BIRDS CONNECT SEATTLE

March 10, 2025

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RE: Please Classify English Holly as Class B Noxious Weed and Restrict its Sale

Birds Connect Seattle, formerly Seattle Audubon, is a nonprofit environmental conservation organization that advocates and organizes for cities where people and birds thrive. On behalf of our 13,000 supporters, we urge the Washington State Noxious Weed Control Board to:

1. Classify English Holly as a Class B Noxious Weed; and

2. Recommend restricting commercial sale of live English Holly in Washington by placing it on the Prohibited Plants and Seeds list.

Supporting Information

Non-native English Holly (*Ilex aquifolium;* also commonly called Christmas Holly, Common Holly, and European Holly) now covers nearly 9,000 acres of forest floor in Washington State and about 1,700 acres in Oregon, according to the U.S. Forest Service. Nature observers have reported the plant in 4,100 locations in western Washington over the past decade on the iNaturalist web platform, twice as many locations as in any other state (1).

Multiple jurisdictions in the Pacific Northwest acknowledge that English Holly is an invasive species and have made recommendations on its removal and containment to prevent its uncontrolled spread such as has been done with Himalayan Blackberry, Japanese Knotweed, and Scotch Broom (e.g. (2–4). In addition to being invasive, English Holly is toxic to all animals, except birds, and could pose a threat to children, pets, and livestock.

English Holly has long been known to impact forests where it creates dense thickets that suppress the germination and growth of native trees and shrubs, reducing the quality of native habitat. Research in a Seattle area forest found that holly is rapidly proliferating through both the growth from root systems and seed dispersal, with its population and canopy area doubling every 6 and 5 years, respectively. "Projecting past spread patterns forward suggests that holly has the potential to soon become a prominent species both in number and canopy extent, likely at the expense of native plant diversity and forest structure." (5)

Removing mature holly trees and shrubs requires mechanical removal which is expensive and physically difficult. Once cut down, stumps must be treated with herbicides or the remaining stump and mature roots left behind will sucker and regrow. Effective herbicide application is expensive and requires specialized and costly equipment. Even younger shoots and suckers growing from underground roots require excessive physical exertion to remove, as root systems can spread up to 20 ft from the main plant. In other words, removing mature trees is not a simple process and could exacerbate the proliferation of even more plants, so removing seedlings before they can be established and spread, and removing established trees now, before they reproduce, are key components of containment that would prevent high future expenses. This saving in future costs, and prevention of further native habitat loss, could be better managed with the designation of English Holly as a Class B Noxious Weed.

In addition to displacing native vegetation, English Holly may pose a greater fire threat to Pacific Northwest forests. It is believed that holly leaves emit a flammable vapor when heated (6), leading to an increased risk and acceleration of forest fires. As climate change continues to increase fire intensity and frequency, controlling the spread of holly is one way we could prevent these fires from becoming worse. A comparison to this future potential can be seen in California wildfires, where the invasive Eucalyptus accelerates and exacerbates wildfires in that state (7).

The proper containment and control of existing holly would also prevent its widespread proliferation and requisite large-scale forest and wildland management efforts, as demonstrated by Class B weeds like Scotch Broom and the many Knotweeds, which impact native ecosystems by outcompeting native vegetation, and are very difficult to remove, once established. Containment and control efforts for English Holly, like other Class B noxious weeks, would prevent the formation of dense monocultures in open forests and native grasslands, preserving Washington's natural biodiversity and forest ecologies.

Despite its invasive characteristics, widespread distribution and studies finding its ability to alter forest and soil composition (5, 8) attempts over the past decade to have English Holly designated as a noxious weed have been unsuccessful. This has been due in part to successfully lobbying by the holly grower industry (1). This is unfortunate, as Class B Noxious Weed would provide much-needed resources for stronger control and containment outside of agricultural land.

The management and removal of English Holly is important to protecting Washington's forests and biodiversity. Given how easily it can spread to unintended places, how destructive it is to native habitat, and how expensive and onerous it is to remove, management alone is insufficient. The sale of holly plants must also be banned to prevent further proliferation.

That is why we recommend classifying English Holly as a Class B noxious weed and placing it on the Prohibited Plants and Seeds list.

Sincerely,

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Cc:

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Sources

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