



LOUISIANA WILDLIFE FEDERATION

"... conserving our natural resources and your right to enjoy them since 1940."

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September 28, 2017

Mr. Robert Bourgeois
Office of Fisheries
Louisiana Department of Wildlife and Fisheries
P.O. Box 98000
Baton Rouge, LA 70898-9000

Re: Notice of Intent: Modify rules and regulations for approved Domestic Aquatic Organisms to include sterlet sturgeon (*Acipenser ruthenus*)

Dear Mr Bourgeois:

On behalf of Louisiana Wildlife Federation, thank you for the opportunity to submit written comments to follow up on oral comments I made at the Louisiana Wildlife and Fisheries Commission meeting on August 3, 2017. Louisiana Wildlife Federation (LWF) represents 25 affiliate organizations comprising more than 7,200 members and is dedicated to the conservation of Louisiana's wildlife and natural resources. As Louisiana's oldest conservation organization, LWF has been active for decades in ensuring the public is aware of and understands the wildlife management practices needed to help protect, preserve, and conserve our natural resources.

LWF is opposed to the introduction of a non-native species that could possibly be released in the wild where it can 1) endanger Louisiana's native sturgeon species through hybridization and competition and 2) join the list of non-native, invasive species thriving in Louisiana's wild natural habitat causing ecosystem imbalance and needing public funding for control or eradication methods.

LWF does not support approval of adding sterlet sturgeon (*Acipenser ruthenus*) to Louisiana's "Domesticated Aquatic Organism" list because it is not native to Louisiana or North America. Sterlet sturgeon is a small species of sturgeon native to areas of Europe and Asia. Sterlet sturgeon is banned in Canada. Louisiana's native sturgeon includes gulf sturgeon, which is federally listed as a threatened species, freshwater shovelnose sturgeon, and pallid sturgeon, which is federally listed as an endangered species and found in the Mississippi, Atchafalaya and Red rivers. The endangered pallid sturgeon is known to co-occur and hybridize with smaller and more abundant shovelnose sturgeon. If the sterlet sturgeon were to escape or be illegally introduced to the wild, it could have a negative effect on native populations.

The following is a partial list of the non-native flora and fauna found in Louisiana: giant salvinia, water hyacinth, hydrilla, nutria, feral hog, cichlid*, apple snail, zebra mussel, Asian carp, and Chinese tallow. Millions of dollars are spent annually in Louisiana to control these invasive species and their impact on native species, recreational enjoyment and/or ecological balance.

In some cases these species were legally permitted for home gardens or ponds. Other non-native species were likely brought here accidentally by ships and other modes of transportation.

Nutria and Asian carp are prime examples of how permitted farming or aquaculture was the original purpose of a non-native species being present in Louisiana and later, unintentionally released during a weather event, such as a flood. The recent failure of the aquaculture facility in Washington that released farmed Atlantic salmon into Puget Sound is fresh in our minds. Non-native species released among wild species is a serious concern for its potential economic and biologic costs to our state.

While we see in the Notice of Intent the numerous restrictions prescribed for a permit to be approved and appreciate the specificity and detail, it only takes one release in a 1,000 year flood event or other unusual act of nature. Similarly it only takes one employee taking home or releasing some of this species for it to become part of Louisiana's natural landscape.

One example to consider is that of the tilapia found in canals in Plaquemines Parish and subsequently eradicated by the Louisiana Department of Wildlife and Fisheries to prevent spread of non-native tilapia where it could outcompete native sport and commercial fisheries. Another example to consider from four years ago is the federally-prosecuted case of imported captive deer brought to Louisiana. A number of the deer imported were secretly and illegally transported into Mississippi. These are just a few examples of how non-native wildlife being managed commercially have escaped or been released by people.

These are too many examples of negative outcomes when introducing a non-native species for LWF to be assured that the benefits of introducing sterlet sturgeon for commercial aquaculture outweighs the potential costs to Louisiana's natural resources.

Sincerely,



Rebecca Triche
Executive Director

*corrected spelling of "cichlid" after letter was submitted for comment.