**South Dakota Division**

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**The Izaak Walton League of America**

**Defenders of Soil, Air, Woods, Waters, and Wildlife**

December 28, 2022

Re: SD IWLA Comments on Draft AIS Strategic Plan

South Dakota Department of Game, Fish, and Parks

523 East Capitol Avenue

Pierre, SD 57501

The South Dakota Division of the Izaak Walton League of America (Division) appreciates this opportunity to comment on the South Dakota Game, Fish, and Parks’ Draft Aquatic Invasive Species (AIS) Strategic Plan. The plan will attempt to implement the most effective efforts to reduce the spread of invasive plant and animal species.

The Division is extremely disappointed with each announcement of another AIS discovery into previously uninfected waters in South Dakota. We agree the primary goal of this plan should be to provide every surface water user the information needed to fully understand the serious threat posed by AIS and how the three simple steps, Clean, Drain, and Dry, will prevent the spread of AIS.

We support continued research and efforts to evaluate the economic and environmental impacts of AIS to the state. We urge a thorough evaluation of how AIS, especially zebra mussels, affect fish growth rates, reproduction, and recruitment. We ask GFP to coordinate AIS management efforts with all surface water stakeholders and engage other state and federal agencies on AIS management and communication efforts.

The Division supports the development of an annual Operational and Communication plan. The draft states that the Operational Plan will contain specific actions and the number and location of inspection and decontamination sites. A “Communications Toolkit’ will be distributed, the information in it may vary to allow for updated practices.

The draft plan outlines the four elements to AIS management: prevention, containment, mitigation, and eradication.

* We believe prevention is the most critical factor in stopping the spread of AIS.
* Enforcement of regulations is critically important to keep AIS from entering or spreading in the state.
* The Division supports an annual review of all AIS regulations to evaluate their effectiveness and make any needed changes.
* Inspection and decontamination stations in high traffic areas will improve education and outreach.

The size of the state, the amount of surface water, and the number of boat ramps and access facilities make this effort challenging. Sampling, monitoring, and increased public involvement are key to preventing the spread and containing existing AIS populations. Removal of an AIS population is expensive and often impossible. Few viable and feasible options are available once a population is established.

The Division recommends the following:

* GFP hire qualified individuals for all AIS positions, whether they be full-time, temporary, or contract employees.
* That State agencies develop a funding mechanism, based on what neighboring states have done, to raise operational funds to combat the spread of AIS.
* Require an AIS stamp for resident and nonresident watercraft, water intakes, and other equipment used to withdraw surface water from multiple locations within the state.
* Coordination with other state, and federal agencies, surface water managers, and other stakeholders on AIS management and strategies.
* Establish the time a watercraft and/or other equipment must remain out of the water after being in an infested water body before it can be used in a non-infested water unless the watercraft and/or equipment has been fully decontaminated at a licensed or approved cleaning station.

The South Dakota Division of the Izaak Walton League of America thanks you for the opportunity to comment on the Draft Aquatic Invasive Species Strategic Plan. We ask to be kept informed on this important topic as the plan moves forward.

Sincerely,



Paul Lepisto

Regional Conservation Coordinator

Izaak Walton League of America

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