

National Environmental Coalition on Invasive Species

National Wildlife Federation ♦ National Association of Exotic Pest Plant Councils

Natural Areas Association ♦ The Wildlife Society

www.necis.net

February 25, 2014

The Honorable Rob Bishop
123 Cannon Building
United States House of Representatives
Washington, DC 20515

Dear Representative Bishop:

The above-listed members of the National Environmental Coalition on Invasive Species have reviewed H.R. 3994, the “Federal Lands Invasive Species Control and Management Act” and wish to comment.

As organizations long-focused on reducing the impacts of invasive species in the United States, we support the underlying goal of the draft bill; that is, to improve the effectiveness and overall scope of on-the-ground invasive species management and control projects on Federal lands. Such projects are critical for stewarding Federal lands as well as neighboring lands. NECIS supports stronger on-the-ground control efforts on (and off) Federal lands. For instance, we support appropriations for the Noxious Weed Control and Eradication Act of 2004 (PL 108-412), which would provide funding to Cooperative Weed Management Areas across the country.

Although NECIS supports the underlying goal of the bill, we have two significant concerns about specific approaches included in the bill.

First, we are concerned that the mandatory percentage allocations for Federal expenditures in Section 4 are too restrictive and would have significant unintended consequences. On-the-ground control activities must be part of a comprehensive invasive species approach, integrated with other critical efforts such as prevention, mapping, early detection, research, and outreach. We do, however, support seeking reports from the Agriculture and Interior Departments and the Governmental Accountability Office (GAO) on how the agencies are spending their budgeted funds for invasive species, including the percent allocations for the different uses discussed in the draft in Section 4. This could be an important step toward seeing whether existing resources might be used more effectively to address on-the-ground control and management priorities.

Second, we oppose Sec. 5(c), which mandates Categorical Exclusions under the National Environmental Policy Act (NEPA). Such Categorical Exclusions should not be mandated by Congress. Rather, they should be considered by individual action agencies, but only if they comply with NEPA’s provisions on when Categorical Exclusions are appropriate. We do support

further analysis by the agencies of whether Categorical Exclusions are appropriate for the various situations listed in Section 5(c).

NECIS has outlined a number of needed reforms to the nation's approach to invasive species in a position paper, *Tackling the Challenge of Invasive Species: A Coordinated and Comprehensive National Response*, (www.necis.net/2013/11/tackling-the-challenge-of-invasive-species-a-coordinated-and-comprehensive-national-response/). The document lays out a comprehensive approach to addressing invasive species, identifies gaps and overlaps in agency responsibilities, illustrates the roles and importance of regulatory and resource management agencies and suggests performance metrics to measure the success of these important efforts. We stand ready to work with your office and others in crafting measures to address the critical challenge of invasive species.

For further information on the above comments, contact: Doug Johnson, Chair of the National Association of Exotic Pest Plant Councils, at (510) 843-2902 x302 or dwjohnson@cal-ipc.org.

National Wildlife Federation

Bruce Stein, Director, Climate Change Adaptation
(202) 797-6602, steinb@nwf.org

The Wildlife Society

Laura Bies, Director of Government Affairs
(301) 897-9770 x308, laura@wildlife.org

National Association of Exotic Pest Plant Councils

Doug Johnson, Chair
Executive Director, California Invasive Plant Council
(510) 843-3902 x302, dwjohnson@cal-ipc.org

Natural Areas Association

Ruark Cleary, NECIS Liaison
Invasion Biologist, Florida Fish & Wildlife Conservation Commission
Ruark.Cleary@MyFWC.com

cc: Honorable Doc Hastings, Chair, House Committee on Natural Resources
Honorable Peter DeFazio, Ranking Member, House Committee on Natural Resources
Honorable Mike Thompson, Co-Chair, Congressional Invasive Species Caucus
Honorable Dan Benishek, Co-Chair, Congressional Invasive Species Caucus