

**From:** Connie Barlow <conniebarlow52@gmail.com>  
**Subject:** **Petition to Downlist Florida Torreya submitted**  
**Date:** September 10, 2019 at 9:35:33 AM PDT  
**To:** timothy\_merritt@fws.gov  
**Cc:** "Chapman, Daniel" <daniel\_chapman@fws.gov>

Dear Mr. Merritt -

Attached is a 26-page petition in pdf to **downlist from endangered to threatened** the Florida Torreya tree. I am cc-ing your region's external affairs staff person who has helped me, a mere citizen, to find my way through the process of actually filing a petition.

The timing of this petition was **inspired by the new ESA regulation clarifying "threatened" status as distinct from "endangered."** In this particular case, downlisting to threatened could substantially help an endangered plant move toward full recovery, by making it possible for we citizens to play an even greater role than we have been playing in past years.

I am the founder of **Torreya Guardians**. For 15 years our growing network of citizen landowners and other volunteers have been utilizing an **"exception for plants" in the ESA** that enables our experimentation with translocating Torreya taxifolia to regions (S. Appalachians and Cumberland Plateau) that offer more favorable climates for this "glacial relict" than does its "glacial refuge" in Florida, where it seems to have been stranded. (The Chattahoochee River offered the acorn-size torreya seeds quick passage southward during glacial cooling, but there was no way to float back north.)

In contrast, during the 2010 recovery plan update, botanic garden implementers of the official recovery plan in Georgia **voted down a Torreya Guardians proposal for authorizing "pilot projects" northward**. So we have been working entirely on our own in these vital experiments. Thus far, as you will see documented in the attached petition, **northward translocation appears to be a winning strategy** — so winning, that "downlisting" can be supported.

Our work could also serve as **a model for how citizens could be engaged** in helping other cryptically relict plants south of the Appalachians obtain action plans that graduate from mere "prevention of extinction" in-place to northward projects offering possibilities for full recovery.

Torreya Guardians has captured a good deal of **media and academic attention** over the years, as the first on-the-ground — and apparently successful — "assisted migration" effort. You can sample the media excerpts on us here: <http://www.torreyaguardians.org/guardians.html>

That citizens are willing and able to step forward and freely offer their lands and effort to assist recovery of an endangered plant is also demonstrated by our accomplishments. This too is **a newsworthy turn, especially in light of the Dusky Frog conflicts** for the agency that drew a lot of media attention in 2018. Thus, it is not surprising that I was recently contacted by an Atlanta-based NPR reporter who is being given several weeks to do the research and onsite investigations for the broader issues that Torreya Guardians actions now bring to light. Daniel Chapman can brief you on that turn of events.

Because **the hope for recovery for Florida Torreya resides not in Florida but in Tennessee, North Carolina, and even Ohio**, it could be helpful for you to alert DNR equivalents in those states to this petition. Certainly they will find it intriguing. They may even be motivated to advise on how their state agencies could step forward to assist in offering more sites for experimental translocations and for initiating professional monitoring of plantings that Torreya Guardians have already documented and/or established there.

Finally, do know there is **a sister species on the other side of the continent known as California Torreya**, which I have personally studied to gain insights on mountainous habitat preferences for this genus. I have posted text and video documentation of those site visits on the Torreya Guardians website. I implore anyone new to the Florida Torreya situation to take some time to acquaint themselves with the natural history of this genus — which cannot be ascertained amid the stragglers in a locale that is clearly the wrong place at this time in natural (and also anthropogenic) climate shifts.

Thank you for your attention. And please have a staff person notify me that this petition is formally now in process and will be identified as such in the Federal Register and in the easy-to-access webpage of current listings at the agency,

Connie Barlow