



Florida Fish and Wildlife Conservation Commission  
Mr. Eric Sutton  
Executive Director  
620 South Meridian Street  
Tallahassee, FL 32399

February 1, 2019

Dear Executive Director Sutton,

The Florida Aquatic Plant Management Society (FAPMS) has long supported the successful Florida Fish and Wildlife Conservation Commission's (FWC) invasive plant management program. The foundation for the program's implementation lies in sound scientific research, with much of it originating from scientists at major research universities, like the University of Florida. This program utilizes integrated pest management practices in order to manage pest species to the lowest feasible level – from both an ecological and an economic standpoint. The Commission's Invasive Plant Management Program (IPMS) is nationally recognized for its invasive weed management and has been a model for programs around the United States and abroad.

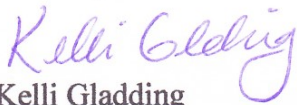
FAPMS is a professional organization founded in 1976 and represents over 500 scientists, lake managers, researchers, and aquatic plant technicians statewide. The mission of FAPMS is to provide the education and resources necessary to support responsible stewardship of Florida's aquatic ecosystems through comprehensive plant management. A primary objective for FAPMS's is: "To assist research scientists, legislators, planners, state and federal governmental agencies, lawyers, engineers, educational institutions, students and others concerned with the general aims of this Society." Based on this mission objective and in response to the recent FWC directive to "pause" the aquatic plant management program, the FAPMS Board of Directors adopted the attached "Resolution Position Statement" in support of the FWC IPMS program. Aquatic weed management takes an integrated approach to be successful and all aquatic herbicides are reviewed, approved and monitored through the Environmental Protection Agency and the Florida Department of Agriculture and Consumer Services. Utilizing the approved aquatic herbicides in rotation and in combination is a recognized and accepted scientific practice for invasive weed control and herbicide resistance management.

To provide further sustenance for the FWC IPMS program, please review the packet of information which provides a historical perspective regarding aquatic plant management along with the Best Management Practices Handbook, developed by scientists and researchers who work in the

aquatic ecosystem. Additional publications describe the history of aquatic plant management in Florida, and the benefits of maintenance control.

The Florida Aquatic Plant Management Society understands there are multifaceted and complex issues regarding the management of aquatic plants in Florida's waterways, and we encourage personnel charged with decision and policymaking to be mindful of the *more than 100 years* of scientific research available. FAPMS appreciates this opportunity to provide comments to the Commission, and we will continue to support research-based approaches to program implementation and governance.

Sincerely,



Kelli Gladding

FAPMS President

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Attachments:

- Florida Aquatic Plant Management Society, Resolution Position Statement, 2019
- "Biology and Control of Aquatic Plants": A Best Management Practices Handbook, Third Edition; 2014; Aquatic Ecosystem Restoration Foundation, Marietta, GA
- Schardt, J.D. "Aquatic Plant Problems and Management Necessity in Florida Public Lakes and Rivers." *Aquatics*. 38: 18-24
- Joyce, J.C. 1985. "Benefits of Maintenance Control of Water Hyacinths." *Aquatics*. 7:11-13
- Schardt, J.D. "Successful Management of Invasive Water Hyacinth in Florida's Public Waterways." *The Journal of Marine Education*. 21: 3-9
- Ferrell, J. August, 2018. Letter, regarding spraying invasive plants on Lake Okeechobee. *University of Florida, Center for aquatic and Invasive Plants*.
- Health Canada. January 2019. "Statement from Health Canada on Glyphosate." Ottawa, ON
- Haller, B. June, 1981. "Maintenance Control of Water Hyacinth." *Aquatics*. 3: 6-7

C.C.:

Governor DeSantis

Florida Fish and Wildlife Conservation Commissioners

FWC Invasive Plant Management Section

South Florida Water Management District

St. Johns River Water Management District

South West Florida Water Management District