

California Native Plant Society

North Coast Chapter
P.O. Box 1067
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December 29, 2009

Katy Coba, Director
Oregon Dept. of Agriculture
635 Capitol St. NE
Salem, Oregon 97301-2532
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Re: Proposed Amendment to the Oregon Noxious Weed Quarantine (603-052-1200) adding two "A" list species commonly known as yellowtuft (*Alyssum corsicum* and *A. murale*).

Dear Director Coba,

These comments are submitted on behalf of the California Native Plant Society (CNPS). CNPS is a statewide nonprofit organization of nearly 10,000 amateurs and professionals dedicated to the preservation of California's diverse flora. CNPS conducts a variety of conservation efforts focused on long-term protection and preservation of native flora in its natural habitat, and is the foremost non-governmental organization working to protect rare, threatened, and endangered plants and sensitive plant communities in California. The North Coast Chapter represents approximately 300 members in Del Norte, Humboldt, Trinity, and western Siskiyou Counties.

We strongly support the proposed addition of yellowtuft, *Alyssum corsicum* and *Alyssum murale*, to the state quarantine list. These two European species pose a serious threat to sensitive serpentine habitats in southwest Oregon and northwest California, thereby threatening dozens of rare, threatened, and endangered plant species. These species are of particular concern due to their natural ability to thrive on serpentine soils.

Yellowtuft has recently begun invading sensitive serpentine areas on public lands in Josephine County, along the California border. These two species were introduced several years ago with the intent of mining nickel by exploiting the plants' ability to hyperaccumulate naturally-occurring metals from the soil. These plants have escaped into the Wild and Scenic Illinois River corridor, and into the BLM and USFS Rough and Ready Botanical Areas and other public lands, including habitat of the federally-listed endangered Cook's desert parsley (*Lomatium cookii*).

Since *Alyssum murale* is likely to thrive on non-serpentine soils, agricultural lands in southwest Oregon and northwest California are also threatened. Additionally, toxicity to livestock and wildlife are likely, since hyperaccumulators are highly toxic to herbivores, though the palatability of these species is apparently unknown.



Dedicated to the preservation of California native Flora

We are particularly concerned about the potential spread of these invasive species to the sensitive serpentine areas of Del Norte County, which is known for its botanical uniqueness. The Smith River National Recreation Area is particularly at risk due to the network of dirt roads crossing the Oregon-California border. These roads are regularly used by off-highway vehicle (OHV) drivers who access the Smith River National Recreation Area from areas in Oregon where roadside populations of *Alyssum* have already been documented just miles from the California border. Since the seeds are known to spread on vehicle tires and equipment, as well as by water and wind, the continued uncontrolled expansion of infestations is highly likely.¹

Since the two *Alyssum* species have the potential to outcompete native flora on serpentine substrates, with a moderate probability of introduction through human activities, they were ranked as "A" list noxious weeds using both the modified USDA-APHIS Risk Assessment and the Oregon Department of Agriculture Noxious Weed Rating System.² Despite quickly listing the species, a few factors will complicate eradication efforts and create a need for intensive ODA effort over the next 2 to 5 years. One, the species are considered difficult to control, and two, the *Alyssum* fields are on county and private lands under a variety of ownerships, in many cases directly bordering BLM and USFS lands. Land ownership issues and agency restrictions both contribute to the complexity of eliminating these species. ODA can play a critical role in coordinating with landowners where eliminating the crops will be essential to eradication efforts. Although eradication of these species from Oregon will not be easy, we hope ODA will highly prioritize this work due the serious threat posed to public lands, Threatened and Endangered plants, livestock and wildlife.

The Klamath-Siskiyou Mountains of northwest California and southwest Oregon contain the largest serpentine area in North America. The region is a world-renowned center of diversity and endemism, with species and unique plant communities that occur nowhere else in the world, including the federally-listed endangered McDonald's rock-cress (*Arabis macdonaldiana*).

Much of the area's diversity is attributed to the extensive serpentine landscapes and the endemic species they support. Local tourism is supported by the unique serpentine habitats, as is scientific study and appreciation of natural history. It should be a top priority to eradicate these noxious weeds before they escape into other sensitive serpentine or agricultural soils in the Kalmiopsis Wilderness, the Smith River National Recreation Area, and other areas in northwest California.

We appreciate the Department's swift action to control these noxious weeds, and also appreciate the opportunity to comment on the proposed addition to the state quarantine list.

Sincerely,



Jennifer Kalt, Conservation Chair
North Coast Chapter, California Native Plant Society

¹ K. Amsberry, M. Jules, and R. J. Meinke. December 5, 2008. Pest Risk Assessment of *Alyssum murale* and *A. corsicum*. Oregon Department of Agriculture and United States Forest Service.

² Ibid.