



# THE WILDLIFE SOCIETY

*Leaders in Wildlife Science, Management and Conservation*

09 October 2020

U.S. Department of the Interior  
Office of Policy Analysis  
Attention: Invasive Species Comments [DOI-2020-0007]  
1849 C Street NW  
Washington DC, 20240

RE: Department of the Interior Draft Invasive Species Strategic Plan

Department of the Interior leadership,

The Wildlife Society appreciates the opportunity to comment on the newly proposed Department of the Interior Draft Invasive Species Strategic Plan.

Founded in 1937, The Wildlife Society (TWS; [wildlife.org](http://wildlife.org)) and our network of affiliated chapters and sections represent over 15,000 wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to inspire, empower, and enable wildlife professionals to sustain wildlife populations and their habitat through science-based management and conservation.

We appreciate the Department's efforts in compiling this document in response to passage of the 2019 Dingell Conservation Act. We find this document to be a good foundation for advancement of federal invasive species prevention and management efforts, and offer the following suggestions aimed at improving implementation of the plan and allowing for increased stakeholder coordination.

## **Performance Metrics**

The Dingell Conservation Act directs the Secretary to “develop a strategic plan that will achieve, to the maximum extent practicable, a substantive annual net reduction of invasive species populations or infested acreage on land or water managed by the Secretary.” A substantive annual net reduction along with associated improvements to invasive species prevention efforts can only be achieved if there is an understanding of what performance metrics are appropriate to determine success.

Appropriate and relevant metrics to determine success in working towards improved invasive species prevention and management can be very difficult to determine. However, there are very few substantive performance metrics provided in the proposed strategic plan. We appreciate the Department's acknowledgement of this fact in Appendix C; however, the existing proposal to provide additional performance metrics come final publication of the plan is inadequate for stakeholder engagement. We request that **as appropriate performance metrics are determined for inclusion in the plan, they are provided for public review.**

This proposed course of action is particularly important for Goal 3 of the plan, which sets a framework for implementation of early detection and rapid response efforts in coordination with other federal agencies, states, tribes, and territories. There are no metrics provided for how success in achieving this goal and its objectives and strategies will be determined by the Department. Given

the cooperative nature of this goal, it is necessary to provide partners with the understanding of how success in implementation will be determined.

In order for any assigned performance metrics to be implemented, the Department also needs to **determine standardized cost data** that will allow for a uniform interpretation of metrics that utilize this information. The ability to compare the financial impact of one invasive species to another is necessary for interpretation of mandates such as utilizing cost-effective management activities as outlined in the Dingell Conservation Act. We are interested in the plan's brief reference to an ongoing DOI project to standardize data management across the Department, and we look forward to hearing more about this effort and its potential implications to standardization of cost data.

### **Improved Data Management and Coordination**

Goal 2 of this plan lays out a vision to “cost-effectively prevent the introduction and spread of invasive species into and within the United States.” Preventing the introduction of invasive species into the U.S. is by far the most cost-effective means of managing the spread of invasives, and this goal is deserving of the Department's attention. **We believe this goal would benefit from more specific implementation strategies aimed at correcting existing gaps in coordination.**

Objective 2.3 of the plan seeks to “leverage research and innovation to develop cost-effective tools, technologies, and methods to prevent invasive species introductions and secondary spread.” In order to provide for adequate execution of this objective, we recommend including an additional strategy that would make it a priority to improve data collection and dissemination for species that are imported into the U.S. This includes updates to record-keeping practices at points of entry as well as improvements to stakeholder access to these records. At present, the Department has an inadequate information collection system that is largely paper-based. Providing an improved electronic record, increasing access to that record, and incorporating information on all species entering the U.S., not just those listed as injurious, will provide a greater understanding for other Department and stakeholder entities as to potentially emerging threats.

### **Improved Partner Engagement**

The Wildlife Society appreciates the desire of the Department to avoid being overly prescriptive in order to allow for flexibility in stakeholder engagement. However, the generality of many of the goals and objectives may limit the ability of partner federal agencies, states, tribes, territories, and other stakeholders to determine with which efforts they can appropriately coordinate.

We believe that improvements to performance metrics and data coordination outlined above will assist in expanding opportunities for coordination and engagement within this plan. However, the plan provides a noticeable lack of coordination with other federal departments mandated to create strategic plans, as well as existing government-wide invasive species initiatives. This is despite coordination with these federal entities, such as the National Invasive Species Council and the Aquatic Nuisance Species Task Force, being listed as a cross-cutting principle of the plan. In order for invasive species prevention and management to be effective at the federal level, federal departments must not be performing siloed work. **We request a reassessment of the Department's interactions with existing government-wide bodies as well as with other departments working on strategic plans as mandated through the Dingell Conservation Act**

In addition, while we find the plan to be an appropriate starting point, we also acknowledge that **attempts to implement the plan will only be accomplished through coordination with**

**Congress on improvements to federal invasive species efforts.** The Department's ability to reduce the spread of invasive species has been severely hampered by judicial decisions limiting the Department's authority to prohibit the interstate transport of species designated as injurious under the Lacey Act. We urge the Department to recognize this lack of authority in the proposed plan, and to **work with Congress towards reinstatement of the Department's authority to regulate interstate commerce.** This should be done alongside associated requests for Congress to increase appropriations for the federal invasive species prevention, management, and coordination efforts laid out in this plan.

Thank you for considering the views of wildlife professionals. Please contact Caroline Murphy, AWB®, government relations manager at The Wildlife Society (cmurphy@wildlife.org; 301-897-9770 x 308), with any questions regarding the recommendations outlined above.

Sincerely,

A handwritten signature in cursive script that reads "Carol L. Chambers".

Carol L. Chambers, PhD  
President, The Wildlife Society