September 28, 2017

Victoria Christiansen
USDA Forest Service
Deputy Chief, State and Private Forestry
Sidney R. Yates Federal Building
201 14th St. SW
Washington, DC 20250

Dear Ms. Christiansen,

The National Plant Board (NPB) values its partnership with U.S. Forest Service, Forest Health Protection (FHP). FHP and member states of the NPB have shared areas of interest and authority on a variety of critical forest health pest issues. For instance, the FHP national strategic framework for invasive species management identifies several mission-critical programs, including management of walnut twig beetle, gypsy moth, sudden oak death, hemlock woolly adelgid, Asian longhorned beetle, emerald ash borer, and white pine blister rust. State plant regulatory agencies have authorities and programs relating to these pests, including quarantines or regulations relating to: firewood transportation, gypsy moth, thousand canker disease, emerald ash borer, various bark beetles, white pine blister rust, Asian longhorned beetle, hemlock woolly adelgid, and sudden oak death. To partner effectively, a coordinated response to these forest health threats requires communication. Regional plant board meetings are an ideal opportunity for plant regulatory representatives to discuss current regional and emerging plant health threats, opportunities, and initiatives with FHP personnel. As such, the NPB believes that FHP participation in plant board meetings, regional and national, is critical to the continued shared efforts of FHP and the state plant regulatory agencies.

Recent FHP participation at plant board meetings has been limited. Lack of FHP representation at these meetings is a lost opportunity for both FHP and the state plant regulatory agencies. Additionally, meeting planners are left struggling to build relevant agendas when FHP participation is uncertain. In 2017, challenges associated with travel approval for invited FHP personnel negatively impacted the Central, Eastern, and National Plant Board meetings. Communication with FHP indicated that the registration costs for the plant board meetings were an obstacle to attendance. Registrations are necessary to pay the costs of plant board meetings and it is difficult to justify waiving registration costs for FHP attendees when registration costs are not similarly waived for other state and federal partners. Waiving registration costs for FHP personnel is neither a sustainable nor equitable solution to bolstering attendance by FHP personnel. Nevertheless, in 2017, the Central Plant Board, and National Plant Board waived or reduced registration fees for FHP personnel whereas the Eastern Plant Board did not. As a result, FHP invitees participated in the Central and National, but not the Eastern, plant board meetings. A
policy that appears to use a registration fee to determine mission relevancy for FHP personnel
fails to recognize the critical partnership between FHP and state regulatory agencies.

The National Plant Board respectfully requests that the FHP administration consider plant board
meetings as mission-critical and not subject to the recently implemented travel approval process.
It is our hope that designating these meetings as mission-critical will reduce obstacles to FHP
participation at future plant board meetings, and will facilitate improved cooperation between
state and federal partners.

Sincerely,

Ann Gibbs, President
National Plant Board

CC:
Patricia Hirami, Associate Deputy Chief, USDA Forest Service
Rick Cooksey, USDA Acting Director, Forest Service, Forest Health Protection
Collin Wamsley, Central Plant Board President
Christopher Logue, Eastern Plant Board President
Kenneth Calcote, Southern Plant Board President
Brad Lewis, Western Plant Board President