

Ms. Brenda Mallory  
Chair, Council on Environmental Quality  
Executive Office of the President  
730 Jackson Place NW  
Washington DC 20503

June 15, 2021

Dear Ms. Mallory:

The North American Invasive Species Management Association (NAISMA) is a network of professionals who implement management programs to prevent the detrimental impacts of invasive species to North America's lands and waters. NAISMA and the partner organizations that are signatories to this letter urge you to promptly approve the Department of the Interior's request for a number of categorical exclusions under the National Environmental Policy Act for invasive species control.

NAISMA's mission is to support, promote, and empower invasive species prevention and management in North America. We have members and partners in all fifty states, as well as in Canada and Mexico. For twenty-eight years, NAISMA has been supporting invasive species managers and growing programs that bridge jurisdictional and geographic divides.

Invasive species create an estimated \$137 billion annual strain on the US economy, and have contributed to the need to list more than 42 percent of the organisms currently listed under the Endangered Species Act. As we have seen with COVID-19, invasive species can pose serious threats to human health.

The problem is a national one, with numerous local manifestations, from nutria degrading valuable wetlands from Delaware to California, to emerald ash borers threatening the fall foliage in West Virginia that attracts so many tourists each year. Eurasian watermilfoil and zebra or quagga mussels impair waterways and water infrastructure, while new variants of hydrilla plague the Connecticut River and water chestnut covers our riverbanks.

Invasive grasses and tree-killing pests also lead to greater and more severe wildfires across the West, introducing large quantities of greenhouse gases into the atmosphere and endangering human health, public safety, and infrastructure. As James Chapin observed in an Op Ed in the Washington Post on April 8, the warming associated with climate change is also allowing invasive species in Florida to not just spread East-West across the country, but to spread more easily northward. Control of invasive species must therefore be an essential part of the Biden Administration's climate change mitigation strategy if we are to truly protect America's ecosystems.

NAISMA requests that you promptly approve the Department of the Interior's request for a number of categorical exclusions under the National Environmental Policy Act for invasive species control. Interior has developed hundreds of pages of documentation that demonstrate a track record of no significant impact from these control activities. Without the ability to use categorical exclusions to promptly control invasive animals and plants, they will reproduce and spread, turning small, localized problems into geographically larger, more environmentally complex, and more expensive problems.

Thank you for your attention to this matter, so we can more effectively mitigate the effects of climate change and better protect America's ecosystems. Feel free to contact me with any questions at [bbergner@naisma.org](mailto:bbergner@naisma.org) or 414.215.0221.

Sincerely,



Belle Bergner, Executive Director  
North American Invasive Species Management Association

Ryan M. Wersal, President  
Aquatic Plant Management Society

Doug Johnson, Executive Director  
California Invasive Plant Council

John D. Byrd, Secretary  
Mississippi Vegetation Management Association

John Reynolds, Executive Director  
National Roadside Vegetation Management Association

Rick Otis, Executive Director  
Reducing the Risks of Invasive Species Coalition

Jasmine Reimer, Chair  
State Weed Coordinators Alliance

David Cornett, Executive Secretary  
Vegetation Management Association of Kentucky (VMAK)

Lee Van Wychen, Executive Director of Science Policy  
Northeastern Weed Science Society  
North Central Weed Science Society  
Southern Weed Science Society  
Weed Science Society of America

Sandra K McDonald, President  
Western Society of Weed Science

Larry Smith, President  
Wyoming Weed and Pest Council

cc: The Honorable Thomas R. Carper, Chairman, Senate Committee on Environment and Public Works

The Honorable Shelley Moore Capito, Ranking Member, Senate Committee on Environment and Public Works

The Honorable Raul M. Grijalva, Chairman, House Natural Resources Committee

The Honorable Bruce Westerman, Ranking Member, House Natural Resources Committee

The Honorable Deb Haaland, Secretary of the Interior

The Honorable Jaime Pinkham, Acting Assistant Secretary of the Army for Civil Works