



**Montana  
Native  
Plant  
Society**

*To observe - conserve - educate*

P.O. Box 8783 Missoula, MT 59807

6 October 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

Dear APHIS,

We are writing on behalf of approximately 600 members of the Montana Native Plant Society (MNPS). MNPS is an organization dedicated to preserving, conserving and studying the flora of Montana and educating the public on the values of the native flora and its habitats. MNPS appreciates this opportunity to comment on the proposal to strengthen the APHIS Q-37 screening of plant imports to prevent introduction of invasive species.

Invasive exotic plants pose a significant threat to Montana's native plant communities as well as causing losses to agriculture and tourism. Approximately half of the seriously invasive plants in Montana were intentionally introduced for horticultural purposes. These include leafy spurge, Dalmatian toadflax, tamarisk and Russian olive. Many nurserymen and landscapers are aware of the problem and would like to avoid introducing invasive plants.

MNPS supports revision of the Q-37 protocols to include the "not authorized pending pest risk assessment" (NAPPRA) category. We believe that every potential introduction should undergo a thorough risk assessment before it is introduced for any reason. We urge you to adopt this revision promptly. Thank you for considering our comments.

Regards,

Dave Hanna, President

Peter Lesica, Conservation Chair