



Washington Native Plant Society
Appreciate, Conserve, and Study Our Native Flora

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November 9, 2004
Steve McGonigal
Washington State Noxious Weed Control Board
PO Box 42560
Olympia, WA 98504

Dear Steve:

On behalf of the Washington Native Plant Society, this letter serves to express our support of the listing of *Buddleia davidii* on the state noxious weed list. *Buddleia davidii* meets the definition of a noxious weed in that it is a non-native species that has escaped cultivation and has demonstrated detrimental impacts in natural areas that it invades. Although the State's proposal is for a Class C listing, we recommend that *B. davidii* be listed as a Class B noxious weed and be prohibited for sale.

In addition to the natural areas mentioned in the proposal for listing (i.e. Dungeness & Nooksack Rivers, Ebey Slough), basin stewards have reported *Buddleia* as being a serious problem in watersheds in King County, and reports indicate it has colonized along sections of the Carbon River. Distribution information suggests that while *B. davidii* may currently occur more on the west side of the Cascades, it is not yet widely distributed. An as yet limited distribution demands a Class B listing with designations in any and all counties in which it does not currently exist or is not yet widespread. A Class B designation would also make it more of a priority for counties to control *Buddleia* before it becomes too widespread, and to report distribution information back to the State in order to confirm or fine tune the Class-B designations. Class C weeds, by definition, are already widely distributed. In practice, Class C weeds tend to be of lowest priority. Listing *B. davidii* as a Class C noxious weed would result in an ineffectual start for this new addition to the state weed list. Additionally, the known popularity of *B. davidii* as a garden ornamental behooves the State Weed Board to add it to the Department of Agriculture's Quarantine list.

The seemingly inconsistent practice or policy regarding the weed listing process is of concern. For example, knotweed is far more widespread than *B. davidii*, yet four knotweed species are currently listed as Class B noxious weeds AND all are prohibited for sale.

We do not agree with the State's suggested approach to only pursue escaped populations of *B. davidii* while ignoring plants that are grown in gardens. Intentional plantings of this "...very popular garden ornamental" will obviously continue to be the source of escaped populations. Control, defined as preventing seed production, is all that is legally required for landowners to do with a Class B weed. While escaped plants should be removed from natural areas as a high priority, gardeners and others who have intentionally planted *Buddleia* should be provided with information about the invasiveness of this species and be given the choices to remove flowers before they set seed (otherwise known as deadheading), or to remove the plant. Non-invasive alternatives should be suggested. The education would help gardeners become more aware of the connection between introduced and escaped ornamentals.

The proposed listing of *Buddleia davidii* is obviously a controversial one among a number of groups and individuals. Although the draft Written Findings for this species suggest that it is not used as a butterfly "host" plant, a number of scientific and horticultural individuals argue correctly that *Buddleia* can be a significant nectar source for butterflies, hence its popularity. We strongly advocate the use of native plants to provide nectar and other resources to butterflies and recommend that the State and County Weed Boards promote restoration of natural and disturbed areas with native plants to counterbalance the loss of nectar sources resulting from the removal of *Buddleia*. We also recommend the State Noxious Weed Control Board work with the Department of Agriculture and the nursery industry to identify other varieties or species of butterfly bush that may be potentially invasive.

One of the keys to successful noxious weed control is prevention. Better educational efforts are desperately needed that encourage the public to choose non-invasive species, and to prevent seed production and the spread of garden ornamentals like *Buddleia* before they escape and require regulatory listing on an ever increasing weed list. The "Voluntary Codes of Conduct" established by the Missouri Botanical Garden should be considered, adopted and actively promoted by the Washington State Weed Board and Department of Agriculture.

Thank you for the opportunity to provide testimony on the proposal to list *Buddleia* on the Washington State Noxious Weed List.

Sincerely,

Jane B. Wentworth
Washington Native Plant Society Board Secretary