

INVASIVE SPECIES ADVISORY COMMITTEE STAKEHOLDER WRITTEN COMMENTS February 26–28, 2019

CALL FOR PUBLIC INPUT

The written comments provided herein are in response to the National Invasive Species Council's (NISC) Invasive Species Advisory Committee's (ISAC) call for public input on the following four questions in preparation for its February 26–28, 2019 committee meeting:

1. What specific federal activities or processes for invasive species management need attention?
2. What specific emerging issues does NISC need to prepare for?
3. Where should specific coordination efforts within the federal government and with non-federal partners be focused?
4. How has ISAC been effective and valuable to NISC, as well as more broadly?

The questions were submitted through the Federal Register Notice 84 FR 3229 and responses collected and compiled by the NISC Secretariat. Comments expressed herein belong solely to the commenter and do not reflect the views of the ISAC or the federal government.

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STAKEHOLDER COMMENTS

Janet Clark, past ISAC member | 2/25/2019

Regarding the value of ISAC, I think one of the most important contributions of ISAC has been building a national network of people from diverse backgrounds who are focused on invasive species issues. Over the years, some of the networks have been formalized (e.g., National Association of Invasive Plant Councils). However, the informal networks have been just as valuable, I suspect. Being able to pick up the phone and call someone on the other side of the country for information or advice has been critical to moving invasive issues forward at a national level. Everyone is speaking the same language.

Kimberly Johnson, Fremont County Wyoming Weed and Pest | 2/25/2019

Fremont County Wyoming Weed and Pest Control District works with many local, state and federal agencies that include USFS, BLM, BOR, BIA and occasionally U. S. Fish and Wildlife. One of our main struggles in this work is communication. We have worked well with the people that represent these agencies at a local/on the ground level as we coordinate annual face to face meetings to discuss our invasive species management strategies.

Communication becomes more of a challenge the more removed from the “on the ground” level you go. Rarely do we have the opportunity to communicate to the people above the local level that our primary focus is participation in the management of invasive species of all the lands within our county no matter the land manager. Participation does not exclusively mean treatment, but the strategy in implementing a management plan. We have had issues in working with federal agencies and cooperative agreements. These issues make it very hard to implement management programs not only on the land managed by federal agencies but the surrounding lands and the vectors that spread invasive species that intersect these lands.

The following is an example of this struggle. For over twenty years we have worked with the Bureau of Reclamation on the strategy for the management of invasive terrestrial species on the land they manage within Fremont County. The past two years have been a challenge in this regard. We are very concerned that progress in invasive species management on these BOR lands will begin to be reversed and no progression is being made. Again invasive species management does not just mean treatment but an invasive species strategy that takes into consideration not only the agency managed land itself but also the partners surrounding those lands.

Part of the strategy for the management of invasive species includes being able to start the work in a timely manner. At times we have had issues with the funding not becoming available in a time frame that allows us to complete our goals for management within a growing season. Another challenge is consistent funding which can be an issue when working with federal agencies. To help achieve sustainable results, consistent funding for implementing invasive species management is required.

The communication between federal agencies including cooperative agreements are essential to the strategy for the management of invasive species on all lands within Fremont County Wyoming. This is where we believe that ISAC is very beneficial to us. They are able to communicate these issues with NISC where we are not.

Rod Walker, Blue Ridge PRISM | 2/24/2019

Many states are working through painful processes to upgrade their noxious weed laws and then work through various processes to classify individual weeds as noxious weeds. The implications of being classified as a noxious weed also vary by state.

I think it would be tremendously helpful if the feds or some central organization put together one or more model noxious weed laws, noxious weed regulations, weed risk assessment processes and weed risk assessments for individual weeds. If this were done well enough, then states could either adopt the “standard model” and use the specific weed assessments to accelerate their work and reduce the work and time required to make all this happen. Right now each state is reinventing these wheels over and over again.

Melissa Bravo, Meadow Lake Farm Consulting Services | 2/24/2019

What specific federal activities or processes for invasive species management need attention?

Dead Ash Recovery Corps and Work Force Deployment needed

During my campaign in 2018 while talking to landowners and the general public across the region about the dairy crisis in Pennsylvania and throughout the country and because of my background with invasive species assessment, I assessed as I drove. What I see is troubling. What I heard is more so. Wooden structures in the former coal mining and lumber towns in Pennsylvania, New York, Ohio, Virginia, Tennessee, North Carolina, New Jersey, New England are rotting. The health ramifications and food-shelter shortages on the horizon due to the trifecta of flooding, unprecedented precipitation created a mold bloom. Mycotoxins are not just toxins of agriculture crops. They are in the wood and materials used in construction projects the last hundred years. Half the country has been invaded and in the aftermath of an invasion we must rebuild.

We are missing an incredible opportunity to mitigate the devastating cost of emerald ash borer by leaving all this dead ash to rot instead of creating a workforce movement to tear down and rebuild out rotting towns while at the same time planting desired tree species for future economic sustainability and using the heat value of that wood to reduce the cash cost of heating assistance.

It is now 2019 and the dead ash in Pennsylvania and New York has peaked. With an estimated 8 million ash trees in the United States at the start of the emerald ash borer invasion it is time to address the dead fall volume and create a nationwide economic stimulus package targeting rural communities to address the cleanup while retraining three generations of rural workers how to respond to a crisis of this magnitude.

Move focus away from public lands no one lives there. Ninety-six percent of Pennsylvania's forest land, 16.2 million acres, is classified as timberland but only four percent (593,000 acres) is reserved forest land, publically-owned land where the commercial harvesting of trees is restricted by law or public policy. ISC needs to address the economic scale of the dead ash on the communities in this region and coordinate a massive effort to rebuild the crumbling infrastructure of this region from the dead ash before it rots.

Dead wood salvage: The volume of dead wood is a significant resource that should not be left to rot when these communities are struggling with low income housing demands, heating assistance, welfare and the largest loss of the agriculture workforce since the great depression due to the consolidation of the dairy market and relocation to western states. A coordinated pilot program to create a logging dependent chain of services at the county level is needed. Only this time we are not logging live trees. We are cutting up deadfall; harvesting tops; fixing roads and erosion caused by the loss of trees; fencing out the highest deer per acre density ever seen; and planting commercially viable hardwood species else all we will have is layer upon layer of non-commercial value invasive undesirable shrubs and softwood trees. Schools are struggling to survive on tax generated payments. Build portable temporary external heating systems that can come on line during the winter months to absorb school heating bills and community shelter heating bills.

Logging and coal towns are rotting: The excessive precipitation in 2018 has severely crippled these former logging town one hundred plus year old wooden structures. Town by town roofs and siding are rotting. Harvested ash lumber could be used in conjunction with blight recovery stimulus to frame up affordable one story, single family homes while tearing down hazardous blighted moldy unfit dwellings that are now more numerous than livable conditions in some towns due to the floods of 2018.

Federal, state and municipal road owners and utility right of way managers cannot address the volume of dead wood along road shoulders. Property owners cannot compete with large tract landowners to have dead wood, dead falls addressed in a timely fashion.

The dead stand in Weiser State Forest along route 61 near Centralia, PA is a prime example of what the millions of acres of forest land, woodlots and right of way acreage will look like in 2019. We are an ash tree dominant region. Every ash tree is dead. I am available to discuss this in further detail as a paid consultant and would welcome the consideration to be appointed to facilitate this on the ground.

Ken Mayer, K.E. Mayer & Associates | 2/22/2019

As you might be aware, I have been leading the Western Association of Fish and Wildlife Agencies (WAFWA) Fire and Invasive Initiative since 2013. As a result, my "Team" has developed a number of reports and decision support tools to assist resource managers and policymakers in the management and control of invasive plants in the sagebrush biome. Our most recent publication is an update of our Gap Report. I believe that this report and the other publications would be very useful to ISAC and the NISC. I have attached a pdf of the Gap Report. If you can't open it because of the size you can find the report and all of our other publications at the following website: https://www.wafwa.org/initiatives/sagebrush_ecosystem_initiative

John Cantlon, Health Habitats Coalition | 2/24/2019

For over a decade, we at Health Habitats Coalition (HHC) have been pushing for improving Invasive Species Management and Control through various Bills in the Senate and House. This was initiated with Governor Otter (ID) within the Western Governor's Association.

We at HHC worked diligently to enhance on the ground results including CES that would free up the freeze on various agency programs. The USFS (NFS) was and continues to be strong supporters. In the end, Invasive Management will be strengthened by supporting this Bill. NISC opposed this Bill in the past.

You mention the Sage Grouse Meeting that occurred in Boise. At that time, before his passing, Secretary Andrus read and fully supported this Bill. He said he could not see how anyone would not support it. A new Bill is appearing in this Session as S.47 with the energy of Senator Barrasso. It is moving through a House Committee as well.

What many of us have identified and testified upon is the ineptness and waste of public money in Natural Resource Management. Through the test of time, HHC assessments continue to be validated. Our concerns about NISC/ISAC were again played out with the recent OIG Report on your Director. In my opinion, I would challenge ISAC/NISC to recalibrate itself to be more effective and better stewards of public money. That starts with Law, followed by implementation of Law, collective collaboration and improvements.

Simply, I am at a loss where ISAC has defined, measured, analyzed and improved upon this issue within a critical mass of people, federal and state agencies with the private land owner interface.

Mike Bald, Got Weeds? | 2/27/2019

1. What specific federal activities or processes for invasive species management need attention?

Talk of partnerships and collaboration is empty rhetoric when it does not address stewardship that needs to happen on private property. Management of invasive species on private property encounters serious obstacles in the form of liability insurance and Workman's Compensation requirements. These difficulties largely prevent volunteers and students from contributing to stewardship work on privately held land. State agencies are also unable to address the gap, and the issue is much more complex than a simple release form implies.

2. What specific emerging issues does NISC need to prepare for?

NISC needs to prepare for greater numbers of people contracting Lyme disease and other tick-borne illnesses. It is impossible to steward landscapes or carry out agricultural activities with bodies that are derailed and debilitated by such illnesses or associated treatment protocols. Farm Bills and federal management programs that do not protect people from tick-borne diseases are a failure; accelerated research and a vaccination program are one piece of the solution. For those of us who actually work the land, the notion of daily tick checks and prevention is a time-consuming necessity, but it also highlights the clear absence of any governmental interest or assistance. The need is NOW.

Climate change is no longer an emerging issue, but the NISC needs to act on it. Burning of unwanted vegetation is no longer an acceptable practice. Period. Not when the planet is already overheated and soils everywhere are so depleted. Eliminate that practice and teach people to build Soil.

3. Where should specific coordination efforts within the federal government and with non-federal partners be focused?

Who are your non-federal partners? I could not find them listed. How does the NISC coordinate efforts with small businesses and Certified B Corporations? Their impact on landscapes is significant, and many of them operate with no funding support whatsoever from government agencies or non-profits. These entities deserve great credit, but they receive little.

4. How has ISAC been effective and valuable to NISC, as well as more broadly?

Wyoming Weed and Pest Districts, via Slade Franklin | 2/28/2019

1. What specific federal activities or processes for invasive species management need attention?

A codified doctrine of commitment to a collaborative process by which all stakeholders are identified, they all agree to a binding conclusion and the difficult decisions and compromises are then worked out. This collaborative process, although difficult and not always successful, helps create solutions and partnerships that outlast the vagaries of politics and whims.

2. What specific emerging issues does NISC need to prepare for?

Invasive annual grasses in the sage-steppe of the West. These species (cheatgrass, Medusahead and ventanata) have the

best chance of changing this ecosystem for virtual ever. Their adaptation to wildfire, their ability to increase wildfire return cycles, their non-successional stability and a more conducive landscape to fire because of a warming/drying climate; all combine to spell the end to the sage steppe and its unique fauna and flora. Strong Federal leadership in R&D of solutions and the focus and cooperation of all Federal entities on this problem will be essential if a solution is attained.

3. Where should specific coordination efforts within the federal government and with non-federal partners be focused?

Please see above.

4. How has ISAC been effective and valuable to NISC, as well as more broadly?

With a problem as complex and varied as invasive species, it is essential for NISC to “ground truth” the issues with local land managers, land owners, scientists, researchers, local governments, et. al., to find truth, find need, find partners and arrive at solutions. In short: The ISAC helps the NISC understand the issues (did I mention that they were complex and varied ☺).

Thank you All for Your Hard Work and Commitment.

George Beck, Colorado State University | 3/1/2019

At first I hesitated to comment because, as a former ISAC chair, my perspective is in pretty sharp contrast to what you might expect. In the last 2 to 3 House Natural Resources Committee hearings on invasive species (2014–16), I represented the Healthy Habitat Coalition and I suspect you remember the bill we helped write that ultimately would have created an invasive species budget and accountability for effective invasive species management; and we called for the dissolution of the National Invasive Species Council and that the funds used to operate the Council and ISAC be re-directed to the federal agencies to be used on the ground to actually control invasive species. The concept of the Executive Order is noble to be sure but unfortunately is not much more than federal hot air. Clearly our (HHC) position reflects that after 20 years of operation, NISC has totally failed their collective responsibilities and continues to do so. This is a leadership issue and not reflective of the NISC staff and certainly not ISACers ... these are dedicated folk that have a passion for the issue and are being betrayed by NISC and their obvious cavalier attitude about invasive species and their management. With that in mind, I remain steadfast to our position to dissolve NISC and re-direct the monies to federal land management agencies and that all agencies be held accountable for effective expenditure of all invasive species management funds.

Bonnie Harper-Lore, Former ISAC Member | 3/1/2019

Twenty years later, after helping write EO13112, I must support [George Beck's] position.

The Executive Order was an opportunity to elevate the issue of invasive species to the Department level which we agency authors thought would lead to support and results on the ground nationally.

Previous NISC leadership has failed to focus on that intended mission and failed to work well with FICMNEW members who wrote the EO along with one ANSTF member in 1999. Both coalitions of whom were written into the EO as resources to the Council's FIRST DUTY – national leadership – “relying to the extent feasible and appropriate on existing organizations addressing invasive species, such as the Aquatic Nuisance Species Task Force, the Federal Interagency Committee for the Management of Noxious and Exotic Weeds, and the Committee on Environment and Natural Resources”. This did not happen, nor did most other Council duties, described in the Executive Order. It was as if each Director failed to even read the original Executive Order, in essence their job description.

The Executive order was one attempt to control invasive species. Re-directing monies to federal land management agencies is another worth trying. It is still important that the Departments, together, have an improved understanding of invasive species threats and costs to the nation at federal, State and local levels and know the value of working together.

Faith Campbell, Former ISAC Member | 3/5/2019

I think George and Bonnie are beating the wrong horse. Have NISC – and by extension ISAC – disappointed? Yes. But the reason is not a failure of the Council staff, but rather of political will. Cabinet agencies/secretaries have their own agendas

and priorities. They will collaborate only when someone makes it in their interest to do so. A Council staff made up of mid-level federal employees might be able to persuade them to do so, but that is highly unlikely in the absence of a “push” from above. That push would most probably come from the Executive Office of the President. That push has been missing since at least the beginning of the Obama Administration, probably earlier.

A second source of impetus would be Congress. Neither top-level Administration officials nor key members of Congress (Committee chairs) has shown any interest in providing that push on invasive species. Senator Barasso has shown sustained interest in invasive plants – but he has focused on on-the-ground control of well-identified species – as George knows because he has been a strong advocate for that approach.

I feel strongly that the many agencies and bureaus that have a role to play in invasive species prevention and management should coordinate. I feel strongly that invasive species programs need to have scientifically based priorities and strategies. NISC was one attempt to provide those, but the absence of necessary political horsepower means it has not succeeded. I believe it is now incumbent upon us to try to figure out a more effective approach.

Mindy Wilkinson, Primum Terrae LLC | 3/6/2019

1. What specific federal activities or processes for invasive species management need attention?

The increased demands on USDA for rapid response due to global trade and increasing numbers of new introductions has been identified as an ongoing concern but is ever more urgent. While the use of new technologies to reduce introductions is promising, additional species will continue to be moved and establish with trade. The ability to detect new invasive species, communicate these findings, and support rapid response across jurisdictions early in the invasion process is still limited compared to the scope of the problem. Additional support for active detection and communication of new regional detections, joint prioritization with states on new rapid response targets, and funding and resources for rapid response continue to be my top priorities.

2. What specific emerging issues does NISC need to prepare for?

Shifting climate and the increasing disturbance caused by extreme weather and water will become even more visible issues. Range shifts are only a small part of the picture as there will be larger scale disturbance and replacement of biota with fire and disturbance tolerant invasive species that will expand the impact of invasions on biodiversity and further restrict threatened communities.

3. Where should specific coordination efforts within the federal government and with non-federal partners be focused?

The role of councils and all-taxa programs in coordinating planning, policies and trainings is critical to meet national scale goals. Better integration between established state level councils and the national Federal representatives across taxa and programs (i.e. not just within forestry or AIS) and developing all-taxa programs for communication and funding. These should be informed by the successful Regional AIS Coordinator – State contact models (and also great examples from Forest Health and others).

4. How has ISAC been effective and valuable to NISC, as well as more broadly?

My view in working directly with several ISAC members from Hawaii and Wisconsin is that our effectiveness was our ability to advocate with our state representatives to support NISC agency member initiatives. The role of ISAC in both shaping and communicating policy and programmatic needs from the States as a conversation and collaboration should continue to be supported. The expertise brought by past ISAC members has been invaluable and the scope of issues has helped maintain the national level overview of the broad field of invasive species.