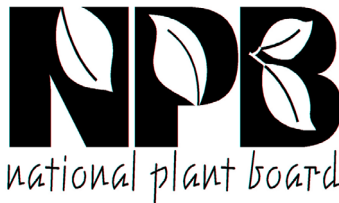


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Dr. Osama El-Lissy
Deputy Administrator
USDA APHIS PPQ
Washington, DC

October 5, 2021

Dear Dr. El-Lissy:

The National Plant Board requests that USDA APHIS PPQ facilitate an initial meeting with their sister agency, the Federal Railroad Administration (FRA), and the states to discuss concerns about spread and control of spotted lanternfly (SLF) and other notable pests of concern that move via U.S. rail lines. The National Plant Board requests that the initial meeting is held prior to mid-November 2021 in order to allow time to respond to any action items resulting from the initial meeting prior to the 2022 SLF survey and management season. Items of discussion during this initial meeting between the states, FRA, and PPQ should include:

- Raising rail industry awareness of the risks posed by invasive pests and the critical role that rail can play in reducing the spread of invasive pests
- Facilitating access to the railroads for survey, trapping, and treatment activities
- Fostering relationship-building between states and local rail
- Reducing the risk of pest introduction and transportation along the rail pathway
- Cooperation in early detection and rapid response efforts to pest detections and management needs

Communication with railroad lines is critical to state- and USDA-shared pest detection and response missions. Railroads can transport goods, and the pests within, between infested and uninfested areas, crossing quarantine and political borders. These national transportation providers are documented pathways for pest movement and critical targets for management and eradication activities. The opportunities to cooperate with local, state and federal rail in control activities and to slow pest introduction and spread are manifest in the response to SLF. Recent detections of SLF in the Midwest appear strongly correlated to the presence of active rail. A preferred SLF host, tree of heaven, is frequent along rail corridors, making them an ideal pathway for management of both SLF and its preferred host. Presence of active SLF along rail corridors and rail yards makes it easier for this nuisance and agricultural pest to be spread by rail. Coordination in reducing SLF populations in the presence of rail would be instrumental in slowing the introduction and spread of this pest.

Although opportunities to cooperate with rail lines are apparent, it has been challenging for states to gain access to rail lines for survey and control activities, likely because of the complexities of rail – from overlapping ownership of national, local, and private

lines to railroad laws that were enacted in the mid-1800's. The rail industry has understandable safety concerns and protocols associated with access to lines and tracks. These access issues result in delayed and often limited state access to rail lines with permission and access fees required before staff can perform survey, trapping, or treatment activities. Lack of access directly impacts the success of treating SLF with broadcast applications of bifenthrin.

Recently, the PPQ SLF program participated in a call with the California Department of Agriculture and rail industry in California that could serve as a model for an initial meeting between FRA, PPQ and the NPB. The National Plant Board believes that PPQ has a critical, and natural, role to play in assisting state communication with railroad lines. Further, the National Plant Board believes that a meeting between the FRA, PPQ, and NPB members is a start to enhancing communication and coordination, that PPQ is uniquely positioned to coordinate this initial meeting, and that an early, initial meeting will lay the groundwork for a more successful 2022 SLF program.

Although the importance of improved cooperation between pest detection and response agencies and rail is highlighted by the SLF program, there are risks of other pests also being introduced and moved along the rail pathway. The National Plant Board believes it is in the shared interests of PPQ and the states to improve communication and coordination with the rail lines now in order to continue to improve current and future pest response programs.

Sincerely,



Steven Long
National Plant Board President

CC:

Samantha Simon, Associate Deputy Administrator, USDA APHIS PPQ
Carlos Martinez, Associate Deputy Administrator, USDA APHIS PPQ
Paula Henstridge, Assistant Deputy Administrator, USDA APHIS PPQ
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Dan Kenny, President, Central Plant Board
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Ansel Rankins, President, Southern Plant Board
Helmuth Rogg, President, Western Plant Board