

American Nursery & Landscape Association
City of Chicago Department of Streets and Sanitation, Bureau of Forestry
Clemson University Regulatory Services
The Davey Institute
Greater Worcester Land Trust
Greenspace-the Cambria Land Trust
International Maple Syrup Institute
Michigan Department of Agriculture
National Association of State Foresters
National Plant Board
The Nature Conservancy
New England Forestry Foundation
North American Maple Syrup Council, Inc.
Oregon Department of Agriculture, Plant Division
Pennsylvania Department of Conservation and Natural Resources
Purdue University, Department of Entomology
Society of American Florists
Union of Concerned Scientists
University of Georgia, Center for Invasive Species and Ecosystem Health

Thursday, April 22, 2010

Rebecca Bech
Deputy Administrator
USDA APHIS PPQ
4700 River Road Unit 140,
Riverdale, MD 20737-1231

Docket No. APHIS-2009-0016

Dear Ms. Bech:

On August 27, 2009, the USDA Animal and Plant Health Inspection Service (APHIS) issued an Advance Notice of Proposed Rulemaking (ANPR) concerning actions the agency might take to reduce the risk of wood packaging infested with exotic forest pests moving in domestic commerce. APHIS received more than 50 comments, ranging across a broad spectrum of views, on the ANPR by the comment deadline of October 26, 2009.

While recognizing the economic impacts and the difficulty in quantifying the threat, the Continental Dialogue on Non-Native Forest Insects and Diseases believes the prevalence of wood packaging pests in international commerce suggests that unregulated wood packaging could spread quarantine and non quarantine pests domestically from infested parts of the country to uninfested areas.

We remain concerned that movement of wood packaging is a probable pathway for the spread of such quarantine pests as the emerald ash borer (*Agrilus planipennis*) and Asian longhorned beetle (*Anoplophora glabripennis*). Unfortunately, the current pest-specific quarantines are often not effective in preventing secondary infestation, in part because detection of outbreaks of these pests often occurs several years after the infestation is established.

In addition, we are concerned that other damaging introduced forest pests that are not currently subject to federal quarantines could also be spread via this pathway. Pests such as Sirex woodwasp (*Sirex noctillo*), redbay ambrosia beetle (*Xyleborus glabratus*), Mediterranean pine-shoot beetle (*Orthotomicus erosus*) and dozens of other woodborers are capable of utilizing this spread mechanism to expand their range.

Therefore, we are writing to encourage USDA APHIS to expeditiously review the ANPR comments and we are hopeful that a regulatory strategy and other appropriate approaches to address this threat can be developed by July 1st. We look forward to working with you on this challenging matter.

Sincerely,

Si Balch, Director of Forest Stewardship, New England Forestry Foundation

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

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

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

Jay Farrell, Executive Director, National Association of State Foresters

Gary Gaudette, President, International Maple Syrup Institute

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

Daniel J. Hilburn, Administrator, Plant Division, Oregon Department of Agriculture

David Howle, Assistant Director, Clemson University Regulatory Services

Rick Marsh, President, North American Maple Syrup Council, Inc.

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

Colin M.J. Novick, Executive Director, Greater Worcester Land Trust

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

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

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

Cliff Sadof, Professor, Department of Entomology, Purdue University

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

Carl Schulze, President, National Plant Board

Phyllis N. Windle, Senior Scientist and Director, Invasive Species, Union of Concerned Scientists

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