January 27, 2020

United States Department of Agriculture
Animal and Plant Health Inspection Service

SUBJECT: Proposed Importation of *Acer buergerianum* Miq., *A. palmatum* Thunb., and *A. pseudosieboldianum* Nakai from the Republic of Korea into the continental United States

Dear Sir or Madam:

The Florida Native Plant Society has reviewed the Pest Risk Assessment (PRA) prepared in response to a proposal to import *Acer buergerianum*, *Acer palmatum*, and *Acer pseudosieboldianum* from the Republic of Korea. Based on the PRA, we must insist the proposed importation be denied.

The PRA lists 28 organisms from the export area “…that are quarantine pests for the PRA area, are likely to exceed the threshold for unacceptable consequences in the PRA area, and have a reasonable likelihood of following the commodity pathway”. Of the 28 species, 18 were ranked as a high risk for introduction and the remaining 10 were ranked as medium risk. The combination of high risk of introduction, and unacceptable consequences of introduction, make this an easy decision for the USDA. The risks are simply too great allow the importation.

The United States has suffered a long history of devastating impacts to our forests and other natural areas due to the importation, intentional or inadvertent, of nonnative species, including especially insect pests and plant pathogens. History has also taught us that phytosanitary measures are inadequate for preventing the introduction of such pests and pathogens. In Florida, we stand on the cusp of losing all our red bays and other native members of the Lauraceae to Laurel Wilt Disease. Do not let history repeat itself when your own research so clearly demonstrates the risks associated with this proposal. Please heed the results of the PRA and prohibit the proposed importation.

Sincerely,

Susan Carr, President
Florida Native Plant Society.

*Preserving, conserving and restoring the native plants and native plant communities of Florida*