

American Forest Foundation
American Nursery & Landscape Association
California Forest Pest Council
California Polytechnic State University, Natural Resources Management Department
Greenspace-the Cambria Land Trust
Michigan Department of Agriculture
Michigan Department of Natural Resources & Environment, Forest Management Division
Mulch & Soil Council
National Association of State Foresters
National Plant Board
North American Maple Syrup Council
Oregon State University, Department of Botany and Plant Pathology
Purdue University, Department of Entomology
Society of American Florists
The Nature Conservancy
University of Georgia, Center for Invasive Species and Ecosystem Health
Valent USA Corporation

Thursday, November 4, 2010

Nancy Sutley
Chair
White House Council on Environmental Quality
722 Jackson Place, NW
Washington, DC 20503

Dear Chair Sutley:

The Continental Dialogue on Non-Native Forest Insects and Diseases is a collaboration of diverse public and private sector interests aimed at improving our nation's efforts to address the significant threat non-native pests and diseases pose to our forests. Our focus is on **sustaining America's forests** which comprise about one-third of the nation's total land area. These forests sustain biological diversity and provide clean air and water to hundreds of millions of people in the United States. Forest products and related industries employ more than 1.6 million people and contribute \$231.5 billion to our nation's economy. Forests can also provide part of the solution in our nation's efforts to reduce energy use and greenhouse gas emissions. **We are writing to urge specific action to protect these vital forest resources.**

Our forests are needlessly being lost to invasive non-native forest insects and diseases. Some of these insects and diseases, such as chestnut blight and Dutch elm disease, have nearly eliminated major tree species across the majority of their natural range. Invasive pests are adding increasing financial burdens to states, communities, and individual property owners. It is estimated that spread

of the exotic emerald ash borer to additional areas over the next 10 years could result in more than \$10 billion in costs to urban and suburban areas for tree removal and replacement or chemical treatments. The recent outbreak of the Asian longhorned beetle, which is decimating the urban forests of Worcester, Massachusetts, poses an alarming threat to hardwood forests reaching from New England to Minnesota and in areas of western states.

Yet, timely action and investments to address these threats are achievable – both in terms of policies dealing with introduction and spread of these pests as well as increased efficiency and coordination of federal actions. In January 2009, we sent you a Presidential Transition package highlighting actions to provide a foundation for a clear, solutions-oriented agenda for your administration. We are now following up with a focused list of five cost-effective practical actions that: 1) are achievable in the next two years; 2) can be accomplished within budgetary constraints; and 3) leverage existing programs and efforts. These integrated actions will also build an important foundation for future work.

Priority Actions to Protect America’s Forests from Invasive Species

The following cost-effective practical actions focus on preventative and outreach measures, especially revolving around the pathways by which numerous pests enter into our country and then spread. While the Continental Dialogue participants support increased appropriations for ongoing invasive species programs, these actions were selected to leverage existing programs and efforts with increased involvement from the states and private sector.

Together, the recommendations provide a foundation to:

1. Prevent many new introductions of non-native forest pests and diseases;
2. Prevent the spread of pests already introduced;
3. Support ongoing prevention, detection, eradication, and management programs; and
4. Ensure needed coordination among the multitude of federal agencies which have responsibility for addressing introduced forest pests.

Action: The movement of firewood provides a pathway for invasive forest pests to spread from one area to another, often over long distances. Federal agencies should partner with states, and others to implement a targeted approach that relies on coordinated outreach strategies, voluntary mechanisms which encourage the use of best management practices, and regulations designed to ensure the safe movement of insect and disease-free firewood.

Benefit: The recommended targeted regulatory approach would establish a national framework in which states would have the flexibility to regulate firewood movement according to their specific needs. The spread of invasive species can be significantly reduced if the public is educated on the dangers of forest pests that can hitchhike in firewood. The outreach program leverages existing communications strategies, such as <http://www.dontmovefirewood.org>. Visitors to this website encounter multiple media for the delivery of the “Don’t Move Firewood” message; blog entries, videos, engaging graphics, and short facts on forest pests.

Action: Ensure that local or treated firewood is available at federal campgrounds.

Benefit: By ensuring that locally-sourced or treated firewood is available, campers will be less likely to bring firewood with them, thereby reducing the risk of new pests being introduced into the area. In addition a key element of these programs will be outreach efforts to ensure the

public is aware of the risks of moving firewood as well as of an alternate source of pest free firewood at or near the campgrounds.

Action: Establish a December 2010 deadline to implement amendments to Quarantine 37 to temporarily restrict risky plant imports that have not been evaluated through a pest risk assessment process.

Benefit: Live plant imports are a significant pathway of plant pest introduction. Current efforts through inspection at ports combined with pest risk assessments to identify protective measures for particular species of imported plants have not adequately prevented the accidental import of plant pests. Comments have been received on a proposed regulation, NAPPRA (Not Authorized Pending Pest Risk Analysis) that was published July 23, 2009 (Federal Register Volume 74, Number 140). This regulation should be finalized quickly and applied aggressively.

Action: Expand citizen-based pest surveys through survey mechanisms and programs initiated by USDA - APHIS PPQ.

Benefit: This action ensures the early detection of harmful or economically significant plant pests and weeds working with state and university cooperators through national and state-level committees to prioritize survey projects. It would also support the efforts of state cooperators to conduct the agreed-upon surveys and train and equip state cooperators to conduct surveys.

Action: The National Invasive Species Council should continue to encourage the use of federal expenditures in a coordinated manner for Invasive Species programs, to ensure that the various agency efforts are collaborative, rather than being overlapping or insufficient. Cross-cutting approaches for each federal fiscal cycle are recommended.

Benefit: In this era of strong budget pressures and, often, declining federal budgets, it is particularly important that the various federal agencies' invasive species programs remain robust and maximize effectiveness. While the agencies themselves lead prioritization of their missions and preparation of their budgets, the National Invasive Species Council can encourage a coordinated and cost-effective federal investment.

We appreciate your consideration of these proposed actions by federal agencies. Participants in the Continental Dialogue stand ready to implement these priority actions with you. These actions are a key first step in addressing political, policy, and programmatic elements needed to assure that our nation's forests continue to provide traditional benefits (e.g., wood, water, recreation) as well as contribute to new environmental, energy, and climate challenges. We are in a unique position, not only to help guide the development of these policies and programs, but also to assist in their delivery at the local level. Please do not hesitate to call upon us.

If you have any questions about our comments or wish to speak to us directly, please contact Paul De Morgan at 202.965.6207 or pdemorgan@resolv.org.

Sincerely,

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Lynne Boyd, Chief, Michigan Department of Natural Resources & Environment, Forest Management Division

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*CC: Secretary Gary F. Locke, Department of Commerce
Secretary Kenneth L. Salazar, Department of the Interior
Secretary Thomas J. Vilsack, Department of Agriculture
Jonathan Jarvis, Director, National Park Service
Cindy Smith, Administrator, Animal and Plant Health Inspection Service
Tom Tidwell, Chief, United States Forest Service*