



## Florida EPPC

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October 20, 2009

Docket No. APHIS-2006-0011  
Regulatory Analysis and Development, PPD, APHIS  
Station 3A-03.8  
4700 River Road Unit 118  
Riverdale, MD 20737-1238

To Whom It May Concern:

The Florida Exotic Pest Plant Council (FLEPPC) appreciates the opportunity to comment on the revisions to the regulations in 7 CFR revision of USDA's "Q-37" regulations.

FLEPPC is a not-for-profit organization of professional land managers, researchers, consultants, and others who share the objective to support the recognition and management of invasive exotic plants in Florida's natural areas by providing a forum for the exchange of scientific, educational, and technical information. Roughly one third of Florida's flora is non-native, resulting in substantial ecological and economic costs. Our membership represents the state's experts in understanding and addressing the difficulties and expense of control of invaders as they spread into natural areas.

The main pathway for introduction of invasive plants from abroad remains purposeful importation, mostly for horticultural use. Agencies at the local, state (over \$100 million/year in Florida) and federal level expend millions of dollars each year to control invasive plants, yet more plant species are introduced every day with very little regulatory oversight. FLEPPC, like many others, supports the use of a "screening" system to prevent the unwanted entry of an invasive non-native plant into the United States. As has been well documented, preventing the entry of invasive plants is considerably less costly than controlling invasive species once established.

We believe that the proposed revisions to the USDA's "Q-37" regulations are a positive step towards the goal of preventing unwanted entry of invasive plants, specifically USDA's proposal for the creation of a new category called "not authorized pending pest risk analysis," or NAPPRA. FLEPPC supports the creation of the NAPPRA category and provides the following additional recommendations:

- Plants that have been and are intended for screening for inclusion under the NAPPRA category should be made available, with outcomes and a timetable for completion of screening evaluations.
- The revisions should create the establishment of a procedure for the public to request evaluation of additional plants for NAPPRA.

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- During the 60-day public comment period, importation of any taxon considered under NAPPRA should be prohibited until a final decision to list or not list is published.
- All screening evaluations should be made available to the public. This will allow other organizations to benefit from using them in their own strategic planning, and allow others to contribute additional relevant information for evaluation.
- Plants considered for addition to the NAPPRA category should include not only species that are not yet present in the U.S., but also risky plants that are already here. This may necessitate an assessment of each plant's economic importance, but continued import or use of such plants can pose a significant threat to our biosecurity and should be evaluated. Increased interest in bioenergy crops only strengthens the need for this change.
- As we have examples in the U.S. of both invasive red and brown macroalgae and colonial microalgae, all should be included under the definition of "regulated plant"
- Clarification needed between the new "not authorized for importation pending pest risk analysis" (NAPPRA) program and the naming of federal noxious weeds under the Plant Protection Act needs to be clarified.

The proposed revisions to the "Q-37" regulations are an important first step towards protecting our Country's natural resources. FLEPPC supports the USDA's attempt to strengthen the "Q-37" regulations and we urge USDA to make this revision towards a preemptive screening process a top priority. In the long-term, we believe that all new species imported to the U.S. should undergo a screening process rather than just the NAPPRA-listed species. As the vast majority of introduced species are not invasive, we believe this approach would safeguard our nation's resources with negligible economic impacts.

Sincerely,



Signed for,

Jim Burney  
Chair, Florida Exotic Pest Plant Council

cc: Tom Vilsack, Secretary, U.S. Department of Agriculture  
Cindy Smith, Administrator, USDA APHIS  
Rebecca Bech, Deputy Administrator, USDA APHIS PPQ  
Dr. Arnold Tschanz, PPQ, APHIS  
President Barack Obama  
Sen. Barbara Boxer, Chair, Senate Committee on Environment and Public Works  
Sen. Blanche Lincoln, Chair, Senate Committee on Agriculture, Nutrition and Forestry  
Sen. Herb Kohl, Chair, Senate Appropriations, Subcommittee on Agriculture  
Rep. Collin Peterson, Chair, House Committee on Agriculture  
Rep. Rosa L. DeLauro, Chair, House Appropriations Subcommittee on Agriculture  
Rep. Nick Rahall, Chair, House Committee on Natural Resources