

**From:** Connie Barlow conniebarlow52@gmail.com  
**Subject:** Followup on Aug 7 Torreya email re seed data and proposal  
**Date:** August 14, 2018 at 11:40 AM  
**To:** Negron-Ortiz, Vivian Vivian\_NegronOrtiz@fws.gov  
**Cc:** Ronald Determann rdetermann@atlantabg.org, Tiffany McClurkin foiar4@fws.gov

CB

Vivian -

1. Q: Did you receive my Aug 7 email titled, "Win-Win proposal to ABG for solving Torreya problem"?

2. Q: If so, is it correct to interpret that neither you nor ABG is interested in communicating with me toward my presenting a story of learnings and future cooperation in the comments I will submit by Sept 24 re USF&WS proposed changes to endangered species implementation?

3. REINSTATEMENT OF FOIA ON SEED DATA. If the answer to Q2 is "no interest in communication," then I plan to reinstate my seed data request (currently held back by Solicitor's Office in DOI), which data I will post online and also use in my comments on the proposed ESA regulatory changes.

3B: Know that one of our Guardians alerted me to the 26 July 2018 new post (attributed to Emily Coffey) on the Center for Plant Conservation webpage for *Torreya taxifolia*. The post displays failure to count (and perhaps value) Blairsville seed production prior to 2016. Thus far, our group has detected nothing posted online as to the annual seed production of the Smithgall Woods ex situ planting, which I understand is managed not by ABG but by the University of Georgia. This site is documented by you as having produced seeds since at least 2010, as the 2010 Recovery Plan states:

"The material planted at Smithgall Woods was propagated from all Georgia source population material (Army Corps. Of Engineers, site at Woodruff Dam, Lake Seminole, in Georgia). The trees have grown quite large and are now reproductively mature producing male and female cones annually." (p. 9)

4. Q: Perhaps you and I could cooperate on just the core piece I will probably include in my comments to USF&WS. That is, please let me know if the idea below sounds reasonable, or how I might improve it. Do know that, if something like this can become the solution, then I can easily frame my comments overall in a cooperative way: that our combined learnings can help for moving not only our species of concern faster toward actual recovery and thus de-listing, but other relict plants that are likewise trapped in cool-climate refugia.

**PROPOSAL: Seeds produced in ex situ plantings that are deemed to be in excess of genetic safeguarding**, extinction-prevention, or other recovery plan goals or projects shall be valued and managed as beneficial for "**non-essential, experimental**" plantings. Such non-essential seeds will be **made available for experimental plantings by institutions** that prepare and submit plans for engaging in their own experiments: (a) for discerning whether climatic or other conditions in their region might be more hospitable for species thrival than the current or recent historic geographic range(s) of wild populations and (b) for determining the specific local habitats (slope, aspects, plant associations, etc.) that yield the best results. Plans shall include institutional commitments toward monitoring for possible plant invasiveness, along with regular posting of reports online of experimental results, what has been learned, and recommendations for improving species recovery.

4B. Extraneous details: I am aware, via Jason Smith, that for species (such as *Torreya*) suffering from pitch cankers (*Fusarium*), the least problematic plant material to transfer geographically is the seed, and that the sending institutions could easily be instructed on ways to prevent disease transmission. As to the **two primary criticisms of assisted migration for plants**, here is how my proposal for modernizing ESA implementation policy during this century of rapid climate change would satisfy each concern:

1. **WASTING PUBLIC MONEY ON OUT-PLANTINGS THAT MAY FAIL.** So long as the seeds are deemed "non-essential" under the established recovery plan, non-governmental institutions would be taking the risk of failure, not tax-payers.

2. **INVASION RISK WITHIN RECIPIENT ECOSYSTEMS.** In addition to institutional commitment to monitoring for invasiveness, for some plant species the risk can be demonstrated to be negligible from the outset. This would be accomplished by documenting non-invasiveness by seed-producing plantings that private landowners and landscapers undertook before or outside the species designation as threatened or endangered. Because *Torreya taxifolia* has been inadvertently served in this way for a century (beginning with the plantings at Harbison House, Highlands NC), **Torreya Guardians have made a point of visiting and photo-documenting these key sites that prove non-invasiveness.** Yesterday I finally completed a new webpage that makes it easy for officials and others to quickly review these examples of *Torreya* non-invasiveness. Please take a look at this new page and let me know if you think it is adequate:

["Historic Groves of Torreya Trees"](#)

Thank you for your dedication to this species and for your continuing cooperation,

Connie Barlow, founder of Torreya Guardians  
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