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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

July 7, 2017

Dear Mr. El-Lissy,

In April of 2017, at the Central Plant Board (CPB) meeting in Indianapolis, Dr. Scott Pfister presented an excellent overview of the status of the Asian Longhorned beetle (ALB) in North America. As you know the CPB states have been greatly impacted by this pest over the past two decades through numerous warehouse interceptions, the infestation in Chicago and recently the most rural infestation in Clermont County, Ohio. Considering the insect's expansive host list, including several species that are common in early successional forests, the ALB represents a major threat to the forests of the Midwest. This is a pest problem for which effective tools are available to not only contain, but to achieve eradication. The CPB feels strongly that the ALB program should be among the highest priorities for USDA – APHIS PPQ. The existing model, a cooperative eradication program led by both Federal and State regulatory agencies is an excellent example of the kind of pooling of resources and efficiency that is often sought but rarely achieved in a program. At this time, it appears that ALB eradication is achievable, but operational plans and policies must continue to reflect that goal and take into account the risk and added costs of prolonging these efforts. Decreased support for the program's activities comes at an increased risk to the forest economy and green industries of the Northeast and Midwest. Short term reductions in progress can significantly extend the timeline for eradication while allowing more opportunity for ALB to spread by human movement or other means.

Reductions to the ALB effort will effectively stalemate progress on eradicating ALB if survey cycles can't keep pace with the insect life cycle. While funding reductions may be required in the "tree pest" line item in FY'18, we strongly advocate that ALB eradication efforts be maintained. Reductions in support put regulated industries at further risk by allowing the infestation to build. At this time there is no regulatory treatment for nursery stock for ALB, so any spread or new infestation near a nursery could have a major economic impact. The most concerning result of this scenario is that reducing ALB operations will sow doubt in local communities affected by ALB on the commitment to the goal of eradication and the need for tree removal to combat the insect.

Recognizing that eradication is a costly endeavor, the CPB encourages continued analysis and revisions to policies that allow more efficient use of resources, like recent changes to allow for the use of maple-only survey and the proposed removal of hackberry from the host list. The CPB commends APHIS on successfully implementing a solution to replace the ERIS database. The use of the ROAM software has allowed the flexibility to work with various mobile collection devices and still get data into a usable and secure location. We encourage APHIS and ALB program leadership to continue to engage with impacted states on policy and operational decisions as well strategic planning via the ALB cross functional working group or other venues. While consistency nationally is very important, it is also critical that each of these cooperative eradication programs seek out and consider state and local input. State and local ALB field office input allows all parties involved to reach solutions that are both practical and effective and assists in achieving buy-in from field staff and local communities.

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 Chicago, New Jersey, areas of Massachusetts, and New York demonstrate the success that is possible with continued focus of resources. Additionally, significant strides toward eradication have been made in all three states (OH, MA, NY) with current ALB infestation. In Ohio, the satellite infestations in Batavia/Stonelick and Monroe townships are approaching potential declaration of eradication in the near future. The USDA Ohio ALB Program recently opened a new facility in Bethel, Ohio that acts as headquarters for the 70 plus combined USDA and ODA staff. These surveyors, as well as those in other ALB states are well trained and experienced in identifying ALB infestation and in regulatory activities. Their continued efforts are making a difference in increasing awareness and reducing the pest level and risk of spread. The CPB believes APHIS should continue to invest in those areas where we have tools to get the job done.

The Central Plant Board states advocate for USDA's continued prioritization of resources for the ALB Cooperative Eradication Program at levels that continue to make real progress toward eradication. CPB very much appreciates the USDA efforts over the years to foster the cooperative nature of the program between State, Local, and Federal partners and supports continuing and bolstering the involvement of States and Local ALB Offices in influencing policy and operational direction. The CPB feels that given continued support, eradication of ALB from the U.S. is still achievable, and should be considered one of PPQ's highest priority goals.

Sincerely,



Collin Wamsley, President
Central Plant Board

CC:

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