

**Response to the Aquatic Nuisance Species Task Force:
Preliminary Review of the
New Mexico Aquatic Invasive Species Management Plan.**

**By:
New Mexico Aquatic Invasive Species Advisory Council**

4 September 2008

Comments on the “*New Mexico Aquatic Invasive Species Management Plan*” (NMPlan) were received during a 30-day public review period ending 15 August 2008. Public comments have been summarized in the final version of the NMPlan under *Appendix I—Public Comment*.

The New Mexico Aquatic Invasive Species Advisory Council (AISAC) also addressed preliminary review comments by the Aquatic Nuisance Species Task Force (ANSTF) in *Appendix I*, but takes this opportunity to address additional comments in greater detail.

Document 1: Email comments (19 August 2008) from the ANSTF.

From: Darren_Benjamin@fws.gov [mailto:Darren_Benjamin@fws.gov]
Sent: Tuesday, August 19, 2008 12:09 PM
To: Lang, Brian, DGF; bob_pitman@fws.gov; david_britton@fws.gov; don_maclean@fws.gov
Cc: Joe_Starinchak@fws.gov
Subject: Preliminary ANSTF Comments on the NM AIS Plan

Brian -

Attached are the comments we received in conjunction with the ANS Task Force's (ANSTF) preliminary review of the New Mexico State Aquatic Invasive Species Management Plan. They are provided for your consideration and I hope you find them useful. If you have any questions or would like clarification, just let me know.

- 1) Comments from Fish and Wildlife Service staff person Don MacLean:
- 2) Comments from ANSTF member Herbert Frost, National Park Service:
- 3) Comments from ANSTF member Paul Zajicek, representing the National Association of State Aquaculture Coordinators:

1. Overall, a well-written plan that is nicely organized and focused in its goals and objectives. Of great benefit to Plan readers, especially folks outside of New Mexico, would be to include a New Mexico map and a description of the water resources within the state (i.e., major rivers, lakes, man-made impoundments, etc).

2. The authors have offered control methods for most of the aquatic plants identified (Priority 1 species) except hydrilla (page 16). New Mexico uses triploid grass carp in concert with other states (Texas and Louisiana) associated with the Rio Grande basin as a preferred method to control hydrilla. The several aquatic plants mentioned on page 23 are also consumed by grass carp.
3. VHS virulence is limited to waters between 37 and 54°F. The authors may wish to discuss the risk VHS poses to NM waters much as they have with the other Priority 1 species.
4. There has been a change made to applesnail taxonomy (page 19). The snail they are calling the channeled applesnail, *P. canaliculata*, is more likely the island applesnail *P. insularum*. Both are phytophagous snails.
5. The silver carp has also been added to the Injurious Species List (page 20).
6. Surprisingly, many of the state plans do not describe state activities associated with current ANSTF supported programs or products. However, on page 29, there is a succinct description of New Mexico's involvement with several ANSTF programs and their recognition and participation is very much appreciated.
7. Strategy 2A, page 33, suggest adding the Generic Nonindigenous Aquatic Organisms Risk Analysis Process as a reference document to 2A3; suggest adding a new strategy that promotes implementation of Habitattitude with the pet owners, distributors, breeders and retailers (also include Habitattitude materials as a component of 6C1); and suggest a new strategy that describes the expanded implementation of the Protect Your Waters program beyond boat ramp posting that they already described as doing.
8. In reference to Strategy 6A, I visited the New Mexico Museum of Natural History and Science in Albuquerque several years ago and was impressed by the quality of its exhibits and information. It would seem that the Museum could be a partner in public education efforts.

Please note that to give the ANSTF members enough time to review the final plan, we must receive a copy of the final plan before September 22. This gives the ANSTF members approximately 30 days before the ANSTF meeting to review the plan - however, the ANSTF is allowed 90 days to approve a plan and if an ANSTF members requests additional time at the meeting then that time would be granted.

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Responses to the ANSTF's 19 August 2008 email:

1. Overall, a well-written plan that is nicely organized and focused in its goals and objectives. Of great benefit to Plan readers, especially folks outside of New Mexico, would be to include a New Mexico map and a description of the water resources within the state (i.e., major rivers, lakes, man-made impoundments, etc).

Response: A map showing surface waters and major transportation routes in New Mexico has been added.

2. The authors have offered control methods for most of the aquatic plants identified (Priority 1 species) except hydrilla (page 16). New Mexico uses triploid grass carp in concert with other states (Texas and Louisiana) associated with the Rio Grande basin as a preferred method to control hydrilla. The several aquatic plants mentioned on page 23 are also consumed by grass carp.
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5. The silver carp has also been added to the Injurious Species List (page 20).

Response: Comments #2 – #5 request specific information for Priority Class species. This information has been added with supplementary detail where appropriate.

6. Surprisingly, many of the state plans do not describe state activities associated with current ANSTF supported programs or products. However, on page 29, there is a succinct description of New Mexico's involvement with several ANSTF programs and their recognition and participation is very much appreciated.

Response: Additional activities have been provided where appropriate to clarify current participation and activities. See *Existing Authorities and Programs* (particularly *State*).

7. Strategy 2A, page 33, suggest adding the Generic Nonindigenous Aquatic Organisms Risk Analysis Process as a reference document to 2A3; suggest adding a new strategy that promotes implementation of Habitattitude with the pet owners, distributors, breeders and retailers (also include Habitattitude materials as a component of 6C1); and suggest a new strategy that describes the expanded implementation of the Protect Your Waters program beyond boat ramp posting that they already described as doing.

Response: All suggestions were incorporated into Strategy 2A3 and Strategy 6A10.

8. In reference to Strategy 6A, I visited the New Mexico Museum of Natural History and Science in Albuquerque several years ago and was impressed by the quality of its exhibits and information. It would seem that the Museum could be a partner in public education efforts.

Response: Change here is reflected in Strategy 6A6.

Document 2: Letter from Dr. Herbert Frost, National Park Service, 8 August 2008, to Mr. Don MacLean.

“...We encourage the Advisory Council to prioritize action items [*Recommended Strategies and Actions*”], with an emphasis on prevention, coordination, and cooperation...”

Response: The New Mexico AISAC acknowledges that prioritization of action items outlined under “*Recommended Strategies and Actions*” of the NMPlan is an important component of adaptive management. As envisaged under the “*Planning and Implementation*” section of the NMPlan, the AISAC recognizes that AIS management strategies and priorities will require constant adjustments in the context of spatial and temporal dynamics of the AIS landscape relative to waters of the State, shared basins of adjacent states, and regional planning strategies. Accordingly, the AISAC preferred not to prioritize action items of the NMPlan.

Document 3: Electronic submission of edits and comments by Mr. Don MacLean.

Comment 2: I assume that names will be listed later, once the draft is more finalized?

Response: Names have been added to the “Acknowledgements.”

Comment 3: Is this a State Council, or are you actually referring to NISC’s (National Invasive Species Council) Invasive Species Advisory Council? If so, you might want to make sure you distinguish that this Council is at the State Level.

Response: Confusion clarified by parenthetically listing (New Mexico) in the “List of Acronyms and Abbreviations”, and in appropriate places throughout the plan.

Comment 4: The ANSTF State Plan Guidance stipulates that the Executive Summary should have a very brief overview of each section of the plan.

Response: A brief overview of each section of the plan has been included in the “Executive Summary.”

Comment 5: A map of New Mexico that shows some of these discussion points would be very helpful.

Response: A map has been added.

Comment 6: Action IB3 mentions coordination with other States. Has there been any historic coordination with other States?

Response: Coordination with other states has been added in various places—see “Existing Authorities and Programs.”

Comment 7: Because this document has numerous audiences at various levels of expertise, it might be beneficial to include a sentence explaining exactly what this is since the layperson may not know what an alga is.

Response: The text as modified now refers a reader to the “Glossary” for a definition of “alga.”

Comment 8: Zebra mussels were found in Lake Mead in early January, 2007.

Response: The date was corrected to “January 2007”, but the dreissenid referenced in this sentence actually is the quagga mussel as occurring in the Lower Colorado drainage.

Comment 9: Add this term (“phoretic”) to the glossary.

Response: “Phoretic” replaced with the term “transport.”

Comment 10: There may be some recent changes to the taxonomy of this species... not sure this is still the proper scientific name.

AND

Comment 11: As of June, 2008, this snail, also known as the golden apple snail, can also now be found in Georgia and South Carolina. See the following for one source of the info: <http://www.manandmollusc.net/Odessa/apple-snail.html>.

Response: Based on comments 10 and 11, this species account was modified to reflect suggested changes.

Comment 12: Silver Carp has also been listed as Injurious – it happened on August 9, 2007.

Response: Federal Register citation has been added.

Comment 13: Are there invasive species that are not yet in NM, but for which there are known management techniques? There may or may not, but it does seem to be a category which falls between Priority Class 1 and Priority Class 2. This is not necessarily a

problem, but something that seems to be a gap in the classes. Perhaps one of the classes could just be slightly redefined to include species that are not yet in NM, but for which there are known management techniques?

Response: Priority Class 4 has been altered slightly to address this recommendation.

Comment 14: As with my earlier comment on Didymo - because this document has numerous audiences it might be beneficial to include a sentence explaining exactly what an alga is.

Response: The text as modified now refers a reader to the “Glossary” for a definition of “alga.”

Comment 15: This title doesn’t seem to be complete. Did I miss an earlier reference to an Executive? If not then perhaps it needs to be in the glossary?

Response: The term “Executive” has been deleted.

Comment 17: This does not make sense.

Response: This sentence was re-written to render more intelligible.

Comment 18: For this activity, you should also consider consulting with the ANSTF Executive Secretary and possibly NISC.

Response: This activity now reads, “Consult with the ANSTF Executive Secretary and the National Invasive Species Council to develop a set of uniform definitions and terms to describe AIS. (Coord, AISAC)”

Comment 19: This is a very important point and one that perhaps should be strengthened with some text in the body of the plan – especially if there was been any historic demonstration of such activities.

Response: Coordination with other states has been added in various places—see “Existing Authorities and Programs.”

Comment 20: Is this term part of the NM Dept. Of Agriculture’s language? If not, I suggest removing it as it is an older term that is no longer used very much. If it is part of NM Dept. Of Agriculture’s language, then its fine to leave it as is.

Response: The term “alien” has been deleted.

Comment 21: This wording seems awkward – is it part of 20.6.4.13 E NMAC? If not, perhaps consider changing it to something like “the degradation of water quality and aquatic habitats.”

Response: This wording is cited directly from statute. No change.

Comment 22: Before implementing the plan you have developed, you might consider testing it with some sort of mock rapid response exercise as has been done in other parts of the country.

Response: Testing of a rapid response plan will be inherently included under 3B1 (the development of a rapid response plan).

Comment 23: Does this mean that current activities were not know at the writing of the this draft? Or that none are being done at the moment. Suggest the wording get changed to be more clear or that this be completed before the final draft.

Response: Activities missing on previous draft have been added.

Comment 24: Is New Mexico just putting up signs, or are they a full-blown partner of the entire Stop Aquatic Hitchhikers! campaign? If so, you might want to mention that you are a member.

Response: Further clarification of state level activity is described under “Current Activities”, with a call for additional statewide participation under Strategy 6A10.

Comment 25: Has New Mexico been involved in the Service’s other National Public Awareness campaign – Habitattitude – which targets pet and aquarium owners and teaches them not to dump their unwanted pets into local waters?

Response: Strategy 6A10 has been modified to call for further involvement with several national awareness campaigns.

Comment 26: If you are referring to State ANS Plans, this is incorrect – Arizona does not have an approved state ANS plan and this could not be implementing this “model.” Perhaps Oregon and Arizona need to be switched in the sentence?

Response: This sentence has been changed to reflect comment.