Dear Mr. El-Lissy,

The Eastern Plant Board appreciates the efforts that APHIS PPQ has taken to streamline and harmonize the state administered surveys funded through the CAPS program and the Farm Bill. These efforts are justified and reasonable because surveys funded through these two sources frequently share survey targets, protocols, activity timing, and the goal to safeguard agriculture. Providing as much consistency as possible between the two programs should allow the programmatic focus to be on the survey activities rather than on administrative efforts. Examples of improvements to harmonize the Farm Bill Goal 1S and CAPS surveys include:

- Aligning the Farm Bill suggestion open period with the CAPS work plan submission period.
- Use of the Survey Summary Form for both CAPS and Farm Bill Goal 1S surveys.
- Use of the CAPS Approved Methods, the CAPS survey supply store, and the CAPS Resource & Collaboration website to support Farm Bill Goal 1S surveys.
- Encouraging State Survey Coordinators to report on Farm Bill support efforts as part of their accomplishment reporting.
- Simplifying the process for submitting a suggestion for a Goal 1S priority survey. This new process recognizes that it should be simpler for states to submit funding requests for priority national surveys. The new survey suggestion template gathers the relevant information for making funding choices, but without requiring a justifying narrative. This simpler template allows states to communicate the target pests, survey locations, number of traps, and other relevant data in a format that is easy for submitters and reviewers alike.

Harmonizing the Farm Bill Goal 1S surveys with the successful CAPS program can reduce the potential uncertainty associated with survey funds that are distributed through a semi-competitive process. There are still challenges, however, with Farm Bill-funded surveys that result in uncertainty for states and PPQ personnel. These uncertainties include which projects are selected for funding, the awarded funding level, and whether Farm Bill funds will be allocated in reasonable time to allow planned survey activities to
occur, including time for APHIS personnel to make and distribute the materials necessary to conduct survey. Efforts should be made to continue to reduce uncertainty so that states can submit proposals that have a high likelihood of funding success, that address relevant pest risks, and with a funding allocation that allows sufficient time to oversee and conduct the survey. The Eastern Plant Board requests that APHIS PPQ continues to seek state input as an important part of the ongoing process to align CAPS and Farm Bill-funded surveys and to address continued uncertainties for states applying for these funds.

Sincerely,

Chris Logue, President, Eastern Plant Board

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