



Testimony of Scott J. Cameron

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Committee on Oversight and Government Reform

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Madame Chairman, Ranking Member Lawrence, members of the subcommittee, my name is Scott Cameron. I am President of a non-profit organization called the Reduce Risks from Invasive Species Coalition, or RRISC. I appreciate the opportunity to testify today on opportunities to improve invasive species policy and programmatic implementation in the United States.

RRISC is a 501(c)(3) organization incorporated in 2014. Our mission is to educate the public on the risks posed by invasive species, and to promote cost-effective strategies to reduce those risks. We pride ourselves in being bipartisan, with a Distinguished Advisory Board comprised of former senior government officials from the Obama, Bush, Clinton, and Bush Administrations. I am pleased to say that since our inception we have had a close working relationship with the Congressional Invasive Species Caucus, co-chaired by Representatives Dan Benishek and Mike Thompson.

Scope of the Problem

Invasive species pose serious economic and environmental problems across the United States. They have been estimated to cost the American economy \$120 billion annually, and to have a \$1.4 trillion annual impact on the global economy. There are significant public health impacts from invasive species. For instance, invasive species like West Nile virus and fire ants put many Americans in the hospital every year, and in some cases the patients don't survive. Invasive species have singlehandedly caused 20% of all species extinctions since the 1600s, and at least contributed to the extinction of half of all species that we have lost. Indirectly, they cause increased regulatory burden on American society, since they are in whole or in part responsible for more than 40% of the species listings under the Endangered Species Act. For example, widespread distribution of invasive cheat grass was a key risk factor that almost led to the listing of the greater sage grouse across the West earlier this year. If your constituents are concerned about loss of biodiversity and species extinctions in the United States, then they should also be concerned about invasive species. If your constituents are frustrated by the regulatory burden imposed by the Endangered Species Act, then they should also be concerned about invasive species.

Having worked on invasive species issues as both a federal and state government employee for twenty-three years, and for another five years in the private and non-profit sectors, I would like to offer a number of recommendations on how institutional arrangements could be improved to yield better results in invasive species management for America.

Specific Policy Recommendations

The National Invasive Species Council, established by President Clinton through Executive Order 13112 in 1992, is only as effective as the level of interest displayed by the political appointees who oversee its small staff of career civil servants. While the Secretaries of Agriculture, Commerce and the Interior nominally co-chair the Council, the reality is that focused attention at the Assistant Secretary or even deputy assistant secretary level, would make for a much more effective Council. Unfortunately, that focused attention has been inconsistent in the last few years, and so the Council has drifted. Were Congress to **direct the National Invasive Species Council to present the Congress with a short annual work plan**, to include deadlines and intended outcomes of Council activities, it would help to focus political level attention on the Council's work.

Most invasive species problems are regional in nature, can only be solved at the regional level, and so it is not surprising that Governors tend to be the elected officials who are the most consistently engaged

in invasive species issues. The **National Invasive Species Council should therefore provide a forum for federal interagency communication and coordination with the regional governors associations** to establish what the invasive species priorities of the Governors might be on a regional basis, and what the federal government can do to support them from policy, budgetary, and research perspectives. For example, for the Western Governors, the priorities might be dealing with the cheat grass that almost led to the ESA listing of the greater sage grouse, and keeping zebra and quagga mussels out of Western rivers and reservoirs, and associated water supply and hydroelectric facilities. For the Great Lakes governors, the priorities might be keeping Asian carp out of the Great Lakes and targeting federal research to combat the emerald ash borer that is killing millions of trees in Midwestern forests and urban neighborhoods.

While the best way to deal with invasive species is to keep them out of the country in the first place, implementing a foolproof regulatory regime to achieve that end that would be too expensive and too draconian to be politically acceptable. As a result, we need to adopt a more practical and cost-efficient strategy, a defense in depth. Therefore, strong efforts to protect our borders from illegal biological immigrants, invasive species, must be coupled with a robust national network for early detection and rapid response to address new invasions that do make it across the border. For instance, it is a lot easier and more cost-efficient to wipe out the first acre of kudzu in a state than to delay action until you are faced with a thousand acres, or ten million acres of that weed across an entire region. Accordingly, **the National Invasive Species Council should design a national network of regionally driven early detection and rapid response capabilities, whose regional priorities are established based on the advice of the Governors of the states in the same region.**

It is ultimately the federal agency Regional Directors, State Directors, Regional Foresters, Regional Administrators, and so on who oversee delivery of federal agency invasive species programs on the ground. More often than not, strong interagency coordination on policy and budget is required to achieve a successful result on the ground. For instance, if BLM and the Forest Service are not able to coordinate activities on adjacent land ownerships in Wyoming because their headquarters are taking an inconsistent approach to funding, then one agency cannot singlehandedly address the problem and so the effort will fail. **The National Invasive Species Council should provide a forum for federal agency Regional executives to more easily get the attention of both Departmental political leadership and the Office of Management and Budget in order to ensure a balanced mutual commitment at agency headquarters to facilitate interagency cooperation on the ground.**

The Council should provide a forum for ensuring and expediting interagency coordination at the headquarters level, so that time-sensitive decisions involving invasive species policy, regulatory approvals, or research are less likely to be caught up in bureaucratic red tape. Examples include facilitating Endangered Species Act section 7 consultation between USDA and EPA on new pesticides targeting invasive species, working with the Council on Environmental Quality to streamline environmental compliance for agency on-the-ground invasive species control actions, and achieving a coordinated interagency biocontrol research agenda that would effectively leverage the relative scientific research strengths of EPA, USGS, USDA, and NSF. One of the most conspicuous bureaucratic failures that could benefit from this type of attention is the US Fish and Wildlife Service's repeated inability to use its existing regulatory authority to take prompt action to list injurious species under the Lacey Act, and so prohibit them in international and interstate commerce. When members of Congress who are not typically fond of new federal regulation find themselves so exasperated with the Service's

regulatory delays to the point where they feel compelled to legislatively list species under the Lacey Act, then you know the agency's program is broken.

The United States does not necessarily have the world's best policies and programs for dealing with invasive species. In fact, countries like Australia, New Zealand, and South Africa have things to teach us in this regard. **The National Invasive Species Council should seek out and evaluate international best practices and the feasibility of adopting them in the United States.** The Council should develop issue papers that lay out legislative, regulatory, and policy options for the United States government to consider as tools to improve our own programs.

One of the crucial capacities that is necessary in invasive species management is the ability to identify an unfamiliar organism when it is first encountered in a country where it has not been seen before. This requires access to trained taxonomists. Since newly encountered species are often unfamiliar to scientists in the newly invaded country, one needs an international network of taxonomists to help with identification and risk assessment. **The National Invasive Species Council should facilitate international communication among taxonomists, and encourage our own National Science Foundation to support a sufficient pipeline of new American taxonomists so we are in a position to interact effectively with taxonomists overseas, and catch new high risk introductions of foreign species before they get out of hand.**

The Council has responsibility for producing and periodically revising the National Invasive Species Management Plan. **Such a plan should be under 50 pages in length so it is likely to actually be read and used. It should clearly articulate goals, priorities, strategies, definitions of success associated with those goals, and performance metrics so Congress and the public can assess whether progress is being made over time.** Most of all, the revised plan needs to be made available for public comment, not developed in a vacuum by the Council staff. Given the critical role of state and local governments, private landowners, and non-profit volunteer organizations in all collectively dealing with invasive species, the plan would benefit greatly from their input. In particular, **the Invasive Species Advisory Committee, a broad group of stakeholders convened to advise the Secretary of the Interior under the auspices of the Federal Advisory Committee Act, needs to have ample opportunity to help shape and review the draft National Invasive Species Management Plan.**

Looking Toward the 2019 Farm Bill

With the encouragement of USDA, the Reduce Risks from Invasive Species Coalition recently announced our intention to convene a broad group of stakeholders to prepare to systematically and comprehensively incorporate invasive species issues in the 2019 Farm Bill. To advance this agenda, we will convene industry, professional associations, non-profit groups, environmental groups, and state and local governments, and other interested parties early in 2016 so that we will have a package of proposals to present to the next President and the House and Senate Agriculture Committees in 2017.

Unintended Consequences

It is worth noting that sometimes in the past state or federal natural resource agencies have deliberately introduced new species into areas of the country where those species were not native, in order to accomplish some otherwise legitimate policy objective, such as erosion control or creating a new sport fishery. Sometimes those introductions turn out to be benign, as was the case of introducing Pacific

salmon in the Great Lakes. In other cases, such as the kudzu vine in South, or the tamarisk shrub in the West, the introduction backfires badly, as the introduced species turns invasive, causing economic or ecological damage. Sometimes the introduced species even ends up complicating state and federal efforts to recover endangered species.

An example of the latter is the stocking a number of years ago by the State of California of striped bass in the San Francisco Bay Delta. Striped bass are native to the east coast of the United States, where they are a great sport fish. Here in the Chesapeake Bay region they are called rockfish. Over the years, striped bass have done well in the San Francisco Bay Delta, creating a great sport fishery. Unfortunately they also like to eat young California salmon and Delta smelt, which are listed under the federal Endangered Species Act. Enormous effort at great cost is being expended by the State of California, federal agencies, and local governments to recover those salmon and the Delta smelt. In order to comply with the Endangered Species Act and try to protect the smelt, farmers in California's Central Valley are being deprived of the irrigation water they desperately need to survive, resulting in high unemployment, and lost income and farm production. In addition, the constraints of the ESA on water moving through the Bay Delta mean that the water supply of Los Angeles and San Diego is less secure, due to striped bass predation on the endangered fish in the Bay Delta. I am sure introducing those East Coast striped bass to California seemed like a great idea at the time, but it turns out there were serious unintended consequences for the farmers of the Central Valley, the drought-stricken residents of southern California, and the endangered fish. Attached to my testimony is a fact sheet on this particular issue.

There is Reason to Be Optimistic

While invasive species problems are numerous and serious, the situation is by no means hopeless. There are numerous success stories, from controlling sea lampreys in the Great Lakes and so saving that prized fishery, to Nebraska's great success in reducing its acreage of noxious weeds by 75%. Targeted research on biocontrols, better intergovernmental coordination, strategically chosen new budgetary investments, and streamlined federal bureaucratic processes are all part of a larger solution.

In closing, I commend the Committee for holding this hearing. Invasive species pose real and present ecological, economic, and human health threats to the United States. If this Committee and the Congress more generally could give this issue greater attention, it would go a long way to mitigating those threats.

When is a Sportfish an Invasive Species?

When it eats an endangered species



Striped Bass

The striped bass (*Morone saxatilis*) is a prized gamefish native to the Atlantic coast and Gulf of Mexico. It can reach five feet in length, exceed one hundred pounds in weight, and is excellent eating. Unfortunately, its voracious appetite, which is a boon to anglers, may be indirectly causing problems for many Californians, and so positions it as an invasive species in that state.

In 1879, about 100 juvenile striped bass were transported from their home in New Jersey to California's San Francisco Bay Delta estuary at the instigation of the California fish and game agency. Over a period of years, there were other introductions of stripers into California waters, including by the predecessor agency of what is now the US Fish and Wildlife Service.

Ironically, this is the same Fish and Wildlife Service that in 1973 came to administer the Endangered Species Act (ESA). A small fish called the Delta smelt, native to the same San Francisco Bay Delta where state and federal agencies introduced the striped bass, was listed as Threatened under the ESA in 1993, and also listed as endangered under California's own state endangered species law. Unfortunately, Delta smelt are just the right size to make a good meal for a striped bass. Endangered salmon runs also have to run the striped bass gauntlet as their young try to make it to the ocean without ending up in a striped bass' stomach.

While the Delta smelt and young salmon are certainly not the exclusive diet of striped bass in the San Francisco Bay Delta, the striped bass' healthy appetite is no doubt helping to suppress the recovery of both endangered fish. The socioeconomic implications for California water users and farmers are significant. The federal government has reduced water deliveries from the Bay Delta to farmers in California's fertile Central Valley in an effort to leave more water in

the San Francisco Bay Delta to help the delta smelt and salmon. Water deliveries to urban water users in Southern California have also been affected by this federal regulatory activity.

While the striped bass is a game fish, it is also an invasive species in California since its predatory behavior fits the definition under the Clinton era Executive Order 13112, which



Delta Smelt

defines an invasive species as “an alien species whose introduction does or is likely to cause economic or environmental harm or harm to human health”. By eating endangered Delta smelt and young salmon, the striped bass is causing direct environmental harm and indirectly causing economic harm to agriculture and water users in California.

The striped bass in California is just one of many examples of government inadvertently introducing invasive species. Well-known plagues like kudzu and tamarisk were also introduced to the United States by well-intentioned government agencies trying to solve a problem, but ended up creating problems that proved much more significant than those they hoped to solve.

Fortunately, there are obvious tools to suppress the bass population in favor of the Delta smelt and salmon. Eliminating catch and size limits would go a long way to reduce the bass population. The question is, will the state of California favor the endangered Delta smelt and the water users affected by it, or the anglers who enjoy catching the striped bass?