



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

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Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia, WA

March 15, 2023

Richard Spinrad
Administrator
National Oceanic and Atmospheric Administration
14th Street and Constitution Avenue, NW
Washington, DC 20230

Dear Administrator Spinrad:

We are writing to you requesting National Oceanic and Atmospheric Administration's (NOAA) reinstatement of its Office of Aquatic Invasive Species to help our state battle a rapidly increasing invasion of non-native European green crab. We appreciate your consideration of this request.

The European green crab is a globally damaging invasive species that is able to survive in a wide range of water temperatures and salinities and has become established in many temperate coastal zones in areas around the world. If they become permanently established in the coastal waters of Washington State, it is likely that European green crabs will harm endangered species and impact resources that are part of the cultural identity of the tribes and native peoples and affect small businesses and low-income communities. They will become predators to shellfish and juvenile Dungeness crab, destroy critical habitat such as eelgrass beds and estuarine marshes, disrupt natural food webs, harm overall crab populations, hinder salmon and Southern Resident killer whale recovery efforts, reduce shorebird food supplies, and ultimately affect the overall health and resiliency of the Salish Sea.

In recognition of the threats posed by the European green crab, Washington State Governor Jay Inslee on January 19, 2022, issued Emergency Proclamation 22-02 citing that the European green crab infestation poses an imminent danger to Washington State's marine environment, marine-based economy, and the cultural well-being of both tribes and non-tribal residents. The state legislature further acknowledged their threat by committing ongoing funding to the Washington Department of Fish and Wildlife to help implement eradication and control measures on European green crabs through coordination and grants with partner organizations.

The invasion of European green crab cannot be abated without a partnership between the State, Tribes, and federal agencies. Multiple federal agencies have played a significant role in supporting Washington State and the Tribes in European green crab's prevention, management, and data coordination. While NOAA has been a participant in the forums and processes, we hope that it will serve in a more prominent role as marine invasive species are within its jurisdiction. We believe that NOAA should reestablish its Office of Invasive Species as an important step forward toward enabling the agency to take action and make targeted investments when disasters

like the European green crab invasion occur. Doing so will align and uphold NOAA's mission is "to conserve and manage coastal and marine ecosystems and resources".

Thank you for your consideration of our request and continuing NOAA's partnership on this critical issue.

Sincerely,



Kelly Susewind
Director



Senator Kevin Van De Wage
Chair of the Senate Agriculture, Water, Natural Resources & Parks
Committee 24th District of Washington State



Representative Mike Chapman
Chair of the House Agriculture & Natural Resources Committee
24th District of Washington State



Leonard Forsman
Chairman of Suquamish Tribe



Eric White
Chairman Stillaguamish Tribe of Indians



Megan Duffy, Director
Washington State Recreation and Conservation Office



W. Ron Allen, Tribal Council Chairman
Jamestown S'Klallam Tribe



Guy Capoeiman, President
Quinault Indian Nation



Laura Blackmore, Executive Director
Puget Sound Partnership



Laura Watson, Director
Washington State Department of Ecology



Derek I. Sandison, Director
Washington State Department of Agriculture



Thomas D. Wooten Tribal
Chairman Samish Indian Nation



Timothy J. Greene, Sr.
Chairman, Makah Tribal Council



March 2, 2023

Senator Patty Murray
Senator Maria Cantwell
Richard Spinrad, NOAA

RE: Support for WDFW request for enhanced federal European Green Crab funding

The Lummi Nation is writing in support of the Washington Department of Fish and Wildlife's request for federal funding to maintain and expand the states and Tribe's battle with the highly invasive European green crab (EGC). The region wide effort supports our goal of protecting and preserving "Our Schelangen", the Lummi Nations traditional way of life, the tidelands, and fisheries. It further ensures efforts to enhance the habitats within our treaty protected Usually and Accustomed (UA) fishing territory. The funding is essential to improving statewide trapping efficiencies, coordination development, and education in local communities.

The Lummi Nation works diligently and effectively with WDFW, in a large-scale response, to contain and capture a high number of EGC. Together more than 2,490 EGC were captured and removed from Lummi Bay, primarily from the Lummi Sea Pond (LSP) between April and November 2020. In 2021, during the same time frame, Lummi Natural Resource staff in collaboration with WDFW, captured and removed more than 70,000 EGC from the LSP, including several mating pairs and gravid females. The number of EGC captured in the LSP in 2021 far exceeded the all-time number of EGC captured in all other areas of Washington State. The exponential growth of EGC captured in the LSP, and the presence of mating pairs, indicated a significant and immediate threat to the nearshore habitats of Lummi Bay, the Lummi Reservation and the greater Salish Sea, and to the treaty-reserved right to harvest fish and shellfish. In response, on November 23, 2021, the Lummi Indian Business Council Declared an EGC Environmental Disaster.

The invasive EGC is an aggressive predator and a highly adaptable shore crab, it has been implicated in the rapid decline of the east coast's shellfish industry within the past decade and now is a direct threat to Lummi tidelands and UA. The voracious EGC consumes 40 juvenile shellfish a day before they ever have a chance to reach harvestable age. The invasive species is also known to wreak havoc in nearshore marine and estuarine ecosystems, critically important nursery habitat for juvenile salmon, Dungeness crab, and other species essential to Lummi

fishers by burrowing into marsh banks and uprooting eelgrass beds, in nearshore areas where the species co-exist.

Lummi Natural Resources Aquatic Invasive Species division (AIS) is working closely with the Lummi Fisheries and Natural Resources Commission, the Lummi Indian Business Council, WDFW, and WSG to explore additional ways to rapidly reduce and contain EGC in the LSP. In 2022 the Lummi Reservation was the only place in Washington to achieve holding the EGC to a similar number caught the year prior. Engineers are performing a multi-step hydrologic assessment to assess physical hydrodynamics and water quality within the LSP for green crab mitigation potential. Additionally, AIS is preparing multiple studies to answer questions leading to the long-term management of EGC to be fully prepared for this year's trapping season.

The aggressive approach we are taking with WDFW and other agencies, in removing EGC will keep the level of population from rising, in our traditional fishing U/A and surrounding areas. Lummi Nation supports all agencies and tribes' efforts towards capturing EGC Invasive species to keep them out of all waters. Maintaining financial support for this work is vital. So, we will be requesting the funding allocation in the equitable amount that Lummi has received in the prior years.

Sincerely,



Anthony Hillaire, Chair
Lummi Indian Business Council