

STATE OF ALASKA

SEAN PARNELL, Governor

ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

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July 30, 2010

Gary Wheeler, Wildlife Refuge Manager
Kodiak National Wildlife Refuge
1390 Buskin River Road
Kodiak, AK 99615

Dear Mr. Wheeler,

The State of Alaska reviewed the US Fish & Wildlife Service's environmental assessment (EA) "Integrated Pest Management of Invasive Plants on Kodiak National Wildlife Refuge and Vicinity." The following consolidated state agency comments were compiled by the State's Alaska National Interest Lands Conservation Act (ANILCA) Implementation Program and cover issues relative to state interests. Any correspondence or response pursuant to the federal Coastal Zone Management Act and the Alaska Coastal Management Program will be provided separately by the Division of Coastal and Ocean Management.

The State supports aggressive measures, including use of herbicides, to control and manage invasive plants on the Kodiak National Wildlife Refuge (NWR) and throughout Alaska. The approaches in this plan which exclude herbicide use can ultimately result in spread of invasive plants and deterioration of fish and wildlife habitat and other natural resources. This plan's approach to management, education, and prevention forwards the holistic approach necessary for effective invasive plant management. The invasive species referenced in Table 2.1 are best managed with a completely integrated pest management program that may include the use of herbicides. With proper use, the herbicides targeted for use in this plan will have a benign to non-existent impact to ecosystems compared to invasive plant proliferation. Finally, the limited quantity of herbicide proposed for use further decreases the potential for adverse impacts to human health, worker safety, fish, wildlife and natural resources.

The State also supports the inclusion of provisions for invasive plant management on and near the Kodiak NWR. We suggest invasive plants of concern not located within refuge boundaries should be considered for herbicide treatments when developing management plans. It is difficult to successfully manage invasive plants without addressing all infestations in an area.

Again, we appreciate the opportunity to comment on this plan, and support appropriate utilization of herbicides to control invasive plants. Reducing proliferation of invasive

plant species in national wildlife refuges is integral to protecting the State's natural resources. A proactive approach will best serve the interests of the Service, other landowners and the public.

Please contact me at (907) 269-7529 if you have any questions.

Sincerely,

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Susan E. Magee
ANILCA Project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator