



Alaska Invasive Species Partnership

December 16, 2019

Attn: Alaska Roadless Rulemaking #54511

To whom it concerns,

Please accept these comments on behalf of the Alaska Invasive Species Partnership (AKISP) regarding the draft EIS for the Alternates to Proposed Alaska Roadless Rule permit process, which if adopted would exempt the Tongass National Forest from the 2001 Roadless Rule.

The AKISP is an informal affiliation of interested individuals representing agencies, organizations, and members of the public. Our purpose is to work for the management of invasive species across the landscape and aquatic systems statewide. We work to heighten awareness of the problems associated with invasive species to the environment and economies in Alaska.

Invasive species have characteristics that allow them to dominate native species communities such as competition, predation on native species, lack of native predators, high fecundity, and chemical or physical attributes that enable survival in novel surroundings. If action is taken, Alaska may avoid the negative impacts of invasive species to our state. The most cost-effective option for addressing invasive species is prevention through outreach and best management practices to avert introduction and spread. Permit stipulations requiring industry compliance with best management practices is an economical and proactive means of protecting public lands. This is especially important because currently there are 24,257 known occurrences of 125 invasive plant species known on the Tongass. If this rule is adopted, there will be increased opportunity for spread of these known invasive plants as well as the possibility of new invasions.

We denote the necessity of incorporating best practices in this planning process to ensure the negative impacts of invasive species are avoided because Alaskans rely on healthy environments for food, livelihoods, cultural practices, and personal and private economies.

In addition to referencing existing Forest Service Management plans as outlined in the draft EIS to guide invasive plant prevention and management, we make the following specific recommendations:

- Emphasis on preventative activities such as thoroughly cleaning all equipment prior to use in the Tongass or after use in a known infested area to reduce the spread of invasive plants because the potential for the introduction and spread of invasive plant species due to ground disturbance associated with timber harvest, road construction, and other development or management activity exists under all alternatives.
- Recognition of the potential for vehicles to translocate non-native invertebrates, vertebrates and fungi, in addition to terrestrial plants.
- Inclusion of baseline surveys of all species present, prior to commencement of work; regularly scheduled early detection surveys for non-indigenous species during the project and after completion; preparation of response plans in the event non-indigenous species are detected to ensure rapid response; and post-response monitoring and assessment.

Thank you for this opportunity to comment on the draft EIS. We look forward to continued communication on this project, including updates, and remain available for any follow up on behalf of invasive species considerations moving forward. Together, may we keep Alaska wild and free of invasive species.

In partnership,

Lisa Ka'aihue, Chair