



Native Plant Society of New Mexico
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Dr. Jeffrey J. Steiner
USDA Agricultural Research Service
Room 4-2290
GWCC-BLTSVL
5601 Sunnyside Ave.
Beltsville, MD, 20705-5140

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Dear Dr. Steiner,

I am writing on behalf of the 770 members of the Native Plant Society of New Mexico. We are a non-profit organization that educates the public about native plants by promoting knowledge of plant identification, habitat ecology, and native plant uses. We strive to foster plant conservation and the preservation of natural plant communities and habitats by supporting botanical research and encouraging the appropriate use of native plants to conserve water, land, and wildlife.

As a society of lay and professional people interested in the native flora, we are concerned about the growing numbers of non-native species that are present in the west and in New Mexico in particular. In 1915, at the time of the publication of the first *Flora of New Mexico* by Wootton and Standley, there were 136 alien or non-native plants in the state. As of 2000, there were some 390 non-native plant species present. (*The New Mexico Botanist*, Number 17, January 16, 2001.)

The current public debates about the effects of man's actions on our environment are critically important to our future health and well-being. Here in New Mexico, we are particularly concerned about the on-going drought we are experiencing, the extensive wildfires that continue to plague the southwest, and the loss of wetlands and their associated, often-rare species. Non-native species, both plant and animal, play a role in each of the challenges, as we know you are fully aware.

Examples of purposely introduced species that have gone on to produce unintended consequences include tamarisk (*Tamarix* spp.), Russian olive (*Eleagnus angustifolia*), lovegrasses (*Eragrostis* spp.) and the thistle-head weevil, (*Rhinocyllus conicus*). Tamarisk and Russian olive have become invasive and can lower water tables and displace desirable natives in riparian

areas. The presence of tamarisk in the Rio Grande and Pecos river systems and other riparian areas causes serious adverse effects on the federally endangered Rio Grande silvery minnow, and the Rio Grande cutthroat trout, as well on agriculture and international relations affected by the inability to deliver water.

The lovegrasses, introduced for erosion control, have become invasive, out-competing desirable natives, changing the structure of semi-desert grasslands and accumulating fine fuels that raise wildfire hazards.

The thistle-head weevil was introduced to control the invasive, non-native musk thistle. Through introductions and its ability to spread on its own, it now preys upon native thistles, including the federally threatened Sacramento Mountains thistle (*Cirsium vinaceum*) in New Mexico.

These and other species compete with native species and pose threats to the integrity of the ecosystems where they are present, be they wetlands and riparian areas, grassland, forest or desert systems.

We understand that the Agricultural Research Service and other agencies do extensive testing of exotic plant and animal species before they are introduced for various purposes, be they soil conservation, bio-control or agricultural development. The problem remains of the untestable, unknowable results that will arise when a species is introduced into an environment that contains none of its native competitors, herbivores/predators, diseases, habitat characteristics or climatic factors. Unfortunately, by the time these responses are understood, it may be too late to contain a species that proves to be invasive.

The Native Plant Society of New Mexico would like to go on record as recommending the use of native species for all purposes where introduced species might otherwise be used. We would encourage the identification and propagation of useful species at the Plant Material Centers, including the center in Los Lunas, New Mexico, as well as the development of conservation techniques to protect soil fertility and ecosystem integrity.

We are aware that policies of agencies such as the US Forest Service call for the use of non-genetically modified native species for erosion control and revegetation, particularly after wildfires. Native seeds are often not available for those agencies. We therefore ask that the USDA Agricultural Research Service encourage and support the commercial production of desirable native species.

We would also like to recommend that your agency continue to work with the Plant Conservation Alliance's Alien Plant and Restoration Working Groups and with the Federal Interagency Committee for the Management of Noxious and Exotic Weeds. Your assistance with their efforts to help states and interested organizations such as ours in dealing with the untoward effects of introduced species is appreciated.

Finally, please be aware that members of our society work conscientiously to educate ourselves

and the members of our communities about the problems created by introduced species and the native plants that represent valuable alternatives. Thank you for your consideration of our suggestions.

Sincerely,

Renee West

Renée West
President, Native Plant Society of New Mexico