



THE STATE OF ARIZONA  
**GAME AND FISH DEPARTMENT**

5000 W. CAREFREE HIGHWAY  
PHOENIX, AZ 85086-5000  
(602) 942-3000 • WWW.AZGFD:GOV

**GOVERNOR**

DOUGLAS A. DUCEY

**COMMISSIONERS**

CHAIRMAN, KURT R. DAVIS, PHOENIX  
EDWARD "PAT" MADDEN, FLAGSTAFF  
JAMES R. AMMONS, YUMA  
JAMES S. ZIELER, ST. JOHNS  
ROBERT E. MANSELL, WINSLOW

**DIRECTOR**

LARRY D. VOYLES

**DEPUTY DIRECTOR**

TY E. GRAY



October 15, 2015

Mr. Calvin Joyner  
Regional Forester  
USDA-Forest Service, SW Region-Regional Office  
333 Broadway SE  
Albuquerque, NM 87102

Dear Mr. Joyner:

The Department wanted to pass on our congratulations for your new USFS website for invasive species ([www.fs.usda.gov/detail/r3/forest-grasslandhealth/invasivespecies/](http://www.fs.usda.gov/detail/r3/forest-grasslandhealth/invasivespecies/)) associated with the Southwest. We see great value in this site for the public and our continuing coordinated efforts concerning aquatic invasive species (AIS) prevention and management in Arizona and New Mexico. This expansion in downloadable resources is a welcome addition to our own AIS Program webpage located at [www.azgfd.gov/ais](http://www.azgfd.gov/ais) for information and education distribution as it applies to this national problem.

However, we do believe we need further discussion on this websites loose interpretation of certain species of sportfish (some of which are stocked by the Arizona Game and Fish Department) as "major aquatic invasive species" in most forests in Arizona. This list of fish can be found when opening the "**list of major invasive species by national forest**" link found on this sites homepage and is further referenced (by link on this same homepage) in your June 2014 "Guidance for Invasive Species Management in the Southwestern Region", page 14, under "Fish" in the Invasive Species Taxa section.

Although we can agree that many of the sportfish in our southwestern U.S. waters are non-native or exotic, we cannot confuse the public or our own conservation management efforts by now defining these sportfish as "major aquatic invasive species". The State of Arizona definition for an aquatic invasive species is, "*any aquatic species that is not native to the ecosystem under consideration and whose introduction or presence in this State may cause economic or environmental harm or harm to human health. This does not include any nonindigenous species lawfully or historically introduced into this State for sport fishing recreation.*" Your current listings would appear to be in conflict with our state's AIS definition, which is in State Statute (A.R.S. §17-255), and is not supported in other classifications/listings from the Aquatic Nuisance Species Task Force (co-Chaired by the U.S. Fish and Wildlife Service and National Oceanic and Atmospheric Administration) or the USDA "National Invasive Species Information Center" websites.

We believe that we need to talk further about this one aspect of your webpage that can be a road block to our public's perception and support of all AIS prevention and management efforts in the southwest and our coordinated future efforts in sportfishing and boating recreation programs in Arizona. Please involve our AIS Program Coordinator Tom McMahon (tmcMahon@azgfd.gov) in these discussions.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim deVos". The signature is written in a cursive style with a long, sweeping underline.

Jim deVos  
Assistant Director  
Wildlife Management Division

tm:cc

cc: Chris Cantrell, Fish Branch Chief  
Dr. Allen White, US Forest Service  
Yvette Paroz, US Forest Service