

AMERICAN SEED TRADE ASSOCIATION

225 Reinekers Lane, Suite 650, Alexandria, VA 22314 Ph: 703-837-8140
Fax: 703-837-9365

August 24, 2006

Native Plant Materials Proposed Directive
Rangeland Management Staff
MAIL STOP 1103
Forest Service
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, DC 20250

BY EMAIL: nativeplant@fs.fed.us

BY FAX: 202.205.1096

Gentlemen/Ladies:

The American Seed Trade Association (ASTA) appreciates the opportunity to comment on the USDA Forest Service's Native Plant Policy. Founded in 1883, ASTA is one of the oldest trade organizations in the United States. Its membership consists of about 850 companies involved in seed production and distribution, plant breeding, and related industries in North America. Members of ASTA currently produce the majority of seed used by the Forest Service.

ASTA commends the Forest Service on their efforts to promote the use of appropriate plant materials on Forest Service projects. The proposed Native Plant policy is very similar to ASTA's position on the Use of Local Native Seed (see attached). However, ASTA believes there are some ambiguities with the proposed policy that can result in the misuse of native and non-native plant materials. We therefore respectfully

request that the Forest Service review these comments and consider incorporating into the final policy and implementation phase.

Definition of 'Native Plant' (Section 2070.5)

ASTA believes the Forest Service definition of 'native plant' is too restrictive. We understand and support the Forest Service policy of planting the most genetically appropriate plant material for a site. However, ASTA believes the selection of this material by the project manager can be better implemented by separating the definition of plants into three categories; local native plant material, non-local native plant material, and introduced plant material. This separation allows the project manager to choose native plants on either the population level (local native plant material), or the species level (non-local native plant material). We recommend the following definitions for those terms:

Page 2

ASTA Comment

August 23, 2006

Local Native Plant Material: Plant material that is the same species as plant material naturally occurring at the site and whose origin is from the region where it is being planted. It may be wildland-harvested, pre-varietal, or variety/cultivar plant material as long as the first generation of plant material came from the region where it is being planted.

Non-Local Native Plant Material: Plant material that is the same species as that occurring at the site but that does not originate from the region targeted for use.

Introduced Plant Material: Plant material whose species is not native to the region where it is being planted.

Incorporating these definitions into the policy will assist the project planner in understanding that non-local native plant material is *more* similar to local native plant material than it is to *introduced* plant material. Understanding this relationship will result in choosing plants of the same species, before considering the use of introduced plant materials.

Definition of 'Noxious Weeds' (Section 2070.5)

ASTA believes that the definition of 'noxious weeds' used in this proposal can be misleading to the project planner. ASTA believes the term 'noxious weed' should only be used when referring to species that are governed by Federal and State laws. ASTA believes that the term 'noxious weed' can be more easily understood and applied by incorporating the definition used in the Federal Seed Act. A plant is considered a 'noxious weed' if designated:

- by the law or rules and regulations of the State into which the seed is offered for transportation, or transported;
- by the law or rules and regulations of Puerto Rico, Guam, or the District of Columbia in which sold; or
- by the rules and regulations of the Secretary of Agriculture under this Act, when after investigation he shall determine that a weed is noxious in the United States or
in any specifically designated area thereof. **(Interstate Commerce provisions of the Federal Seed Act)**

Page 3
ASTA Comment
August 23, 2006

Responsibilities of the Chief (Section 2070.41.3)

ASTA encourages the Forest Service to include the seed industry when promoting cooperation and coordination for the development and supply of native and non-native plant materials.

Persistent vs. Non-persistent plant materials (Section 2070.3.2 and 2070.3.3)

Members of ASTA have found that Policy points 2070.2 and 2070.3 appear to contradict each other. ASTA believes differentiating between the intention of using persistent plant materials in Policy point 2070.2, and non-persistent plant materials in Policy point 2070.3 can eliminate this contradiction.

Again, we thank you for giving the American Seed Trade Association the opportunity to comment on this very important policy. If you have any questions or need further clarification, please call on us.

In closing, we want to extend our appreciation for the continued support and leadership of the Forest Service and are especially grateful to Larry Bryant, Jeanette Kaiser and Scott Lambert. Their participation at ASTA meetings and availability to discuss issues of mutual concern has been most helpful. We look forward to continuing building our relationship with the Forest Service.

Sincerely,

Andrew W. LaVigne
President/CEO

ASTA Position Statement
<http://www.amseed.org/newsDetail.asp?id=98>

August 23, 2006

Summary

Recommended changes proposed by the American Seed Trade Association

Note: Suggested changes are noted in italics

2070.2 Objectives

3. Promote revegetation of native ecosystems by the use of *local* native plant materials.

2070.3 Policy

1. Insure *local* native plant materials are given primary consideration.
2. Restrict use of *persistent non-local native and persistent non-invasive introduced plant materials* to only those situations when timely reestablishment of a
native plant community either through natural regeneration or with the use of native plant materials is not likely to occur.
6. Do not use Federally or state designated noxious weeds as *mandated by the laws, rules and regulations of the state or territory into which the material is to be planted.*

2070.41.3 Chief

3. Promotes cooperation and coordination between federal agencies, state, tribal and local governments, the *seed* and nursery industry, and the public for the
development and supply of native and non-native plant materials.

2070.5 Definitions

Local Native Plant Material: *Plant material that is the same species as plant material naturally occurring at the site and whose origin is from the region where it is being planted. It may be wildland-harvested, pre-varietal, or variety/cultivar plant material as long as the first generation of plant material came from the region where it is being planted.*

Non-Local Native Plant Material: Plant material that is the same species as that occurring at the site but that does not originate from the region targeted for use.

Introduced Plant Material: Plant material whose species is not native to the region where it is being planted.