STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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May 5, 2010

Dear Reviewers and Interested Parties:

The Washington State Department of Ecology (Ecology) Water Quality Program completed a Draft *Non-Project Environmental Impact Statement* (DEIS) *for Aquatic Invasive Species Control*. Ecology developed this DEIS to accompany and provide supporting documentation for the *Aquatic Invasive Species Management General National Pollutant Discharge Elimination System Permit* (NPDES permit) and *Fact Sheet*. This DEIS covers the management of nonnative invasive marine and freshwater animals, and nonnative, invasive marine algae.

Invasive species cause economic or environmental harm and are capable of spreading to new areas of the state. They also threaten the diversity or abundance of native species, the ecological stability of infested waters, or commercial, agricultural, or recreational activities dependent on such waters. Aquatic invasive animals include zebra and quagga mussels, Asian carp, rusty crayfish, New Zealand mud snails, green crabs, sea squirts (tunicates), and many others. *Caulerpa taxifolia* (killer algae) and *Sargassum muticum* (Japanese wireweed) are examples of invasive marine algae.

Washington has an abundance of surface water resources including approximately 7,800 lakes, ponds, and reservoirs, 40,492 miles of rivers and streams, 2,337 miles of saltwater shorelines, and many acres of associated wetlands. Washingtonians depend on these abundant water resources for many uses. Invasive species often degrade aquatic systems to such a degree that it is desirable to eradicate or aggressively manage their populations to protect and maintain the beneficial uses of the affected water bodies. Therefore, Washington must make the prevention, eradication, and control of these species high priority.

The proposed Aquatic Invasive Species NPDES permit for Washington State, being developed in conjunction with this DEIS, will help limit the spread and reduce the impacts of these species by allowing for their management with chemical control technologies. The permit also allows for rapid emergency response for early invasions of these organisms. Ecology determined that invasive aquatic species management by chemical treatment may have significant adverse environmental impacts, and that an EIS was necessary. The preparation of this DEIS is a non-project proposal under SEPA rules.

This DEIS analyzes five reasonable alternatives for aquatic invasive species management, the probable significant adverse and beneficial environmental impacts of these alternatives, and their relation to existing policies, rules, and regulations. The alternatives evaluated are:

1. The use of an integrated pest management approach that incorporates adaptive management principles.
2. The "no action" alternative – continuing current practices.
3. The use of physical removal/mechanical methods only.
4. The use of biological methods only.
5. The use of chemical methods only (the proposed action).

The recommended alternative is an integrated approach that uses the most effective and environmentally protective mix of management methods and includes adaptive management elements.

The DEIS is limited in part by lack of scientific or anecdotal information on aquatic invasive animal control methods and their impacts.

Thank you for your participation in this important issue. The waters of the state are vital to all of us and we appreciate your participation in their protection.

If you have any questions, please contact Kathy Hamel at 360-407-6562, or by email kham461@ecy.wa.gov.

Sincerely,

Kelly Susewind, P.E., P.G.
Water Quality Program Manager