

Alliance for Community Trees  
American Forest Foundation  
American Nursery & Landscape Association  
American Phytopathological Society  
California Forest Pest Council  
City of Chicago Department of Streets and Sanitation Bureau of Forestry  
The Davey Institute  
Greenspace-the Cambria Land Trust  
Maine Department of Agriculture  
Michigan Department of Agriculture  
National Plant Board  
National Wooden Pallet and Container Association  
Pennsylvania Department of Conservation & Natural Resources, Bureau of Forestry  
Purdue University, Department of Entomology  
Society of American Florists  
The Nature Conservancy  
University of California Berkeley, Department of Entomology  
University of Georgia, Center for Invasive Species & Ecosystem Health

Tuesday, September 28, 2010

Rebecca A. Bech  
Plant Protection and Quarantine  
Animal and Plant Health Inspection Service  
Whitten Building, Room 302-E  
1400 Independence Avenue, SW  
Washington, DC 20250

Dear Rebecca,

We are writing to you on the significant issue of introduction of wood-related invasive pests. Our groups have come together with many others under the auspices of the Continental Dialogue on Non-Native Forest Insects and Diseases. The Continental Dialogue is a collaboration of diverse interests aimed at addressing the threat of non-native insects and diseases on America's forests.

Across the nation, a growing number of introduced pests are ravaging urban and wildland forests. Once they become established, they are difficult to eradicate and are often transported from their initial infestation locations to other areas via various pathways, including untreated firewood.

We applaud USDA APHIS' initiative to address the firewood pathway through convening the national Firewood Task Force and on-going efforts to implement its consensus recommendations. Many of the undersigned groups are working with USDA and state partners to

implement its recommendations. We note, however, that two entry pathways into the U.S. have not been addressed by the Task Force's recommendations.

The first regulatory gap is imports of potentially contaminated firewood from Mexico. Under its regulations at 7 CFR § 319.40-3 (ii), USDA APHIS allows importation from States in Mexico adjacent to the United States of commercial and noncommercial shipments of firewood, as well as small, noncommercial packages of wood for personal use as firewood or for medicinal purposes.

According to the pest risk assessment recently released by APHIS CPHST PERAL,<sup>1</sup> the U.S. imported firewood worth \$780,000 from Mexico during the period 2005 through 2009. While imports from Mexico constitute only 2% of total U.S. imports of firewood, we suggest that the pest risk is substantial. During this period, U.S. inspectors intercepted 17 pest taxa on firewood from Mexico; the risk assessment does not specify the genera involved.

Our concern is heightened by the recent phenomenon of pests native to Mexico and in some cases U.S. border states killing significant populations of native trees in the United States. Examples include:

- *Pityophthorus juglandis* – the walnut twig beetle associated with thousand canker disease
- *Agrilus coxalis*– the gold-spotted oak borer
- *Agrilus prionurus* – a beetle now killing western soapberry trees across Texas

We are concerned that imports of wood containing these beetles might be taken to areas of the United States not yet experiencing these damaging pests. Furthermore, other insects and pathogens native to nearby Mexico could pose similar threats to other tree species.

The second regulatory gap is imports of coniferous firewood from Canada. States in the Northeast have expressed concern that imports of spruce logs from Nova Scotia might contain larvae of the brown spruce longhorned beetle (*Tetropium fuscum*). During the annual meeting of the National Plant Board, you noted this concern and spoke about taking action to regulate coniferous firewood from Canada. We applaud this step and hope that the necessary regulatory change can be accomplished quickly. In amending the appropriate regulations, we hope that APHIS will also consider imports of “hog fuel.” These imports are composed of large, untreated slabs of waste wood cut off roundwood in lumber mills. According to the APHIS CPHST PERAL risk assessment, “This material may not be covered within the existing regulatory structure.” The pest risk assessment notes that the U.S. imported 189.7 thousand metric tons of “hog fuel” from Canada in 2009 (and presumably similar quantities in other years).

**The undersigned organizations would like to offer our support for prompt amendment of 7 CFR § 319.40-3 (i) and (ii) to require treatment of firewood from Mexican border states [with the exception of wood from mesquite (*Prosopis* spp.)] and coniferous firewood from Canada (including “hog fuel”).**

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<sup>1</sup> USDA APHIS PERAL CPHST. 2010. Risk Assessment of the Movement of Firewood within the United States. May 2010.

Adoption and implementation of stronger regulations governing importation of firewood is just one part of a more effective strategy to prevent introduction of damaging forest pests. There are other troublesome pathways for these pests that will require our continued collective search for solutions. Nevertheless, the undersigned organizations believe closing this/these regulatory gap(s) would significantly reduce the risk to valuable urban and wildland forest resources.

Sincerely,

Faith T. Campbell, Senior Policy Representative, The Nature Conservancy

G. Keith Douce, Co-Director and Professor, Center for Invasive Species & Ecosystem Health,  
University of Georgia

Donald A. Eggen, Forest Health Manager, Bureau of Forestry, Division of Forest Pest Management,  
Pennsylvania Department of Conservation & Natural Resources

Alice C. Ewen, Executive Director, Alliance for Community Trees

Ann Gibbs, State Horticulturist, Maine Department of Agriculture

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

Tom Martin, President & CEO, American Forest Foundation

Joseph McCarthy, Senior City Forester, City of Chicago Department of Streets and Sanitation  
Bureau of Forestry

Anand B. Persad, Regional Technical Advisor, The Davey Institute

Ken Rauscher, Division Director, Pesticide and Plant Pest Management, Michigan Department of  
Agriculture

Craig J. Regelbrugge, Vice President, Government Relations and Research, American Nursery &  
Landscape Association

Robert Rynearson, Chairperson, California Forest Pest Council

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

Bruce Scholnick, President, National Wooden Pallet and Container Association

Carl Schulze, President, National Plant Board

John Sherwood, APS President, American Phytopathological Society

David L. Wood, Professor Emeritus of Entomology, University of California Berkeley

Steve Yaninek, Professor and Head, Department of Entomology, Purdue University