



SOUTHERN GROUP OF STATE FORESTERS
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November 16, 2018

Robyn Rose
National Policy Manager, PPQ
USDA Animal & Plant Health Inspection Service
4700 River Road, Unit 26
Riverdale, MD 20737-1231

RE: Removal of Emerald Ash Borer Domestic Quarantine Regulations, RIN: 0579-AE42

Dear Ms. Rose,

This set of comments is in regards to USDA Animal & Plant Health Inspection Service (APHIS) request for comment on the proposed removal of Emerald Ash Borer Domestic Quarantine Regulations, RIN: 0579-AE42. The Southern Group of State Foresters (SGSF) appreciates the opportunity to provide comment to APHIS regarding the removal of current federal quarantines related to the control of emerald ash borer (EAB). SGSF is a non-profit organization that represents the State Foresters from 13 southern states, Puerto Rico and the US Virgin Islands, and whose mission is to provide leadership in sustaining the economic, environmental, and social benefits of the south's forests. To achieve this mission SGSF works with many partners across the south and nation to identify and address existing and emerging issues and challenges that are important to southern forests and citizens.

The south is blessed with abundant natural resources, including over 230 million acres of forests, of which 200 million are privately owned and managed. These forests provide numerous economic, environmental, and social benefits to over 114 million people. Recent analyses conducted by Mississippi State University Extension Forestry indicate that the forest sector in the south generates over \$251 billion in economic output annually which represents over 2.7% of the regional economic output. Also, the forest related economic activity supports over 1 million jobs, 2% of all jobs in the south, with a payroll over \$50 billion annually.

SGSF and its members have a long history of working with private landowners, state and federal agencies, academia, conservation organizations, and other cooperators to support forest conservation, resource protection, economic development, and environmental sustainability. This includes working with landowners and land managers across the south to maintain healthy forests while keeping watch for newly discovered pests and plants that threaten their viability.

Forestland across the south and nation are under constant threat of invasive pests and plants some of which threaten to completely remove a tree species from the landscape.

Since the introduction of EAB in the United States it has infested 33 states and 4 Canadian provinces, including 11 of the 13 states in our region. For over a decade, state forestry agencies in conjunction with APHIS and other state/federal agencies have been at the forefront of monitoring and managing the spread of EAB. Unfortunately, EAB is a prolific killer of ash trees and its spread had been aided by the transport of wood products, mainly firewood, from state to state. The health of the forests in the south and nation are critical and SGSF is prepared to continue to work with a diverse group of partners to ensure the health and sustainability of all private, state and federal forestland and ensure proper policy and protocols are in place to protect these productive lands.

Little has been able to stop the spread of EAB since its original detection in Southeast Michigan in 2002. Federal quarantines, while unable to prevent the spread of the pest, can be reasonably believed to have at least slowed the spread allowing state forestry agencies and others time to develop strategic plans for dealing with inherent infestations and also protect and preserve high value ash trees within communities and historical sites.

SGSF understands the reasoning behind APHIS' desire to deregulate EAB but feels there could be unintended consequences to this decision. With this said, SGSF provides the following comments knowing there is no "silver bullet" and increased cooperation will be required to manage EAB now and in the future.

1. **APHIS should continue the regulation of EAB along with associated federal quarantines or at minimum provide oversight of state level quarantines to ensure consistency.** While it can be argued that federal quarantines have done little to stop the spread, we believe federal quarantines have been successful at:
 - a. Slowing the spread of EAB allowing states, in particular southern states, time to prepare for potential infestations and develop strategic plans for the education and mitigation of EAB, especially in urban areas where ash can be a prevalent species.
 - b. Federal quarantines provide a foundation for outreach for state forestry agencies who do not have regulating authority. These quarantines provide a mechanism to educate the public, forest industry and wood dealers on the perils of moving infested material across a state and/or over state lines. Non-regulatory state forestry agencies are able to leverage the federal quarantines with their educational efforts providing more urgency for their message.
 - c. Federal quarantines also ensure consistent protocols for moving potentially infested wood material across state lines. Removing these established quarantines will likely lead to contradicting state level quarantines which could impact interstate commerce within the forest products sector. There must be some level of consistency when dealing with interstate commerce and policies affecting wood movement.

2. **Within the parameters of any new APHIS policy for managing EAB nationally, monitoring efforts should not be limited to just those areas currently known to be infested.** In the south, state forestry agencies play a critical role in EAB monitoring efforts and this tool is the only means for identifying the spread of EAB within a state. Knowing where EAB is currently located and the direction the spread is moving is necessary to ensure that all possible is being done to combat the spread but more importantly provide data needed to make timely decisions for protecting high value trees in urban/suburban areas as well as

historical sites. Protecting high value trees is highly dependent upon timing - systemic injection treatments are too costly to administer unwarranted but must be administered in a timely manner for full efficacy. Limiting monitoring efforts to infested areas only for the release of bio-control agents as proposed by APHIS would severely limit state's ability to track and monitor the spread of EAB leading to public relations issues with local stakeholders.

3. **APHIS should champion a national, multi-agency strategic approach for EAB management.** We support the proposal's commitment to biocontrol, but research and management needs related to EAB go beyond this tool. These include research on other treatments to slow ash mortality, on resistance breeding, and on restoration of upland, urban, and wetland forests. Management needs include detection and mapping, cost-share programs for removal, treatment, and restoration, and continued outreach.
4. **APHIS should support the creation of a national voluntary treatment standard and label for the packaged firewood industry,** including taking the following actions:
 - a. Lend expertise to the packaged firewood industry and proactively assist development of a third-party voluntary certification program to ensure success.
 - b. Support creation of a national "clean" firewood certification program which includes a federally recognized "all pest" treatment standard and an easily recognizable and educational consumer label.
5. **Should APHIS still choose to deregulate EAB, then we suggest that all quarantine regulatory savings be redirected to research and management, including State survey activities.** In addition, we recommend that the Administration advocate for a funding increase for USDA APHIS, the US Forest Service, and state EAB programs. Funding needs for state EAB programs include assistance for their increased responsibility for slowing the spread, including survey, outreach and education, and for growing needs to provide assistance to municipalities, forest landowners, and businesses.

SGSF recognizes the challenges in managing such a deadly invasive pest nationally, but believes there is room for compromise in the new policy affecting the regulation of EAB. Our organization stands ready to assist APHIS in protecting our natural resources and forest land as well as collaborating on the development of policies and implementation procedures to mitigate future invasive pest populations.

Sincerely,



Scott Bissette
Assistant Commissioner, North Carolina Forest Service
Chair, Southern Group of State Foresters