



Robyn Rose
National Policy Manager, PPQ
Department of Agriculture
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 Dr. Rose:

As Director of the Nebraska Forest Service and State Forester, I cannot support the proposed action to remove the domestic quarantine regulations for the plant pest emerald ash borer (EAB). Moreover, the action to discontinue this essential domestic regulatory component of the EAB program would be detrimental to management of the pest in our state.

In our harsh prairie climate, trees are highly valued; and because of its toughness and adaptability, ash makes up a significant proportion of our urban forests. Nebraska communities have nearly one million ash trees, which are valued at \$823 million. Another 43 million ash occur in windbreaks, riparian areas and native stands. The vast majority of these trees occurs outside of the current federal EAB quarantine, and there is a critical need to delay as long as possible the introduction of EAB into these areas.

The quarantine has not completely stopped EAB, but it has been an extremely valuable tool in slowing its spread. For Nebraska and other areas outside of the quarantine, continued regulation of EAB will:

- Increase ash tree lifespan, which will prolong the benefits that those trees provide, such as shade, beauty, improved air quality, and stormwater regulation.
- Delay the need for treatments—perhaps for many years—which will reduce insecticide use and provide cost savings to communities and individual homeowners.
- Buy time for communities to conduct tree inventories, develop a preparedness plan, preemptively remove trees, and plant new trees. Spreading these activities over more years will lessen the strain on city budgets and staff.
- Provide time for newly planted trees to grow and become functional in the urban canopy.

Shifting regulatory resources into biocontrol will not mitigate EAB spread. According to our forest pest specialist who has worked with EAB parasitoids, there is a lack of strong evidence that the parasitoids can slow the spread of EAB on their own. The research merely says that some of the parasitoids are establishing and spreading, and that they may be of help with ash regeneration. But it is doubtful that biocontrol will meet the current need to limit EAB spread without continued regulation of firewood and other ash products.

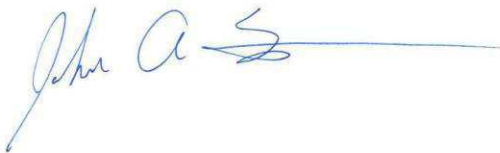
I cannot overstate how devastating the rapid loss of our ash resource will be to Nebraska; our only option is to try to slow the spread of this destructive insect. Continued regulation, monitoring and early detection, along with public education and outreach regarding firewood movement, are critical to the management of EAB in our state and across the country. I ask you to consider the following as you deliberate this issue:

APHIS should:

- Continue to regulate interstate movement of firewood and ash products
- Continue coordinating efforts, policy and initiatives with USDA Forest Service Forest Health Program and the National Plant Board to reduce new introduction risks of harmful agents
- Continue to monitor EAB spread
- Continue education and outreach campaigns to curtail movement of firewood
- Develop appropriate safeguards for the firewood pathogen pathway
- Reconvene the 2010 National Firewood Task Force (NFTF).
 - Update NFTF recommendations
- Support creation of a national voluntary treatment standard and label for the packaged firewood industry
- Support creation of a national “clean” firewood certification program

In closing, I am deeply concerned knowing EAB’s impact across the country and seeing what is potentially on the horizon with other invasive pests. Nebraska is one of 35 states currently facing the EAB epidemic. As the tree planter state, Nebraskans cherish our trees; however, we are troubled at what the future holds for our trees and forests. Movement of untreated firewood places our trees and forests at great risk. In a state where the selection of trees to plant is limited, adding another destructive pest into our forest environments is not sustainable and will surely lead to another blow to Nebraska’s trees and forests. We are running out of options in Nebraska. Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "John A. Erixson", followed by a long horizontal line.

John A Erixson
State Forester and Director
Nebraska Forest Service

102 Forestry Hall | PO Box 830815 | Lincoln, NE 68583-0815
(402) 472-2944 | trees@unl.edu