



**UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration**

*National Marine Fisheries Service*

*P.O. Box 21668*

*Juneau, Alaska 99802-1668*

September 19, 2006

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

Re: Scoping Comments for Exotic Plant Management Plan for Alaska Parks Environmental Assessment

Dear Mr. Heys:

The National Marine Fisheries Service (NMFS) has reviewed the August, 2006 scoping solicitation for the referenced environmental assessment. NMFS shares your concern that a number of exotic plant species threaten aquatic environments that support runs of salmon and trout, yet methods of control, particularly chemical, may also do harm to these valuable resources. Anadromous fish streams that support salmon are classified as Essential Fish Habitat (EFH) under the Magnuson -Stevens Fishery Conservation and Management Act. Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act requires federal agencies to consult with NMFS on all actions that may adversely EFH. NMFS is required to make conservation recommendations, which may include measures to avoid, minimize, mitigate or otherwise offset adverse effects.

Any recommendations NMFS would have regarding various exotic plant chemical control methods would depend on a number of variables, including which herbicides are being considered for certain plant species, application methods, active ingredients and formulations, seasonality and climate. Together these factors define a risk of exposure that will vary. Similarly, specific analyses would be needed for thermal or biological control methods. NMFS suggests that the National Park Service consult with NMFS when classes of these actions are better defined, perhaps as programmatic EFH consultations under 50 CFR 600.920(j). Such programmatic consultations could address multiple control efforts using sets of prescribed methods.

Linda Shaw is the contact for this project and can be reached at 907-586-7585.

Sincerely,

Robert D. Mecum  
Acting Administrator, Alaska Region



cc: \* Rick Golden, NMFS Portland  
\*Richard Enriquez, USFWS  
\*Jackie Timothy, ADNR

\*e-mail