



THE CENTRAL PLANT BOARD

Illinois · Indiana · Iowa · Kansas · Michigan

Minnesota · Missouri · Nebraska · North Dakota

Ohio · South Dakota · Wisconsin

October 17, 2012

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

Dear Rebecca,

At this year's Central Plant Board (CPB) meeting in Traverse City, Michigan we discussed APHIS' proposed changes to the Emerald Ash Borer (EAB) Program. We understand and support the overall response by the program to address severe budget cuts in the context of survey results and effects on impacted industries. We appreciate APHIS' data-based approach to decision making and efforts to provide stakeholders with detailed maps and summaries of current and historical activities and results.

The CPB enthusiastically supports EAB biocontrol efforts and would like for this to continue to be a high priority for APHIS. The number of tools in the toolbox are limited and biocontrol will be critical to controlling the movement of EAB and managing the existing EAB infestations in the future. Furthermore, states in the CPB that have conducted EAB biocontrol releases have appreciated the professionalism, guidance and service they have received from the biocontrol lab staff. The CPB encourages APHIS to develop guidelines and policies to direct the overall EAB biocontrol program and to ensure that limited funds are being used in the most efficient way possible.

The CPB appreciates APHIS hearing our concerns and working with us to modify the Contiguous Federal EAB Quarantine to better reflect existing state interior quarantines and to prevent further movement in partially infested states. We encourage APHIS to engage the states early in the process when future modifications to the EAB quarantine are considered.

The CPB has concerns regarding the model that was used for the 2012 EAB national survey design and suggests rigorous verification of the model in the future. We also feel strongly that

APHIS should allow for flexibility by state officials and state level PPQ operatives who are more familiar with local conditions to adjust trap placement to target known high risk pathways and sites with potential for establishment of EAB. Again, we encourage APHIS to engage states early in the process as plans for the 2013 EAB National Survey are discussed. Various state and local agencies could have provided extensive, detailed data layers for the 2012 survey model had we been consulted earlier.

The CPB states look forward to continued cooperation with APHIS to manage and contain this devastating wood pest that threatens our valuable native ash resource.

Sincerely,



Philip Marshall, President
Central Plant Board

CC: Dave Kaplan, USDA APHIS PPQ
Paul Chaloux, USDA APHIS PPQ
Frank Sapio, USDA Forest Service FHTHET
Ian MacFarlane, NAASF Executive Director
Mike Cooper, National Plant Board President
Vicki Smith, Eastern Plant Board President
Christel Harden, Southern Plant Board President
Donna Rise, Western Plant Board President