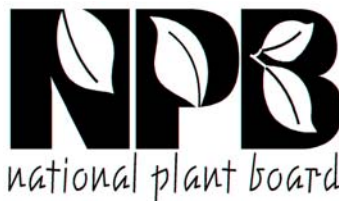


CENTRAL PLANT BOARD:
Illinois -- Indiana -- Iowa -- Kansas -- Michigan -- Minnesota -- Missouri
North Dakota -- Nebraska -- Ohio
South Dakota -- Wisconsin

SOUTHERN PLANT BOARD:
Alabama -- Arkansas -- Florida -- Georgia -- Kentucky -- Louisiana
Mississippi -- North Carolina -- Oklahoma -- Puerto Rico -- South
Carolina -- Tennessee -- Texas -- Virginia



EASTERN PLANT BOARD:
Connecticut -- Delaware -- Massachusetts -- Maryland -- Maine
New Hampshire -- New Jersey -- New York -- Pennsylvania
Rhode Island -- Vermont -- West Virginia

WESTERN PLANT BOARD:
Alaska -- Arizona -- California -- Colorado -- Guam -- Hawaii -- Idaho --
Montana -- Nevada -- New Mexico -- Oregon -- Utah -- Washington --
Wyoming

PRESIDENT
STEVEN LONG
SOUTH CAROLINA

VICE PRESIDENT
MIA KIRK
ALASKA

SECRETARY-TREASURER
PIERA SIEGERT
NEW HAMPSHIRE

PAST PRESIDENT
JULIE VAN METER
NEBRASKA

NPB EXECUTIVE ADMINISTRATORS
KRISTEN METCALF
HEATHER KRAMER
5329 FAYETTE AVE
MADISON, WI 53713
(608) 515-8210
ADMIN@NATIONALPLANTBOARD.ORG

DIRECTORS

CENTRAL PLANT BOARD

DAN KENNY
OHIO

MEGAN ABRAHAM
INDIANA

EASTERN PLANT BOARD

CHRIS LOGUE
NEW YORK

GARY FISH
MAINE

SOUTHERN PLANT BOARD

ANSEL RANKINS
LOUISIANA

AWINASH BHATKAR
TEXAS

WESTERN PLANT BOARD

HELMUTH ROGG
OREGON

IAN FOLEY
MONTANA

Dr. Osama El-Lissy
Deputy Administrator
USDA APHIS PPQ
Washington, DC

27 September 2021

Dear Dr. El-Lissy:

The states recognize PPQ's budgetary constraints and the challenges inherent in distributing limited funding across a wide portfolio of programs to safeguard U.S. agriculture and natural resources against the entry, establishment, and spread of economically and environmentally significant pests, and facilitate trade of agricultural products. The states believe that CAPS funding is a critical component of achieving PPQ's mission as the CAPS surveys and activities support early detection and rapid response of national priority pests and facilitate trade. In 2021, 53 states and territories participated in 125 bundled surveys, targeting 93% of the priority pests within the CAPS program. States appreciate that the dollar amount of CAPS funding available to the states has been stable for more than a decade, despite several Continuing Resolutions and required funding limitations. However, CAPS funding to states has not changed substantively since 2005 and has not matched inflation rate. In short, states are appreciative of efforts to maintain stable CAPS funding levels, but not adjusting available funding over time to at least match the rate of inflation results in lower programmatic support which in turn impacts the scope and stability of state CAPS programs.

The original intent of the CAPS program was to maintain state-based resources that supported surveys and responses to national priority pests. These resources primarily included fully funding a State Survey Coordinator (SSC) through the CAPS Infrastructure Agreement. However, it is challenging for states to maintain the SSC position as the value of available CAPS funds diminishes. Additionally, as the value of the CAPS funding decreases, the number of surveys that states can meaningfully complete likewise decreases. In many cases, states have been utilizing PPA funds to make up for funding shortfalls, but this is an incomplete solution. There is increased competition for PPA funds, the amounts awarded vary by year and may be less than requested. Multiple funding sources for survey work result in increased accountability for activities which increase administrative costs. This increase in administrative costs may make surveys previously bundled into the CAPS program, unpalatable for a state department of agriculture administrations.

Inadequate CAPS funding to the states could reduce program readiness in detecting and responding to national priority pests. For instance, after the introduction of box tree moth in 2021, states are being encouraged to include a box tree moth survey in their CAPS surveys in the upcoming year. This is a pest that can only be surveyed for using

CAPS funding and is not eligible for a PPA-funded survey. Without additional CAPS funding to support the survey, it requires states to review their other survey and program activities to accommodate the request, potentially removing an alternate priority pest.

States appreciated the opportunity to comment as part of the Pest Detection Cross Functional Working Group review of the CAPS program. It is understood that this process is continuing with a goal to build upon the strengths of the CAPS program. However, it is unclear if this effort will include a review of funding to states. Therefore, the National Plant Board would like to move forward in a collaborative manner with PPQ on the issue of CAPS funding and requests consideration of the following:

- Update on progress of the Pest Detection Cross Functional Working Group that reviewed the CAPS program.
- A joint review, potentially utilizing the National CAPS Committee, on CAPS funding levels and the additional funding that would be required to maintain the SSCs with Infrastructure agreements based on current costs rather than 2005 funding levels.
- Development of an action plan for periodic adjustments to CAPS funding levels commensurate with the CAPS program's goals and adjusted for inflation.

Sincerely,



Steven Long
National Plant Board President

CC:

Matt Royer, Associate Deputy Administrator, USDA APHIS PPQ
Samantha Simon, Associate Deputy Administrator, USDA APHIS PPQ
John Crowe, National Policy Manager – Pest Detection, USDA APHIS PPQ
Darrell Bays, National Operations Manager – Pest Detection, USDA APHIS PPQ
Lisa Jackson, National Operations Manager – Pest Detection, USDA APHIS PPQ
Monica Montero, Acting National Policy Advisor, Plant Protect Act 7721, USDA APHIS PPQ
Paula Henstridge, Assistant Deputy Administrator, USDA APHIS PPQ
Sharon Lucik, Communications Specialist, USDA APHIS PPQ
Dan Kenny, President, Central Plant Board
Christopher Logue, President, Eastern Plant Board
Ansel Rankins, President, Southern Plant Board
Helmuth Rogg, President, Western Plant Board