American Forest Foundation
American Forest & Paper Association
American Nursery & Landscape Association
California Forest Pest Council
City of Chicago Department of Streets and Sanitation, Bureau of Forestry
Davey Institute
International Maple Syrup Institute
Mulch & Soil Council
National Association of State Foresters
National Plant Board
The Nature Conservancy
New York State Department of Environmental Conservation
North American Maple Syrup Council, Inc.
Pennsylvania Department of Agriculture
Purdue University, Department of Entomology
Society of American Florists
Union of Concerned Scientists

The Honorable Herb Kohl
Chairman
Subcommittee on Agriculture, Rural Development, Food
and Drug Administration, and Related Agencies
Committee on Appropriations
United States Senate
Washington, D.C. 20510

The Honorable Sam Brownback
Ranking Member
Subcommittee on Agriculture, Rural Development, Food
and Drug Administration, and Related Agencies
Committee on Appropriations
United States Senate
Washington, D.C. 20510

March 19, 2010

RE: Fiscal Year 2011 Appropriation for the USDA Animal and Plant Health Inspection Service, Emerging Plant Pests

Dear Chairman Kohl and Ranking Member Brownback:

We urge the Subcommittee on Agriculture, Rural Development, Food and Drug Administration, and Related Agencies to increase funding substantially for the USDA Animal and Plant Health Inspection Service (APHIS) Emerging Plant Pests program. A sharp increase in funding is necessary in order to ensure adequate funding for eradication and control efforts targeting the Asian longhorned beetle, emerald ash borer, sudden oak death pathogen, sirex woodwasp, thousand canker disease, and gold-spotted oak borer. All six invasive species threaten trees in our forests and communities and related economic values worth hundreds of billions of dollars. We also

support expansion of APHIS' program to address the firewood pathway by which forest pests are transported to previously un-infested parts of the country.

We recognize that the requested increases – which total $17.5 million over the FY10 appropriation – are significant in the current climate of budgetary restraint. We put them forward, however, as our best information on the true cost of addressing the severe threat to America's economy and natural resources arising from these pests. Pests not contained by USDA APHIS become burdens to states, communities, and individual property owners. We, the citizens, will pay control and response costs; we believe it is best if these costs are incorporated into coordinated, federal programs that are effective in minimizing damage caused by already-introduced pests and preventing future introductions.

This coalition represents a widely diverse group of stakeholders that are unified in support of the following program areas. This statement of common goals supplements individual letters submitted to the Subcommittee by several of these organizations. Some of these individual letters address additional issues.

ASIAN LONGHORNED BEETLE

We seek an appropriation of $49 million for FY2011 to carry out eradication of the Asian longhorned beetle. Maintaining the elevated FY2010 level of funding in FY2011 is necessary because of the ruinous threat that the Asian longhorned beetle poses to hardwood forests reaching from New England into Minnesota and in the West; to the dependent hardwood timber, maple syrup, and autumn foliage tourism industries; and to street trees across the nation. APHIS and its state partners must complete eradication of Asian longhorned beetle populations in New Jersey and parts of New York; continue progress toward final elimination of the beetle in other parts of New York; build on the strong progress made in containing the alarming outbreak in Worcester, Massachusetts; and support expanded efforts to ensure that no other outbreaks in the Northeast remain undetected.

The availability of $41 million in emergency funds empowers APHIS to eradicate the pest through aggressive removal of infested or exposed trees promptly after their detection and chemically treat tens of thousands of additional trees. However, emergency funds cannot be used to pay for detection efforts at high-risk sites in New England. This essential work must continue to be supported by appropriated funds.

EMERALD ASH BORER

We seek an appropriation of $37 million for FY2011 to contain the emerald ash borer. This represents continuation of the program at the FY2010 level. The emerald ash borer threatens sixteen species of ash across the continent. The greatest cost associated with loss of trees to the emerald ash borer is to towns and property owners who must remove dead or threatened trees to prevent their falling and causing injuries or property damage. A recently published study by Kent Kovacs and colleagues estimated that spread of the emerald ash borer to additional areas over the next ten years could result in more than $10 billion in costs to urban and suburban areas for tree removal and replacement or chemical treatments. This study did not include the Plains states, which are highly vulnerable because of the high proportion of city trees in those states that are ash. There are more than 4 million ash trees on urban land in Kansas, Nebraska, and North and South Dakota. The Plains states are taking steps to absorb the cost of ash treatment and removal - for example, by speeding up ash removal in the course of routine tree maintenance programs. Still, costs will be in the hundreds of thousands to millions of dollars for individual cities in these states, depending on

the numbers of trees involved and their size. For example, Ann Arbor, Michigan spent nearly $4 million to cut down 10,000 trees. Removal and replacement of the 97,000 ash trees growing along Chicago's streets is estimated to cost $150 million.

None of these estimates includes the substantial value of the trees themselves. Urban trees reduce summer cooling and winter heating bills; reduce storm-water runoff; and raise property values.

The emerald ash borer outbreak is too large to be eradicated. The infestation now occupies expanding portions of thirteen states – significant areas in Illinois, Indiana, Michigan, and Ohio, and portions of Pennsylvania; with more distant outbreaks in Kentucky, Maryland, Minnesota, Missouri, New York, Virginia, West Virginia, and Wisconsin. Most of these outbreaks were caused by the movement of infested nursery stock or firewood. Continuing funding at the current level will allow APHIS to work with partners to carry out detection surveys needed to locate additional emerald ash borer outbreaks; apply regulatory measures and public education to deter people from transporting infested wood; and test improved detection methods (traps and lures) and suppression methodologies – both biological and chemical control. We suggest that research on biological control particularly might deserve increased funding. The Administration's proposed severe reduction in program funding would undercut these vitally important components of a comprehensive slow-the-spread program, which is meant to provide verified management tools to areas experiencing this devastating pest for the first time.

PHYTOPHTHORA RAMORUM

We request an appropriation of $7 million for FY2011 to contain *Phytophthora ramorum*, known commonly as sudden oak death or Phytophthora leaf and stem blight. *Phytophthora ramorum* threatens nearly one hundred North American plant species, including such widespread trees in eastern forests and urban/suburban landscapes as oaks, black walnut, sugar maple, and magnolias. To protect hardwood forests across the continent, as well as our city and suburban landscapes, APHIS must address more effectively the spread of this pathogen through the commercial trade. Despite five years' of efforts, 26 nurseries and 6 landscape sites still had infected plants in 2009. While significantly fewer than in 2004, when 176 nurseries had infected plants, the risk to forests and ornamental landscapes remains as long as the pathogen continues to be found on plants in trade. Five of the nurseries with infected plants in 2009 are in states with extensive oak-dominated forests – Florida, Mississippi, North and South Carolina, and Texas. This disease damages the nursery industry itself because it attacks many common ornamental species, including rhododendrons and camellias that have an annual value of more than $250 million.

At a December 2009 meeting convened by USDA officials and involving state departments of agriculture, representatives of the nursery industry, and conservation organizations, it was agreed that APHIS's regulatory program for *P. ramorum* should move toward greater reliance on management of critical control points. Use of a systems approach rather than the current reliance on periodic inspections of plants will be the preferred approach in the future. Important steps in the development and validation of such approaches are being funded under the Farm Bill's Title X, Horticulture and Organic Agriculture, Section 10201, Plant Pest and Disease Management and Disaster Prevention Program. We encourage the Congress to maintain this funding mechanism in FY11 and beyond. This is critical investment in research and development. Still, the APHIS regulatory program itself is funded by the Emerging Plant Pest account. Implementation of the recommended shift in this program from one based on inspections to one based on a systems approach will be incremental; for at least the first several years, APHIS will be managing both the

traditional regulatory program and an expanding systems-based program. The agency will need additional funding to carry out this task. We seek an increase of $2.7 million to allow APHIS to begin implementation of the new approach in calendar year 2011, along with sustaining Farm Bill Sec. 10201 funding.

SIREX WOODWASP

We support the Administration's request for an appropriation of $1.5 million for FY2011. We remain concerned that the sirex woodwasp poses a serious threat to pine resources across the continent. We will seek increased funding for this pest through the USDA Forest Service to assist states and private landowners to develop and apply control strategies. In the meantime, APHIS should continue its efforts to track spread of the woodwasp, to develop biological control tools, and to determine effective treatments aimed at preventing movement of infested wood, nursery stock, and other materials that spread the insect.

ADDRESSING NEW PESTS AND IMPORTANT PATHWAYS BY WHICH PESTS SPREAD

We urge the Congress to encourage APHIS to adopt regulations aimed at preventing the spread of thousand canker disease from the West to the walnut's native range in the East. This disease threatens to kill highly valuable native and ornamental black walnut trees nationwide. An APHIS evaluation has estimated the value of the black walnut timber supply at $1 trillion.

We urge the Congress to encourage APHIS to adopt regulations aimed at preventing spread of the gold-spotted oak borer from southern California and Arizona. Already, the gold-spotted oak borer has killed nearly 20,000 oak trees in southern California. We strongly support an APHIS initiative to manage the pathways by which forest pests are moved around the country, especially firewood. We ask the Congress to provide $1 million to implement the recommendations of the APHIS-led Firewood Task Force.

We applaud the Administration's support for continued funding of programs under Farm Bill Sections 10201 and 10202.

We note that the Administration has this year released significant emergency funds from the Commodity Credit Corporation (CCC), a step long called for by this Subcommittee. We support such a coordinated use of combined appropriations and CCC funds to ensure accomplishment of actions needed to curtail pest risks.

APHIS Plant Protection and Quarantine works closely with the USDA Forest Service and other partners – particularly through cooperative funding agreements with state forestry, state departments of agriculture, and state land grant universities - to carry out much of the survey and detection activities related to non-native introduced tree diseases and insect pests.

Action now at the funding level requested would help ensure that these forest pests do not reach populations so large as to threaten trees in our forests and communities, garden nursery stock, and related economic activities worth hundreds of billions of dollars.

Sincerely,

American Forest Foundation: Tom Martin, President and CEO
American Forest & Paper Association: William R. Murray, Deputy General Counsel

American Nursery & Landscape Association: Craig J. Regelbrugge, Vice President, Government Relations and Research
California Forest Pest Council: Bob Rynearson, Chairman
City of Chicago Department of Streets and Sanitation, Bureau of Forestry: Joseph J. McCarthy, Senior City Forester
Davey Institute: Anand B. Persad, Ph.D., B.C.E., Regional Technical Advisor
International Maple Syrup Institute: Gary Gaudette, President
Mulch & Soil Council: Robert C. LaGasse, Executive Director
National Association of State Foresters: Jay Farrell, Executive Director
National Plant Board: Carl P. Schulze, Jr., President
The Nature Conservancy: Robert L. Bendick, Director, Government Relations
New York State Department of Environmental Conservation: Robert K. Davies, New York State Forester, Director of Lands and Forests
North American Maple Syrup Council, Inc.: Rick Marsh, President
Pennsylvania Department of Agriculture**:** Russell C. Redding, Secretary
Purdue University, Department of Entomology: Clifford S. Sadof, Professor
Society of American Florists: Lin Schmale, Senior Director, Government Relations
Union of Concerned Scientists, Phyllis N. Windle, Ph.D., Senior Scientist and Director, Invasive Species

Pest	FY 09 funding level (Omnibus)	FY10 appropriation	FY11 Admin proposal	FY11 Dialogue "ask"
Asian longhorned beetle	$19,918,000 appropriated	$33,021,000	$49M	$49 M
	~ $24 M	CCC - $41 M		
Emerald ash borer	$34,625,000	$37,205,000	$13 M	$37
Sirex woodwasp	$1,500,000	$1,500,000	$1.5 M	$1.5 M
Sudden oak death	$5,305,000	$5,347,000	$5.1 M	$7 M
Thousand canker disease				TBD
Gold-spotted oak borer				TBD
TOTAL	$61.3 M appropriated	$77 M approp	$68.6 M	$94.5 M
	$24 M CCC emergency	$41 M CCC		