

Notes and Commentary

Invasive Species Defined in a Policy Context: Recommendations from the Federal Invasive Species Advisory Committee

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***Preamble:* Executive Order (EO) 13112**—defines an *invasive species* as “**an alien species whose introduction does or is likely to cause economic or environmental harm or harm to human health.**” In the Executive Summary of the National Invasive Species Management Plan (NISMP) the term *invasive species* is further clarified and defined as “**a species that is non-native to the ecosystem under consideration and whose introduction causes or is likely to cause economic or environmental harm or harm to human health.**” To provide guidance for the development and implementation of the NISMP, the National Invasive Species Council (NISC) and the Invasive Species Advisory Committee (ISAC) adopted a set of principles outlined in Appendix 6 of the NISMP. Guiding Principle #1 provides additional context for defining the term *invasive species* and states “**many alien species are non-invasive and support human livelihoods or a preferred quality of life.**”

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However, some alien species (“non-native” will be used in this white paper because it is more descriptive than “alien”), for example West Nile virus, are considered invasive and undesirable by virtually everyone. Other non-native species are not as easily characterized. For example, some non-native species are considered harmful, and therefore, invasive by some sectors of our society while others consider them beneficial. This discontinuity is reflective of the different value systems operating in our free society, and contributes to the complexity of defining the term *invasive species*.

NISC is engaged in evaluating and updating the 2001 NISMP and is developing comments for a revised action plan as required by the EO 13112. While there have been numerous attempts to clarify the term *invasive species*, there continues to be uncertainty concerning the use and perceived meaning of the term, and consequently over the prospective scope of actions proposed in the NISMP. Options related to private property use, pet ownership, agriculture, horticulture, and aquaculture enterprises may be affected depending upon the definition, use, and policy implications of the term.

In particular, the desire to consider a non-native species as “invasive” may trigger a risk/benefit assessment process to determine whether regulatory action is warranted. All these uncertainties have hindered and could continue to hinder progress in actions and policy development to prevent new invasions and manage existing *invasive species*. While it is not the purpose of this white paper to define a risk/benefit assessment process, development of such a process must be open and efficient to minimize the uncertainties.

This paper is intended to provide a non-regulatory policy interpretation of the term *invasive species* by identifying what is meant, and just as important, what is not meant by the term. ISAC recognizes that biological and ecological definitions will not precisely apply to regulatory definitions. We believe,

Weeds As Examples

Weeds provide good examples to clarify what is meant by an invasive species because most people have a concept of what constitutes a “weed.”

Invasion can be thought of as a process that in our example, a plant must go through to become a successful, yet harmful invader. Several barriers must be overcome for a plant to be considered an invasive weed (Richardson et al. 2000). Invasive weeds are invasive species.

Large-scale geographical barriers.

First, a geographical barrier must be overcome, which often occurs as a mountain range, ocean, or similar physical barrier to movement of seeds and other reproductive plant parts. Plants that overcome geographical barriers are known as alien plants or alien species, i.e., non-native plants or species, not originally known in the area described. These non-native plants or species thus now are occurring outside their natural range boundaries. This movement is often mediated by human activities, either deliberately or unintentionally.

Survival barriers.

The second set of obstacles that a non-native plant must overcome is barriers to germination and survival in its new location. These typically are environmental barriers such as adequate moisture availability to allow successful germination and survival of seedlings that will continue to grow to maturity. Other physical barriers may include soil pH, nutrient availability, or competition for resources from neighboring plants.

Establishment barriers.

The third obstacle that a non-native plant must overcome to be considered an invasive weed, is to form a population that is self-sustaining and does not need re-introduction to maintain a population base. Such a population will continue to survive and thrive in its new environment. Once this occurs, this population of non-native plants is considered to be established. Environmental barriers to survival and establishment are similar.

Dispersal and spread barriers.

Established non-native plants must overcome barriers to dispersal and spread from their site of establishment to be considered invasive plants. Additionally, the rate of spread must be relatively fast. However, this movement or spread alone does not necessarily make this non-native plant an invasive weed or invasive species.

Harm and impact.

Finally, a plant is deemed to be invasive if it causes one or more negative environmental, economic, or human health effects, which outweigh any beneficial effects. For example, yellow starthistle is a source of nectar for bee producers. But the displacement of native and other desirable plant species caused by yellow starthistle leads to dramatically decreased forage for wildlife and livestock, which severely disrupts the profitability of associated businesses. These negative effects greatly overshadow the positive effects and thus, define harm caused by yellow starthistle and explain why it is considered an invasive species.

however, that our clarification will apply to *all taxa of invasive species in all habitats* and furthermore, our explanation will be functional and acceptable to most stakeholders. ISAC simply wants to clarify what is meant and what is not meant by the term *invasive species* in the technical sense and to provide insight into those areas where societal judgments will be necessary to implement effective public policy.

The utility of our explanation should be to provide clarity for use of the term *invasive species* in education,

conflict resolution, and efficiency in the planning, prevention, control/eradication, and management of *invasive species*. ISAC recommends that NISC adopt the clarifications presented in this white paper to enhance progress for *invasive species* management in the United States.

Introduction

An *invasive species* is a non-native species whose introduction does or is likely to cause economic or environmental harm or harm to human, animal, or plant health. The National Invasive Species Management Plan indicates that NISC will focus on non-native organisms known to cause or likely to cause negative impacts and that do not provide an equivalent or greater benefit to society. In the technical sense, the term “invasion” simply denotes the uncontrolled or unintended spread of an organism outside its native range with no specific reference about the environmental or economic consequences of such spread or their relationships to possible societal benefits. However, the policy context and subsequent management decisions necessitate narrowing what is meant and what is not meant by the term *invasive species*. Essentially, we are clarifying what is meant and not meant by “causing harm” by comparing negative effects caused by a non-native organism to its potential societal benefits.

Perception to Cause Harm

Complications concerning the concept of *invasive species* arise from differing human values and perspectives. Differing perceptions of the relative harm caused or benefit gained by a particular organism are influenced by different values and management goals. If *invasive species* did not cause harm, we would not be nearly as concerned. Perceptions of relative benefit and harm also may change as new knowledge is acquired (e.g., the level of harm may change over time as a non-native species adapts to its new environment), or as human values or management goals change.

For a non-native organism to be considered an *invasive species* in the policy context, the negative effects that the organism causes or is likely to cause are deemed to outweigh any beneficial effects. Many non-native introductions provide benefits to society and, even among species that technically meet the definition of invasive, societal benefits may greatly exceed any negative effects (for example, crops and livestock raised for food). However, in some cases any positive effects are clearly overshadowed by negative effects, and this is the concept of causing harm. For example, water hyacinth (*Eichhornia crassipes*) has been popular in outdoor aquatic gardens. Its escape to natural areas, however, where its populations have expanded to completely cover lakes and rivers has devastated water bodies and the life they support, especially in the

southeastern U.S. And, there are some organisms, such as West Nile virus, that do not appear to provide any benefit to society at all. Such organisms constitute a small fraction of non-native species, but their ability to spread and establish populations outside their native ranges may prove disastrous for the natural environment, the economies it supports, and/or public health. Because *invasive species* management is difficult and often very expensive, these worst offenders are the most obvious and best targets for policy attention and management.

The negative impact to a native species caused by an *invasive species* might trigger additional negative interactions for other associated native species; i.e., there could be direct and indirect effects. For example, an invasive weed that is undesirable as a food source may outcompete and displace native grasses and broadleaf plants. These displaced native grasses and broadleaf plants may have been primary forage for animals, which subsequently would be displaced to a new location or have their populations reduced because the weed invasion decreased the availability of food in their native plant and animal community. Negative effects, however, do not always create a cascade of impacts realized throughout the environment. For example, simple displacement of an endangered species by a non-native species might alone provide sufficient justification to consider the non-native organism an *invasive species*.

What We Do Not Mean, What We Do Mean, and the “Gray” Area

Native and Non-native Species. *Invasive species* are species not native to the ecosystem being considered. Canada geese (*Branta canadensis*) are native to North America and most of their populations migrate annually. However, in some locations in the U.S. (e.g., suburban Maryland, the Front Range of Colorado) introduced, non-migratory populations of Canada Geese are causing problems—such as fouling lawns, sidewalks, grass parks, and similar areas. While non-migratory populations can cause problems, they are not considered an *invasive species* because they are native. Additionally, Canada geese are of significant financial value to many local economies through waterfowl hunting and simple enjoyment. Mute swans (*Cygnus olor*), however, are invasive. Mute swans are native to Europe and Asia but were introduced into North America where their populations have increased dramatically. They compete directly with native waterfowl for habitat and displace them. That is why mute swans are considered an *invasive species*. Whitetail deer (*Odocoileus virginianus*) populations have increased dramatically in the northeastern U.S. and are problems in farms, yards, and natural areas because they consume plants valued by humans; but are not invasive because they are native. Nutria (*Myocaster coypus*), on the other hand, are another classic example of an *invasive*

species. Nutria are native to South America but were introduced into North America where their populations have soared. Nutria compete directly with native muskrats (*Ondatra zibethicus*), beavers (*Castor canadensis*), and other similar native species for habitat, often causing the displacement of these native species.

Feral Populations. It is also essential to recognize that *invasive species* are not those under human control or domestication; that is, *invasive species* are not those that humans depend upon for economic security, maintaining a desirable quality of life, or survival. However, the essential test is that populations of these species must be under human control or management. Escaped or feral populations of formerly domesticated plants and animals would be considered *invasive species* if all the concepts and conditions are met as outlined in this article’s side panels entitled “Weeds Are Examples.” The cereal grain rye (*Secale cereale*) being produced on a farm in Kansas is considered very desirable, but feral rye on the breaks of the Poudre River in Colorado would be considered an *invasive species* because it is displacing native plants and the native animal communities they support. Domesticated goats (*Capra aegagrus hircus*) on a farm in Texas are considered highly desirable, but feral goats in Haleakala National Park on Maui are considered an *invasive species*. Feral goats have severely overgrazed areas and eliminated native Hawaiian plants, which were never adapted to grazing. Areas denuded by feral goats have led to increased soil erosion.

A Biogeographical Context. An *invasive species* may be invasive in one part of the country, but not in another. A biogeographical context must be included when assessing whether a non-native species should be considered an *invasive species*. Lake trout (*Salvelinus namaycush*) are highly desirable in the Great Lakes where they are native, but are considered an *invasive species* in Yellowstone Lake. They compete with native cutthroat trout (*Oncorhynchus clarki bouvieri*) for habitat, which decreases cutthroat trout populations. Atlantic saltmarsh cordgrass (*Spartina alterniflora*) is an essential component of east coast salt marshes, but is highly invasive on the west coast where it covers mudflats and displaces native estuarine plants and the community of animals they support, including huge flocks of migrating waterfowl. Kentucky bluegrass (*Poa pratensis*) would be considered an *invasive species* in Rocky Mountain National Park in Colorado, but is considered non-invasive a mere 60 miles away at a golf course in Denver. English ivy (*Hedera helix* and *H. hibernia*) is considered a good ground cover species in the Great Plains and Midwest, but is a highly invasive weed in the forests of the Pacific Northwest and Eastern U.S., where it outcompetes native plants and displaces the associated animal communities.

The “Gray” Area. There are many other obvious examples of *invasive species* such as snakehead fish (*Channa marulius*), yellow starthistle (*Centaurea solstitialis*), or *Phytophthora ramorum* (the organism that causes sudden oak death); and there are obvious examples of species that are not invasive, namely native plants and animals. There are, however, non-native organisms for which it will be difficult to make a determination and these should be subject to assessment. Whether these non-native organisms will be considered *invasive species* will depend upon human values. For example, European honeybees (*Apis mellifera*) are cultured to produce honey and pollinate crops. Even though they form wild populations in many parts of the country, occasionally creating problems by building hives in the walls of homes and presenting a human health problem for individuals that are highly allergic to their sting, most people would not consider them an *invasive species* because they directly and indirectly produce desired food products.

Another example of a gray area would be native termites versus Formosan termites (*Coptotermes formosanus*). No one wants termites in their homes but only Formosan termites would be considered an *invasive species* because they are non-native. Smooth brome (*Bromus inermis*) also serves as another gray area example. It was imported from Russia in the 1890s for forage and was widely planted. It clearly has escaped cultivation and can be found in many natural areas, particularly in the western U.S., but in most situations, smooth brome would not be considered an *invasive species* because of its forage value for wildlife and livestock as well as its widespread use as a sod for artificial drainage waterways and on roadsides.

Chinese or Oriental clematis (*Clematis orientalis*) serves as another gray area example. Chinese clematis (virgin’s bower, orange peel) is a popular ornamental that has been planted worldwide. However, it has escaped cultivation in several western states where its populations can spread in many habitats. Escaped populations of Chinese clematis occur in Idaho, Nevada, Utah, New Mexico, and Colorado but so far, it is considered an *invasive species* only in Colorado where it has spread dramatically from its site of introduction and has displaced native plant species.

Environmental Harm. We use environmental harm to mean biologically significant decreases in native species populations, alterations to plant and animal communities or to ecological processes that native species and other desirable plants and animals and humans depend on for survival. Environmental harm may be a result of direct or indirect effects of *invasive species*, leading to biologically significant decreases in native species populations.

Examples of direct effects on native species include preying and feeding on them, causing or vectoring diseases, preventing them from reproducing or killing their young, out-competing them for food, nutrients, light, nest sites, or

other vital resources, or hybridizing with them so frequently that within a few generations, few if any truly native individuals remain. Environmental harm includes decreasing populations of species listed as threatened or endangered under the Federal Endangered Species Act, or of other rare or uncommon species. In addition, harm may include reductions in populations of otherwise common native species. For example, over three billion individual American chestnut (*Castanea dentata*) trees were found in U.S. forests before the invasive chestnut blight (*Cryphonectria parasitica*) arrived and virtually eliminated them. Environmental harm also can be the result of an indirect effect of *invasive species*, such as decreasing native waterfowl populations that may result when an invasive wetland plant decreases the abundance of native plants, thus decreasing seeds and other food that they provide and that the waterfowl depend upon.

Environmental harm also includes significant changes in ecological processes, sometimes across entire regions, resulting in conditions that native species and entire plant and animal communities cannot tolerate. For example, some non-native plants can change the frequency and intensity of wildfires, or alter the hydrology of rivers, streams, lakes, and wetlands and that is why they are considered *invasive species*. Other *invasive species* significantly alter erosion rates. Two such examples include trapping far more wind-blown sand than native dune species, or holding far less soil than native grassland species following rainstorms. Some invasive plants and micro-organisms can alter soil chemistry across large areas, significantly altering such factors as soil pH or soil nutrient availability. Environmental harm also includes significant changes in the composition and the structure of native plant and animal communities. For example, the invasive tree *Melaleuca quinquenervia* can spread into and take over marshes in Florida’s Everglades, changing them from open grassy marshes to closed canopy swamp-forests.

Environmental harm may also cause or be associated with economic losses and damage to human, plant, and animal health. For example, invasions by fire-promoting grasses that alter entire plant and animal communities may eliminate or sharply reduce populations of many native plant and animal species. This can lead to large increases in fire-fighting costs and sharp decreases in forage for livestock. West Nile virus is a well known human health problem caused by a non-native virus which is commonly carried by mosquitoes. West Nile Virus also kills many native bird species, causing drastic reduction in populations for some species including crows and jays.

Additional Examples of Impacts Caused by *invasive species*

Specific examples of the harm caused by *invasive species* are useful to further clarify the definition. The following

list of examples is not meant to be comprehensive, but offers further explanation:

Impacts to Human Health. *Respiratory infections.* The outbreak of *West Nile virus* in the U.S. began in the Northeast in 1999 and has since spread throughout the country. Infections in humans may result in a flu-like illness and in some cases death. This outbreak has caused illness in thousands of citizens, increased medical costs for affected persons, and decreased productivity due to absences from work. *West Nile virus* also has affected horses and has caused widespread mortality in native birds (National Biological Information Infrastructure 2008).

Poisonous plants. Exposure to the sap of *Tree-of-heaven/Chinese sumac tree (Ailanthus altissima)* has caused inflammation of the heart muscle (myocarditis) in workers clearing infested areas. Afflicted personnel experienced fever/chills, chest pain radiating down both arms, and shortness of breath. Exposure occurred when sap from tree-of-heaven contacted broken skin. Such exposure has caused hospitalization, medical expense, and lost productivity due to absences from work (Bisognano et al. 2005).

Impacts to Natural Resources. *Declines in wildlife habitat and timber availability.* *Chestnut blight* is a disease of American chestnut caused by a non-native fungal pathogen that was introduced into eastern North America around 1910. The disease eliminated the American chestnut from eastern deciduous forests, thereby decreasing timber harvests and wildlife that depended upon the American chestnut for habitat (USDA-APHIS/FS 2000).

European gypsy moth (Lymantria dispar) defoliates trees on millions of acres of northeastern and mid-western forests. It currently is found in 19 states causing an estimated \$3.9 billion in tree losses and also decreased wildlife habitat (USDA-APHIS/FS 2000).

Decreased soil stabilization and interrupted forest succession. *White pine blister rust* is a disease of white pine (*Pinus strobus*) species caused by the non-native fungal pathogen *Cronartium ribicola*. It was introduced into eastern North America around 1900 and western North America in 1920. It spread rapidly, killing off native white, whitebark (*Pinus albicaulis*), and limber pines (*Pinus flexilis*), whose seeds are an important food source for birds, rodents, and bears. Elimination of these trees caused by this pathogen alters forest ecosystems, eliminates wildlife forage, and decreases the soil stabilization effects of these trees, snowmelt regulation, and forest succession (Krakowski et al. 2003).

Changes in wildfire frequency and intensity. *Downy brome (Bromus tectorum)*, also known as cheatgrass, decreases the interval between the occurrences of wildfires in the Great Basin region from every 70 to 100 years to every 3 to 5

years because it forms dense stands of fine fuel annually. The decrease in interval between wildfires causes increased risk to human life and property and also places at risk established communities of plants and animals that we consider desirable (Knapp 1996; Pimentel et al. 2000; USFWS 2003; Whisenant 1990).

Excessive use of resources. *Tamarisk (Tamarix spp.)* in the desert southwest uses more than twice as much water annually as all the cities in southern California, placing this invasive weed in direct competition with humans for the most limiting resource in the southwestern U.S. (Friederici 1995; Johnson 1986).

Suppressors. *Russian knapweed (Acroptilon repens)* exudes toxins from its tissues that inhibit the growth of surrounding plants or eliminates them. Desirable plant communities are placed at risk from *Russian knapweed* invasion, which may result in decreased numbers of wildlife species or livestock that the invaded land otherwise could support. *Russian knapweed* also is very toxic to horses (Stevens 1986; Young et al. 1970a and 1970b).

Decreased carrying capacity for wildlife and livestock. Expansion of *leafy spurge (Euphorbia esula)*, *yellow starthistle*, or other unpalatable invasive weeds displace desirable forage plants and may allow fewer grazing animals to survive in infested areas (DiTomaso 2001; Lym and Kirby 1987; Lym and Messersmith 1985).

Impacts to Recreational Opportunities and Other Human Values. *Decreased property values.* *Asian longhorned beetles (Anoplophora glabripennis)* first appeared in New York in 1996 and in Chicago in 1998. Larvae burrow into trees causing girdling of stems and branches, dieback of the crown, and can kill an entire tree. It infests many different tree species in the U.S. and is a threat to urban and rural forests (Cavey et al. 1998).

The *Emerald ash borer (Agrilus planipennis)* was first detected in the U.S. in 2002. Infestations currently are found in Michigan, Ohio, and Indiana. Emerald ash borer larvae tunnel under bark of ash trees and could eliminate ash as a street, shade, and forest tree throughout the U.S. Estimated replacement cost in six Michigan counties is \$11 billion and an additional \$2 million in lost nursery sales (Chornesky et al. 2005).

Dutch elm disease (Ophiostoma ulmi and Ophiostoma novo-ulmi) was first introduced into the U.S. in 1927 and occurs in most states. Dutch elm disease has killed more than 60% of elms in urban settings and decreased the value of urban and suburban properties (Brasier and Buck 2001).

Spotted knapweed (Centaurea biebersteinii) and *leafy spurge* expansion in the western U.S. have displaced desirable forage plants, thereby decreasing the value and sales price of grazing land in the western U.S. (Maddox 1979; Weiser 1998).

Eurasian watermilfoil (*Myriophyllum spicatum*) was introduced into the U.S in the 1940s and has since spread throughout much of the country. This submersed aquatic plant can form dense mats at the water surface, limiting access, recreation, and damaging aesthetics, and as a result, has decreased the values of shoreline properties in New Hampshire, the Midwest, and elsewhere (Halstead et al. 2003). Eurasian watermilfoil also decreases spawning success of salmon species (Newroth 1985) and causes many other negative effects (Eiswerth et al. 2000).

Decreased sport fishing opportunities. *Whirling disease* is caused by a parasite (*Myxobolus cerebralis*) that most likely originated in Europe. It was first observed in the U.S. in 1958. The parasite attacks the soft cartilage of young trout, causing spinal deformities and causes the fish to exhibit erratic tail-chasing behavior. Heavily infected young trout can die from *Whirling disease* and even if they recover, they remain carriers of the parasite. Most species of trout and salmon are susceptible, and angling and the businesses supported by trout and salmon fishing may be at risk if this disease continues to spread (Aquatic Nuisance Species Task Force et al. 2005; Colorado Division of Wildlife 2006).

Smallmouth bass (*Micropterus dolomieu*) fishing in Lake Erie was closed during bass mating because of *round goby* (*Neogobius melanostomus*) predation of nests. Fishing was closed because male smallmouth bass aggressively guard nests from predators and are easier to catch by anglers during this time of year. Removal of males by anglers decreased the number of bass offspring because of increased *round goby* predation of unguarded nests (Steinhart et al. 2004). Businesses that smallmouth bass anglers patronize could be adversely affected by such closures.

Altered business opportunities. The concern over *Sudden Oak Death Syndrome* caused by the pathogen *Phytophthora ramorum* is causing drastic changes in availability of potentially susceptible nursery stock by nurseries and landscape businesses. This clearly impacts the profitability of these businesses and choice by consumers and could devastate oak forests nationwide (Chornesky et al. 2005; Rizzo and Garbelotto 2003).

Annual harvests of oysters in Long Island Sound averaged over 680,000 bushels during 1991 through 1996. After *Haplosporidium nelsonii* (MSX) invaded in 1997 and 1998, oyster harvests decreased from 1997 through 2002 to an average annual harvest of 119,000 bushels with a low of 32,000 bushels in 2002. The wholesale value of oyster farming dropped 96% in 10 years from \$45 million in 1992 to \$2 million in 2002 (Sunila et al. 1999).

Non-native algae introduced into the Hawaiian Islands costs Maui alone about \$20,000,000 annually due to algae fouling of the beaches and subsequent lost tourism (Carroll 2004; Keeney 2004; University of Hawaii 2006).

Sea lampreys (*Petromyzon marinus*) were introduced into Lakes Ontario and Erie during the construction of the Welland Canal and quickly spread to the other Great Lakes. The *sea lamprey* is a parasite that attaches itself to fish, eventually killing them, and has devastated commercial and recreational Lake Trout fishing in the Great Lakes (Lawrie 1970).

The *Australian spotted jellyfish* (*Phyllorhiza punctata*) was introduced into the Gulf of Mexico in 2000 and occurred in such massive numbers that shrimping operations were shut down because jellyfish clogged shrimp nets (Graham et al. 2003).

Altered ecosystems and recreational opportunities. The submersed aquatic plant *hydrilla* (*Hydrilla verticillata*), forms dense canopies at the water surface that raise surface water temperatures, change pH, exclude light, and consume oxygen, resulting in native plant displacement and stunted sport fish populations. This example of an altered aquatic ecosystem caused by an invasive aquatic weed also negatively affects recreation and businesses that depend upon that human activity (Colle et al. 1987).

Avian vacuolar myelinopathy (AVM) is a neural disease of birds that has killed over 100 bald eagles (*Haliaeetus leucocephalus*) and thousands of American coots (*Fulica americana*). Recently, this disorder was associated with an uncharacterized neurotoxin produced by cyanobacteria that covered up to 95% of the leaf surfaces of hydrilla in reservoirs where the disease has killed birds. This species of cyanobacteria has not been found on hydrilla where the disease has not been reported. AVM was induced experimentally using naturally occurring blooms of cyanobacteria growing on hydrilla (Wilde et al. 2005).

Summary

Invasive species are those that are not native to the ecosystem under consideration and that cause or are likely to cause economic or environmental harm or harm to human, animal, or plant health. Plant and animal species under domestication or cultivation and under human control are not *invasive species*. Furthermore for policy purposes, to be considered invasive, the negative impacts caused by a non-native species will be deemed to outweigh the beneficial effects it provides. Finally, a non-native species might be considered invasive in one region but not in another. Whether or not a species is considered an *invasive species* depends largely on human values. By attempting to manage *invasive species*, we are affirming our economic and environmental values. Those non-native species judged to cause overall economic or environmental harm or harm to human health may be considered invasive, even if they yield some beneficial effects. Society struggles to determine the appropriate course of action in

such cases, but in a democratic society that struggle is essential.

Many *invasive species* are examples of “the tragedy of the commons,” or how actions that benefit one individual’s use of resources may negatively impact others and result in a significant overall increase in damage to the economy, the environment, or public health. In ISAC’s review of Executive Order 113112, the public domain is specifically represented; however, the implementation of the NISMP has prompted concerns over the rights of personal and private property owners. Property rights are of great importance in the U.S. and one outcome of the NISMP should be to recognize the right to self determination by property owners and promote collaboration on *invasive species* management. The right to self determination is an important concept in a democratic society; however, with that right comes personal responsibility and stewardship, which includes being environmentally responsible. The natural environment that our society enjoys, recreates in, and depends upon to support commerce must be conserved and maintained. Effective *invasive species* management is just one aspect of conserving and maintaining our nation’s natural environment, the economies it supports, and the high quality of life our society enjoys.

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