

**Chicago Bureau of Forestry**  
**Greenspace-the Cambria Land Trust**  
**Grantham Foundation for the Protection of the Environment**  
**International Maple Syrup Institute**  
**Massachusetts Association of Campground Owners**  
**National Association of RV Parks & Campgrounds**  
**National Association of State Foresters**  
**National Plant Board**  
**Pennsylvania Department of Conservation and Natural Resources, Bureau of Forestry**  
**Society of American Florists**  
**Society of American Foresters**  
**Society of Municipal Arborists**  
**The Nature Conservancy**  
**The Ohio State University, Department of Entomology**  
**Virginia Native Plant Society**  
**Walden Forest Conservation**

October 21, 2011

Ms. Rebecca Bech  
Deputy Administrator  
US Department of Agriculture  
Plant Protection and Quarantine  
Animal and Plant Health Inspection Service  
Whitten Building, Room 302-E  
1400 Independence Avenue, SW  
Washington, DC 20250

RE: Maintaining Funding for Vital CPHST Programs

Dear Ms. Bech,

We are conscious of the need to constrain federal spending in order to reduce the federal budget deficit. We recognize further that the programs implemented by APHIS PPQ must share in the reductions and – consequently, that continuing projects need to focus on the highest priorities and promise the biggest payoffs.

While the Congress has not completed action on the federal budget for Fiscal Year 2012, which begins October 1, it appears virtually certain that APHIS programs will be cut at that time and again in FY13. The appropriations bill passed by the House of Representatives calls for a cut of seven percent in funding for APHIS PPQ's Methods Development program. This cut, while small compared to some other reductions now being contemplated, still threatens to curtail or eliminate several APHIS programs of crucial importance in reducing the risk of introduction or post-introduction impacts of forest pests. Three on-going projects are of particular concern to us:

- studies evaluating the efficacy of the two treatments authorized by the International Standard for Phytosanitary Measure # 15 for use on wood packaging;
- technical/scientific assistance provided to the USDA Forest Service to improve management of two insects that are not federal quarantine pests – goldspotted oak borer and walnut twig beetle; and
- studies leading to the identification, testing, and development of rearing techniques for biological control agents targeting a variety of introduced pests.

### **ISPM #15**

Ensuring the efficacy of treatments applied to wood packaging is critical to protecting the United States from repeated assaults by the most damaging types of introduced tree-killing pests. As Aukema *et al.* (2011)<sup>1</sup> demonstrate, wood borers that enter the country primarily on wood packaging already cost the country dearly. Each year, these organisms force municipal governments to spend nearly \$1.7 billion for tree removal and replacement; reduce residential property values by approximately \$830 million; and cause \$92 million in federal expenditures. If the International Standard for Phytosanitary Measure # 15 is not sufficiently effective, the authors concluded, the chance that another borer species as destructive as the emerald ash borer will invade the U.S. in the next 10 years is one out of three.

### **Goldspotted Oak Borer and Thousand Cankers Disease**

The goldspotted oak borer was introduced to California's San Diego County in firewood. In approximately a dozen years, it has killed 80,000 oak trees.<sup>2</sup> Oak trees throughout California are at risk,<sup>3</sup> including those in nearby Los Angeles. According to one estimate, there are approximately 90,000 oak trees found in yards, parks, and along streets in Los Angeles County. Assuming half of these trees are killed by the goldspotted oak borer, and that removal costs are \$2000 per tree on average, remediation costs will exceed \$100 million. The loss of property value if 45,000 oaks die could range from about 150 million to a billion dollars.

The walnut twig beetle and associated fungus threaten black walnut, which has a standing value of timber estimated to be \$539 billion. This figure does not include loss of jobs (logging, milling, and domestic utilization), loss of residential walnut trees, and loss of the export market that accounts for nearly 80% of walnut timber harvested, or the value of the nuts as food and industrial abrasives.

---

<sup>1</sup> Aukema, J.E., B. Leung, K. Kovacs, C. Chivers, K. O. Britton, J. Englin, S.J. Frankel, R. G. Haight, T. P. Holmes, A. Liebhold, D.G. McCullough, B. Von Holle. 2011. Economic Impacts of Non-Native Forest Insects in the Continental United States. *PLoS One* September 2011, Volume 6, Issue 9

<sup>2</sup> Perry, T. 2011. A hungry pest is devouring San Diego County oak trees. *Los Angeles Times*. September 5, 2011.

<sup>3</sup> Coleman, Thomas W. and Steven J. Seybold. 2009. Tree Mortality from the Goldspotted Oak Borer in Oak Woodlands of Southern California. [in](#) Frankel et al. Fourth Sudden Oak Death Science Symposium June 2009 Meeting Abstracts

## **Biological Control**

Ensuring continuation of biological control programs targeting such species as the Emerald Ash Borer and Sirex woodwasp is essential to long term management of many introduced pests. Funding for such programs comes, to a large extent, from APHIS PPQ's Methods Development program.

We urge you to support continuation of these studies and technical assistance programs even as APHIS PPQ must adjust its programs in response to the need to reduce the federal budget deficit.

Sincerely,

Paul Bambei, President and CEO, National Association of RV Parks & Campgrounds

Robert L. Bendick, Director, Government Relations, The Nature Conservancy

Mike Cooper, President, National Plant Board

Donald A. Eggen, Forest Health Manager, Pennsylvania Department of Conservation and Natural Resources, Bureau of Forestry

Jay Farrell, Executive Director, National Association of State Foresters

Marcia Galvin, Executive Director, Massachusetts Association of Campground Owners

Michael T. Goergen, Executive Vice President and CEO, Society of American Foresters

Rupert Grantham, Trustee, Grantham Foundation for the Protection of the Environment, and Consulting Forester and Owner/Operator, Walden Forest Conservation

Richard Hawley, Executive Director, Greenspace-the Cambria Land Trust

Daniel A. Herms, Professor, The Ohio State University, Department of Entomology

Jerri J. LaHaie, Executive Director, Society of Municipal Arborists

Mary Ann Lawler, Conservation Chair, Virginia Native Plant Society

Joseph McCarthy, Senior City Forester, Chicago Bureau of Forestry

Richard Norman, President, International Maple Syrup Institute

Ken Rauscher, Michigan Department of Agriculture, retired

Lin Schmale, Senior Director, Government Relations, Society of American Florists