

Belle Bergner
Executive Director
Direct: 414.215.0281
Email: bbergner@naisma.org

January 18, 2022

To the Administrator of the Animal and Plant Health Inspection Service:

The North American Invasive Species Management Association (NAISMA) is the largest organization dedicated to protecting North America's natural heritage from the threat of invasive species. NAISMA's mission is to support, promote, and empower invasive species prevention and management in North America. NAISMA advocates an integrated pest management (IPM) approach to addressing the threat of invasive species. Biological control is a key component of IPM and is critical to the successful and sustainable management of many invasive species.

After a careful review of the USDA APHIS Environmental Assessment "Field Release of *Lophodiplosis indentata* (Diptera: Cecidomyiidae), for classical biological control of *Melaleuca quinquenervia* (Myrtaceae), in the contiguous United States" (March 2021) and consultation with members of the NAISMA Biocontrol Committee, **NAISMA supports the APHIS determination** that release of the fly, *Lophodiplosis indentata* (Diptera: Cecidomyiidae), into the contiguous United States for use as a biological control agent of *Melaleuca quinquenervia* (Myrtaceae) (hereinafter referred to as melaleuca) will not have a significant impact on the quality of the human environment.

The Environmental Assessment clearly articulated the state of melaleuca invasions in the US and the threats associated with melaleuca invasion and concluded that, despite gains in controlling melaleuca using three other biological control insects (*Oxyops vitiosa*, *Boreioglycaspis melaleucae*, and *Lophodiplosis trifida*), aerial herbicides, and other control efforts, many localized areas in Florida are still overwhelmed by melaleuca. NAISMA considered the following points:

-Biological control can provide long-term sustainable control that, over time, can dramatically reduce the impact of invasive weeds.

-Melaleuca biological control is highly successful at providing sustainable control in many areas, but the currently available biocontrol agents are limited in their distribution across the invaded landscape and unlikely to colonize all melaleuca infested areas.

-*Lophodiplosis indentata* was found to be safe for release after a rigorous Environmental Assessment process. *Lophodiplosis indentata* is a melaleuca specialist that does not feed on other native North American species.

-The Environmental Assessment concluded *Lophodiplosis indentata* will be particularly beneficial for controlling persistently inundated melaleuca infestations like those in the eastern Everglades and Big Cypress.

- Studies on seedlings and saplings indicated that *Lophodiplosis indentata* caused melaleuca to shift resources to the production of galls and away from flowering and bud growth. In combination with *L. trifida*, this caused a significant reduction in melaleuca plant growth over six months.

Given the information summarized in the Environmental Assessment and the need to further control melaleuca, NAISMA supports APHIS's determination that the release of *Lophodiplosis indentata* to control melaleuca and reduce the ever-growing negative ecological, economic and human health risks that it poses will not have non target impacts. We look forward to *Lophodiplosis indentata*'s approval as a biocontrol agent to aid land managers in their ongoing integrated melaleuca management efforts.

Sincerely,



Belle Bergner
Executive Director

