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October 10, 2017

Osama El-Lissy

Deputy Administrator for Plant Protection and Quarantine

USDA APHIS PPQ

Jamie L. Whitten Federal Building

1400 Independence Avenue, SW

Washington, DC 20250

Dear Osama,

The National Plant Board (NPB) feels strongly that the Asian longhorned beetle (ALB) program should be among the highest priorities for USDA APHIS PPQ. ALB represents a major threat to forest resources across the country as the insect has an expansive host list, including several species that are common in early successional forests. Recovery from an ALB introduction is achievable in spite of these risks because effective tools are available to not only contain, but to achieve eradication. Central and Eastern Plant Board states have been significantly impacted by infestations of this pest over the past two decades. The existing ALB response model is a cooperative eradication program led by both federal and state regulatory agencies and is an excellent example of the pooling of resources and efficiency that is often sought, but rarely achieved. The NPB believes that continued inter-agency cooperation supported by adequate funding will lead to eradication of the ALB. The NPB recognizes that although resources for eradication programs are limited, significant progress has been made in the active eradication programs in Massachusetts, New York, and Ohio. Continued funding and adequate staffing in these cooperative programs is the only path towards eradication and the preservation of our forest resources.

While ALB eradication is achievable, there are challenges to success, including: survey intensity, property access, and the complexity of the life cycle of the ALB itself. The NPB recognizes that budgetary reductions may be under consideration for the "tree pest" line item for FY'18. We strongly advocate for the importance of continuing coordinated ALB eradication efforts. Reducing support will negatively impact regulated industries by allowing infestations to build and spread, increasing overall costs. For example, any ALB detection near a nursery would have major economic impacts as there is no regulatory treatment for nursery stock impacted by ALB. Additionally, ALB poses a unique threat to the maple-based wood products, syrup, and tourism industries in New England, New York and the Upper Midwest, warranting continued eradication efforts. The NPB is concerned that reductions in staffing and funding for this important program will deleteriously impact public perception of program efforts. Reductions in staffing and funding could cause local

communities to question the efforts and commitment of our agencies and our ability to eradicate this pest. Doubts in our local officials and communities will only increase property access challenges, further slowing our eradication efforts.

A sizable investment has been made in the ALB cooperative eradication program to date and it is vital to continue this effort at a level that is focused on the goal of eradication of ALB from the U.S. and North America as a whole. We have seen eradication programs in Illinois, New Jersey, areas of Massachusetts, and New York demonstrate the success that is possible with the continued commitment of resources. Significant strides toward eradication have been made in all three currently infested states. In New York, Eastern Queens was recently deregulated and in the near future Western Queens is expected to follow. USDA and New York State Department of Agriculture staff share office space in Queens and Amityville and continue to work cooperatively to safeguard New York's forest resources. Similar examples of cooperation exist in Massachusetts and Ohio.

The membership of the NPB strongly advocates for USDA's continued prioritization of resources for the ALB Cooperative Eradication Program at levels that ensure eradication can be achieved. The NPB deeply appreciates PPQ's efforts over the years to create and maintain a cooperative program that includes local, state, and federal partners. The NPB feels that with continued support, eradication of ALB from the U.S. is achievable, and should be among PPQ's highest priorities.

Sincerely,



Ann Gibbs, President  
National Plant Board

CC:

Paula Henstridge, Assistant Deputy Administrator, USDA APHIS PPQ  
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