



EASTERN PLANT BOARD

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May 14, 2012

Rebecca Bech, Deputy Administrator
USDA, APHIS, PPQ
Washington DC

Dear Rebecca,

The Eastern Plant Board (EPB) recognizes that the United States Department of Agriculture in general and Animal Plant Health Inspection Services specifically is facing unprecedented budget cuts which are forcing cuts to personnel and programs. We support APHIS's development of a "modernization" plan in order to continue to provide plant protection services with increasingly limited resources. EPB states' budgets have been, and continue to be, similarly constrained and reduced during this time of economic hardship. We believe that not only do the states share the responsibility for safeguarding agriculture, and but also should share in the conversation about how APHIS is restructured.

The EPB has significant experience sharing key personnel, such as ECSs, SPHDs and PSSs across multiple states. Co-locating offices is a reasonable immediate and short-term response to a budget crisis, but does not result in sustainable long-term programs. It is critical that APHIS consult with its state cooperators when making decisions to co-locate federal personnel. A lack of proximity to a federal counterpart can reduce interaction, even where the will to succeed exists among state and federal collaborators. Overburdened federal employees may not have the ability to respond to individual state's concerns in a timely manner. Co-locating positions also sets a dangerous precedent for future budgetary considerations. A stop-gap program which is adequate now may not be satisfactory when faced with the increases in export certification and pest surveys which are sure to follow economic recovery in the private sector. A conversation as to the rationale behind the consolidation of positions would enhance buy-in from the states for APHIS's modernization plan.

The EPB feels that this economically-driven restructuring should be a time to think creatively about how to accomplish the shared mission of APHIS and state Departments of Agriculture. For instance, instead of distributing responsibilities of federal employees geographically, perhaps it makes more sense to assign responsibilities based on areas of expertise. Already ECSs are shared across wide geographic ranges, so that proximity is no longer a significant factor in the support that they can give to a state Department of Agriculture. Instead of directing ACOs to an ECS for a given state, perhaps they should be directed to an ECS for a specific commodity. Similarly, a difficulty that state Departments of Agriculture often face in regards to exports is shipments which are delayed at ports during non-work hours. A help desk(s) with extended hours would reduce the burdens on ECSs, assist with state response time, assist the impacted industry, and provide a ready example of how APHIS's activities positively impact the U.S. economy.

Now is the time to prepare for a future of reduced resources. That future and the goals and outcomes of plant protection activities are shared by both Federal and State agencies. The conversation about how to best meet these challenges also should be shared by both Federal and State agencies. The EPB supports APHIS as it undergoes "modernization" and restructuring and asks to be a fully cooperative participant in the process, assisting wherever possible.

Sincerely,

Victoria Lynn Smith, President
Eastern Plant Board

CC:

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