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Dr. Jeffrey Steiner  
USDA Agricultural Research Service  
Room 4-2290  
GWCC-BLTSVL  
5601 Sunnyside Ave.  
Beltsville, MD, 20705-5140

Dear Dr. Steiner,

We are writing on behalf of many thousands of members of western native plant societies. We are dedicated to conserving the native flora of western North America. We are concerned about the U.S. Department of Agriculture's continuing practice of promoting the introduction of non-native species into the native plant communities of the western United States.

**Tamarisks** (*Tamarix ramosissima* and *T. chinensis* and hybrids) were introduced into the U.S. as ornamentals but were not widely naturalized until after 1850 (Horton 1964). The USDA was cultivating these species in 1868 (Horton 1964) and presumably began distributing them for bank stabilization soon thereafter. Tamarisk was reported escaped and naturalized in Utah, Arizona and Texas in 1894, 1901, and 1902 respectively. These plants are now listed as noxious weeds throughout the west and hundreds of millions of dollars have been spent trying to control the plant in order to protect precious riparian habitat (reviewed in Hultine et al. 2010).

**Lehmann lovegrass** (*Eragrostis lehmanniana*) was introduced into Arizona by the USDA in the 1930's (Cable 1971). It was planted for erosion control after fire but frequently displaces native vegetation (Cable 1971, Peterson 2003). It has transformed the structure and function of large areas of semi-desert grasslands in southern Arizona (Anable et al. 1992).

Selections of **buffelgrass** (*Pennisetum ciliare*) were released by the NRCS James E. 'Bud' Smith Plant Materials Center in Texas in 1977. Buffelgrass grows densely and crowds out native plants of similar size. Competition for water can weaken and kill larger desert plants. Dense roots and ground shading prevent germination of seeds. It promotes larger fires in areas that are not historically fire-prone, resulting in the death of most native woody species (Tellman 2002). Buffelgrass is invasive and is listed as noxious in Arizona (USDA Plants Database).

**Annual fescue** (*Vulpia myuros*) is believed to have been introduced to California inadvertently in the 1700's and was selected and released for commercial use by the Lockeford Plant Materials Center in 1977 (USDA-NRCS 2012). Annual fescue has become naturalized throughout the western states and is considered aggressive (USDA-NRCS 2012) and invasive (Whitson 1996).

**Garrison creeping foxtail** (*Alopecurus arundinaceus*) was introduced to North Dakota as a pasture grass and was evaluated for planting at USDA plant materials centers in North Dakota and Montana and was released for commercial use in 1959 (USDA-SCS 1981). The plant escapes into native subirrigated meadows and riparian areas where it forms monocultures and is no longer considered desirable as a pasture grass (Lavin 2012).

**Canada bluegrass** (*Poa compressa*) was introduced into Canada circa 1792 (Majerus and Holzworth 2003). A selection of Canada bluegrass was released in 2003 by the NRCS Plant Materials Center at Bridger, Montana. The plant frequently escapes (Soreng 2007) and invades native rangeland and has formed persistent monocultures in some areas of Montana (P. Lesica observations).

**Forage kochia** (*Kochia prostrata*) was introduced into North America by USDA Forest Service and NRCS in 1966 and released in 1984 for use as forage and soil erosion control. The plant successfully competes with both weeds and desirable native plants and is capable of invading native rangelands. There is evidence that it may suppress native plant diversity both in areas where it is seeded and where it has invaded (Gray and Muir 2013).

We recognize that USDA has done good work in developing selections of native plants useful in restoration and that the above introductions were made with good intent. However, we are concerned with the introduction of exotic plants, many of which have had an adverse effect on native biological diversity. We urge USDA to take two steps to address these concerns. First, APHIS (USDA Animal Plant Health Inspection Service) requires ARS (USDA Agricultural Research Service) to do extensive testing of potential biocontrol insects or diseases to determine with relative certainty that they will not have an adverse effect on native or commercial plants and animals. Similar rigorous testing for adverse effects to native plant communities should be required before exotic plants are released for commercial use. Secondly and more importantly, we strongly urge USDA to develop and release native rather than exotic species for restoration purposes.

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Regards,

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