ICTA INTERNATIONAL CENTER FOR TECHNOLOGY ASSESSMENT

April 30, 2003

Alan Tasker, Noxious Weed Program Manager
Invasive Species and Pest Management, PPQ
USDA APHIS, 4700 River Road
Riverdale, MD 20737

HAND DELIVERED

Re: new noxious weed petitions to list *Caulerpa* genus and *Caulerpa taxifolia* (entire species)

Dear Mr. Tasker,

Enclosed please find the originals and extra copies of two new noxious weed listing petitions submitted by the International Center for Technology Assessment and Professor Susan L. Williams of the University of California at Davis. They seek listing under 7 USC § 7712(f)(2) of the entire *Caulerpa* genus and of the entire species of *Caulerpa taxifolia*, not limited to the "Mediterranean clone," as is currently the case. The scientific evidence submitted in support of these petitions is abundant and convincing, meriting high scores in almost every applicable category in APHIS's listing guidelines. The Affidavit of Susan Williams, Ph.D., is submitted in support of both petitions. We note that the genus petition dated April 29 is obviously more inclusive than the species petition dated April 30, and that its approval would render the species petition unnecessary and redundant, thus we urge you to give the genus petition your highest priority.

The *Caulerpa* genus petition has been endorsed by 105 people, with 100 of them also endorsing the *C. taxifolia* species petition. A total of ten organizations endorsed both, including four large national groups: American Lands Alliance, The Nature Conservancy, National Wildlife Federation, and Union of Concerned Scientists. Important State organizational endorsers include the California Native Plant Society and South Florida Water Management District. You also will recognize several noted authorities on invasive species generally, whose support indicates that these petitions are tailored to improve the nation's response to the broad invasives crisis. These include: James T. Carlton, Professor, Williams College; Carla D'Antonio, Professor, Univ. of California; David M. Lodge, Professor, University of Notre Dame; Richard N. Mack, Professor, Washington State Univ.; Sarah Reichard, Asst. Professor, Univ. of Washington; Don C. Schmitz, Biologist, Florida; and Daniel Simberloff, Professor, Univ. of Tennessee.

We hope that you and your Department will approve the petitions and use your authority to its fullest extent to reduce these unnecessary threats. Please promptly assign separate identification numbers to the petitions, advise me of them, and create separate formal open dockets for them. For further information please contact me at 202.547.9359 or email: peterjenkins@icta.org.

On behalf of petitioners,

Peter T. Jenkins, Attorney/Policy Analyst
Enclosures
cc: Susan L. Williams

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ENDORSERS OF PETITIONS TO LIST CAULERPA GENUS AND CAULERPA TAXIFOLIA AS FEDERAL NOXIOUS WEEDS

Notes: * indicates endorsement is for the *Caulerpa* genus petition only and not for the *C. taxifolia* species petition; insitutional or group affiliations are for identification purposes only, except for the **bolded** names, for which the endorsement is on behalf of the institution or group. Endorsements total 105, with 5 of those limited to the genus petition; 10 groups and organizations endorsed both petitions, including 4 large national environmental groups: American Lands Alliance, The Nature Conservancy, National Wildlife Federation, and Union of Concerned Scientists. Endorsements are from 31 States and the District of Columbia.

Richard G. Baker, Ph.D., Professor Emeritus, Univ. of Iowa
Randal T. Bartlett **for the Maui Invasive Species Committee,** Hawaii
Ann M. Bartuska, Ph.D., Exec. Director, Invasive Species Initiative, **for The Nature Conservancy**
James L. Ballard, Instructor, Minnesota State Univ.
Ewann A. Berntson, Ph.D., Bonney Lake, Washington
Martin R. Brittan, Ph.D., Emeritus Professor, California State Univ., Sacramento
Jeb Byers, Ph.D., Asst. Professor, Univ. of New Hampshire
Faith Campbell, Ph.D., **for the American Lands Alliance**
James T. Carlton, Ph.D, Professor, Williams College, Massachusetts
Kai M. A. Chan, Princeton Univ., New Jersey
John Chapman, Ph.D., Professor, Oregon State Univ.
Paul C. Chestnut, Ph.D., Palo Alto, California
Janie Civille, Univ. of California, Davis
Jamie Rapapport Clark, Vice President, **for the National Wildlife Federation**
Andrew N. Cohen, Ph.D., Research Scientist, San Francisco Estuary Inst., California
Ligia Collado-Vides, Ph.D., Visiting Scientist, Univ. of Miami
Robert H. Cowie, Ph.D., Assoc. Researcher, Univ. of Hawaii
Don Croll, Ph.D., Asst. Professor, Univ. of California, Santa Cruz
Jeffrey A. Crooks, Ph.D., Research Coordinator, Tijuana River Natl. Est. Res., California
Carla D'Antonio, Ph.D., Professor, Univ. of California
Deborah Dexte, San Diego State Univ., California
Tom Dudley, Ph.D., Research Faculty, Univ. of Nevada, Reno
David C. Duffy, Ph.D., Professor, Univ. of Hawaii
Jeffrey S. Dukes, Ph.D., Carnegie Institution of Washington
Ruth Ann Dunn, MD, Londonderry, Vermont
C. Mark Eakin, Ph.D., Boulder, Colorado*
Adam Eyring, Analytical Chemist, Philadelphia Water Dept., Pennsylvania
Amy E. Frappier, Newmarket, New Hampshire
Jed Fuhrman, Ph.D., Professor, Univ. of Southern California
Jesse Giessow, President, **for Dendra Inc.,** Encinitas, California
Edwin Grosholz, Ph.D., Univ. of California, Davis

Caulerpa Petitions Endorsers

Sander Gliboff, Ph.D., Asst. Professor, Indiana Univ.
Danile Gluesenkamp, Ph.D., Sonoma, California
Douglas Henderson, Commercial Manager, **for ReMetrix LLC**, Carmel, Indiana*
Richard Hildreth, J.D., Professor, Univ. of Oregon
Bernadette Holthuis, Ph.D., Biologist, Gainesville, Florida
Matthew D. Hooge, Ph.D., Univ. of Maine
Marc Imlay, Invasives Committee Chair, Maryland Native Plant Society
S. Taylor Jarnagin, Ph.D. , Research Ecologist, Reston, Virginia
Barbara J. Javor, Ph.D., Environmental Microbiologist, San Diego, California
George Koch, Ph.D., Assoc. Professor, Northern Arizona Univ.
Fred Kraus, Ph.D., Bishop Museum, Hawaii
Doug La Follette, Ph.D., Madison, Wisconsin
Dawn M. Lawson, San Diego, California
Irving Leskowitz, Emeritus Professor, Southern Connecticut State Univ.
Roy R. "Robin" Lewis III, **for Lewis Environmental Services, Inc.**, Salt Springs, Florida
David M. Lodge, Ph.D., Professor, University of Notre Dame, Indiana
Scott Luchessa, Assoc. Wetland Ecologist, Pentec Environmental, Seattle, Washington
Richard N. Mack, Ph.D., Professor, Washington State Univ.
Dan C. Marelli, Ph.D., Florida State Univ.
Linda McCann, Edgewater, Maryland
Ross McCluney, Ph.D. , Research Scientist, Univ. of Central Florida
Tanya Meyer, Consultant, Chico, California
Claudia E. Mills, Ph.D., Friday Harbor Laboratories, Univ. of Washington
Carol Moore, Beaverton, Oregon
W. A. Morgan, M.D., Wisconsin*
Susanne C. Moser, Ph.D., Union of Concerned Scientists, Washington, DC
Christa Mulder, Ph.D., Asst. Professor, Univ. of Alaska, Fairbanks
Stephen J. Mullin, Ph.D., Assistant Professor, Eastern Illinois Univ.
Steven N. Murray, Ph.D. Professor, California State Univ., Fullerton
Raymond M. Newman, Ph.D., Professor, Univ. of Minnesota
Thomas M. Niesen, Ph.D., Professor, San Francisco State Univ., California
Ingrid M. Parker, Ph.D., Assoc. Prof., Univ. of California, Santa Cruz
Richard M. Peters, M.D., Palo Alto, California
Robert J. Piorkowski, Ph.D., Invasive Species Program Lead, Alaska Dept. of Fish and Game
Mary Jean Pramik, San Francisco, California
Edwin R. Price, Cleveland, Ohio
Margaret S. Race, Ph.D., SETI Instititute, California
Mark J. Rauzon, Marine Endeavours, Oakland, California

Caulerpa Petitions Endorsers

Tara Reed, Ph.D., Asst. Professor, Univ. of Wisconsin
Sarah Reichard, Ph.D., Asst. Professor, Univ. of Washington
Peter M. Rice, Univ. of Montana
Gregor H. Riesser, Ph.D., Houston, Texas
Robert E. Rutkowski, Topeka, Kansas
Pamela Roe, Ph.D., Turlock, California
Don C. Schmitz, Biologist, Tallahassee, Florida
Angela Seidenberg, Biologist, Corpus Christi, Texas
Frank J. Shaughnessy, Ph.D., Humboldt State Univ., California
Jacob Sigg, Chair, Invasive Exotics Committee, **for California Native Plant Society**
Daniel Simberloff, Ph.D., Professor, Univ. of Tennessee
Annie Simpson, Entomologist, Reston, Virginia
Doris Sloan, Ph.D., Adjt. Professor, Univ. of California, Berkeley
Jennifer E. Smith, Univ. of Hawaii
Stefan Sommer, Ph.D., Director, Natural Heritage Center, Idaho State Univ.
Barbara K. Sullivan, Ph.D., Adjt. Prof., Univ. of Rhode Island
D. Scott Taylor, Ph.D., Brevard Co. Environmentally Endangered Lands, Florida
Dan Thayer, Dir., Veg. Mgmt Div., **for South Florida Water Management District**
Mark I. M. Thompson, Ph.D., Elder/Director, Otter Clan Educ. Fdtn., Nevada City, California*
Christina Tonitto, Ph.D., Univ. of California, Berkeley
Cynthia D. Trowbridge, Ph.D., Research Asst. Professor, Oregon State Univ.
Mary S. Tyler, Ph.D., Professor, Univ. of Maine
Seth Tyler, Ph.D., Professor, Univ. of Maine
Beatrice Van Horne, Ph.D., Vienna, Virginia*
Paul Van Steenberghe, Lecturer, Univ. of Maine
Tanya Veldhuizen, Environmental Scientist, Sacramento, California
Linda Walters, Ph.D., Assoc. Professor, Univ. of Central Florida
Kerstin Wasson, Ph.D., Elkhorn Slough National Estuarine Research Reserve, California
Judith S. Weis, Ph.D., Professor, Rutgers Univ., New Jersey
David Whitacre, Ph.D., Research Ecologist, The Peregrine Fund, Boise, Idaho
Raymond R. White, Ph.D., City College of San Francisco, California
Howard G. Wilshire, Ph.D., Board Chair, Public Employees for Envtl. Responsibility, Sebastopol, Cal.
Teresa Wilson, Fisheries Biologist, Clemson, South Carolina
Phyllis Windle, Ph.D., Senior Scientist, **for the Union of Concerned Scientists**
Jerry Woolpy, Ph.D., Emeritus Professor, Earlham College, Indiana