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Kathy Cooper

From: IRRC
Subject: FW: Proposed regulation update

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2018 JAN 10 P 3:37

From: Klemow, Kenneth [<mailto:kenneth.klemow@wilkes.edu>]
Sent: Saturday, December 23, 2017 10:30 PM
To: NR, Ch45WildPlant <RA-Ch45WildPlant@pa.gov>
Subject: Proposed regulation update

Dear Colleague,

I am writing to provide my full support for the PA Department of Conservation and Natural Resources (DCNR) proposal to change its Chapter 45 regulation: Conservation of Pennsylvania Native Wild Plant (regulations). These changes will affect the status of 130 vascular plants on its rare plant list.

The proposed changes are the result of careful deliberation by the Vascular Plants Technical Committee (VPTC), which meets twice a year. One of those meetings is the Rare Plant Forum, which is open to the public, and in which most of the changes are proposed and debated.

The VPTC, which I currently chair, has well-established, objective procedures for recommending changes in plant status - including decisions to add or remove plants to the rare plant list. The VPTC is populated by the Commonwealth's top botanists, who collectively have expertise over the range of species classified as vascular plants. Moreover, the committee has expertise in the areas of population biology, genetics, plant physiological ecology, and plant ecology - which is needed to help decide whether a particular species is in danger of extinction over the near or long term. On that basis, decisions made by the group are rendered using the best available science.

While members of the VPTC are committed to species conservation, they also understand the economic and personal implications of decisions to list various taxa. To that end, much of the group's discussion is aimed at conserving the truly rare species, and not conserving those species that are sufficiently common so as to warrant de-listing. As a case in point, of the 130 species under consideration, 9 are proposed for new classification, whereas 31 species are proposed to be de-listed.

Significantly, most (79) of the species under consideration are proposed because of changes in taxonomy. Thanks to advances in molecular genetics and other systematics approaches, the taxonomic status of some species has changed in the past decade or two. The changes proposed by DCNR recognizes those changes in taxonomy, which again highlights the scientific nature of the process.

In all, the changes in regulations proposed by the DCNR are very well thought out, and scientifically sound. They deserve to be approved by the Pennsylvania Legislature.

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