

**Changes in the Invasive Plant Management Plan
NPS Alaska Region
Environmental Assessment**

Chapter 1:

- Sections 1.2.4 and 1.2.5 were inserted to address the Plant Protection Act of 2000 and the Noxious Weed Control & Eradication Act of 2004.

Chapter 2:

- A new table summarizing weed infestations larger than 20 acres in AK parks was inserted.
- Alternative 1, Table 2.2 (formerly Table 2.1) was updated to include 2008 treatment data.
- Alternative 2, Table 2.3 (formerly Table 2.2) was updated to include 2008 treatment data.
- The upper estimate of potential use of herbicides was increased to address the worst case scenario.
- Alternative 2, table 2.4 (formerly 2.3) limits for effective physical control of invasive plant species was enlarged to include more of the low, moderate, and high risk invasive plant species present in or near Alaska National Parks.
- Figure 2.1, the integrated pest management decision tree was revised to be less confusing and more adaptable to situations the NPS is likely to face.
- Herbicides listed in table 2.6 (formerly table 2.5) were changed to include all or most of those the NPS would consider under the existing plan.
- Section 2.4.4 herbicide use monitoring was added to address this comment from the public.
- Section 2.5.2, contractors and construction workers were added to the list of those needing educational programs to minimize the spread of invasives.
- Minor changes were made to numbers and language in tables 2.8 and 2.9 (formerly 2.7 and 2.8) , summary description of the alternatives and summary impacts of the alternatives, respectively.

Chapter 3:

- Table 3.1 was modified to include additional invasive plant species in or near Alaska National Parks.
- Table 3.2 on gross acres of management activities for medium to high-risk invasive plant species was adjusted to include data from years 2007 and 2008.
- Section 3.6 Subsistence was changed to include information on plants used for subsistence in Alaska NPs.

Chapter 4:

- Section 4.2.1 Cumulative Effects includes a description of how climate change is factored into the analyses.
- Minor edits were made to section 4.3.2, which includes the analyses of impacts on aquatic resources from potential use of herbicides. In particular, glyphosate with toxic surfactants would not be used in or near water.
- The section 4.5.2 on human health and safety was revised to include the full list of herbicides being considered in the EA. Tables 4.5 and 4.6 were combined into a new table 4.5 that summarizes both the hazards and health risks associated with various herbicides being considered. Oust XP is not being considered and was removed from the table.
- Section 4.6.2 on soils impacts was greatly expanded to include information from recent literature regarding the persistence and effects of the proposed herbicides in northern environments.
- Section 4.8.2 on vegetation impacts of the proposed plan includes examples of success where herbicides have been used in Alaska or other cold environments.

Chapter 5:

- The EA was corrected to indicate no public meetings or hearings on the public review EA were held.
- Two NPS invasive plant specialists were added to the list of consultants.

Chapter 6:

- Several new reference citations were added to the bibliography.

Appendix B:

- This invasiveness ranking list was updated to highlight species documented in NPS areas and within 15 miles of NPS areas. Additionally a list on unranked species observed in Alaska has been included.

Appendix G: Summary of Environmental Fate and Effects of Proposed Herbicides

- This appendix identified reference source data and the names of proposed herbicides are listed under each generic name of herbicide. Several changes were made based on public review comments.

Appendix H: Herbicide Use Best Management Practices

- Several changes were made to this appendix based on comments from the State of Alaska and the public.