

NYISCMMP PUBLIC COMMENT RESPONSE SUMMARY

Com #	Sec.	Commenter	Comment	Response	Edits?
G.1	Gen	1	Happy with the addition of EBM principles into plan.	Thank you for your comment. We have done our best to include ecosystem-based management principles into the document.	No
G.2	Gen	3, 4, 6	Engagement of “ambassadors” to draw people in from different professions and emphasis on education of future generations is great.	Thank you for your comment.	No
G.3	Gen	4	Use of emerging technologies for early IS detection and prevention is positive.	Thank you for your comment.	No
G.4	Gen	6	Incorporation of Incident Command System into the rapid response process to keep up to date with new IS.	Thank you for your comment.	No
G.5	Gen	6	Importance of retaining flexibility so all agencies can use one standard with each species that are handled differently.	Thank you for your comment.	No
G.6	Gen	10	Spread information through social media	Thank you for your comment.	No
G.7	Gen	13	Concern about ticks and Lyme disease	This is a separate initiative, outside the scope of the Comprehensive Management Plan (ISCMMP).	No
G.8	Gen	14	Inclusion of Japanese Stiltgrass and Barberry in IS database.	ISCMMP is not species-specific. Also note that these species are included, and tracked in the iMapInvasives database.	No
G.9	Gen	15	Reduce the amount of white space on page	The layout of this document is intended to provided readability to a broad audience.	No
G.10	Gen	17	More plan diagrams which help further illustrate the management areas and proposed approach for any given location.	Such process diagrams exist elsewhere, e.g., rapid response framework.	No
G.11	Gen	17	Better education about public volunteer opportunities for IS prevention.	This type of recommendation would be accomplished by an improved web presence which may include social media outreach, etc. which is noted in Section 2.	No
G.12	Gen – S4?	18	More IS eradication programs open to the public throughout the year throughout the state in areas which previously did not have them. Encourage the public to participate through incentives such as community service hours.	PRISMs do an exceptional amount of work to provide public engagement opportunities. Invasive Species Awareness Week events represent just one of many examples throughout the year. iMap and PRISMs also help create a more empowered public through IS identification and management workshops. This ISCMMP has several recommendations that are designed to help iMap identify locations throughout the state that may need additional focus; and to help PRISMs identify where additional survey and management (and associated public programs) may be required (Section 2, Section 5).	No
G.13	Gen	20	Use of have-a-heart traps for invasive birds with natives released.	We appreciate your comment however this level of detail is beyond the scope of the ISCMMP.	No

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G.14	Gen – S4?	21	Plan for use of divers to pull IS out of lakes throughout NYS? Advertise to local dive shops and divers to volunteer.	This level of detail is beyond the scope of the ISCMP.	No
G.15	Gen	23	Help homeowners and others understand the problem and how to deal with it. Place signs with pictures and identification techniques in parks; dedicate a part of County Parks budget to IS removal and education.	This is largely covered in Section 4, Recommendations 3 & 4.	No
G.16	Gen	23	Hold nurseries accountable for selling IS, possibly provide information to buyers of IS to help contain the plants.	These actions have been implemented as part of 6 NYCRR Part 575 (Prohibited and Regulated Species) which is noted in Section 3.	No
G.17	Gen	23, 27	Transportation departments can help eradicate IS in right of ways with proper education.	Added “NYSDOT personnel” to Section 5, Recommendation 4, Bullet 6. Also, note text in Section 4, Recommendation 4 – engaging municipalities.	Yes
G.18	Gen	26	More practical information on how to effectively manage IS which require pesticide treatments.	While this recommendation is beyond the scope of the ISCMP, we recommend that this type of information be housed on a centralized website (Section 2).	No
G.19	Gen	26	With Japanese knotweed, phragmites, and wild parsnip being such a large part of terrestrial invasive plants in New York, I recommend the Plan include specific recommendations for effective management as well as include what practices can worsen spread. Suggest encouraging other locations across the state develop programs such as RIIPP, which includes government support and has volunteers identify and obtain permission from property owners, and hires pesticide applicators to do the herbicide treatments needed for effective management of knotweed and phragmites.	While these species do pose significant risks to the environment and human health, species-specific recommendations are beyond the scope of this ISCMP. Volunteer coordination, property owner engagement, and IS management (chemical or otherwise) is the responsibility of the PRISMs.	No
G.20	Gen	30	DEC should perform mandatory inspections and cleaning at boat launches. Advocate for the legislature to institute criminal penalties for boat owners and operators of private launch facilities who do not inspect and clean boats.	Regulations (6 CRR-NY 576.3) were adopted in June of 2014 requiring watercraft to be cleaned, drained, and treated (dried, rinsed, or painted) before launching into a public waterbody. This regulation includes private launches that provide access to public waterbodies. A permit is required to transport a boat that deviates from regulations.	No

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G.21	Gen – S5?	31, 35, 45	The plan does not mention the Champlain and Erie Canals and Hudson Rivers as vectors for transport of IS.	Altered sentence in Section 3A: “At each scale of prioritization (State and regional/local), both public and private land must be considered along with a realistic assessment of vectors including river and canal corridors. ” Added to Section 5, Recommendation 4, Bullet 1: “Major connecting watercourses such as the Hudson River and Erie and Champlain Canals should also be a significant consideration.”	Yes
G.22	Gen	32	The beekeeping industry seeks the recognition by NYS of the importance of the plant species listed above (spotted knapweed, Japanese knotweed, purple loose strife glossy buckthorn, white and yellow sweet clovers) as critical to the survival of domestic and wild pollinating insects in NYS. The Empire State Honey Producers Association remains opposed to the use of any biological remedy capable of crossing property lines.	The opposition is noted however, title 17 of New York’s Environmental Conservation Law provides a legislative mandate to manage invasive species such as spotted knapweed and purple loosestrife.	No
G.23	Gen	35	Stronger emphasis on vector control- minimizing the risk of bringing IS into uninvaded areas.	Added to Section 5, Recommendation 3: “Expand support for research focused on prevention through pathway and vector management. Research may encompass social, biological (e.g. biological dispersal barriers), and engineering (e.g. physical barriers) components.”	Yes
G.24	Gen	35, 45	Evaluate the feasibility of constructing a biological barrier on the Erie Canal?	Added to Section 5, Recommendation 3: “Expand support for research focused on prevention through vector management. Research may encompass social, biological (e.g. biological dispersal barriers), and engineering (e.g. physical barriers) components.”	Yes
G.25	Gen	36	NYS should make a stronger effort to keep IS out of the country. NYS should take a leadership role in changing the federal trade regulations that allow IS into our country.	Note Section 1, Recommendation 6, Bullet 1: Ensure that members of New York’s IS leadership work with Federal and international partners to promote policies designed to prevent the introduction of IS at a national level (e.g., ballast water policy), and that State initiatives are compatible with and help advance the goals of Federal and international programs.	No

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G.26	Gen	37	Within the Draft Plan, adding more emphasis to the research component, including calls for more stable research funding is needed.	Research is a prominent component in the ISCMP with each section containing its own research-specific recommendations. The following are a few examples. Sections 1 and 3 call for establishing research priorities; Section 3 recommends support for basic research in the marine ecosystem to better understand IS impacts; Section 4 recommends providing students with opportunities to contribute through field based research; Section 5 calls for research into emerging technologies and their application, and additional research focused on pathway and vector management. Section 6 contains recommendations regarding biocontrol research in addition to research into response/treatment effectiveness. Section 7 recommends supporting research to evaluate the biotic and abiotic factors that act as drivers of ecosystem change.	No
G.27	Gen	38, 39	The 40 proposed actions and 123 action bullets should be prioritized. At minimum, they should be assigned a priority category e.g. "high, medium, low." Actions and implementation bullets should be identified by alphanumerically. This would facilitate reference and progress tracking.	Priority levels one through three (relatively high to low, respectively) are given for each recommendation. This initial ranking reflects a combination of schedule and budget priority but it may be modified by the IS Council as conditions change over time.	Yes
G.28	Gen	38	Each NYS IS council agencies should have at least one full time employee hired specifically to address IS and access funding for IS management.	Edited Section 1, Recommendation 4, Bullet 1 as follows: State agencies on the IS Council should be actively represented at Council meetings and routinely prompted to reflect on their role in the collaborative network. Each agency is encouraged to hire or designate one full time staff specifically focused on addressing IS issues and serving as a representative to the IS Council. Each IS Council member should share information about their agency's interests and responsibilities regarding IS to clarify potential roles regarding regulatory issues, land management, funding channels, and target audiences for outreach and training.	Yes
G.29	Gen	39	The Plan's focus and core strategy being prevention as a "first line of defense" followed by early detection and rapid response for removal of invasive species is a sound approach. However, there seems to be little or no attention paid to invasive species that have become established, let alone those that have become fairly widespread.	Prevention and early detection are important components of this ISCMP. However, we recognize the reality that established IS are already causing significant harm and have recommended developing a list of priority species and locations at the local, regional, and state levels (Section 3).	No

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G.30	Gen	39	The Plan puts considerable emphasis on the use of public outreach and awareness in combating IS. While this is a tool, Council members believe this is overly optimistic thinking.	Public education and outreach is a fundamental tool in the Invasive Species Management Toolbox and is highlighted in Section 4. This ISMCP also places considerable emphasis on many other facets of IS management in the other 7 sections.	No
G.31	Gen	39	While it may have had a different objective, and is not as user-friendly a document as this current draft Plan, the 2005 Report of the New York Invasive Species Task force was, in a number of ways, a more comprehensive document. It also provided a more diverse set of management options to deal with species that are well-established or have recently become a problem or even those yet to be documented in New York. At the same time, that document recognized that not all invasives will have catastrophic impacts.	The 2005 Report sets the stage by describing the problem, and listing broad recommendations including the creation of this Plan. The goal of the ISCMP is to review the 2005 recommendations, note the progress that has been made, then list recommendations of its own that may advance the IS program. Through input from multiple agencies and organizations it was decided to limit the length of the ISCMP to make more user-friendly and readable – no need to duplicate what has already been documented in previous documents.	No
G.32	Gen	41	Collaboration efforts and partnerships are critical in addressing the IS issues. We would ask that those efforts be expanded to include additional representation from our lake and river associations. Adirondack Lakes Alliance has been working closely with associations in the Adirondacks providing regional workshops that address IS issues as well as sponsoring an annual symposium and resource fair, addressing resources available to our associations that could assist them in their IS mitigation efforts. We feel that representation from ALA on statewide IS committees would be beneficial to all.	The Adirondack Lake Alliance’s contributions to IS management have been instrumental in maintaining healthy aquatic systems in the Adirondack Park. We encourage continued action by engaging with PRISMs, NYSFOLA, and DFWI which are represented on the ISAC.	No
G.33	Gen	41	There appeared to be a larger focus on terrestrial than aquatic control and response in several areas.	Although many recommendations were not ecosystem-specific, many could be applied to terrestrial or aquatic environments.	No
G.34	Gen	41	Further review should be given to state procurement procedures regarding awarded grants for IS projects. Delays in the process can seriously impede program implementation.	The ISCMP recommends a number of strategies to alleviate this issue. See Section 1, Recommendation 1, Bullet 3 which calls for long-term master contracts with annual task orders; Section 6, Recommendation 7 which calls for increased use of partner organizations such as SWCDs, and Master Service Agreements.	No

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G.35	Gen	43	The New York State Office of Parks and Recreation and all of the amazing work they are doing addressing invasive species work on their lands across the state needs to be included.	<p>The following have been added to the Progress to date subsections:</p> <p>Section 1: New York State’s Office of Parks, Recreation and Historic Preservation (NYSORPHP) Invasive Species Management Team (ISMT) develops, administers, and coordinates IS management efforts within NYS Parks and Historic Sites. The ISMT operates a strike team program to conduct manual removal of invasive species impacting rare, threatened, and endangered species and unique communities; a forest health program which conducts forest pest surveys and organizes treatments; and a statewide boat launch steward program which provides watercraft inspections and public education. Additionally, since 2008 NYSOPRHP has hired 6 natural resource stewardship biologists, 5 stewardship specialists, and multiple other long-term positions. The duties of these new staff positions include developing and implementing invasive species management projects at State Parks and Historic Sites.</p> <p>Section 1: In 2008 NYSOPRHP developed its Friends of Recreation, Conservation, and Environmental Stewardship (FORCES) program with the intention of boosting and growing volunteerism within New York State Parks. The program creates opportunities for a wide range of mutually beneficial partnerships that enhance State Parks while providing students with real world experiences and opportunities to further their academic programs, and develop personal connections to New York State Parks. Many of these opportunities focus on invasive species management and restoration.</p> <p>Section 2: The Watercraft Inspection Stewardship Program App (WISPA) was developed through a partnership among NYSOPRHP, iMapInvasives, NYSDEC, NYSG, and PRISMs. WISPA was designed to standardize data collection during aquatic invasive species watercraft inspections statewide. In 2018, 16 organizations utilized WISPA and participation is expected to expand in the future.</p>	Yes

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G.35 (cont.)	Gen	43	[continued from previous page] The New York State Office of Parks and Recreation and all of the amazing work they are doing addressing invasive species work on their lands across the state needs to be included.	<p>Section 3: NYSOPRHP is currently creating an Invasive Species Management Plan Template (expected in 2019) to guide development of invasive species management plans and priority setting within individual state parks.</p> <p>Section 5: Since 2014 NYSOPRHP has operated a watercraft inspection program designed to contribute to the goals of the Aquatic Invasive Species Spread Prevention Program. NYSOPRHP partnered with SUNY ESF to administer this program in 2018.</p> <p>Section 7: Since 2012 NYSOPRHP has allocated over \$5 million toward invasive species control and habitat restoration projects that promote species diversity and improve ecosystem resiliency.</p>	Yes
G.36	Gen	43	Photos and captions do not show the diversity of NYS landscapes and the urgency surrounding IS management.	Numerous photos have been added to the final draft.	Yes
G.37	Gen	44	Tree of Heaven IS spreading throughout NYC. As the population increases, the pollen increases the allergen load on humans.	While species-specific recommendations are beyond the scope of this ISCMP, this concern highlights the importance of involving NYSDOH within the statewide IS management structure as noted in Sections 1 and 3.	No.

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G.38	Gen	47	One important omission throughout the Plan is information and guidance on how New York will engage on the continued introduction of invasive pests and pathogens into the country through the international transport of wooden packing material and horticultural plants. Given the significance of this threat and impacts exhibited in New York to date, the Plan should recommend the State's full engagement in changing federal trade regulations that currently allow pests into the country. This will help move us past the reactive and mostly unsuccessful attempts to address infestations of pests and pathogens that the State has been limited to engaging in to date.	<p>NYSDAM, along with federal authorities, conduct inspections aimed at identifying and controlling invasives in wood packing material and on horticultural plants. NYSDAM is also active in the National Plant Board and voice our opinion that the ISPM 15 wood packing materials regulation should be monitored and enforced more vigorously. Wood packing material is a staple of interstate and international trade, and any change would clearly need to begin at the federal level. Regarding horticultural plants, NYSDAM routinely inspects plant material coming in under post entry quarantine. On the federal level, an overhaul of the regulations relating imported plants is in development.</p> <p>ISPM 15 has reduced introductions from wood packing materials and ongoing review by regulatory authorities throughout the world has strengthened the effectiveness of ISPM 15. Federal regulation restricts the import of most plants. Plants that are imported must be accompanied by a phytosanitary certificate indicating inspection in their home country and be any restrictions based on the species and location of the plants. For example, you cannot import grapevines into the United States from any country other than Canada. A perception exists that plant import is not regulated which is not the case since the establishment of the Plant Quarantine Act in 1912. Inspections at the border coupled with the vested interest of industry makes for an effective frontline of defense against invasive species.</p>	No
G.39	Gen	48	The Document needs to strive for a clearer "voice" and message. It veers back and forth between being an analysis by the consultants "holding a mirror up" to the IS Partners from the outside and the collective "us" of the partnerships speaking as a whole. It should be more of the latter.	The ISCMP aims to address scope, not reflect any one/collective perspective.	No
G.40	Gen	48	<p>It is difficult to find the Utilities in the partners. Not often discussed, but they are very critical for control.</p> <p>Why aren't utilities included in the list of stakeholders? Utility corridors are major vectors of IS spread. Comprehensive management cannot occur without their input and assistance.</p>	<p>The following are examples of how utilities are represented in the statewide partnerships:</p> <ul style="list-style-type: none"> • Environmental Energy Alliance of NY is represented on the state's IS Advisory Committee • NY Power Authority is an AIPP "Cooperating Partner" 	No

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G.41	Gen	48	The Plan should place more emphasis on restoration and methods to restore reclaimed land. This is critical to ensure that re-infestation does not occur.	We agree that restoration is an important component of IS management. In Section 7 we include recommendations to more fully incorporate restoration as a fundamental component of IS management in NYS. Restoration methods are beyond the scope of the ISCMP and would be determined on a case-by-case basis.	No
G.42	Gen	50	The following statutory provisions are among the significant requirements of the statute that are not adequately met in the draft ISMCP: The comprehensive plan should, at a minimum...recommend approaches to funding invasive species work; Such plan shall recommend responsibilities for different agencies with the goal of reducing or eliminating, where practicable, contradictory or conflicting policies or programs; Such plan should identify needs for additional staff positions at state agencies and recommend New York state or federal legislation or regulations and, Such plan shall evaluate and incorporate, as appropriate: the approved New York State Aquatic Nuisance Species Management Plan; the Lake Champlain Basin Aquatic Nuisance Species Management Plan; and the Adirondack Park Aquatic Nuisance Species Management Plan.	This comment is noted, however these topics are covered throughout the ISCMP. A goal of this plan is to increase the effectiveness of the NYS invasive species program. As such, the ISCMP attempts to reduce overlapping policies and responsibilities while highlighting opportunities for collaboration among IS partners. This plan also makes recommendations intended to fill existing gaps (such as reinstating the IS Coordinator position at NYSDAM), to highlight opportunities to innovate, and to point out currently untapped sources of funding. Additionally, other IS management plans are incorporated into many of the Plan's recommendations in addition to recommendations at the administrative level intended to advance all NYS IS management plans.	No
G.43	Gen	51	The plan should address how ecosystems are to be managed once IS have been eradicated or controlled (i.e. long term monitoring).	This ISCMP has recommended greater integration of long-term monitoring into IS management projects to track outcomes. Ecosystem-specific management actions are beyond the scope of this ISCMP and will be determined based on site conditions at the discretion of the managing agency/organization.	No
G.44	Gen	51	The plan should address the role of watersheds and their role in IS management.	This ISCMP recognizes the importance maintaining watershed integrity. Section 7 includes recommendations that highlight the importance of maintaining or enhancing water quality through ecosystem based management.	No
G.45	Gen	51	A state-wide program to collect and bank seeds of keystone species on an eco-regional basis is an essential first step to plant restoration. The plan should include measure to assure that such seed is readily available to commercial growers.	This comment is beyond the scope of the ISCMP.	No

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G.46	Gen	52	New York has a diverse and unique natural heritage and NYBG supports the addition of defined invasive species prevention zones that should take high priority for the deployment of resources. The Plan does not emphasize and define the ecosystems or specific areas in New York State that are currently uninvaded and should actively be protected from future invasions.	We agree. In Section 3 we recommend the establishment of a prioritization and horizon scanning task force whose charge would be to identify and designate priority species, and priority locations which could include the establishment of IS prevention zones. Information such as this should ultimately be included in iMapInvasives, and the NYS Environmental Resources Mapper (Section 2, and 3)	No
G.47	Gen	53	The CMP does not appropriately address the foundation for the activities that are being proposed, why IS are being targeted for removal. Invasive species are targeted because they are known, or expected to, threaten ecosystems, species, agriculture or human health. The motivations for invasive species control are to restore or protect healthy ecosystems (a term that itself needs more definition, see below) and improve human health and well-being. This means that removal, population reductions, or eradication of invasive species themselves are not the goals. These are only means to achieve healthy ecosystems, or productive forests or agriculture. This is particularly important because the simple suppression or removal of invasive species themselves does not automatically lead to better living conditions for native species. The reasons for this outcome are many and include, but are not limited to: (a) the invasive species is not the driver of ecosystem deterioration, (b) combination of different stressors are more important (for example earthworm invasion are initially preparing the soil for plant invasions), (c) control methods can have serious detrimental impacts on species management is supposed to protect, etc.	<p>Added recommendation to Section 7:</p> <ul style="list-style-type: none"> ■ Evaluate drivers of ecosystem alteration. <ul style="list-style-type: none"> » Support research to evaluate how interactions among invasive species and other biotic and abiotic stressors (e.g., white-tailed deer, earthworms, climate change, habitat loss, etc.) act as drivers of ecosystem alteration and influence the establishment and proliferation of invasive species. Such research may contribute to IS control effectiveness and habitat restoration success. <p>Added sentence to Introduction, Paragraph 1: “However, invasive species (IS), combined with the effects of other stressors such as climate change, development, and localized imbalances of wildlife populations, threaten to disrupt the resilience of New York’s ecosystems. In response, multiple NYS agencies and partners have collectively developed a nationally recognized IS management program that is positioned to continue being a leader in invasive species management.”</p>	Yes

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G.48	Gen	53	<p>Accountability-- it is of major importance that the outcome of (control) activities be assessed. At present there is no such process in place in NYS or elsewhere, to evaluate impacts of invasive species (except when they are blatantly obvious, as in EAB killing trees), or outcome of management approaches may they be physical, chemical or biological. While there are thousands of studies trying to assess impacts of invasive species, the vast majority of them are plagued by methodological shortcomings. They rarely account for co-occurrence of multiple stressors (deer, earthworms, invasive plants, pollution, for example), and management outcomes are rarely assessed beyond short time frames (1-2 years or less) and then often framed in terms of expenditure or effort (volunteer hrs., area sprayed, control costs, reduction in the year following treatments, etc.). We recognize that land managers charged with implementing invasive species management do not have the appropriate scientific "guidance" available at the present time. Our lab group is spearheading efforts to engage with PRISMS and land owners to develop assessment protocols for impacts, as well as outcome of management. While this is not a simple standard procedure, we hope to at least provide a blueprint for how this can be done (we focus on assessment of plant management) without needing a PhD in ecology. This requires close collaboration among academic scientists and land managers from the beginning.</p>	<p>Updates to the following Sections have been made:</p> <p>Section 7: "Evaluate drivers of ecosystem alteration. Support research to evaluate how interactions among invasive species and other biotic and abiotic stressors (e.g., white-tailed deer, earthworms, climate change, habitat loss, etc.) act as drivers of ecosystem alteration and influence the establishment and proliferation of invasive species. Such research may contribute to IS control effectiveness and habitat restoration success."</p> <p>Section 8: "This initiative, which may be managed through the IS Coordination Section, is analogous to the requirement for water quality monitoring programs to develop and adhere to a Quality Assurance Project Plan (QAPP). Measures of success should be informed by research focused on developing metrics to assess treatment effectiveness (Section 6)."</p> <p>"Support the long-term assessment of IS treatment outcomes through post-intervention monitoring. Results of post-intervention monitoring should be integrated into decision-support tools, and may be used to further research focused on developing meaningful metrics to assess treatment outcomes and the effectiveness of various control methods (Section 6)."</p>	Yes

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G.49	Gen	53	We would like to see more in this management plan about how to involve and engage members of the public (beneficiaries of the public trust) in NY State. The CMP would ideally include details about: (1) creating opportunities for members of the public to communicate with officials about invasive species issues that are important to them; (2) actively involving members of the public in identifying important issues and desirable (or at least tolerable) outcomes; and (3) creating opportunities for members of the public to monitor and evaluate success of invasive species management programs. Systematic processes of public engagement exist (e.g. structured decision making), and NYS has used them in the past. They should be clearly represented in CMP or goals should be articulated to develop such approaches (potentially through NYISRI).	<p>Opportunities for public engagement currently exist via iMapInvasives (training, monitoring), IS Awareness Week (statewide events), and PRISMs (listservs open to anyone interested). Anticipated updates to iMapsInvasives will provide public visibility into outcomes of management efforts (noted in Section 2).</p> <p>New wording added to 2C recommendation “Leverage the collective capacity of partner organizations to maintain an active and interesting online presence, <i>and promote interaction when possible.</i>” A new sub-bullet under that heading reads: “Invite and encourage public engagement on IS topics through social media (e.g., establish public social media user group, use crowdsourcing to assist in addressing information gaps). Social media may also be leveraged to increase public participation in the IS Advisory Committee and other public meetings. Guidelines for this type of public engagement could be addressed in the social media content strategy guide, with a web content manager in the role of moderating comments and transmitting information.”</p>	Yes
G.50	Gen	53	Nearly all the recommendations in the initial task force assembled by Governor Pataki have been put in place. That in itself is a major accomplishment...What is needed now, is to assess whether the institutional structure, and the accountability associated with it, leads to improvements in outcomes in the field. For example, the number of meetings, participants, hours in meetings, downloads etc. is only one way of measuring impacts. This seems to be more informed by how social media platforms measure their importance, then by how assessments should be conducted in the field. Additional metrics need to be considered that are outcome based. Our recommendation is to develop an evaluation process to assess the utility of the structural and funding components based on outcomes in the field. We do not have an easy answer how this should be done - it is outside our realm of expertise. But we know there is a need for it. The CMP should articulate the need for its development.	Development of outcome-based success metrics is needed in order to best advance and adapt New York’s IS management efforts. While a starting point is tracking IS management outcomes in iMapInvasives (as noted in Section 2), ongoing efforts to track the outcomes of all IS efforts (e.g., outreach and education) are warranted.	No

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G.51	Gen	53	Page. 42. Herbicide applicator is not appropriately dressed and seems to be spraying cattails	Appropriate PPE is determined (at a minimum) by the pesticide label (6 CRR-NY 325.6). According to the Glyphosate label, a long-sleeved shirt, long pants, shoes and socks are required. The applicator in this photograph is dressed appropriately. Additionally, there are two species of invasive cattail that are often managed in NYS.	No
G.52	Gen	53	<p>Please check definitions for accuracy:</p> <p>Biological control (note the addition of host-specific): The release of host-specific natural enemies of a target invasive species with the aim to reduce abundance and spread.</p> <p>Ecosystem Resilience (note the change from tendency to ability): The ability of ecosystems to resist disturbances or quickly recover from major disasters (fire, windstorm etc.)</p>	The definitions have been updated accordingly, with the exception that the relative term “quickly” was not used in the definition of resilience. The term is used in the sense that resilience is relative to some reasonable amount of time given particular circumstances. The biocontrol definition was edited slightly for clarity.	Yes
G.53	Gen	54	ISCMP needs to include: implementation of similar initiatives Statewide, that have been effective within the Adirondack Park, to include Lake Association partnerships, education and outreach and coordination of AIS preventative measures	Establishing regional partnerships is an effective way to manage invasive species. The ISCMP recommends establishing more effective avenues of communication through an actively managed centralized web presence, expansion of iMapInvasives capabilities and usership, and documentation and sharing of management results. The goal of these recommendations is, in part, to allow organizations such as the Upper Saranac Lake Foundation to share knowledge with the rest of the state, ultimately strengthening the collective management of IS.	No

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I.1	Intro	16	It reads: In response, multiple NYS agencies and partners have collectively developed a nationally recognized IS management program that is positioned to continue being a leader in invasive species management. I read the entire document and nowhere did I see how we as a national leader we are taking any steps to reduce the introduction of our native species elsewhere in the country or the world. Our natives can become invasives and if we want to lead the way nationally we should take steps to protect others and let people know that we are doing it.	<p>It would be an overreach to attempt to extend our regulatory authority to native species that may become invasive in another part of the country or world. It is the responsibility of the destination state or country to implement laws/regulations that would prohibit the import of any such species from NYS.</p> <p>NYSDAM routinely inspects nursery stock and other agricultural commodities to prevent the spread of invasive plants, insects and diseases to other states. They also respond to inspection data from other states. For instance, NYSDAM recently received a report from another state on Japanese stiltgrass that was moving as a hitchhiker on balled and burlap stock. In response, NYSDAM tracked down the source to inspect and work with them to improve their weed/pest control practices.</p>	No
I.2	Intro	34	In addition to the seven million acres of agriculture and 6.1 million acre Adirondack Park, it would be valuable to acknowledge New York's 19 million acres of forests and supporting a \$22 billion forest economy.	Reference to New York's 19 million acres of forests and supporting a \$22 billion forest economy has been added to the first paragraph of the Executive Summary.	Yes
I.3	Intro	34	In addition to the spread of IS due to global trade and climate change, there should be acknowledgement of the treat of IS spreading domestically across state boundaries.	Added "spread of IS across state boundaries" to 2 nd paragraph of the Introduction.	Yes
I.4	Intro	47	In order to ensure that a lead agency is assigned to each action we recommend that the ISC vote to formalize these roles and responsibilities upon the plan's finalization. This will help avoid any particular action being couched as lower priority or left unaddressed. Further, TNC realizes that there is an on-going need to better share the administrative burden to deliver New York State's comprehensive invasive species management program and formal designation of roles will help ensure all needs are met while balancing resources across agencies.	Allocating responsibility (assigning a lead agency) rests with the IS Council and others in State government. Additionally, multiple recommendations in Section 1 highlight the need to define the roles, needs, and contributions of partner organizations.	No

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1.1	1A.	15	In figure 2, heading "Collaborative Network for Invasive Species Management in New York State" makes it seem like all groups listed here are those involved in IS management. However, others such as NYS Office of Parks, Recreation, and Historic Preservation and DEC's Forest and Terrestrial Health Section may also be involved in statewide management for IS. Perhaps change this to "NYSDEC IS Coordination Collaborative Network for Invasive Species Management in New York State"?	Because the number of IS management partners is so extensive, acknowledging each one would be very difficult. For brevity's sake, we have included only the lead agency (e.g. NYSDEC) which by extension includes their subsections.	No
1.2	1A.	28	Figure 2 hard to read	Figure 2 re-inserted with higher resolution	Yes
1.3	1A.	3	Keep the iMap invasive program up and going with improvements for more practical sharing capabilities.	See Section 2 for specific recommendations regarding iMapInvasives.	No
1.4	1A.	6, 10	Stronger encouragement for use of iMap to report IS for professionals and general public with easier user interface.	See Section 2 for specific recommendations regarding iMapInvasives.	No
1.5	1A.	7	Restructuring iMap will facilitate more user engagement like offering current management options of the observed invasive species. More thorough information for identification by citizen-scientists to limit misidentification as well as promote education. Possibly adding a "news and research projects" section will help updated information be at the forefront and promote marketing about invasive species management.	See Section 2 for specific recommendations regarding iMapInvasives. See Section 4 for recommendations regarding branding/marketing and education/outreach.	No
1.6	1A.	10	Promote iMap through social media.	See Sections 2 and 4 for specific recommendations regarding the use of social media.	Yes
1.7	1A.	11	Possibility to report size of infestation on iMap.	This option already exists however it is only available for advanced iMapInvasives users. To receive advanced access, users must take required training. To include size of infestation an "Infestation Management Record" must be uploaded.	No
1.8	1A.	12	Inclusion of Spotted Lanternfly in iMap database.	Species-specific recommendations are beyond the scope of the ISCMP. Additionally, Spotted lanternfly (<i>Lycorma delicatula</i>) is currently included in the iMapInvasives database.	No

Com #	Sec.	Commenter	Comment	Response	Edits?
1.9	1A.	19	Campaign to get more citizens involved and trained in iMap. Possibility of online classes and tutorials for using iMap.	“Training” is one of 4 prominent menu items on the iMapInvasives.org home page, linking to “online tutorials” and specific upcoming events and opportunities. Section 4C of the ISCMP recommends “Promote the awareness of major, centralized sources of information (e.g., iMapInvasives)...”	Yes
1.10	1A.	29	Once the priority management areas are established, use as a layer in NYSDEC Resource Mapper and iMap with information on IS.	Added to Section 3, Recommendation 2 “Include state, regional, and local priority areas on NYS’s Environmental Resource Mapper.”	Yes
1.11	1.A	43	There are two more ways iMap Invasives staff could engage: 1) with adjacent states that use iMap Invasives on data access and coordinate on issues like confirming records, mapping along state boundaries, and email alerts. 2) With NatureServe, the PRISM network, neighboring states and Canadian Provinces to leverage existing technology in order to more easily share data across data management systems.	Added bullet to Section 1, Recommendation 6: “iMapInvasives staff should engage neighboring states that use iMapInvasives to allow data access, coordinate on issues such as confirming records and mapping along state boundaries, and establish multi-state email alerts. iMapInvasives staff should also work with NatureServe, PRISMs, neighboring states, and Canadian provinces to advance data sharing capabilities by leveraging existing technology.”	Yes
1.12	1.A	43	We would like to suggest adding the New York Flora Association to your list of discretionary organizations and request that a member of NYFA be rotated onto the ISAC when an opportunity presents itself.	ISAC has made a recent change to guiding documents that institutes a member term limit of 3 years. This provides other organizations with opportunities to be engaged. Additionally, ISAC membership is reviewed on an annual basis to determine the level of engagement of its members and to make changes as needed.	No
1.13	1.A	43	IS-specific monitoring locations and data would ideally be housed in iMap Invasives, a module of iMap, or a compatible system that could be easily connected with iMap Invasives for data exchange.	Sentence added to Section 5, Recommendation 4, Bullet 1: “Permanent monitoring points and data may be housed within the iMapInvasives database (Section 2).”	Yes
1.14	1.A	49	Might already be in existence, but I also think every PRISM should partner up with a nearby SUNY university and somehow involve invasive species mapping and monitoring as a field credit class.	Added to Section 4 recommendation “Educate future generations...”: “provide students with opportunities to contribute to an invasive species monitoring network (Section 5) through field -based student research.”	Yes

Com #	Sec.	Commenter	Comment	Response	Edits?
1.15	1.B	47	<p>“The IS Coordination Section should evaluate the opportunity to reduce contracting uncertainty and increase flexibility by establishing unit cost, long-term (e.g., five year) master contracts with annual task orders.” Contracting delays in combination with insufficient administrative staffing capacity within state agencies has historically been and continues to be the primary roadblock for implementation of NYS's comprehensive invasive species management program. Contracting inefficiencies and delays force organizations like TNC to operate at risk for extended periods as well as interrupt and create setbacks for the critical work of PRISMs and other hosted programs. Contracting issues in combination with restoring administrative staff capacity within state agencies should be considered top priorities to address through implementation of this plan.</p>	<p>Addressing contracting issues and uncertainty is of the utmost importance. The ISCMP includes a number of recommendations aimed at alleviating some of these issues. See Section 1, Recommendation 1, Bullet 3 which calls for long-term master contracts with annual task orders; Section 6, Recommendation 7 which calls for increased use of partner organizations such as SWCDs, and Master Service Agreements.</p>	No
1.16	1.C	42	<p>"Engage climate change experts in invasive species collaborations" the need to synthesize current knowledge on invasive species and climate change interactions and incorporate that into regulations and management plans should be mentioned. I understand that this is referred to with a different angle under regional collaborations, but it doesn't get to the point of translating knowledge into action.</p>	<p>Added the following new bullet under 1C “Engage climate change experts...”: “Synthesize current knowledge on invasive species and climate change interactions, and pursue initiatives that will translate this knowledge into action (e.g., incorporate into regulations and management plans).”</p>	Yes
1.17	1.C	42	<p>This section provides an opportunity to emphasize the importance of taking leadership to promote policies to prevent the introduction of IS at a national level.</p>	<p>Revised first bullet under recommendation 1C “Connect with national IS organizations...” to read: “Ensure that members of New York’s IS leadership work with Federal and international partners to promote policies for preventing the introduction of IS at a national level (e.g., ballast water policy)...”</p>	Yes
1.18	1.C	46, 47	<p>Incentivize ongoing support for agricultural organizations.</p> <p>Under “Explore ways to involve State agencies,” include Soil and Water Conservation District representatives.</p>	<ul style="list-style-type: none"> • In Section 1C under the recommendation “Incorporate agriculture programs more fully with the IS leadership framework,” added “and incentivize” ongoing support of these valuable programs (per commenter 46). • Soil and Water Conservation Districts are already a permanent member of the IS Advisory Committee. SWCDs are not eligible for membership on the IS Council, in which membership is limited to state agencies. 	Yes

Com #	Sec.	Commenter	Comment	Response	Edits?
1.19	1.C	52	The listed strategies to expand stakeholder groups within the IS leadership structure, the plan should explicitly encourage: The cultivation of partnerships and training programs for municipal parks systems, parkway authorities, and public works who manage highly probable areas for invasions with public gardens. Build capacity with universities and specific researchers around the nation who are conducting high-impact work on invasive species. NYISRI is a great start but, they need additional support to grow and increase impact. In our experience, all gardeners not just water gardeners are a stakeholder group unaware of the role of their gardens in spreading invasive species. They also want to be well informed and need Information about impacts of the species and alternatives.	<p>These ideas are largely addressed in section 4C, which includes further engagement and training by “ambassadors” such as the CCE Master Gardeners program, strengthening relationships with local municipalities (a major recommendation with several sub-bullets), educating future generations (2nd sub-bullet focuses on higher education).</p> <p>IS Council currently includes representation by NYSDOT and Thruway Authority.</p>	No
2.1	2A.	47	Any attempt at consolidation or "phasing out" of existing resources should be vetted with potentially affected stakeholders and seek to reduce duplication and waste.	Implementation of a centralized website would be done in consultation with IS collaborators with the goal of reducing duplication and waste and creating a unified message. See also the response to Comment 2.1a.	No

Com #	Sec.	Commenter	Comment	Response	Edits?
2.1a	2A	53	We do not believe there is a need to develop yet another website that should become the #1 in providing invasive spp. information. Nearly daily the information changes, sometimes fundamentally so. Why would anyone even look at only a single site. Nobody looks at just one website when researching a question, and there is value in diversity. Why would all information be readily available or how many people would work to update this regularly (daily, hourly?). while we agree that web presence is important for some info, trying to becoming the gold standard will prove too costly and ill advised.	To clarify the underlying reasoning for this recommendation: <ul style="list-style-type: none"> Stakeholder research shows “audiences seeking IS expertise <i>perceive</i> a scattered array of online resources and a high potential for conflicting/outdated information.” It is already the case that the NYIS.info website (since 2007) has been promoted as a “clearinghouse,” but support for the site has fluctuated. The crux of the recommendation regarding a centralized information framework is that an <i>actively managed</i> site be overseen by a professional who is dedicated to engaging with New York State’s collaborative IS network, soliciting high-priority content, and focusing on the needs of end-users. The unique value of a centralized framework is that a web content expert would be responsible for coordinating among many partners to ensure effective, efficient sharing of messages and up-to-date content. The centralized site wouldn’t necessarily replace existing sites, but it could allow others to focus on program-specific topics (e.g., events, contact information, annual reports). The plan does recommend evaluating the potential for consolidating competing social media accounts, based on feedback received from stakeholders. 	No
2.2	2.C	16	As a NYS Park employee and knowing our agencies commitment to invasive species management, the recent addition of stewards across the state and forward thinking park employees I am lucky to interact with I would suggest adding NYS OPRHP to Horizon Scanning Task Force.	Added NYSOPRHP to the list in Section 3, Recommendation 1, Bullet 2	Yes
2.3	2.C	28	Consider development of a FB IS public users group. - By using crowd sourcing, methods for use may include answering questions, assisting with information gaps and how to direct outreach and management resources.	New wording added to 2C recommendation “Leverage the collective capacity of partner organizations to maintain an active and interesting online presence, and promote interaction when possible. ” A new sub-bullet under that heading reads: “Invite and encourage public engagement on IS topics through social media (e.g., establish public social media user groups, use crowdsourcing to assist in addressing information gaps)... Guidelines for this type of public engagement could be addressed in the social media content strategy guide, with a web content manager in the role of moderating comments and transmitting information.”	Yes

Com #	Sec.	Commenter	Comment	Response	Edits?
2.4	2.C	53	There is a current evaluation effort underway to understand the utility of iMap for many different uses in invasive spp. management. The outcome of these exercises is not particular encouraging for most applications (like mapping presence/absence, or prioritizing control efforts spatially). The ideas behind iMap's creation are compelling, but the practical and financial limitations are enormous. Not to speak of the enormous scientific expertise that is needed to map all of NYS for all invasive species, plants or animals. To make this system work and hold up to scientific scrutiny will likely require more resources than NYS has currently budgeted for all activities in the CMP. An appropriate cost assessment for different options should be developed with guidance by academic scientists and modelers. Otherwise resources are expended yet the appropriate pay-off is not realized. What the most meaningful approaches for using iMap's capabilities are remains elusive at the present point without appropriate financial and scientific accounting.	Advancements in the capabilities of iMap are already in progress, and the ISCMP attempts to build upon this progress. The usefulness of iMap goes beyond its application to scientific study, although we recognize that scientific study is an appropriate use for iMap's data. This database can serve as a data repository for IS managers, builds public awareness, and in some cases, may help prioritize locations and species for monitoring and management. While not perfect, iMapInvasives provides, at minimum, general distribution patterns for common species, helps highlight existing data gaps, and has built-in mechanisms to assist with early detection and rapid response (i.e. email alert system). In addition to the recommendations specifically focused on advancing iMapInvasives, it is our hope that other recommendations such as creating a more consistent web presence, encouraging knowledge sharing, engaging with landowners and municipalities, and connecting with neighboring states and provinces will help create a more robust iMapInvasives database.	No
3.1	3.A	15	It would be good to mention for Early Detection/Rapid Response that Forest and Terrestrial Health Staff conduct annual aerial surveys, which cover the entire state every 2 years to look for signs of forest pests and invasive species. In addition, Forest and Terrestrial Health Staff conduct early detection/rapid response insect trapping to increase detection of new potential invasive species/forest pests.	Added to Section 5, Progress to date: "As part of the NYSDEC Forest Health Aerial Survey Program, forest health conditions, including those that may indicate the presence of invasive forest pests, are monitored annually. NYS is surveyed every two years."	Yes
3.2	3.A	25	Use PRISM-level IS ranking for setting priorities (i.e. a tiered system for all relevant IS)	The ISCMP recommends that PRISMs work with CCE, SWCD and partners to develop regional/local priorities. These would likely be at the PRISM scale as is currently the case.	No
3.3	3.A	28	There is an emphasis on dealing with individual IS on species by species basis. In areas where there are multiple species of IS with a high potential for dispersal (roadways, public parks, etc.) how will these IS cohorts be prioritized within their management area & prioritize against other infestations?	Prioritization and other management decisions within specific management areas would need to balance state-level priorities (e.g. those identified by a prioritization and horizon scanning task force [Section 3]), regional priorities, and the specific needs of a given site.	No

Com #	Sec.	Commenter	Comment	Response	Edits?
3.4	3.A	28	Priorities may differ between stakeholder groups or are they only speaking to individuals?? Who is the target audience?	Because priorities vary among stakeholders, this ISCMP recommends including representatives from multiple agencies and organizations on the priorities and horizon scanning task force to ensure information sharing, diverse perspectives and collaboration among stakeholder groups.	No
3.5	3.A	52	There is a need for systems approach to classify terrestrial, aquatic, and marine ecosystems based on degree of current invasion, to model risk of potential invasions, impacts of invasions on biodiversity and ecosystem function in order to establish priorities for areas to be protected and restored. This need moves beyond an individual species focus as the only priority.	Under Section 3, Recommendation 1, Bullet 1, the ISCMP recommends species and spatial priority setting on public and private land as well as aquatic and marine environments.	No
3.6	3.B	34	In regulatory actions also add “delisting or moving” species under Part 575. More on keeping the list current.	“Review[ing] and update[ing]” the Part 575 list would include this type of action.	No
3.7	3.C	33	How does one annual meeting accomplish the goals recommended for this task force?	While a once annual meeting (minimum) is recommended to review, add, or modify state-level priorities, task force collaborators would likely be expected to work together throughout the year toward completing objectives as outlined in a priority and horizon scanning procedure.	No
3.8	3.C	38	The 3 action bullets under this recommended action including messaging for municipalities regarding grants, best management practices, and tree planting would benefit municipalities. An additional action bullet calling for providing technical services and funding should be added as this step would result in better engagement and "buy in" at the municipal level.	This comment is addressed in two section 4C recommendations: “Strengthen relationships with local municipalities...” (now explicitly mentions “funding opportunities” as well as grants) “Engage ‘ambassadors’ by formalizing a role for key stakeholders from various sectors” (includes “initiate a program to recruit and train leaders from...municipalities...”)	Yes
3.9	3.C	41	The first recommended action is to establish a Task Force that is intended to "set State-level priorities for IS determined to pose the greatest threat(s)..." It is not clear if the Task Force determines which pose the greatest threat or if someone else does that and the Task Force prioritizes.	Section 3, Recommendation 1, Bullet 1 changed to: “This Task Force is intended to set State-level priorities for IS that pose the greatest threat(s) to New York’s environment, economy, and public health...”	Yes

Com #	Sec.	Commenter	Comment	Response	Edits?
3.10	3.C	43	1) The Task Force should have a mechanism for regular communication with other states and incorporating lessons learned from adjacent states into NY early detection and, response efforts. Communications with adjacent and nearby states for potential new invaders should be part of the "Horizon Scanning" procedure. 2) As a way of transferring information, encourage multistate meetings and Task Force participation at key IS events that include cross-border partners.	Added to Section 3, Recommendation 1, Bullet 3: "Regular communication with neighboring states, and participation in multistate meetings and other events (Section 1) should be encouraged as part of the horizon scanning procedure."	Yes
3.11	3.C	54	Identify priority source waters from which invasives are entering the state or region and take preemptive actions to the cause of the problem in the form of management, education, mandatory inspections and Is transportation law enforcement	These actions would be taken as part of the priority and horizon scanning task force described in Section 3.	No
4.1	4.A	34	Outreach and education is to industry sectors, for example agriculture, forestry and boating and marine trades. Has there been consideration of adding industry groups to PRISMs.	Industry groups are encouraged to engage with PRISMs. Anyone is free to join PRISM list serves, get involved in PRISM activities through volunteer work, and/or attend and contribute to quarterly and annual meetings.	No
4.2	4.C	9	Perhaps in both grade schools and colleges, the local PRISM could have some sort of program or presentation to reach beyond the natural resource departments and bring wider awareness to campuses.	Section 4, Recommendation 5, Bullet 3 has been modified: "Promote the integration of invasive species topics into college/university courses and look for ways to raise awareness across the broader campus community by drawing on ideas presented in NYSDEC's strategic recommendations for IS education and outreach (2016b, 10): ..."	Yes
4.3	4.C	33	On including elected officials, nothing is suggested... possibly through building codes? Through planning departments?	In 4C, added planning departments as a specific audience for efforts to "Strengthen relationships with local municipalities" (2 nd sub-bullet). Under "Engage 'ambassadors' by formalizing a role for key stakeholders from various sectors," added "Planning departments could also help to enhance meaningful engagement at the municipal level and support elected officials in the role of ambassador."	Yes
4.4	4.C	34	Target messages to foresters and loggers, including DEC cooperating foresters. Engage ambassadors.	In 4C, 1 st bullet under "Engage 'ambassadors'..." added "foresters/loggers" to list of professionals, and added NYSDEC Cooperating Foresters as an example of those who may have insights.	Yes
4.5	4.C	47	The DEC should consider expanding the Keep Invasive Species Out program statewide in order to avoid duplicating efforts, conserve resources, and leverage investments that have already been made.	This suggestion will be shared with NYSDEC IS Coordination Section outreach professionals.	No

Com #	Sec.	Commenter	Comment	Response	Edits?
4.6	4.C	49	I think we need to involve industry professionals (stone companies, gravel and sand, lumber, DOT, pet trade/aquarium etc.) into IS training. Unfortunately, these types of companies often transport invasive species unknowingly. I think the state or maybe even the PRISMs themselves should come up with an "Invasive aware" certification program. In other words, we run a training with managers and employees of companies and then certify them as an "invasive aware" company (or whatever term would be best). It would offer some incentive for business owners to get there employees to attend these workshops. I think more and more people might begin to seek out companies that are aware of invasive species.	Under last recommendation in 4C (Engage ambassadors), added a sub-bullet that states: "Provide an incentive for industry professionals (e.g., lumber, pet trade/aquarium, gravel and sand companies) to participate in IS training by establishing a certification program that would allow employees and managers to be recognized for capabilities in this area."	Yes
4.7	4.C	49	We should create more statewide videos on specific IS.	The use of video and other media would be determined through collaboration between a web content professional, and marketing/communication consultant	No
4.8	4.C	46	Page32, 6th bullet- Encourage private landowners in each region to perform EBM... could be initiatives with PRISMs, SWCD, NRCS, or organizations such as NYFOA identifying and engaging with large landowners	Under "Encourage private landowners...to perform EBM..." added SWCDs and NY Forest Owner's Association to list of those who might lead such initiatives.	Yes
5.1	5.A	5	Need for a study on all new non-natives that enter into the US on their potential as a threat to become invasive.	Note that this plan is NYS-specific and does not address entirety of the US. A comprehensive study of non-natives likely to become invasive in NYS would be completed as per Section 3, Recommendation 1, Bullet 3.	No
5.2	5.A	8	Need to incorporate a larger list of invasives not able to be possessed, transported, imported, sold, purchased and introduced to NYS. Current list only regulates a select few.	This is addressed in Section 3, Recommendation 3, Bullet 4.	No
5.3	5.A	38	Add Part 576 Aquatic Species Spread Prevention regulations to the "progress" bullets. This "clean, drain, dry / reasonable precautions" regulation applies to all boats launched on public waters in the State and is in addition to the AIS spread prevention regulations that apply to boaters using DEC boat access sites (6 NYCRR Sections 59.4 and 190.24).	See 6 CRR-NY 576 . This is in addition to the regulations we have noted which can be found here . Added to Section 5, Progress to date: "Additional regulations (6 CRR-NY 576.3) were adopted in June of 2014 requiring watercraft to be cleaned, drained, and treated (dried, rinsed, or painted) before launching into a public waterbody" to second bullet in Section 5 Progress to date.	Yes

Com #	Sec.	Commenter	Comment	Response	Edits?
5.4	5.A	41	Does recognize the boat steward program but does not provide for further expansion of the program or address areas where there are existing gaps. There is a need to highlight the expansion of this proven program statewide.	Added bullet to Section 5, Recommendation 1: "Expand support for programs that have had a demonstrable impact on prevention and early detection of IS, such as the Aquatic Invasive Species Spread Prevention Program."	Yes
5.5	5.A	53	The articulated desire to expand the monitoring efforts and taxonomic expertise are greatly appreciated by our group. However, it is apparent that there was no thought given to the costs of such surveillance, the spatial implementation of surveys, or the taxonomic expertise that is required. We are missing a clear scientific and financial articulation of the true costs of appropriate surveillance - or a cost benefit analysis of random detection by citizens vs. structured searches by specialists. This will greatly differ by taxonomic group and size of the organisms, or habitat invaded. While early detection is always the best approach to do something immediately, we question the wisdom of the high investment that is required to make this work comprehensively at large spatial scales for many species. As we outlined under [comment 2.4], we encourage the creation of a group that involves economists and scientists able to evaluate proposed approaches, statistical, spatially or otherwise (scientific capacity) before moving forward. The question always is, what is it that we are giving up? And even if this would work, how are the early detectors enabled to do something about newly detected species? The rapid response element is not well developed in treatment or law.	An assessment of scope and costs associated with the establishment of a monitoring program is not within the scope of this ISCMP. The NYSIRRI may be an appropriate entity to bring the referenced experts together to address this important topic.	No
5.6	5.C	33	IS specific monitoring network: utilize existing volunteer networks at a state quality level so all data meets the same standards. Sampling locations can be formalized for long term trend analysis, etc. Use the PRISMS to coordinate and fund their local volunteers or agency efforts.	Section 5 recommends assessing existing statewide monitoring programs for potential use within IS specific program. The same recommendation highlights the need for permanent (i.e. formalized) monitoring points. PRISMs will likely play an important role in a statewide monitoring program however the level of engagement will be determined by a lead organization designated by DEC in consultation with DEC and PRISMs.	No
5.7	5.C	34	Include silviculture community under "Support the advancement of the early warning notification".	Section 5, last recommendation: "silvicultural" communities were added to the text under the first subbullet.	Yes

Com #	Sec.	Commenter	Comment	Response	Edits?
5.8	5.C	46	Need to regularly review and add to the Prohibited and Regulated Species list to include high risk IS... especially those being sold in the aquatic trade.	Section 3, Recommendation 3, Bullet 4 has been updated to say: "These lists could incorporate high risk species identified by a priority and horizon scanning task force."	Yes
5.9	5.C	54	Implement more aggressive full time AIS preventative measures and mandatory boat inspection programs through the Watershed Stewards program.	Added to Section 5, Recommendation 1: "Expand support for programs that have had a demonstrable impact on prevention and early detection of IS, such as the Aquatic Invasive Species Spread Prevention Program."	Yes
6.1	6.A	33	In no way can PRISMS be thought of as mechanisms for rapid response, it must come from the state because that is where the regulatory authority lies.	PRISMs are one piece of successful rapid response team. Their knowledge, expertise, and ability have already proven to be extremely valuable during rapid response efforts (e.g. HWA in the Adirondacks). This ISCMP recommends utilizing the established Rapid Response Framework, which was developed by DEC, and employing the ICS where appropriate. The ISCMP also calls for the utilization of other mechanisms such as MSA's to streamline response.	No
6.2	6.C	2	Regarding streamlining the permitting process: 1) Do you have a roadmap for developing BMPs and the GPs, and 2) did your group consider recommendations for strengthening regulatory actions during construction (e.g., incorporate invasive species management considerations in storm water management protocols)?	Developing a roadmap for BMP's is beyond the scope of this ISCMP. Invasive species management during construction would be subject to permitting requirements on a project by project basis	No
6.3	6.C	25	Addressing streamlining the permitting process for IS management the outline is vague- will a general IS management permit be administered by the IS Coordination Unit or Regional Permit administrators? How can this process apply specifically to PRISMS?, etc.	The ISCMP calls for an evaluation of the use of a general IS permit but the specifics of potential implementation would be up to DEC/regulators.	No
6.4	6.C	28	Research/include prescription burns as control methods?	Changed last bullet in Section 6 to "Encourage collaboration among research programs focused on IS response applications; and support research on meaningful metrics to assess the effectiveness of various IS control methods (both established and innovative) in natural areas and agricultural settings. This may be achieved, in part, by supporting more extensive post-intervention monitoring (Section 8)."	Yes
6.5	6.C	28	Develop business models specific to IS control and maintenance much like lawn care companies? Advanced technical training for herbicide applicators through BOCES System or other Tech/Trade schools?	It is not within the scope of this ISCMP to suggest private business models. Regarding technical training, the following sub-bullet has been added under 4C, "Educate future generations...:" "Engage with the Boards of Cooperative Educational Services (BOCES) to develop a technical training program for high school students focused on invasive species management."	Yes

Com #	Sec.	Commenter	Comment	Response	Edits?
6.6	6.C	33	Biocontrol isn't the whole story. Re Hydrilla, there was little to no information available about this biotype in this climate - we were flying blind. There was no money to encourage researchers to assist (until later in the project). We could have used any number of easy short term projects right here at home (IC, CU, HWS) to guide our treatment.	The ultimate goal of establishing a horizon scanning task force would be to limit the likelihood of this scenario occurring again. A horizon scanning task force could identify potential IS early or before establishment and institute preparedness measures - some building off of recommendations in other sections: adding species to list of priority monitoring species (5), training field staff (5), development of BMPs (6), informing the public (4), etc.	No
6.7	6.C	38	The ISCMP should include a recommendation to provide technical and funding support for municipalities to control invasive species. For example, assisting municipalities in understanding and using available tools and guidance such as the Rapid Response for Invasive Species Framework and the Invasive Plant Management Decision Analysis Tool would benefit local government in their invasive species control efforts. Providing community grants for local IS removal control projects is a critical need.	<p>This is addressed in Section 4 under "Strengthen relationships with local municipalities to foster or improve local engagement and buy-in." Under this recommendation, PRISMs would take the lead on engaging with local governments. Municipalities and PRISM representatives would discuss needs and how to meet them.</p> <p>Communities are eligible to apply for funds under the Invasive Species Rapid Response and Control Grant Program. Additionally, Section 7 recommends other avenues to receive funding for IS projects including REDC awards.</p>	No

Com #	Sec.	Commenter	Comment	Response	Edits?
6.8	6.C	42	More emphasis should be placed on measuring the effectiveness of invasive species control projects and treatment methods as we continue to control invasive species without knowing if we are meeting our management objectives.	<p>The following changes made:</p> <p>Added to Section 6, Recommendation 3, Bullet 2: “Decision-support tools should be designed to incorporate the results of post-intervention monitoring (Section 8) and recommend additional or alternative management approaches as conditions change.”</p> <p>Section 6, Recommendation 8, Bullet 4 changed to: “Encourage collaboration among research programs focused on IS response applications; and support research on meaningful metrics to assess the effectiveness of various IS control methods (both established and innovative) in natural areas and agricultural settings. This may be achieved, in part, by supporting more extensive post-intervention monitoring (Section 8).”</p> <p>Added a bullet under Section 8, Recommendation 3: “Support the long-term assessment of IS treatment outcomes through post-intervention monitoring. Results of post-intervention monitoring should be integrated into decision-support tools, and may be used to further research focused on developing meaningful metrics to assess treatment outcomes and the effectiveness of various control methods (Section 6).”</p>	Yes
6.9	6.C	46	Include regional considerations such as time of introduction from a regional perspective versus a biological perspective.	<p>Section 6, Recommendation 3, Bullet 2 has been updated: “New IS response decision-support tools should be applicable to all taxa and include region-specific considerations such as species biology (e.g. leaf out, flowering, seed set) and climatic conditions, as well as time of introduction (e.g., season), and spatial extent of an initial established population. Decision-support tools should be designed to incorporate the results of post-intervention monitoring (Section 8) and recommend additional or alternative management approaches as conditions change. “</p>	Yes

Com #	Sec.	Commenter	Comment	Response	Edits?
6.10	6.C	53	<p>What does it mean to implement the NYS Rapid Response framework? Will private property be respected (we think so), are laws being changed (such as herbicide use on Parkways in the NY City area?). What are IS decision-support tools? The metrics of website visitations does not provide any more clarity.</p> <p>As academic scientists and students we appreciate the recommendation to support research and development. But the CMP is silent on what that actually means. Not all R+D is meaningful, or helpful. We provide some of our own ideas here of potential research avenues:</p> <p>At present, we do not have useful metrics to assess impacts of invasive species, or outcome of management. For all involved in invasive spp. management, accountability is required, yet the lack of appropriate metrics is a major hurdle. Funding for developing such metrics is not competitive in the hypothesis-driven typical granting agencies at NSF or USDA. NYS should commit resources to develop such metrics (in appropriate multiple-stressor frameworks), potentially through establishing graduate student fellowships through NYISRI. This should be conducted in close collaboration and partnerships with the PRISMS. Many of these efforts will need appropriate guidance from established scientists focused on such efforts. We recommend the establishment dedicated of post-doctoral fellowship(s) with rotating expertise that can help guide students, PRISMS and agencies beyond the usual faculty PI's.</p> <p style="text-align: center;">CONTINUED BELOW</p>	<p>The rapid response framework is used to guide response to newly discovered invasions while promoting consistency among invasive species responses. Private property will be respected.</p> <p>We have not advocated for changing any specific laws however this ISCMP builds in room to encourage greater collaboration with IS agencies, professional organizations, and elected officials. Issues such as laws dictating the use of herbicide should be addressed through these mechanisms.</p> <p>Decision support tools are those that help determine the most appropriate level and/or method of response</p> <p>These thoughts are addressed in Sections 6 and 8.: “Encourage collaboration among research programs focused on IS response applications; and support research on meaningful metrics to assess the effectiveness of various IS control methods (both established and innovative) in natural areas and agricultural settings. This may be achieved, in part, by supporting more extensive post-intervention monitoring (Section 8).”</p> <p>Section 8, Recommendation 2, Bullet 1 added: “Measures of success should be informed by research focused on developing metrics to assess treatment effectiveness (Section 6).”</p> <p>Section 8, Recommendation 3, added: “Support the long-term assessment of IS treatment outcomes through post-intervention monitoring. Results of post-intervention monitoring should be integrated into decision-support tools, and may be used to further research focused on developing meaningful metrics to assess treatment outcomes and the effectiveness of various control methods (Section 6).”</p>	Yes

Com #	Sec.	Commenter	Comment	Response	Edits?
6.10 (cont.)	6.C	53	<p>[continued from above] While some major progress is being made in NYS in funding and implementing biological control for insects and plant invaders, this does not receive recognition in the recommendations. Biocontrol is the only means by which long-term suppression of invasive species has been achieved. It should be a main focus of R+D for well-established invaders.</p> <p>At present, funding for invasive spp. control efforts rarely, if ever, requires long-term assessment of outcomes. Sometimes that is a function of annual budgets, sometimes this "falls through the cracks" because outcome assessments are considered research. This prevents learning from doing and there is no accountability for the outcome on the species management is supposed to protect. We consider it only appropriate for any management program (physical, chemical or biological) to develop a long-term outcome assessment protocol that is funded together with the initial treatment (for example a herbicide application). How to best set-aside such resources at the tie treatments are funded, is an issue that NYS will have to grapple with. We do not know what "vehicles" are available, but one could consider outside entities to hold money and then fund assessments in appropriate intervals.</p>	<p>Biocontrol recommendations can be found in Section 6.</p> <p>Added to Section 8, Recommendation 3: "Support the long-term assessment of IS treatment outcomes through post-intervention monitoring. Results of post-intervention monitoring should be integrated into decision-support tools, and may be used to further research focused on developing meaningful metrics to assess treatment outcomes and the effectiveness of various control methods (Section 6)."</p>	Yes
6.11	6.C	54	Allocate more resources and support funding to manage, control, and eradicate AIS, utilizing EDRR and an initial aggressive attack.	Many of the ISCMP recommendations regarding funding, early detection and response are not specific to a particular ecosystem and could be applied to terrestrial and aquatic environments.	No
7.1	7.A	33	Missing research, again with hydrilla, we were hard pressed to find research that put the economic cost into dollars and sense. More of these studies, across the region with a variety of potential invaders would be very helpful.	This is the goal of a horizon scanning task force.	No

Com #	Sec.	Commenter	Comment	Response	Edits?
7.2	7.C	16	Develop/encourage resources devoted to collection of native plant species on sites where future IS removal projects will take place (seeds) to be propagated in advance of removal efforts to be planted after invasives have been removed. This would ensure local biotypes and prevent undesired species sometime contained in commercially purchased seed mixes.	This comment is beyond the scope of the ISCMP. See also comment G.45.	No
7.3	7.C	16	Consider plans for the collection of rare or threatened plant species to be stored for later propagation efforts with a partner like MARSB if no such effort is not already currently underway.	Beyond scope of ISCMP.	No
7.4	7.C	24	Coordinating "deer management" with invasive species management: local municipalities need help reducing deer overpopulation in their area. DEC should have a dedicated herd reduction team to help local authorities take effective action (i.e., harvest more deer). Is there ANY terrestrial invasive NOT growing where too many deer have caused the "overlaid" impact?	Deer management is under the purview of the NYS Deer Management Plan developed by NYSDEC Division of Fish and Wildlife. This ISCMP recommends greater coordination between NYSDEC Division of Fish and Wildlife and the IS Coordination Section during development of the deer management plan (see below). Added to Section 7, Recommendation 1, Bullet 2: "Additionally, the IS Coordination Section should seek opportunities to collaborate with the NYSDEC Division of Fish and Wildlife during future white-tailed deer management plan updates to identify and include mutually beneficial management strategies."	Yes
7.5	7.C	24	Persist with deer herd reduction efforts everywhere possible. "Cooperative Hunting Areas" have not been sufficient to reduce deer herds to sustainable levels; smart deer killing, not sport hunting, is the answer: we need more shooting over bait with DEC nuisance permits. "Quantitative metrics for key recommendations" must include Deer Management as key to invasives control.	Deer management is under the purview of the NYS Deer Management Plan developed by NYSDEC Division of Fish and Wildlife. Specific deer management techniques are beyond the scope of the ISCMP. The ISCMP recommends greater coordination between NYSDEC Division of Fish and Wildlife and the IS Coordination Section during development of the deer management plan (see below). Added to Section 7, Recommendation 1, Bullet 2: "Additionally, the IS Coordination Section should seek opportunities to collaborate with the NYSDEC Division of Fish and Wildlife during future white-tailed deer management plan updates to identify and include mutually beneficial management strategies."	Yes

Com #	Sec.	Commenter	Comment	Response	Edits?
7.6	7.C	34	Emphasis of IS management on private lands. Include IS restoration projects in private forest stewardship efforts.	Section 7, Recommendation 3, Bullet 1 now reads: "Encourage IS Council members, PRISMs, contract awardees (e.g., within the Invasive Species Rapid Response and Control Grant Program) and private landowners (e.g., those participating in conservation incentive programs) to incorporate an ecological restoration strategy..."	Yes
7.7	7.C	43	Will the ISC or ISAC identify a lead for the Approach and Recommended Actions in Chapter 7? Land management agencies, especially NYS DEC and NYS OPRHP, might consider hiring staff or partnering with the PRISMs to bring on the type of expertise (for example, restoration ecologists) needed to help support a coordinated statewide effort.	Exactly how the recommendations are implemented would be up to the ISCS, ISC, and ISAC.	No
7.8	7.C	51	On-the-ground restoration should be the main goal of the plan and its overall priority. The plan should include measure to support and encourage municipalities to send crews to the field as soon as possible for ecosystem restoration.	Section 7 recommends building an ecosystem restoration component into IS management projects. Terms of restoration would be determined on a project basis.	No
7.9	7.C	53	The recommendations make a big point about ecosystem restoration and resilience, but at present land managers are not enabled to follow-through for many different reasons. They include lack of appropriate local seed or plant resources for restoration efforts (or funding for such efforts). Replanting or reseeding after treatments is very rarely done, in part because that has not been SOP. However, it should be to fend off the invasion "treadmill" where we just see succession of different invasive species after control efforts. And very important in this effort is an articulation of what should be in a local habitat, not what should NOT be there (the introduced species, for example).	See Section 7, Recommendation 4 which calls for incorporation of a restoration strategy and associated long term monitoring plan as essential elements of IS management projects. This recommendation also calls for funding to ensure these actions are taken.	No
8.1	8.B	28	Develop a municipal report card	Report cards could be developed based on the wants/needs of individual municipalities. These could be established as part of a municipal engagement and relationship building effort recommended in Section 4.	No
8.2	8.B	51	A timeline of when action items should be addressed or completed would be useful to measure progress and evaluate success.	The ISCMP is a living document meant to be reviewed and updated periodically. Timeframes have not been established however each recommendation was prioritized in the recommendation report card.	No