

# STATE OF ALASKA

## ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

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August 14, 2009

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

Dear Mr. Wheeler:

The State of Alaska reviewed the July 13, 2009 scoping notice for an environmental assessment (EA) regarding management of invasive plants on Kodiak National Wildlife Refuge and holdings of Alaska Maritime National Wildlife Refuge adjacent to Kodiak Island. The following consolidated state agency comments were compiled by the State's Alaska National Interest Lands Conservation Act (ANILCA) Implementation Program. Any correspondence or response pursuant to the Coastal Zone Management Act and the Alaska Coastal Management Program will be provided separately by the Division of Coastal and Ocean Management.

The State appreciates the scoping notice addresses key areas of importance, including species of concern, the proposed action, partnership options and management of new infestations of invasive plants.

We also appreciate the proposed action includes sound integrated pest management (IPM) practices, using the appropriate pesticides for the sites and species targeted. The Refuge proposes to continue using clopyralid and aminopyralid herbicides in addition to other methods of weed control including cultural, biological, mechanical, and manual methods as part of the Integrated Pest Management Plans for each infestation. No pesticide permit is required for ground based pesticide application to federal or private lands. When used appropriately, use of pesticide is a reasonable method of weed control for integrated pest management. Results of previous efforts by the Refuge using these pesticides proved successful in reducing the severity of the infestations in the targeted area. Two of the three targeted species, Canada thistle (*Cirsium arvense*) and orange hawkweed (*Hieracium aruantiacum*), are on Alaska's prohibited noxious weed seeds list. Oxeye daisy (*Leucanthemum vulgare*) is also targeted, and while not on the noxious weed seeds list it is a species of concern in Alaska. We recommend the Refuge coordinate with the State of Alaska, the Kodiak Soil and Water Conservation District, and the Alaska Committee for Noxious and Invasive Plants Management for information, surveys, and best management practices for controlling and eradicating invasive plants and noxious weeds.

It is unclear whether the EA will specifically address newly discovered infestations. We recommend doing so for infestations that are not substantially different from the current proposed action (e.g. covers more than 100 acres) so that management action can be implemented without added delay associated with additional analysis and review. Delay can lead to further spread of the infestations to other areas, increase adverse impacts (i.e. seedbank and severity of infestation), the amount of herbicide needed to manage the infestation, and associated costs. For anything significantly different that could likely impact natural resources or human health, we support the need for additional analysis and public review.

We also encourage the Service to consider developing a programmatic EA for the Kodiak Refuge, as well as all refuges in Alaska. A programmatic EA could identify the suite of species and methods and chemicals available for management. Currently, several species could negatively impact refuges in Alaska. In the general area of Kodiak, Japanese knotweed (*Polygonum cuspidatum*), creeping buttercup (*Ranunculus repens*) and other invasive species are present. While not currently known in the area, reed canarygrass (*Phalaris arundinacea*), smooth cordgrass (*Spartina alterniflora*), and other highly invasive species are potential invaders. Developing a programmatic EA would allow for management of infestations soon after discovery, while the populations remain manageable. As previously noted, delayed action may exacerbate the problem.

The scoping document also indicates the Refuge intends to cooperate with non-refuge landowners and managers in management of invasive plant infestations. This is an important aspect of invasive species management, which helps prevent the further spread of infestations. We support this effort and recommend allowing for management with herbicides legally authorized for use in Alaska with the appropriate IPM practice that would be considered most effective and acceptable to the State, the Refuge, and neighboring landowners and managers.

From the information provided, it appears the Refuge will follow typical protocols and evaluations prior to making decisions about management practices. However, to ensure compliance with applicable state regulations and various department protocols, we request the Refuge continue to coordinate with the State during the development of the EA. Please contact me at (907) 269-7529 if you have any questions or need assistance obtaining appropriate state agency contacts. Thank you for this opportunity to comment.

Sincerely,



Susan E. Magee  
ANILCA Project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator