



November 14, 2018

Robyn Rose
 National Policy Manager
 USDA Animal and 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,

The National Association of States Foresters (NASF) respectfully submits the following comments regarding APHIS’s proposed deregulation of the emerald ash borer (EAB). NASF is a non-profit organization composed of the directors of forestry agencies in the states, U.S. territories, and the District of Columbia. These directors, referred to as state foresters, manage and protect state and private forests that together encompass nearly two-thirds of the nation's forests.

In cooperation with federal agencies, state forestry agencies have been at the forefront of EAB monitoring, early detection, delimiting, and outreach since the discovery of EAB in southeast Michigan in 2002. Today, the highly mobile and destructive exotic insect is found in 35 states.

The federal deregulation of EAB concerns state foresters for the following reasons:

- Any shift in federal funding away from EAB surveying will significantly reduce state forestry agencies’ capacity to monitor EAB spread, and thus respond to infestations.
- Federal EAB quarantines have been beneficial in several ways. They have (1) slowed the spread of EAB, giving states more time to plan, (2) proven to be effective communications tools that non-regulatory agencies have used to reach the public, and (3) allowed for consistent policies state-to-state that support wood-based interstate commerce.

In an effort to address these concerns, state foresters recommend that APHIS champion a national, multi-agency approach to EAB management by taking the following actions:

1. Redirect available funding remaining from terminated quarantine and regulatory efforts to support state research and management of EAB. State forestry agencies need additional funding to slow the spread of EAB through greater survey research, outreach, and education. State forestry agencies have been charged with providing crucial EAB technical assistance to municipalities, private forest landowners, and businesses, but in order to reach these critical stakeholders with the assistance and information they need, states must first have the requisite funding.

2. Continue to fund the EAB parasite lab, distribution of EAB parasites, and identification of ash tree genetics tolerant and/or resistant to EAB.

Executive Director
 Jay Farrell

2018-19 Executive Committee

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3. Articulate a refreshed strategy for curbing the spread of EAB. The spread of EAB has been directly attributed to the movement of firewood, and through extensive research, it has been established that firewood treatment with chemicals or heat can prevent the spread. NASF would like to see APHIS:

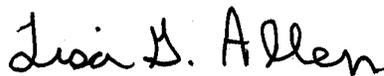
- Reconvene the 2010 National Firewood Task Force (NFTF) (made up of the National Plant Board, NASF, and the U.S. Forest Service) to update its recommendations (last published in 2010).
- Support creation of a national voluntary treatment standard, certification, and/or label for the packaged firewood industry.
- Continue to provide chemical and heat treatment certification for regulated forest products.
- Continue to support outreach campaigns to curtail the movement of firewood, such as the “We Promise” and “Don’t Move Firewood” campaigns.

4. Work with USDA Forest Service to develop a cooperative EAB Management program to sustain and replace ash trees killed by EAB.

5. Provide information to the public about the federal deregulation of EAB and exactly what it means for a board range of audiences, including businesses. Because many states will retain restrictions and quarantine requirements post federal deregulation of EAB, it is critical that APHIS messaging on deregulation include reference to these rules and make clear the distinction between federal and state deregulation.

NASF stands ready to support the above recommendations and further discuss our concerns about the federal deregulation of EAB with USDA. Thank you again for your consideration.

Sincerely,



Lisa Allen
NASF President
Missouri State Forester

cc:

Vicki Christiansen, Chief USDA Forest Service
Rick Cooksey, Acting Director USDA Forest Service, Forest Health Protection
National Plant Board Representatives
Leigh Greenwood, Don’t Move Firewood Manager, Nature Conservancy