



*The mission of the Florida Native Plant Society is to promote the preservation, conservation, and restoration of the native plants and native plant communities of Florida.*

August 28, 2008

The Honorable Edward T. Schafer  
Secretary of Agriculture  
United States Department of Agriculture  
1400 Independence Avenue, Southwest  
Washington, D.C. 20250

Dear Secretary Schafer:

Please allow me to preface my request for your assistance with a distressing story. Floridians are currently watching the redbay, one of our native species of bay trees, wither and die as it succumbs to laurel wilt. This is the latest in a long series of devastating attacks launched upon the native flora of the United States by an insidious and nearly invisible enemy. In this instance, the enemy is an invasive, non-native beetle that is rapidly spreading a non-native plant disease. The redbay is susceptible to the disease and, thus far, there is no evidence of natural resistance. We are virtually powerless to halt the spread of this disease and can do little but hope the redbay is not driven to extinction.

On behalf of the 3,000 members of the Florida Native Plant Society, I ask that you take immediate action to expedite rulemaking that would revise the regulations governing the importation of plants to the United States. Plant importation is the primary pathway for the introduction of invasive non-native insects and plant diseases. The USDA's Animal and Plant Health Inspection Service (APHIS) began revisions to 7 CFR, part 319 section 37 (the Q-37 regulations) several years ago; however, there has been no discernable progress since the Advance Notice of Proposed Rulemaking was published in 2004. Unfortunately, as the USDA's rulemaking has languished, the rate of invasion by destructive insects and diseases continues unabated and has actually increased dramatically in recent years.

To facilitate the Q-37 rulemaking, a working group drawn from the Continental Dialogue on Non-Native Forest Insects and Diseases has developed a set of consensus recommendations to address the risks posed by non-native insect pests and diseases. The membership of the working group includes representatives of the environmental community, academia, the forest products and nursery industries, and state agencies. Their initial recommendations were submitted to Under Secretary Bruce Knight and APHIS Administrator Cindy Smith in 2007 and were received with apparent interest. Yet there continues to be little evidence of progress in the adoption of aggressive regulations that would halt the importation of these destructive pests and diseases.

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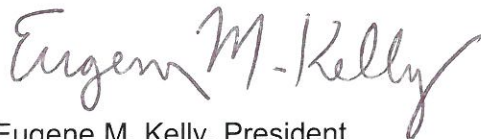
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The history of invasions by non-native insects and plant diseases is a sad one that does not bode well for Florida's redbay. It remains to be determined if the commercially valuable avocado, which is a species closely related to the redbay, will also be susceptible to laurel wilt. The decimation of the American Chestnut and American Elm in the first half of the 20<sup>th</sup> Century changed the face of our forests forever. Rapidly expanding zones of dead Balsam Fir and Eastern Hemlock now define the ridgelines of our eastern mountains, including the beloved Blue Ridge, and hint of a future landscape we will not even recognize. It is difficult to contemplate the devastation that may result from Sudden Oak Death.

The environmental, economic and cultural costs of invasions by non-native insects and plant diseases are too great to ignore. Please take immediate action to expedite the Q-37 revisions, consistent with the consensus recommendations of the Continental Dialogue on Non-Native Forest Insects and Diseases.

Thank you for considering the concerns of the Florida Native Plant Society. We stand ready to assist you in this important effort in any way possible.

Sincerely,

A handwritten signature in cursive script that reads "Eugene M. Kelly". The signature is written in dark ink and is positioned above the typed name.

Eugene M. Kelly, President  
Florida Native Plant Society

pc: Charles Bronson, Commissioner, Florida Department of Agriculture and  
Consumer Services