



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

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

January 27, 2009

Tom Irwin, Commissioner
Department of Natural Resources
550 W. 7th Avenue, Suite 1400
Anchorage, AK 99501

Dear Commissioner Irwin:

The National Marine Fisheries Service (NMFS) supports the Alaska Plant Materials Center's proposal to the Coastal Impact Assistance Program titled, "Implement the newly developed *Spartina* sp. prevention and response plan for Alaska." Several species of cordgrasses in the genus *Spartina* have invaded the west coast of the United States and British Columbia. These cordgrass species pose a serious threat to Alaska's coastal ecosystems if, as predicted, seeds or propagules from west coast populations arrive in Alaska. Cordgrasses would transform Alaska's native mudflats into high marshes with resulting changes to hydrology, nutrient cycling, sediment retention, and biomass sequestration. These changes would affect native shellfish, fish and shorebirds and the recreational, commercial and subsistence activities that depend on them. Movements of vessels and equipment, such as oil platforms, are potential pathways for the spread of *Spartina* from the east or west coasts of the United States and Canada.

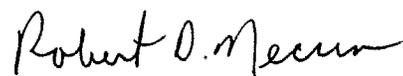
In recognition of this threat and the unique opportunity Alaska has to prepare for a *Spartina* invasion before it occurs, NMFS has contracted with Portland State University to prepare a *Spartina* prevention and response plan for Alaska. Similar planning efforts in Oregon have shown that early responses to *Spartina* invasions are cost-effective. Alaska is in a position to take advantage of this experience and respond to *Spartina* infestations at the earliest possible opportunity; the economic and ecological benefits of doing so are potentially high. The Alaska plan is due to be completed in December 2009. In addition, the Alaska Department of Fish and Game has funded a habitat suitability model for *Spartina* (completed in December 2008) which will go hand in hand with the NMFS plan. Our hope is that the state of Alaska will embrace and implement the plan we are funding as described in the Alaska Plant Material Center's proposal.

NMFS has been working closely with the Alaska Invasive Species Working Group and the Alaska Committee for Noxious and Invasive Plants Management (CNIPM) to identify priorities in the State of Alaska; *Spartina* prevention and response has been flagged as a priority by both. In addition, Mr. Gino Graziano, Alaska's Invasive Weeds and Agricultural Pest Coordinator and Chair of CNIPM, is the ideal proponent for this project. He brings a wealth of knowledge, experience and enthusiasm to this issue and has already begun some of the work for citizen based early detection and rapid response planning for *Spartina*. Mr. Graziano is well known and respected by NMFS staff, who have been working with him on the invasive species issue for several years. We have the utmost confidence that he will see this project to success. NMFS will likewise be an enthusiastic and supportive partner for this project.



Thank you for the opportunity to comment. If you have any questions regarding our support of this proposal, please contact Linda Shaw at 907-586-7643 or linda.shaw@noaa.gov.

Sincerely,

A handwritten signature in black ink that reads "Robert D. Mecum". The signature is written in a cursive style with a large, prominent 'R' and 'M'.

Robert D. Mecum
Acting Administrator, Alaska Region