

# STATE OF ALASKA

**SARAH PALIN, Governor**

## **ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting**

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June 25, 2009

Scott Snelson, Acting District Ranger  
Ketchikan-Misty Fiords Ranger District  
3031 Tongass Avenue  
Ketchikan, AK 99901

Dear Mr. Snelson:

The State of Alaska reviewed the scoping notice dated May 14, 2009 and additional supporting materials regarding the proposed invasive plan management project for the Ketchikan-Misty Fiords and Wrangell Ranger Districts. With the exception of any requirements specific to the Alaska Coastal Management Program and scoping comments submitted directly to the Forest Service by the Alaska Department of Environmental Conservation on June 9, 2009, the following comments represent the consolidated views of the State's resource agencies.

The State appreciates the Districts' efforts to address invasive plant infestations on forest lands. This proposal does an excellent job addressing the highest priority infestations with the highest probability for success overall. From the information provided, it also appears Alternative 2 in all cases has a greater probability for success than alternatives 1 and 3.

The infestations identified for treatment represent those that should be treated immediately to support the goals and objectives identified in the Forest Management Plan. However, we note there are other high priority species with more widespread infestations that can severely hamper achievement of these goals and objectives. Native fish, wildlife and plant resources that are either adjacent to or travel through forest lands for part of their life cycle may also be negatively impacted by high-priority invasive species that may not be adequately controlled over the long term by this proposal. For example, reed canarygrass (*Phalaris arundinacea*) is a plant identified as infesting this area, which is known to impact biodiversity and diminish habitat for fish, waterfowl and other wildlife. To meet the goals of the Forest Plan, the possibility of reinfestation with reed canarygrass should be addressed in all of the site-specific treatment options. We therefore recommend the Forest Service also develop a more comprehensive programmatic long-term plan to address all invasive plants in these management areas.

Although most of the proposed treatment sites listed may not be immediately adjacent to fish streams, road ditching does allow runoff from road surfaces (and prisms) during

periods of rain to eventually end up in streams. Application of chemicals to areas along pull-outs and shot-rock fill areas where ditches are not present could also allow for easy dispersion of chemicals into waters. As such, treatment methods using chemicals may be of concern when and where the distance to a stream is short and/or slopes steep.

Using treatment methods other than chemicals (manual pulling, cultivating) also comes with risks depending on the target species. For example, the literature indicates that rhizome fragments of reed canary grass left behind from pulling/cultivating could easily end up in streams during high flow events thus infecting stream corridors. Of the species targeted for treatment, reed canarygrass appears to pose the most threat to riparian corridors in that the streams can easily transport it and exacerbate invasion. From the information provided, it is not known whether surveys for reed canary grass (where found) have attempted to also detect a presence in nearby streams. If not, we recommend initiating such follow-up surveys in addition to the proposed treatment.

If the Forest Service has concerns regarding the impact of methods of treatment to anadromous and resident waterbodies, Alaska Department of Fish and Game area staff are available to assist the Districts in conducting site visits to obtain more information on which to base recommendations.

#### **Page Specific comments**

Page 1, Alternative 2: The herbicides listed generally are excellent for control of these species. It may, however, be too limiting to list brand names as opposed to active ingredients, and to limit the treatments to these two products. For example, if the infestations spread too close to water to use Roundup Pro, an aquatic approved formulation of glyphosate may be available. Specific brand names may also go out of registration in Alaska for various reasons, which could limit the Forest Service's ability to purchase the product identified in the plan. This may also be the case if a programmatic plan is developed as suggested above, and other products not identified in the plan are necessary to be more effective or apply per the label requirements.

Page 2, Biodiversity Goal and Objective C: Both the goal and objective appear to support the need for a programmatic plan to address all invasive plant populations that pose risk to management objectives.

Page 3, Time and Duration: Three years may not be long enough to eradicate the populations identified. These plants are difficult to eradicate. For example, the seed life of orange hawkweed (*Hieracium aurantiacum*) is up to seven years. We recommend the duration of proposed treatments reflect the biology of the species, seedbank, and relevant efforts of others in managing these species.

Page 3, Site 1: We recommend addressing reed canarygrass infestations and the potential for reinvasion of the treated area at this site, particularly because infestation is 500 feet from Blossom River, and reed canarygrass is present in the area.

Page 6, Shrimp Bay: We recommend addressing reed canarygrass at this site and in the surrounding area.

Page 6, Proposed Action, Alternative 3: Covering the infestation with road bed fabric, such as Typar, prior to rock may reduce the need for so much rock and increase probability of success.

Page 8, Shelter Cove, Proposed Action, Alternative 2: We recommend using a broad leaf herbicide instead of glyphosate. Using glyphosate on a cutbank may kill more vegetation than desired and decrease bank stability. Establishing appropriate grasses and using a broadleaf specific herbicide may successfully address both these issues.

Page 9, Sarembo Island- 6587 Road: Since Yellow hawkweed is present in the area, the scientific name is necessary to comment on any proposed treatments and importance of the species. We also recommend addressing reed canarygrass reinvasion and the potential to affect resources in this area.

Page 12, Mitigation measures: Regarding the statement “Application will be performed when there is less than 20% chance of rain to occur in the two hour period after application and winds are less than 5 miles per hour,” we recommend checking the label for requirements related to weather. While the criterion about chance of rain seems accurate, the wind speed may be incorrect. Some labels provide direction to apply with wind speeds between 5 and 10 mph to allow predictability, and not to apply at times when no wind is present. Avoiding application when no wind is present is addressed in some labels to protect applicators from unpredictable updrafts of air that may occur when wind is not present.

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

Sincerely,



Susan E. Magee  
ANILCA Project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator