

December 22, 2017
To Whom It May Concern:
On behalf of the Board of Directors and membership of the Pennsylvania Native Plant Society I am writing to express our support of the DCNR and their efforts to protect plants as a critical part of our ecosystem. DCNR has used the best available science to update their plant protection list including data and recommendations from the Pennsylvania Biological Survey's (PABS) Vascular Plant Technical Committee (VPTC); comprised of professional botanists. DCNR also gathered input from a public forum of the VPTC-the Rare Plant Forum; attended by 50-80 amateur and professional botanists from across the state.

Their proposed status changes are based on recognized standards and methodology to assess plant conservation needs and have been extensively reviewed by botanical experts. We do not view this as an increase in regulation but as a fine-tuning, meant to increase efficiency and effectiveness. The proposed changes adjust the list to target protection towards the plants that need it most. With 9 plants added to the list and 31 plants removed, this proposal will reduce the permit review burden providing more resources for the protection of the target plants. This update will improve protection for biodiversity while enabling better, more accurate and efficient permit review.

By updating this list the DCNR is acting on its responsibility to classify wild plants as set forth in the Wild Resource Conservation Act. And as as trustee of public natural resources, it is acting to follow the directive of the Pennsylvania Constitution's Article 1, section 27: "the Commonwealth shall conserve and maintain public natural resources for the benefit of all the people."

If this list does not pass, we are concerned that important elements of Pennsylvania's biodiversity will not be receiving the protection they need.

Sincerely,
Jean Najjar, President
PA Native Plant Society


