on USFWS land and at relevant critical access points. The following comments represent the consolidated views of state agencies.

The State supports the “Regional IPM Strategy with Herbicide” as detailed in the preferred alternative. Historically, individual EAs have been prepared on a regional or area basis as new invasive species infestations are discovered. This approach is costly and takes significantly more time. The proposed IPM strategy provides the invasive plant team at the Alaska Department of Natural Resources, Division of Agriculture, the ability to rapidly respond to infestations across the state by allowing the deployment of herbicide at the soonest possible time. This greatly improves the division’s ability to treat, remove and eradicate invasive terrestrial plants rapidly. This also matches closely with the IPM strategy found in the Alaska Department of Environmental Conservation’s Pesticide Control regulations.

Thank you for the opportunity to comment. Please contact me at (907) 269-7529 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Magee".

Susan Magee  
ANILCA Program Coordinator