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15 April 2013

Rebecca H. Bowen
Ecological Services
Bureau of Forestry
Department of Conservation and Natural Resources
P. O. Box 8552
Harrisburg, PA 17105-8552

Dear Ms. Bowen,

I am writing on behalf of the Western Pennsylvania Conservancy in support of the Proposed Rulemaking published in the *Pennsylvania Bulletin* [Pa. B. Doc. No. 13-452] regarding the management of the herbaceous wild plant: ginseng (*Panax quinquefolius*). Under 17 PA CODE CHAPTER 45, Conservation of Pennsylvania Native Wild Plants, the status of ginseng is officially listed as a "Pennsylvania Vulnerable" species. This designation is appropriate considering the harvesting pressure on this species as it relates to medicinal herb marketing, as takes place in the United States and due to international commerce. Pennsylvania ginseng roots are included in this commerce. If not adequately managed, the mass harvesting of ginseng roots presents a clear threat to the sustainability of ginseng populations in Pennsylvania.

A key aspect of the Department of Conservation and Natural Resources' (DCNR) ginseng management is to govern the appropriate harvest period for ginseng roots. In order to allow the completion of the reproduction cycle, and thus sustain wild populations, the dispersal of viable ginseng seed must take place as, or before, the plants are harvested for their roots. Presently, DCNR regulations allow for an August 1st commencement of the ginseng harvest season, which runs through November 30th each year. In recent years a general consensus has developed among the U.S. Fish and Wildlife Service (which also has management responsibilities under the Convention on International Trade in Endangered Species of Wild Fauna and Flora [CITES]), scientists and the ginseng industry, that beginning the harvest season on August 1st is not allowing ginseng plants enough time to ripen and/or disperse seeds. Therefore, there is now a general agreement that the harvest should commence a month later on September 1st, thus allowing plants to produce mature and viable seeds that will regenerate the population.

This proposed rulemaking is reasonable and is necessary for this Pennsylvania Vulnerable species to remain part of Pennsylvania's flora. WPC supports DCNR's effort to update the ginseng management program with this change.

Sincerely,

Charles W. Bier, Senior Director
Conservation Science