February 26, 2019

Chairman Barrasso and Ranking Member Carper

Senate Environment and Public Works Committee

410 Dirksen Senate Office Building
Washington, DC 20510

RE: Letter for the Record for the Hearing on “The Invasive Species Threat: Protecting Wildlife, Public Health, and Infrastructure”

Dear Chairman Barrasso and Ranking Member Carper:

On behalf of our millions of members and supporters, the signed organizations respectfully submit this letter for the record of the Committee’s February 13, 2019, hearing on, “The Invasive Species Threat: Protecting Wildlife, Public Health, and Infrastructure.”

Invasive species are a serious and growing threat to our environment and our economy. We concur with the hearing witnesses that more capacity is needed to monitor and address invasive species. We also strongly agree that more needs to be done to address anthropogenic climate change, which can facilitate the spreading of invasive species and perpetuate unnatural ecological disturbance.

We vehemently disagree, however, with one witness’s recommendation to roll back environmental review and categorically exclude certain invasive treatments from consideration under the National Environmental Policy Act (NEPA). Responses to invasive species inevitably come with risks and often have very serious side effects. Even when the invasive threat is well-established and fast-spreading, we have to ensure we have a safe, reliable solution that minimizes repercussions. NEPA plays this role. It requires federal agencies to look at the best available science, consider reasonable alternatives, and inform the public of a treatment’s potential impacts. In short, NEPA reviews are essential to a safe and effective invasive species program.

History is replete with examples of well-intentioned attempts to “fix” an invasive species problem that only made matters worse. One notorious example is the release of Mongooses in Hawaii in an effort to eradicate non-native and invasive rat populations. Not only did the diurnal mongoose not reduce the nocturnal rat population but the mongooses proceeded to prey on native birds and turtle eggs on Maui, Oahu. and Molokai. A more recent example, also from Hawaii, was the transplant of the cannibalistic rosy wolfsnail to address invasive African land snails. Unfortunately, native Hawaiian molluscs are now at a greater risk of extinction because of that invasive “treatment.” As many of the witnesses testified, using biological agents needs extensive consideration before application. NEPA reviews are an important part of that process.

The risk is not just with biological responses. The aerial application of pesticides, for example, can be effective in eliminating some invasive species but can also contaminate drinking water and crops. This risks the health and well-being of human and wildlife communities alike. It is why environmental review of the specific treatment in a specific location is so important.

Furthermore, invasive species problems often involve complicated interactions with native wildlife and human communities. One of the hearing witnesses described invasive viruses carried by native wildlife populations. This is a good example of how difficult it can be to isolate an invasive species without harming native species and native ecosystems. NEPA reviews help to ensure that these complications are addressed rather than ignored.

In addition to its safety net role, NEPA provides important information and insights. A NEPA review can help identify contributing factors to the spread of invasive species which in turn can be helpful for both current and future upstream management (i.e., treating the cause, not just the symptom). This was the case when NEPA review helped to establish that recreational vehicle use was contributing to the spread of invasive species thereby flagging the need to address management issues in addition to physical treatment. The NEPA alternative process can help assess different combinations of responses from mechanical to chemical to management changes that might produce the best outcome with the least unintended consequences for a specific location. In addition, NEPA is instrumental to the collaborative process that multiple witnesses credited with essential work across private, local, state and federal jurisdictions. NEPA provides the forum for public comment and it provides the information on impacts and alternatives that facilitate that collaboration.

We caution that rushed responses to invasive species can prove disastrous. At the hearing, Mr. Slade Franklin described the importance of taking early action to address invasive species, using the analogy of early treatment in cancer. Certainly, early action on invasive species is important. But speed is not the only consideration. Ensuring that the response is informed, effective, targeted and mitigated is even more important. Hurried, misguided responses may only multiply the problems that must be addressed.

Mr. Franklin’s subsequent suggestion that invasive treatments be categorically excluded from NEPA review, and that new herbicides be fast-tracked through approval review, is even more dangerous. To take his analogy of treating cancer, excluding a NEPA review for invasive species response would be akin to telling doctors that, in the name of expedience, they should not take the time to evaluate the size of the tumor or the relative health and condition of the patient before determining the dose or starting with chemotherapy treatment. Derailing NEPA reviews, and specifically their public information aspect, also would be akin to telling doctors to not discuss with the patient the fact that chemotherapy could endanger their lives by killing healthy tissue. NEPA helps to ensure that the application of a treatment is evaluated for a specific situation and location, that alternatives are considered and that communities are made aware of impacts.

Even actions potentially beneficial to the environment, wildlife, and people such as Habitat Conservation Plans under the Endangered Species Act are and should be benefitting from NEPA reviews. These reviews provide an essential safety check where these decisions are not easy and can come with large implications for communities and the environment.

While cutting NEPA is an unhelpful, even counterproductive, response to the need for early action on invasive species, Congress can and should improve funding for NEPA implementation so that the agencies have the staff and resources to get this important work done in a timely fashion.

In summation, we thank you for addressing the important issue of invasive species and encourage the committee and the Congress to provide for a robust invasive species program but also to ensure that it fully complies with essential environmental safeguards such as NEPA.

Thank you for your consideration.

Sincerely,

**Defenders of Wildlife**

**Others Here.**