

The Michigan Terrestrial Invasive Species State Management Plan (SMP)

Summary of Public Comments and Response

Michigan's Terrestrial Invasive Species (TIS) State Management Plan (SMP) was made available for a comment period from May 16th to June 24, 2016. Advanced notice of the public comment period was announced during open meetings of the Natural Resource Commission and Agriculture Commission, Michigan Departments of Natural Resources and Environmental Quality websites, through various list-serves, a press release, and direct emails to known interested groups and individuals, including representatives from key industries. Prior to the comment period, key stakeholders were sent a survey in February 2015 soliciting feedback on key components that were needed in the TIS SMP. On December 18, 2015, the state invited partners to participate in a webinar to review the TIS SMP goals, objectives and strategic actions. They were invited to ask questions and provide feedback in January 2016.

Eleven comment letters were received which included four citizens, two from industry partners, Little Traverse Bay Bands of Odawa Indians, Plymouth Christian High School, Blandford Nature Center, Michigan State University, and Grand Valley University. A total of 55 individual comments were compiled from the letters.

A meeting was held on September 8, 2016 among representatives from the Michigan Nursery and Landscape Association, Michigan Farm Bureau, Michigan State University, Michigan Department of Natural Resources, and the Michigan Department of Agriculture and Rural Development to incorporate comments.

The greatest number of comments pertained to the need to identify high priority terrestrial invasive species through risk assessment (4), outreach and education (4), and that more species should be on the restricted or prohibited species lists through policy changes (4). Three commenters expressed the need for greater involvement from the plant industry in the development of the plan. Commenters noted a concern about inadequate available funding and other resources for invasive species prevention and control (2) and the need for better definitions of terms used in the document (2). One letter called for greater tribal involvement in invasive species management, and more coordinated and collaborative efforts with various organizations and landowners (1). Most of the remaining fifteen comments were textual changes of which many represented ideas expressed in the comments noted above. There were four letters that included general support for the document's contents.

The following table summarizes the comments received in writing and provides a brief response, many of which indicate how the comment was incorporated into the final SMP. Written comments are provided in their entirety following the table.

Comment #	Letter #	Comment	Comment Category	Response
		<p>The following changes in text were made to clarify meaning, especially where information was implied and not directly stated. The edits define and describe the relationship of risk assessment and risk analysis, and more accurately describe chronology of early detection and response.</p> <p>Page 4: The text box about invasive species and shoreline erosion was edited to remove the term “native” and “biodiversity”, which would have required defining. Similarly, the term “interrupting natural shoreline processes” was replaced with more direct language describing that invasive species alter erosional processes and can replace many species.</p> <p>Page 5: Prevention section more clearly links Figure 2 with text describing the existing costs of prevention, albeit they are magnitudes less than controlling established invasive species. The text was modified to set up more clarification of risk assessment, risk analysis, and pathways, and how the three relate.</p> <p>The risk assessment section was edited to clarify the two components in the definition of risk assessment (evaluating the likelihood of introduction and severity of impact).</p> <p>Page 8: Preparation was moved to more accurately be placed before detection. The process of early detection and response was more clearly articulated and now includes “a contingency plan”. The latter was an oversight since many new invasive species may not be anticipated at all. On-the-ground continuous surveillance of most likely pathways was previously implied, but it is now explicitly stated. A sentence was added to clarify the general process for what will occur after a detection of a high risk species.</p> <p>Page 12: Risk analysis section was edited to define and relate risk assessment and risk analysis.</p> <p>Page 14: Monitoring and research section was edited to clearly describe that scientific inquiry is important and that it is communicated. The second paragraph was added to clarify that monitoring is intended for the program itself by way of appropriate metrics.</p> <p>Page 16: Regulation and policy section were edited to make the writing more direct.</p>		
1	1	<p>Invasive Species Watch List paragraph that references Appendix B - the Terrestrial Invasive Species Watch List of species that have never been confirmed here or have limited distribution is prudent. The "Other High Priority Terrestrial Invasive Species" list should be removed. The reasons given are arbitrary and are not founded by a risk assessment process. Utilizing a risk assessment process was identified early in this plan as an important factor in identifying invasive species and the level of risk they pose. It is also identified in the V. Regulation and Policy as the only way that policies and response actions will be developed. Published lists in a public document should be science-based and should not reflect views and opinions.</p>	Risk Assessment	<p>The "Other High Priority Terrestrial Invasive Species" list has been removed. The plan calls for evaluating and implementing a science-based risk assessment to identify high priority TIS that are likely to be introduced through various pathways; however, it is not a requirement of Part 413 to conduct a risk assessment prior to a recommendation that a terrestrial species be added/removed from the watch list or prohibited/restricted lists.</p>

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2	2	Wisconsin has a risk analysis process using a panel of about ten knowledgeable people to recommend whether a species should be prohibited, restricted, or unregulated. Tribes in Michigan should have the opportunity to participate in the process in some way.	Risk Assessment	The plan calls for implementing a science-based risk-assessment process to analyze the level of ecosystem susceptibility and vulnerability to TIS (Objective I.A.1.). This process will be developed by the TIS Core Team which is comprised of ecologists and specialists in plant industry, invasive plant and animal species, and exotic pests and disease. Tribal agencies have been added as a cooperating agency.
3	3	Other States such as Wisconsin, Ohio, Indiana, Missouri are finding that these top invaders are a problem how can we in Michigan demand a ranking system and incorporate known invasive plants onto our restricted species lists? Not just risk assessment but inclusion of significant time and research already performed by our neighboring States. Currently Indiana, Ohio and Wisconsin have invasive plant councils that have a scientific assessment process to determine if a plant is invasive. Why reinvent the wheel? The landscape industry and landscape academia may justify certain risk assessments needing to be performed for a specific region of the State, delaying regulation and therefore not preventing a known invader who is just south of us.	Risk Assessment	The plan provides objectives and actions pertaining to risk analysis, calling for "refining and adapting processes for use by state agencies and partners" (Example Task in 1.B.1.).
4	1	under #4. Collaboration - where it says "significant work is needed in the area of risk assessment..." The USDA Risk Assessment process for plants is the standard for bringing plants into the country and is identified and being used in AIS State Management Plan. This plan continues to reference the development of a risk assessment process and it is our recommendation that the USDA Risk Assessment process be included in this plan as the risk assessment process.	Risk Assessment	In order to maintain the scope of this plan, we have not specified a risk assessment process. Risk assessment processes will be identified that are cost-effective and scientifically rigorous.

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5	4	<p>Collaboration (pg. 9) 3rd sentence, 1st paragraph. There is no mention of the USDA Risk Assessment process that was adopted within the AIS State Management Plan. MDARD has been working with USDA and is perfecting its use in assessing aquatic plants in Michigan. Given the scientific rigor of this system and the fact that it is already in use by state agencies, it should be written into the Terrestrial State Management Plan.</p>	Risk Assessment	
6	1	<p>Risk Analysis - FOR PLANTS - The USDA Risk Assessment process for plants is the standard for bringing plants into the country and is identified and being used in AIS State Management Plan. This plan continues to reference the development of a risk assessment process and it is our recommendation that the USDA Risk Assessment process be included in this plan as the risk assessment process. a. a. Any species determined to be prohibited or restricted and are in trade should also include a phase-out period and reimbursement for economic losses.</p>	Risk Assessment	
7	4	<p>OB I.A. There is no mention of the USDA Risk Assessment process that was adopted within the AIS State Management Plan. MDARD has been working with USDA and is perfecting its use in assessing aquatic plants. Given the scientific rigor of this system and the fact that it is already in use by state agencies, it should be written into the Terrestrial State Management Plan.</p>	Risk Assessment	

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8	4	Risk Analysis (pg 11) Bolded title sentence should add a phrase that addresses potential benefits to society. "Develop and implement a methodology to assess the risk of new invasives based on their aggressiveness, adaptability, potential cost to the environment, economy and human health as well as to their potential benefits to society and the environment ".	Risk Assessment	To maintain the scope of this plan, we have not specified a risk assessment process. A risk assessment process will need to be identified that is cost-effective and scientifically rigorous, so it is not yet possible to determine if the process will include analysis of potential benefits to society and the environment.
9	5	...I'd like to say that the plan is very detailed on how to go about managing for invasives and the steps that need to be taken to prevent and control.	General Support	No Response Needed
10	2	Overall, I am pleased with the plan	General Support	No Response Needed
11	2	I am glad to see the leadership that the state is beginning to take on invasive species	General Support	No Response Needed

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12	2	I look forward to continued collaboration with state agencies on invasive species.	General Support	No Response Needed
13	2	I am pleased to see tribal agencies listed as Cooperating Agencies or Organizations many places in the Implementation Table of Appendix D. Many of the federally recognized tribes in Michigan, through past treaties with the Federal government, have retained their rights to use natural resources on public lands. The fact that tribal leaders thought to explicitly include these rights in the treaties demonstrates how important natural resources are to the tribes. As sovereign tribal entity, the Little Traverse Bay Bands of Odawa Indians create its own regulations on the use of natural resources in accordance with the 2007 Consent Decree between the State of Michigan and five of the tribes. The tribes are key stakeholders in any discussions of invasive species in Michigan because their treaty rights are directly affected by the negative impacts that invasive species have on the environment	General Support	No Response Needed
14	3	I am so delighted to see annual review on there	General Support	No Response Needed
15	6	Thank you for your work on this critically important topic that threatens the stability of the Great Lakes ecosystem. I cannot comment as to the specific details of the plan since I do not have any expertise on the topic, but I have sought to stay current on invasive species that impact our region and the plan brings together many of the ideas I have seen in some of the scientific literature I've come across over the years as well as the pertinent legal framework.	General Support	No Response Needed

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16	6	<p>Something to consider regarding outreach to students in our state (and beyond): one of the topics of study this year and next in the middle school and high school competition Science Olympiad is Invasive Species. Contact info for the state site is: http://misciol.org/ and for the national site is: https://www.soinc.org/invasive_species_c. Several hundred schools around the state compete in this and a variety of other science topics and your resources could reach potentially thousands of interested students right at the level of most interest and impact: future STEM career-oriented Michigan stakeholders.</p>	Outreach and Education	<p>Providing educational materials for youth programs such as Science Olympiad and local university summer programming are examples of products for Strategic Action IV.A.3. (Incorporate TIS into educational programming for youth and adults).</p>
17	6	<p>In addition, I really appreciate the state’s invasive species website—very informative and user-friendly for students. Consider linking volunteer opportunities taking place at state game areas (often coordinated by MUCC) as they often include invasive species removal as part of habitat restoration. I would love to see more of Michigan’s residents get involved in this worthwhile effort and see firsthand the value of our public lands and the need for public and private stewardship of our natural resources.</p>	Outreach and Education	<p>This plan fully supports networks that match willing volunteers with meaningful invasive species work – work that can result in significant growth in capacity for local conservation communities. Specifically, the plan calls for II.B.1. (Build partnerships and recruit partners in response efforts), IV.C.1. (Provide training opportunities on BMPs, control methodology and treatment monitoring), and II.C.4 (Increase number of management activities that contribute to a reduction in TIS).</p>
18	7	<p>I would like to see a seminar type meeting to see first hand what these specie's look like up close I'm thinking this would generate a lot of interest in reporting of such.</p>	Outreach and Education	<p>Hand's on learning opportunities are an integral piece of Activity Area IV: Outreach and Education Objective A. Increase public awareness of TIS impacts and sthreats utilizing public and private partnerships.</p>
19	8	<p>I also hope that the DNR can increase its public education about invasive plants and about the importance of planting native plants through social media, workshops, news articles, etc.</p>	Outreach and Education	<p>Public education regarding TIS is an important component of the plan. Specifically, Activity Area IV (Outreach and Education). Restoration using appropriate species is a management measure addressed in II.D. (Prevent future TIS invasions and restore ecosystem integrity through enhanced restoration and rehabilitation strategies).</p>

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20	3	On page 4, under economic effects is there anyway to represent the decrease in biodiversity caused by invasive species and how this directly impacts educational programs? You mention recreational opportunities but here at the nature center we have found that many of the students from the inner city do not get a chance to see healthy ecosystems and that the increased invasive plants are destroying the biodiversity they could have witnessed, therefore it impacts their education. Example, we are not finding as much wildlife and insects/butterflies in the dense reed canary grass taking over the wetlands.	Outreach and Education	We agree that it is important for youth to have access to healthy ecosystems; the plan's successful implementation is intended to maximize this outcome.
21	6	I would also like to see species on the watch list and high priority list be prohibited in the nursery and/or pet trade.	Policy	Michigan's Terrestrial Invasive Species Watch List (Appendix B) provides a listing of organisms identified by the State's Invasive Species Program as being immediate and significant threats in Michigan. They are not yet regulated as "prohibited" or "restricted" under Part 413 of NREPA (Natural Resources and Environmental Protection Act 451 of 1994, Section 324.41301) which places legal restrictions on the possession, import or sale of such species. This plan calls for identifying a risk assessment process that would standardize how species are vetted for possible inclusion in the "prohibited", "restricted", and "watch lists"; implicit in this is the employment of a consistent, scientifically-based process that minimizes potentially differing professional opinions in favor of standard criterion. The process for adding or deleting from the lists follows Part 413 which states that the Natural Resources Commission issues an order under Section 41302 after consultation with Michigan Department of Agriculture and Rural Development, which consults with Michigan Department of Natural Resources. Prohibited non-aquatic (i.e., terrestrial) species are 1) not native, 2) not naturalized or widely distributed in the state, and 3) have the potential to cause harm and/or effective control techniques are not available; in contrast, "restricted" species are also not native but they are naturalized in the state. Furthermore, they potentially cause harm and/or control techniques are available.
22	8	I would really like to see Michigan make the sale of a number of invasive ornamental plants illegal, including privet, buckthorn, the non-native honeysuckle, barberry, burning bush, vinca and others. It is so sad to see our beautiful natural areas being taken over by these invasives.	Policy	

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23	3	<p>Appendix B should be much larger. Can you better explain how this list is generated in the document? This is not a quality list of all the species we should be concerned with and on a Michigan terrestrial watch list for example <i>Clematis terniflora</i> and <i>Wisteria sinensis</i>. When was autumn olive listed as a restricted species in Michigan?</p>	Policy	
24	5	<p>...it saddens me to see that many of the invasive species that I personally deal with are not restricted by law. For example, there are many outbreaks of buckthorn, barberry, garlic mustard, and swallow-wort that are concerning. Without restrictions on sales of these species at greenhouses and other stores there is no way to effectively prevent them from expanding into our natural areas.</p>	Policy	
25	3	<p>Many CISMA's are generating invasive species priority lists. This is something they are setting for their region. Local citizens engaged in their local CISMA's are generating watch lists. These top invasive species and watch lists should be taken seriously, reviewed and considered at the State level. How can these local species list help benefit the State planning on regulation?</p>	Policy	<p>We agree that species on watch lists generated by Cooperative Invasive Species Management Areas (CISMAs) should be considered for the State's Watch List. The TIS core team is responsible for implementing the forthcoming risk assessment process; CISMA lists could be one source of species for assessment. The most efficient communication mechanism between the TIS core team, which establishes the State Watch List species, is via the Michigan Invasive Species Coalition (MISC). MISC provides a communication network for invasive species coordinators and addresses common challenges.</p>

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26	3	To "prevent future TIS invasions" we are going to need a larger portion of this draft plan to address landscapers and nursery industry.	Greater industry involvement	Landscape and nursery industry partners are recognized in the plan as cooperating organizations, identified as "industries" in the plan. They are directly referenced or inferred within the sections entitled "Cause for Concern", "Risk Assessment", "Collaboration", "Leadership and Coordination" and in Table 1. They are called out in 48 out of 61 strategic actions. Inclusion of industry considerations has been a focus of this planning process. Several points of feedback from industry were incorporated into the final draft including the addition of industry as a partner in many strategic actions in the implementation table.
27	3	Expand and improve existing data sharing and include landscapers and nursery in updates on the severity of the invaders in our natural areas. How can the growing green industry be included in understanding the true cost and threat these invaders play because they do not get it now and have a disconnection and failure to understand the issue?	Greater industry involvement	"Industries" has been added as cooperating agencies throughout the strategic actions under Activity Area III
28	1	Add the "plant and landscape industries" to the sentence "Such a system will be built through collaboration with, and training of... Our industries have history of working closely with MDARD on early detection of invasive species.	Greater industry involvement	"industries" has been added to this sentence.

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29	4	Leadership and Coordination - It is disappointing that collaboration with stakeholders was not a part of the development of this plan, as was the case with the AIS State Management Plan. You are witnessing the problems that has arisen from not having all industries involved in the AIS Plan. All industries directly impacted by this plan need to be involved in its finalization and adoption.	Greater industry involvement	Industry representatives were invited to provide input on the plan as part of the public request for comment from May 16th to June 24th, 2016. Comments were received by representatives from the Michigan Nursery and Landscape Association (MNLA), Michigan Farm Bureau (MFB), and Michigan State University Extension (MSUE). MNLA requested a meeting with this plan's committee members to discuss the feedback provided. To fulfill this request, key committee members and other relevant officials invited all industry commenters to a meeting to clarify feedback and to discuss comments received. The September 8th, 2016 meeting was attended by representatives of MNLA, MSUE, MFB, Michigan Department of Natural Resources-Wildlife and Forest Resources divisions, and Michigan Department of Agriculture and Rural Development. The outcome of this meeting was that nearly all comments provided by industry were fully incorporated into the plan. Justification for any comments not fully incorporated can be found in these responses to public comments.
30	1	Leadership and Coordination - coordination and collaboration is emphasized in many areas of the plan. Since it hasn't occurred to this point, it is important that all industries are included in the completion and adoption of this plan.	Greater industry involvement	
31	9	Your approach to this growing problem is has one large hole in it. The private land owner who doesn't have the time, resources, or manpower to control the invasive species on his or her land and in their water.	Lack of Resources	We recognize the resource limitations of private landowners in managing invasive species on their land. Objective V.B. calls for securing resources for high-priority invasive species projects. The size and scale of invasive species problems also require coordination and collaboration in order to leverage limited resources as described in Objective VI.C.

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32	8	I sincerely hope that this plan can be funded appropriately so that the work outlined in it can be fully implemented.	Lack of Resources	The completion of this plan and its eventual implementation is a result of broad, inter-departmental investment in addressing invasive species in Michigan. A combination of funding sources will contribute to plan implementation including federal grants (e.g., Great Lakes Restoration Initiative, Farm Bill, U.S. Fish and Wildlife Service), state general fund, as well as budgetary commitments from partnering agencies. Furthermore, invasive species management will be optimized by providing funding opportunities through the Michigan Invasive Species Grant Program.
33	8	I would really like to see our natural areas funded so that the staff can put more effort into ridding these areas of the invasives that have already invaded.	Lack of Resources	
34	1	First line, ...each of these terms has a slightly different meaning...ADD "by different disciplines". This addition recognizes the inconsistency of interpretations by the different user groups.	Definitions	The terms "non-indigenous", "nuisance", and "exotic" were removed. "Non-native" and "invasive" are now defined, consistent with Executive Order 13751. Based on this comment, consideration was made for clarifying other definitions. "Risk analysis" and "risk assessment" were more clearly described. Likewise, "restoration" and "rehabilitation" were defined more clearly.
35	1	Define in the Glossary nonindigenous, nuisance, exotic, and non-native. Definitions will help to less the inconsistency of interpretations.	Definitions	
36	4	Nonindigenous, exotic and non-native are interchangeable terms for non-native species. They do not and should not imply invasiveness. Nuisance has been used for both native and non-native troublesome/invasive species. The inconsistencies in the use of these terms has led to confusion among stakeholders and the general public. Complete definitions of these terms should be provided in this section as well as in the glossary of terms to minimize misinterpretation. The State Management Plan will aid in lessening the confusion and inconsistencies in the use of these terms.	Definitions	

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37	2	I would like to see more opportunities for tribal involvement, especially when it comes to risk analysis (Activity Area I) and interagency response planning and mock response exercises (under Activity Area VI).	Greater tribal agency involvement	Tribal agencies were added to the strategic actions in the implementation table
38	2	Tribal first responders have participated in interagency response exercises, such as last year's mock oil spill exercise in the Straits of Mackinac. Tribal natural resources agencies may have the desire and capacity to be involved in any mock exercises planned for invasive species as well. Please keep in mind, however, that each tribe is independent, with different levels of desire and capacity to participate in invasive species planning and action. I am just making the case for more opportunities for tribal collaboration in the process.	Greater tribal agency involvement	Thirty-eight out of sixty-one strategic actions include tribal agencies. These actions support the most important objectives for which tribal agencies should be directly involved as cooperators .
39	9	Why isn't the DNR collaborating with private interest groups like QDMA (Quality Deer Management Association), DU (Ducks Unlimited), and NTF (National Turkey Federation) to name a few. I believe the access to these lands and waters from land owners would be overwhelming and the DNR would then be able to actually control, and possibly eliminate some if not most of these problems.	More coordination and collaboration	This plan calls for building partnerships among state, provincial, federal, tribal and local agencies, as well as NGOs (non-government organizations) to maximize effectiveness in managing invasive species. NGOs imply organizations such as Quality Deer Management Association (QDMA), Ducks Unlimited (DU), National Turkey Federation (NTF), and many potential others. Section 4. (Collaboration) and implementation table strongly repeatedly acknowledges that solutions will be found when collaboration occurs across a wide range of partners. Specifically called out are universities, government agencies, NGOs and the private sector, as well as on-the-ground implementation from local conservation districts and Cooperative Invasive Species Management Areas.

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40	9	A true coordinated effort between the DNR and some if not all of these groups with a rock solid non BS contract from the state. Promising to supply material and manpower and the land owner would also have to supply the same or matching contribution. You would be able to sweep across the state in one broad motion to limit if not eliminate most of our problems. If the state would sell the material to the landowner at a discount, or set up a payment system via property taxes. Not always looking to turn a profit or to line some self absorbed politician pocket this could actually work.	More coordination and collaboration	
41	10	I believe that every vessel entering the Great Lakes needs to be stopped and inspected for invasive species. I understand that this would create for extra financial cost. What has all of the invasive species cost and will be costing aquatic species and citizens? Matters will only become worse if this thought is not acted on. I know a lot of people have mentioned the same idea. Thankyou for your support.	Misc.	Reducing the risk of introducing AIS via ballast water is covered in Michigan's Aquatic Invasive Species State Management Plan 2013 Update (http://www.michigan.gov/documents/deq/wrd-ais-smp-public-review_380166_7.pdf). This plan pertains only to terrestrial invasive species. We agree that ballast water regulation is an important component of prevention. Michigan continues to be involved and committed to appropriate and effective regulation for the Great Lakes Basin as it continues to progress. Michigan has been on the forefront of prevention and has required treatment of ballast water discharges since 2007 or certification of no discharge. Michigan has also been supportive of additional monitoring as techniques continue to advance.
42	1	Activity Area I: Risk Analysis - we are requesting that Industries be added to every section we are not included in-1.A., 1.B., 1.C., 1.D.		Incorporated
43	1	Activity Area II: Management Measures - please add Industries to sections 11.A.2 and 11.A.3.	Misc.	Incorporated

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44	1	Activity Area III: Monitoring and Research - please add Industries to sections 111.A.1, 11 1.A.2, 111.A.3, 111.A.4, 111.A.5, 11 1.B.1, 111.B.2, 111.B.3, 111.C.1, and 111.C.2.	Misc.	Incorporated
45	1	Activity Area IV: Outreach and Education - please add Industries to section IV.B.3.	Misc.	Incorporated
46	1	Activity Area V: Regulation and Policy - please add Industries to sections V.A.1 and V.A.2.	Misc.	Incorporated
47	1	Activity Area VI: Leadership and Coordination - please add Industries to sections VI.A.2, VI.A.3, VI.B.1,VI.B.2, and VI.C.2	Misc.	Incorporated
48	1	Add the following text as a bullet point under "The following examples illustrate these impacts:" The economic impact of Michigan's nursery, perennial plant production, Christmas tree, sod producers, landscaping and lawn care industries is \$5.715 billion. The economic impact of our landscape services and retail sectors is \$4.5 billion. Together, all segments of the Green Industry account for a total of 36,162 individuals employed (Knudson & Peterson, 2012). According to US Census Data, this equates to 1out of every 170 Michigan citizens between the ages of 18-65. The estimated losses on these industries combined from the Emerald Ash Borer totaled over \$10 million. This does not include the costs incurred by homeowners.	Misc.	All of the text was added for which a reference was obtained within the section "Cause for Concern".

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49	1	In the last sentence, remove the word "native" as our terrestrial resources are much broader than just native. To leave it as is implies that we're limiting our concern	Misc.	Changed to "valued terrestrial resources"
50	2	I am glad that this is explicitly stated in the plan!: "Protecting valued native terrestrial resources from invasive species requires dedicated resources for monitoring, response and suppression activities."	Misc.	The word "native" was removed in order to be inclusive of other non-native valuable resources.
51	2	"Broad collaboration with state, federal, and international partners..." Add tribal.	Misc.	Incorporated
52	2	Some BCPs have already been developed, so don't overlook those. But more research is always needed to develop treatments for species for which we do not currently have good treatments. A unified format and centralized location on the internet would also help the advancement of BCPs.	Misc.	This feedback is addressed under Objectives VI.B. (Increase technical expertise available for TIS information and identification), III.B. (Expand research on TIS), and II.D. (Prevent future TIS invasions and restore ecosystem integrity through enhanced restoration and rehabilitation strategies).
53	1	Monitoring and Research - In order for a species to be invasive it must include harm. So in this section research should also include determining harm	Misc.	Incorporated

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54	1	we question the validity of citizen "scientists" and that they are documenting presence and not a science-based harm. Harm is a significant factor in determining whether a plant is invasive.	Misc.	This call-out box has been removed
55	3	I like the tree branching out and showing all the departments, divisions. Is there a way to show responsibilities or major responsibilities in there? The implementation table does a nice job with this. More importantly to add the CISMAs in there. I feel the CISMAs are doing a lot of on the ground work and should be listened to and included in planning more pertinently.	Misc.	<p>The implementation table (Appendix D) prescribes the lead state agency and cooperating agencies or organizations for each objective-strategy sequence in the Implementation Table (Appendix D). The level of detail is appropriate for the intended scope and size of the plan. Responsibilities of the three lead state agencies (Department of Natural Resources, Environmental Quality, and Agriculture and Rural Development) is outlined in detail within the Invasive Species Program Charter available upon request to:</p> <p>Joann Foreman Communications Coordinator Invasive Species Program Department of Natural Resources Department of Environmental Quality Department of Agriculture and Rural Development Ph. 517-284-5814 foremanj@michigan.gov</p> <p>Cooperative Invasive Species Management Areas (CISMAs) are defined in Section 4 (Collaboration). Further details outlining responsibilities were not included in order to limit the length of the plan, yet future projects would still be able to define relevant responsibilities in greater detail.</p>

Letter #	Name	Affiliation
1	Amy Frankmann	Michigan Landscape and Nursery Association
2	Noah Jansen	Little Traverse Bay Bands of Odawa Indians
3	Jesse Schulte	Blandford Nature Center
4	Robert Schutzki	Michigan State University
5	Emily Dunnigan	Grand Valley State University
6	Kevin DeVries	Plymouth Christian School
7	James McNamara	Citizen
8	Susan Beecher	Citizen
9	John MacKenzie	Citizen
10	Patrick Walsh	Citizen
11	Emily Reinart	Michigan Farm Bureau

-----Letter 1-----

From: Kevin DeVries <kdevries@plymouthchristian.us>

Sent: Monday, May 16, 2016 8:47 PM

To: Wheeler, Ryan (DNR)

Subject: TIS SMP

Mr. Wheeler:

Thank you for your work on this critically important topic that threatens the stability of the Great Lakes ecosystem. I cannot comment as to the specific details of the plan since I do not have any expertise on the topic, but I have sought to stay current on invasive species that impact our region and the plan brings together many of the ideas I have seen in some of the scientific literature I've come across over the years as well as the pertinent legal framework.

Something to consider regarding outreach to students in our state (and beyond): one of the topics of study this year and next in the middle school and high school competition Science Olympiad is Invasive Species. Contact info for the state site is: <http://miscioloy.org/> and for the national site is: https://www.soinc.org/invasive_species_c. Several hundred schools around the state compete in this and a variety of other science topics and your resources could reach potentially thousands of interested students right at the level of most interest and impact: future STEM career-oriented Michigan stakeholders.

In addition, I really appreciate the state's invasive species website—very informative and user-friendly for students. Consider linking volunteer opportunities taking place at state game areas (often coordinated by MUCC) as they often include invasive species removal as part of habitat restoration. I would love to see more of Michigan's residents get involved in this worthwhile effort and see firsthand the value of our public lands and the need for public and private stewardship of our natural resources.

I would also like to see species on the watch list and high priority list be prohibited in the nursery and/or pet trade.

Regards,

Kevin DeVries
Plymouth Christian School, Grand Rapids
Invasive Species Coach, Science Olympiad

-----Letter 2-----

Hello,

I have reviewed the Michigan Terrestrial Invasive Species State Management Plan and would like to share the following thoughts.

- I sincerely hope that this plan can be funded appropriately so that the work outlined in it can be fully implemented.
- I also hope that the DNR can increase its public education about invasive plants and about the importance of planting native plants through social media, workshops, news articles, etc.
- I would really like to see Michigan make the sale of a number of invasive ornamental plants illegal, including privet, buckthorn, the non-native honeysuckle, barberry, burning bush, vinca and others. It is so sad to see our beautiful natural areas being taken over by these invasives.
- I would really like to see our natural areas funded so that the staff can put more effort into ridding these areas of the invasives that have already invaded.

Thank you for listening.

Susan A. Beecher,

Chelsea, MI

-----Letter 3-----

Michigan Terrestrial Invasive Species State Management Plan Comments

To: Ryan Wheeler, MDNR

Submitted by: Amy Frankmann, Michigan Nursery & Landscape Association

Date: June 3, 2016

Comments:

1. Page 2, What are Terrestrial Invasive Species?

a.First line, ...each of these terms has a slightly different meaning...ADD “by different disciplines”. This addition recognizes the inconsistency of interpretations by the different user groups.

b. Define in the Glossary nonindigenous, nuisance, exotic, and non-native. Definitions will help to less the inconsistency of interpretations.

2. Page 3 – add the following text as a bullet point under “The following examples illustrate these impacts:”

a. The economic impact of Michigan’s nursery, perennial plant production, Christmas tree, sod producers, landscaping and lawn care industries is \$5.715 billion. The economic impact of our landscape services and retail sectors is \$4.5 billion. Together, all segments of the Green Industry account for a total of 36,162 individuals employed (Knudson & Peterson, 2012). According to US Census Data, this equates to 1 out of every 170 Michigan citizens between the ages of 18-65. The estimated losses on these industries combined from the Emerald Ash Borer totaled over \$10 million. This does not include the costs incurred by homeowners. This addition recognizes the negative economic effects of invasive species on our nursery, landscape, and retail industries that provide ecosystem services in Michigan’s constructed urban and suburban landscapes.

3. Page 7 – Under #2 Early Detection and Response:

a. Add the “plant and landscape industries” to the sentence “Such a system will be built through collaboration with, and training of, ...

i. Our industries have history of working closely with MDARD on early detection of invasive species.

b. In the last sentence, remove the word “native” as our terrestrial resources are much broader than just native. To leave it as is implies that we’re limiting our concern.

4. Page 8 – Invasive Species Watch List paragraph that references Appendix B – the Terrestrial Invasive Species Watch List of species that have never been confirmed here or have limited distribution is prudent. The “Other High Priority Terrestrial Invasive Species” list should be removed. The reasons given are arbitrary and are not founded by a risk assessment process. Utilizing a risk assessment process was identified early in this plan as an important factor in identifying invasive species and the level of risk they pose. It is also identified in the V. Regulation and Policy as the only way that policies and response actions will be developed. Published lists in a public document should be science---based and should not reflect views and opinions.

5. Page 9 – under #4. Collaboration – where it says “significant work is needed in the area of risk assessment...” The USDA Risk Assessment process for plants is the standard for bringing plants into the country and is identified and being used in AIS State Management Plan. This plan continues to reference the development of a risk assessment process and it is our recommendation that the USDA Risk Assessment process be included in this plan as the risk assessment process.

6. Page 11 – Risk Analysis – FOR PLANTS --

- The USDA Risk Assessment process for plants is the standard for bringing plants into the country and is identified and being used in AIS State Management Plan. This plan continues to reference the development of a risk assessment process and it is our recommendation that the USDA Risk Assessment process be included in this plan as the risk assessment process.

a. Any species determined to be prohibited or restricted and are in trade should also include a phase---out period and reimbursement for economic losses.

7. Page 12 –Monitoring and Research –

In order for a species to be invasive it must include harm. So in this section research should also include determining harm.

8. Page 13 – we question the validity of citizen “scientists” and that they are documenting presence and not a science-based harm. Harm is a significant factor in determining whether a plant is invasive.

9. Page 16--

- Leadership and Coordination – coordination and collaboration is emphasized in many areas of the plan. Since it hasn’t occurred to this point, it is important that all industries are included in the completion and adoption of this plan.

10. Appendix D. Implementation Table:

a.Activity Area I: Risk Analysis – we are requesting that Industries be added to every section we are not included in—1.A., 1.B., 1.C., 1.D.

b. Activity Area II: Management Measures – please add Industries to sections II.A.2 and II.A.3.

c.Activity Area III: Monitoring and Research – please add Industries to sections III.A.1, III.A.2, III.A.3, III.A.4, III.A.5, III.B.1, III.B.2, III.B.3, III.C.1, and III.C.2.

d. Activity Area IV: Outreach and Education – please add Industries to section IV.B.3.

e. Activity Area V: Regulation and Policy – please add Industries to sections V.A.1 and V.A.2.

f.Activity Area VI: Leadership and Coordination – please add Industries to sections VI.A.2, VI.A.3, VI.B.1, VI.B.2, and VI.C.2.

-----Letter 4-----

MICHIGAN STATE
UNIVERSITY



DEPARTMENT OF
HORTICULTURE
Michigan State University
Plant & Soil Sci. Bldg.
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June 23, 2016

Memorandum

To: Ryan Wheeler, MDNR

From: Robert E. Schutzki, Horticulture, Michigan State University

Ref: Michigan Terrestrial Invasive Species State Management Plan Public Review

**Michigan Terrestrial Invasive Species State Management Plan
2016-2021 Public Review
June 24, 2016
Comments**

What are Terrestrial Invasive Species (pg. 2)?

Nonindigenous, exotic and non-native are interchangeable terms for non-native species. They do not and should not imply invasiveness. Nuisance has been used for both native and non-native troublesome/invasive species. The inconsistencies in the use of these terms has led to confusion among stakeholders and the general public. Complete definitions of these terms should be provided in this section as well as in the glossary of terms to minimize misinterpretation. The State Management Plan will aid in lessening the confusion and inconsistencies in the use of these terms.

Cause for Concern (pg. 3)

“The following examples illustrate these impacts:”

The landscape and nursery industry has been drastically impacted by invasive species in the past, most recently from Emerald Ash Borer. Include figures on the economic impacts to the landscape and nursery industry in the example section. Mike Bryan from MDARD can provide information on EAB and other invasive species that have plagued nurseries, landscape contractors and subsequently the general public.

Add a bullet point referencing the “Decrease in available plants and loss of revenue by Michigan’s nursery, landscape and garden center companies” in the box titled effects of Terrestrial Invasive species. See Mike Bryan, MDARD and Amy Frankmann, Michigan Nursery and Landscape Association for a citation.

Early Detection and Response (pg. 7)

In the 4th sentence, 1st paragraph, “Such a system will be built through collaboration with, and training of” add the agricultural plant industries. The plant industries are actively involved in this effort. Last sentence, 1st paragraph, remove the word native. We are concerned with protecting all of our terrestrial resources. The word native is limiting the scope of the state’s efforts.

Invasive Species Watch List (pg. 8)

This paragraph references Appendix B. Appendix B includes a section on “**Other High Priority Terrestrial Invasive Species**”. This section is extremely problem-some for inclusion in the State Management Plan. Plants on the list have not been identified through a risk assessment process as invasive. It is biased and based on opinions not sound science. In addition, it does not take into consideration any benefits provided by a listed species. We all know that once a plant is placed on a list, it is condemned. The State Management Plan, as indicated in several places in this document, should be based on sound science. The State Management Plan should not print information unless it has the sound science to justify the statements. The sound science produced by a risk assessment process in Michigan is not yet available.

Collaboration (pg. 9)

3rd sentence, 1st paragraph. There is no mention of the USDA Risk Assessment process that was adopted within the AIS State Management Plan. MDARD has been working with USDA and is perfecting its use in assessing aquatic plants in Michigan. Given the scientific rigor of this system and the fact that it is already in use by state agencies, it should be written into the Terrestrial State Management Plan.

Risk Analysis (pg.11)

Bolded title sentence should add a phrase that addresses potential benefits to society. “Develop and implement a methodology to assess the risk of new invasives based on their aggressiveness, adaptability, potential cost to the environment, economy and human health **as well as to their potential benefits to society and the environment**”.

OB I.A. There is no mention of the USDA Risk Assessment process that was adopted within the AIS State Management Plan. MDARD has been working with USDA and is perfecting its use in assessing aquatic plants. Given the scientific rigor of this system and the fact that it is already in use by state agencies, it should be written into the Terrestrial State Management Plan.

Monitoring and Research (pg. 12)

Standardized data collection and carefully directed research efforts are needed to identify priorities... Data collection and research need to document harm. There is a tremendous void on “establishing harm”. Presence does not constitute harm. Many species, native (outside their native range/environment) and non-native have naturalized. Naturalization does not constitute harm. Establishing harm needs to be included in this paragraph on pg. 12.

The Midwest Invasive Species Information Network (pg. 13)

This network provides a service; however, participants are identifying the presence of a species and not establishing or contributing to documented harm. Again, once a plant is posted on the

network, it is classified as invasive, regardless whether it is true or not. How were targeted species identified? Not based on sound science.

Regulation and Policy (pg. 14)

2nd sentence, 1st paragraph. “Developing policies and response actions that are based on risk assessment will promote success in preventing new invasions. Providing clear and concise information on laws and policies and streamlining process will promote compliance...”

The State Management Plan seems to be ground in the words “**based on risk assessment**”; however this does not appear to be consistent in many strategies and actions.

Leadership and Coordination (pg. 16)

It is disappointing that collaboration with stakeholders was not a part of the development of this plan, as was the case with the AIS State Management Plan. You are witnessing the problems that has arisen from not having all industries involved in the AIS Plan. All industries directly impacted by this plan need to be involved in its finalization and adoption.

-----Letter 5-----

From: Patrick Walsh <pwalsh@hughes.net>
Sent: Monday, May 16, 2016 7:11 PM
To: Wheeler, Ryan (DNR)
Subject: Invasive a Species,

Hello,

I believe that every vessel entering the Great Lakes needs to be stopped and inspected for invasive species. I understand that this would create for extra financial cost. What has all of the invasive species cost and will be costing aquatic species and citizens? Matters will only become worse if this thought is not acted on. I know a lot of people have mentioned the same idea.

Thank you for your support.

Sincerely,
Patrick Walsh

Sent from my iPad

-----Letter 6-----

Dear Ryan,

Thank you for your continued good work and for giving us a chance to review the quality terrestrial invasive species management plan. I am most appreciative of your efforts to build partnerships and recruit partners.

My quick comments: On page 4, under economic effects is there anyway to represent the decrease in biodiversity caused by invasive species and how this directly impacts educational programs? You mention recreational opportunities but here at the nature center we have found that many of the students from the inner city do not get a chance to see healthy ecosystems and that the increased invasive plants are destroying the biodiversity they could have witnessed, therefore it impacts their education. Example, we are not finding as much wildlife and insects/butterflies in the dense reed canary grass taking over the wetlands.

PREVENTION

Michigan is one of only a few States in the [MidWest](#) that does not have a system to rank invasive species and the plan is to help develop a better strategy. But how can we not re-invent the wheel spending a lot of money and time. If these other States such as Wisconsin, Ohio, Indiana, Missouri are finding that these top invaders are a problem how can we in Michigan demand a ranking system and incorporate known invasive plants onto our [restricted species lists](#)? Not just risk assessment but inclusion of significant time and research already performed by our neighboring States. Currently Indiana, Ohio and Wisconsin have invasive plant councils that have a scientific assessment process to determine if a plant is invasive. Why reinvent the wheel? **The landscape industry and landscape academia may justify certain risk assessments needing to be preformed for a specific region of the State, delaying regulation and therefore not preventing a known invader who is just south of us.**

To "prevent future TIS invasions" **we are going to need a larger portion of this draft plan to address landscapers and nursery industry.**

CISMA definitions page 11

Many CISMA's are generating invasive species priority lists. This is something they are setting for their region. Local citizens engaged in their local CISMA's are generating watch lists. These top invasive species and watch lists should be taken seriously, reviewed and considered at the State level. How can these local species list help benefit the State planning on regulation?

Appendix B should be much larger. Can you better explain how this list is generated in the document? This is not a quality list of all the species we should be concerned with and on a Michigan terrestrial watch list for example [Clematis terniflora](#) and [Wisteria sinensis](#). When was autumn olive listed as a restricted species in Michigan?

Page - 16, I am so delighted to see annual review on there.

Page 22, I like the tree branching out and showing all the departments, divisions. Is there a way to show responsibilities or major responsibilities in there? The implementation table does a nice job with this. More importantly to add the CISMAs in there. I feel the CISMAs are doing a lot of on the ground work and should be listened to and included in planning more pertinently.

Page 29 - Expand and improve existing data sharing and include landscapers and nursery in updates on the severity of the invaders in our natural areas. How can the growing green industry be included in understanding the true cost and threat these invaders play because they do not get it now and have a disconnection and failure to understand the issue?

Thank you so much for your consideration!

Jessie Schulte

Land Stewardship Volunteer Coordinator

Blandford Nature Center

1715 Hillburn Ave NW

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P: 616-735-6240 ext 22

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Jessie@blandfordnaturecenter.org

www.blandfordnaturecenter.org

-----**Letter 7**-----

Hello,

I wanted to make a comment on the Invasive Species Management Plan draft. Firstly, I'd like to say that the plan is very detailed on how to go about managing for invasives and the steps that need to be taken to prevent and control. However, it saddens me to see that many of the invasive species that I personally deal with are not restricted by law. For example, there are many outbreaks of buckthorn, barberry, garlic mustard, and swallow-wort that are concerning. Without restrictions on sales of these species at greenhouses and other stores there is no way to effectively prevent them from expanding into our natural areas.

--

Emily Dunnigan

dunnigae@mail.gvsu.edu

-----Letter 8-----

Dear Mr. Wheeler:

I am submitting comments on the draft Terrestrial Invasive Species State Management Plan. Attached you will find a pdf version of the plan with my comments in the margins. I have tried to highlight text that is pertinent to each comment in yellow.

Overall, I am pleased with the plan, and many of my comments are related to style or formatting. I am glad to see the leadership that the state is beginning to take on invasive species, and I look forward to continued collaboration with state agencies on invasive species. I am pleased to see tribal agencies listed as Cooperating Agencies or Organizations many places in the Implementation Table of Appendix D. I would like to see more opportunities for tribal involvement, especially when it comes to risk analysis (Activity Area I) and interagency response planning and mock response exercises (under Activity Area VI). Many of the federally recognized tribes in Michigan, through past treaties with the Federal government, have retained their rights to use natural resources on public lands. The fact that tribal leaders thought to explicitly include these rights in the treaties demonstrates how important natural resources are to the tribes. As sovereign tribal entity, the Little Traverse Bay Bands of Odawa Indians create its own regulations on the use of natural resources in accordance with the 2007 Consent Decree between the State of Michigan and five of the tribes. The tribes are key stakeholders in any discussions of invasive species in Michigan because their treaty rights are directly affected by the negative impacts that invasive species have on the environment.

Wisconsin has a risk analysis process using a panel of about ten knowledgeable people to recommend whether a species should be prohibited, restricted, or unregulated. Representatives from various tribes have often been included on these panels, and tribes in Michigan should have the opportunity to participate in the process in some way. Similarly, tribal first responders have participated in interagency response exercises, such as last year's mock oil spill exercise in the Straits of Mackinac. Tribal natural resources agencies may have the desire and capacity to be involved in any mock exercises planned for invasive species as well. Please keep in mind, however, that each tribe is independent, with different levels of desire and capacity to participate in invasive species planning and action. I am just making the case for more opportunities for tribal collaboration in the process.

I thank you and the TIS Core Team for the work you put into developing this plan, and I appreciate the chance to submit comments on the draft Terrestrial Invasive Species State Management Plan.

Sincerely,
Noah Jansen

Noah Jansen, Conservationist
Natural Resource Department

Little Traverse Bay Bands of Odawa Indians
7500 Odawa Circle, Harbor Springs, MI 49740
231.242.1684

-----Letter 9-----

From: James Mcnamara <jbmac1025@gmail.com>
Sent: Tuesday, May 17, 2016 2:44 PM
To: Wheeler, Ryan (DNR)

I would like to see a seminar type meeting to see first hand what these specie's look like up close
I'm thinking this would generate a lot of interest in reporting of such

-----Letter 10-----

From: John MacKenzie <mwjmack@yahoo.com>
Sent: Tuesday, May 17, 2016 8:55 AM
To: Wheeler, Ryan (DNR)
Subject: Invasive Species

Good Morning, Mr. Wheeler

This letter is in response to the e-mail I received from the DNR yesterday.

Your approach to this growing problem is has one large hole in it. The privet land owner who doesn't have the time, resources, or manpower to control the invasive species on his or her land and in their water.

Why isn't the DNR collaborating with privet interest groups like QDMA (Quality Deer Management Association), DU (Ducks Unlimited), and NTF (National Turkey Federation) to name a few. I believe the access to these lands and waters from land owners would be overwhelming and the DNR would then be able to actually control, and possibly eliminate some if not most of these problems.

I hope it doesn't sound like I'm a money grabber or I want someone else to do everything for me and I'll just sit back and watch. That's not the case. A true coordinated effort between the DNR

and some if not all of these groups with a rock solid non BS contract from the state. Promising to supply material and manpower and the land owner would also have to supply the same or matching contribution. You would be able to sweep across the state in one broad motion to limit if not eliminate most of our problems.

If the state would sell the material to the landowner at a discount, or set up a payment system via property taxes. Not always looking to turn a profit or to line some self absorbed politician pocket this could actually work.

Obviously their would need be a need for guidelines but that could be worked out with all the privet interest groups in a couple of meetings. If everyone involved put on there "let's not be selfish and help each other hats". REMEMBER this is about helping OUR environment. Or you guys can keep spinning your wheels and patting each other on the backs, telling each other what a fine job your doing. Your choice.

Sorry for the rant, but I've tried to get help with "very little" success.

If you the DNR really cares, I dare you to try it.

Thanks for your time. John MacKenzie

-----Letter 11-----



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June 23, 2016
Ryan Wheeler
MDNR Wildlife Division
P.O. Box 30444
Lansing, MI 48909-7944

Subject: Public Comments - Michigan's Terrestrial Invasive Species State Management Plan

Submitted via e-mail to: wheelerr5@michigan.gov

Dear Mr. Wheeler,

Thank you for the opportunity to offer comments on Michigan's Terrestrial Invasive Species Management Plan 2016-2021 as coordinated by the Terrestrial Invasive Species Core Team. Michigan Farm Bureau is the state's largest general farm organization, representing more than 45,000 farmer members and values the importance of managing terrestrial invasive species in the state.

Page 2 of the draft plan states, "A coordinated, statewide, strategic effort will more effectively limit the economic and environmental impacts of terrestrial invasive species." *MFB Policy #29 Plant Pests and Diseases* also acknowledges the impact of infestation by pests and diseases on agriculture.

We recognize the proposed plan is a partnership effort based on collaboration of different agencies. *MFB Policy #76 Invasive Species* states, "We support efforts to establish the Michigan Department of Agriculture and Rural Development, with input from appropriate industry associations, as the state agency with responsibility for all terrestrial invasive species."

We suggest the following underlined text on page 3 under the **Cause for Concern** section be added, "With over 3,200 miles of shoreline, 20 million acres of forest, 10 million acres of farmland and 5.5 million acres of wetlands, Michigan's landscape provides invaluable economic, cultural, ecological, agricultural and recreational resources that are threatened by the growing problem of invasive species."

MFB Policy #29 Plant Pests and Diseases supports educational efforts to help producers and consumers understand the importance of their roles in preventing the spread of plant pests and diseases. Page 5 of the draft plan under the **Prevention** section indicates the importance of informing state and local agencies and the public of invasive species pathways and proper prevention methods. Additionally, page 7 indicates in the **Early Detection and Response** section that a system of monitoring and reporting "will be built through collaboration with, and training of, state and local agencies, volunteer groups and committed citizens." Further mention in the **Outreach and Education** section on page 13 highlights the importance of equipping diverse audiences including TIS program managers and citizens with information and training through outreach and education. Further support for early detection and education is in *MFB Policy #76 Invasive Species*, ("Any statutory policy changes and control measures to deal with invasive species should be based on:") "We support an increase in funds for inspection services and facilities. Funding should also be made available for public education and outreach efforts."

In the draft plan's **Leadership and Coordination** section on page 9, collaboration is emphasized in order to successfully manage TIS. *MFB Policy #76 Invasive Species* states, "We believe federal, state and local agencies should work more closely with private landowners to address invasive species problems. We recommend the Department of Natural Resources notify all levels of local government and gain their support before releasing a non-native species."

MFB Policy #76 Invasive Species statement that "Any statutory policy changes and control measures to deal with invasive species should be based on clear and scientific criteria to delineate what are invasive species." provides support for the strategic action under the **Risk Analysis** section on page 11 "implement a science-based risk assessment process," and **Monitoring and Research** section on page 12 "Acquiring and maintaining important data on the

threat, status and distribution of TIS will help drive science-based decision-making and improve the effectiveness of invasive species management. Additionally, *MFB Policy #76 Invasive Species* states (“Any statutory policy changes and control measures to deal with invasive species should be based on:”) “State and federal funding should be adequate to develop sound science sufficient to determine long-term effects of invasive species.”

The **Regulation and Policy** section on page 14 of the draft plan states, “Prevention, early detection and response to new TIS are most successful when bolstered by enforceable regulations.” *MFB Policy #76 Invasive Species* states “Programs should rely on cooperative, voluntary partnership-based efforts between public agencies, private landowners, and concerned citizens.” and “Any invasive species program that is proposed should not create additional restrictions on agriculture producers and landowners.”

In the event of eradication, *MFB Policy #29 Plant Pests and Diseases* supports “Indemnification for losses of farm income when agricultural commodities or products are impounded, farms are quarantined or sales are restricted in the public interest.” *MFB Policy #76 Invasive Species* states “Any statutory policy changes and control measures to deal with invasive species should be based on indemnification of crop, nursery stock and livestock losses from invasive species when it can be documented that the quarantine requirements or treatment methods are the basis for the loss.”

Page 15 indicates, to “use risk assessments to conduct annual review and update the Prohibited and Restricted Species list.” The example task for completing this action lists the lead state agencies and cooperating organizations. *MFB Policy #76 Invasive Species* states: “We do not support the elimination of the roles of the Agriculture and Natural Resource Commissions in establishing the prohibited species list, and support re-establishing the Commissions’ decision-making powers.

To see our complete member-developed policy on *Plant Pests and Diseases and Invasive Species*, visit www.michfb.com and click on the "Policy & Politics" section. MFB looks forward to partnering in the implementation of the State Management Plan in efforts to prevent, detect, control and collaborate on TIS issues.

Please contact me if you have any questions.

Sincerely,



Emily Reinart
Agricultural Ecology Specialist