



March 26, 2021

The Honorable Eduardo Garcia, Chair
 Assembly Water, Parks and Wildlife Committee
 Legislative Office Building
 1020 N Street, Room 160
 Sacramento, CA 95814

RE: AB 223 – SUPPORT

Dear Chairman Garcia,

On behalf of the undersigned organizations, we are writing in support of Assembly Bill (AB) 223, which would help protect the state’s *Dudleya* populations from illegal poaching.

AB 223 would make it illegal to harvest *Dudleya* (liveforevers) from land in California without a permit or landowner permission. This bill would establish stiff penalties for *Dudleya* poaching, with fines of \$5000 per plant, for first offenders. *Dudleya* includes 68 named species, subspecies, and varieties, 42 of which are native to California. Ten *Dudleya* are listed as threatened or endangered by the state and/or federal government and a total of 29 are included in the California Native Plant Society Rare Plant Inventory.

Officials estimate that potentially hundreds of thousands of *Dudleya* have been removed from habitats in California. The vast majority of these have been exported and are available for sale internationally. Mature *Dudleya* can be decades old, and specimens such as these can fetch as much \$1000. Some of these plants for sale are common species, such as *Dudleya farinosa* (powdery liveforever), but, dishearteningly, some recent poaching operations have targeted extremely rare species. In 2020, posts on social media pointed to shipments of *Dudleya candelabrum* (candleholder liveforever) harvested from California and destined for sale in Korea. Candleholder liveforever is restricted to San Miguel, Santa Rosa, and Santa Cruz Islands off the coast of Ventura County. Furthermore, searches of online marketplaces including Etsy and Ebay reveal large, mature, possibly poached plants of numerous rare species, including *Dudleya gnoma* (munchkin liveforever), which is known from a single population, for sale. The harvest of rare and imperiled species such as these could place them at risk of extinction.

The Department of Fish and Wildlife needs an effective way to enforce action against *Dudleya* poaching operations and to dissuade future poaching activity. AB 223 would make it unlawful to uproot, remove, harvest, or cut *Dudleya* on lands owned by the state government, local governments, or private landowners, and establishes substantial penalties for violations, thereby making the potential profits from selling *Dudleya* on the black market less attractive.

AB 223 is an important first step that places plants, for the first time, on the same playing field as animals that are being poached in California. For these reasons, we urge an “Aye” vote on AB 223.

Sincerely,

Nick Jensen
Conservation Program Director
California Native Plant Society

Linda Castro, J.D.
Assistant Policy Director
California Wilderness Coalition

Kate Hoit
California State Director
Vet Voice Foundation

Pamela Heatherington
Director
Environmental Center of San Diego

Michael J. Painter
Coordinator
Californians for Western Wilderness

Dan Silver
Executive Director
Endangered Habitats League

Maureen Forney
California Volunteer Advocate
Great Old Broads for Wilderness

Sandra Farrell
President
Friends of Hedionda Creek

James Peugh
Conservation Chair
San Diego Audubon Society

Brandon Dawson
Policy Advocate
Sierra Club of California

Frazier Haney
Executive Director
The Wildlands Conservancy

Susy Boyd
Public Policy Coordinator
Mojave Desert Land Trust

Jora Fogg
Policy Director
Friends of the Inyo

Mariela Ruacho
Policy & Education Strategy Program
Manager
California ReLeaf

Helen O'Shea
Director, Renewable Energy, Lands Division,
Nature Program
Natural Resources Defense Council

Pamela Flick
California Program Director
Defenders of Wildlife

Juan Altamirano
Associate Director of Public Policy
Audubon of California

Lucas Frerichs
Associate Director of State Policy
The Nature Conservancy

Naomi Fraga
Director of Conservation Programs
California Botanic Garden

Katherine Emery, PhD
Executive Director
Santa Barbara Audubon Society

Brian Nowicki
California Climate Policy Director
Center for Biological Diversity

Greg Suba
Conservation Biologist
Sierra Forest Legacy

Steve Bardwell
President
Morongo Basin Conservation Association

Bryant Baker
Conservation Director
Los Padres ForestWatch

Evan Meyer
Executive Director
Theodore Payne Foundation

Paul Mason
V.P., Policy & Incentives
Pacific Forest Trust

Joyce Maschinski, Ph.D.
President and CEO
Center for Plant Conservation

Chris Clarke
Associate Director, California Desert Program
National Parks Conservation Association

Catherine Rich, J.D., M.A.
President and Executive Officer
The Urban Wildland Group

Travis Longcore
President
Los Angeles Audubon Society

Sandra Schubert
Executive Director
Tuleyome

Roberta Lyons
President
Redbud Audubon Society

Richard W. Halsey
Director
California Chaparral Institute

Matt Guilliams
Curator of the Clifton F. Smith Herbarium
Santa Barbara Botanic Garden