



United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE
Anchorage Fish and Wildlife Conservation Office
4700 BLM Road
Anchorage, Alaska 99507



In Reply Refer to:
FWS/IR11/AFWCO

March 31, 2021

Ms. Joni Johnson
U.S. Forest Service
P.O. Box 1328
Petersburg, Alaska 99833

Subject: U.S. Forest Service Wrangell-Petersburg Invasive Plant Management Project
(Consultation 07CAAN00-2021-CPA-0063)

Dear Ms. Johnson:

Thank you for the notification and opportunity to provide comments on the U.S. Forest Service's Tongass National Forest (Forest) proposed Invasive Plant Management project in the Wrangell and Petersburg Ranger Districts. The proposed action includes: 1) no annual treatment limit; 2) herbicide, manual, and mechanical treatment tools; 3) coverage of the 3.7 million project acres on both Forest (including wilderness) and non-Forest lands; 4) treatment of emergent vegetation; 5) the use of aminopyralid and the aquatic formulations of glyphosate and imazapyr; and 6) the Early Detection and Rapid Response (EDRR) management strategy.

The U.S. Fish and Wildlife Service (Service) has no specific concerns, although we encourage you to consider the following in the project design: in addition to Milestone, which was included in the 2013 Environmental Assessment, we recommend the use of Metsulfuron Methyl (Escort), which works with another site of action. This herbicide can be used for oxeye daisy, which is one of the more abundant species mentioned in the scoping proposal; it can also be used on Canada thistle and bull thistle.

Additionally, we recognize that some of the proposed activities could affect Service trust resources. The Service recommends the following conservation measures to reduce adverse impacts to wildlife and their habitats:

- Schedule mechanical treatment activities outside of the peak bird breeding season to the extent practicable. For the most recent timing guidance, visit:
<https://www.fws.gov/alaska/pages/nesting-birds-timing-recommendations-avoid-land-disturbance-vegetation-clearing>

- When conducting mechanical treatment activities, avoid disturbing amphibian breeding areas, including shallow margins of ponds and lakes, geothermal springs, and river backwaters. Limit human disturbance in and around important habitats.
- Reduce or avoid the use of broad-spectrum herbicides. Many amphibians depend on robust invertebrate populations as prey. If possible, avoid spraying closer than 60 feet from a water body. Do not spray if heavy rain is expected and apply herbicides in the early morning or in the evening when winds are calm. Use a low pressure, large droplet sprayer, and spray close to the ground. Follow the instructions on the herbicide label.
- Minimize the use of herbicides on and along roads. Create no-spray zones along roads adjacent to wetlands and streams. Chemical pollutants can poison aquatic fauna and may contribute to poor water quality or groundwater contamination.

For additional guidance and questions regarding these recommendations, please contact Ms. Sarah Markegard, at the Service's Anchorage Fish and Wildlife Conservation Office, at 907-271-2440 or sarah_markegard@fws.gov. Please refer to *07CAAN00-2021-CPA-0063* in any correspondence on this project.

Sincerely,

Douglass M. Cooper
Ecological Services Branch Chief