

## National Environmental Coalition on Invasive Species

**California Invasive Plant Council, Defenders of Wildlife  
Natural Areas Association, National Wildlife Federation, The Nature Conservancy**

February 19, 2009

Nancy Sutley, Chair  
Council on Environmental Quality  
722 Jackson Place, NW  
Washington, DC 20503

Re: NEPA Guidance on invasive species

Dear Ms. Sutley:

The undersigned organizations are members of the National Environmental Coalition on Invasive Species (NECIS). Our mission is to improve Federal policy related to environmental, economic, and health threats posed by non-native invasive species of plants and animals. We are writing to express our eagerness to work with you in helping the Council on Environmental Quality (CEQ) to complete an important assignment that promises to advance progress on invasive species issues. President William J. Clinton's Executive Order (EO) 13112 of 1999 was a watershed event in creating a better Federal approach to the invasive species issue. It created the interagency National Invasive Species Council (NISC) and mandated the writing of the comprehensive 2001 National Invasive Species Management Plan.

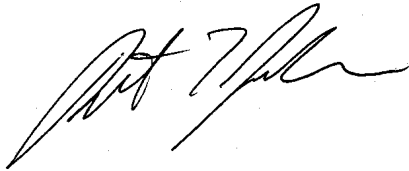
Both the EO (excerpted below) and the National Management Plan (excerpted below) called for NISC and CEQ to cooperate on developing a new formal NEPA Guidance document on how Federal agencies should address invasive species – with respect to both their prevention and control – in implementing NEPA. The 2001 National Management Plan, which all major Federal agencies involved committed to implementing, stated the Guidance was to be issued by August of 2001.

While a draft of this Guidance had been prepared by June of 2000 and plans to release the draft Guidance for public comment were announced by NISC in late 2003, to date no draft has been released.

We would like to meet with you and your staff to discuss the delay in implementing this important component of the Nation's invasive species strategy and how we might help you to expedite the process at this stage. We believe the Guidance can improve Federal agencies' efforts regarding invasive species – an issue now further complicated by climate change.

We would very much appreciate a meeting at your convenience to discuss this further. To arrange the meeting, please contact Peter Jenkins, whose information is listed below. We look forward to meeting with you soon.

Sincerely,

A handwritten signature in black ink, appearing to read 'Peter T. Jenkins', written in a cursive style.

Peter T. Jenkins, Director of International Conservation  
Defenders of Wildlife  
1130 17th St. NW  
Washington, DC 20036  
Tel: 202.772.0293; email: [pjenkins@defenders.org](mailto:pjenkins@defenders.org)

AND SIGNING FOR:

Doug Johnson, Executive Director  
California Invasive Plant Council

Corry Westbrook, Legislative Director  
National Wildlife Federation

Ruark L. Cleary, Board of Directors  
Natural Areas Association

Robert L. Bendick, Jr., Director, U.S. Government Relations  
The Nature Conservancy

CC: Lori Williams, Director, National Invasive Species Council  
Horst Greczmiel, Assistant Director for NEPA Oversight, CEQ

Attachment

**EXCERPTS**

**EO 13112: Section 4. Duties of the Invasive Species Council.**

*The Invasive Species Council shall provide national leadership regarding invasive species, and shall: ...*

*(d) develop, in consultation with the Council on Environmental Quality, guidance to Federal agencies pursuant to the National Environmental Policy Act on prevention and control of invasive species, including the procurement, use, and maintenance of native species as they affect invasive species;*

-----

**2001 National Invasive Species Management Plan:**

*National Environmental Policy Act Guidance - Federal agency decisions to undertake many Federal actions that affect or are affected by invasive species are usually preceded by the need to comply with the National Environmental Policy Act (NEPA). Under NEPA, Federal agencies, often in cooperation with State, local, and tribal governments, must analyze the environmental, economic and social affects of their proposed actions and alternatives to the proposed action. Through greater familiarity with the issue and available literature, such analyses can be utilized to identify more efficient and effective means of addressing invasive species issues in the course of undertaking numerous Federal actions.*

**Action Planned**

*12. By August 2001, the Council in cooperation with the President's Council on Environmental Quality (CEQ), will prepare and issue guidance to Federal agencies based on the National Environmental Policy Act (NEPA) for prevention and control of invasive species.*

-----

**2008 revision of National Invasive Species Management Plan**

**OBJECTIVE OC.4: ENHANCE POLICY AND IMPROVE REGULATORY PROCESSES ON INVASIVE SPECIES.**

**• Implementation Task OC.4.1:** *As required by EO 13112, prepare, in cooperation with the President's Council on Environmental Quality (CEQ), guidance to federal agencies to prevent and control invasive species that is fully compliant with the National Environmental Policy Act (NEPA).*

**Performance Element OC.4.1.1:** *Prepare draft NEPA guidance for CEQ consideration and finalize.*

**Leads:** *NISC Staff, CEQ*

**Participants:** *All NISC members*