



TEXAS INVASIVE PLANT & PEST COUNCIL

FOUNDED 2007

AFFILIATED WITH THE NATIONAL ASSOCIATION OF EXOTIC PEST PLANT COUNCILS

October 5, 2009

Secretary Tom Vilsack
U.S. Department of Agriculture
1400 Independence Ave., SW
Washington, DC 20250

4801 La Crosse Ave.
Austin, Texas 78739-1702
www.texasinvasives.org

2009 Board Of Directors

Damon Waitt, President
Lady Bird Johnson Wildflower
Center

James Bergan, President-Elect
The Nature Conservancy

Scott Walker, Secretary
Malcolm Pirnie Inc.

Marilyn Good, Treasurer
Texas Nursery & Landscape
Association, Ret.

Earl Chilton
Texas Parks and Wildlife Dept.

Forrest Smith
Caesar Kleberg Wildlife Research
Institute

R. Deborah Overath
Texas A&M-Corpus Christi

Susan Bagget
USDA-NRCS

Trey Wyatt
Emerald Garden

Alexander Mathes
Malcolm Pirnie Inc.

David Todd
Wray-Todd Ranch

Chris Best
U.S. Fish & Wildlife Service

Tom Philipps
U.S. Forest Service

Jim Houser
Texas Forest Service

[Affiliations for identification only]

RE: Strengthening APHIS Q-37 screening of plant imports to limit introduction of futures invasive plants

Secretary Vilsack,

On behalf of the Texas Invasive Plant & Pest Council, I am writing to express our support for stronger screening of plant imports to limit introduction of future invasive plants and plant pests to the United States. Here in Texas we spend significant financial and human resources controlling invasive plants such as Chinese tallow (*Triadica sebifera*), giant cane (*Arundo donax*) and tamarisk (*Tamarix* spp.) as well as introduced plant pests.

Invasive plants and plant pests pose a serious threat to Texas natural areas, agriculture, horticulture, and managed landscapes. Invasive plants and plant pests greatly degrade wildlife habitat and damage ecosystem services like flood and fire protection, water supply, and outdoor recreation. In addition, many diminish crop, range and forest productivity and some exacerbate public health issues. These invasive plants and plant pests threaten our country's natural resources and future security.

The intentional introduction of plants for agronomic and horticultural purposes is a major pathway for introduction of plants and plant pests from abroad. Agencies at the local, state and federal level expend millions of dollars each year to control invasive plants and plant pests, yet more species are introduced every day with very little regulatory oversight. Other nations, most notably Australia, have adopted a more conservative approach based on straightforward screening analyses developed to protect the environment without unduly limiting trade. It is time for the U.S.D.A. to implement a screening system to protect our country's natural heritage.

APHIS recently published draft guidelines for revising the "Q-37" protocol, presenting a unique opportunity to establish a federal screening system that will help protect the country from future introductions of invasive plants and plant pests. Creating the "not authorized pending pest risk assessment" (NAPPRA) category is an important and useful step, and should be implemented promptly. As an organization working to stop the spread of invasive plants, we urge you to make Q-37 reform a top priority for immediate action.

Sincerely,

Damon Waitt (dwaitt@wildflower.org)
President, Texas Invasive Plant & Pest Council

cc: Cindy Smith, Administrator, USDA APHIS
Rebecca Bech, Deputy Administrator, USDA APHIS PPQ