

American Forest Foundation
American Nursery and Landscape Association
California Association of Nurseries and Garden Centers
California Forest Pest Council
The Davey Institute
California Center for Urban Horticulture, UC Davis
Florida Nursery, Growers & Landscape Association
Greenspace-the Cambria Land Trust
National Association of State Departments of Agriculture
National Association of State Foresters
National Plant Board
The Nature Conservancy
New York State Department of Environmental Conservation
Pennsylvania Department of Conservation and Natural Resources
Department of Entomology, Purdue University
Society of American Florists
Union of Concerned Scientists
Center for Invasive Species & Ecosystem Health, The University of Georgia
Valent USA Corporation

December 16, 2009

Secretary Vilsack
US Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Dear Secretary Vilsack:

The Continental Dialogue on Non-Native Forest Insects and Diseases (“Dialogue”) was formed to cultivate and catalyze collaborative action among diverse interests to abate the threat to North American forests from non-native insects and diseases. The Dialogue is comprised of non-profit organizations, for-profit corporations, government agencies, landowners, and academic scholars who share an interest in forest health protection. Dialogue efforts are organized around improving programs to prevent non-native insects and diseases from arriving, surviving and thriving on the continent.

The undersigned Dialogue participant organizations join together to express our concern about the unacceptably low levels of the agricultural quarantine inspection (AQI) funds available for a wide variety of inspection programs conducted by APHIS and the Department of Homeland Security’s Customs and Border Protection (CBP). Many of us openly supported the USDA-APHIS interim rule regarding AQI user fees and are now concerned about both the short-term and long-term consequences on programs that are critically important to us. Since the interim rule was withdrawn, it is imperative that USDA publish, as quickly as possible, a rule

that fairly establishes user fees that adequately fund the necessary programs or identify alternative means to fully fund these programs.

In recent decades, global travel and commerce have reached historically unprecedented levels, and people and goods now move all over the world with unprecedented speed. The AQI program represents America's primary defense against pest incursions that pose a constant and grave threat to American plant resources, including our forests. AQI user fees fund the most critical inspection and related safeguarding efforts, and we fear the consequences if funding collections fall short of what is needed to sustain current efforts. Indeed, given the complex and changing nature of the forest threats associated with global trade and travel, we believe the AQI program should be strengthened.

AQI user fees are applied broadly to those engaging in, and therefore benefiting from, international travel and trade. AQI user fees represent an equitable mechanism for ensuring adequate and timely inspection services. Fluctuations in travel, commerce, and cost of service delivery necessitate periodic review and adjustment of the fees, as we believe is now the case.

Since USDA is required to periodically review the user fee schedule, and the time for this review is upon us, we urge APHIS and CPB to use this opportunity to quickly and thoroughly review the current assessment rates, the allocation of fees among international passengers and conveyances and publish a proposed rule that adjusts AQI fees adequately and fairly. Undue delays may lead to service cuts that will allow the introduction and establishment of many new exotic, invasive forest pests thus further endangering North America's precious forest resources. We consider APHIS and CBP important partners in the defense of our country against invasive species; now is a critically important time to assure these programs are properly funded.

Thank you, and please let us know whether and how we can assist toward the goal of an effective and efficient AQI program.

Sincerely,

Robert Bendick, Director, US Government Relations, The Nature Conservancy

Ben Bolusky, CEO, Florida Nursery, Growers & Landscape Association

Joe Chamberlin, Field Development Manager, Valent USA Corporation

Robert K. Davies, New York State Forester, New York State Department of Environmental Conservation

Drue DeBerry, Senior Vice President, Conservation, American Forest Foundation

Robert J. Dolezal, Executive Vice President, California Association of Nurseries and Garden Centers

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

Donald A. Eggen, Forest Health Manager, Pennsylvania Department of Conservation and Natural Resources

Bob Ehart, Public Policy Director, National Association of State Departments of Agriculture

Jay Farrell, Executive Director, National Association of State Foresters

Dave Fujino, Executive Director, California Center for Urban Horticulture, UC Davis

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

Anand B. Persad, Regional Technical Advisor/ Lecturer Entomology, The Davey Institute

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

Bob Rynearson, Chairman, California Forest Pest Council

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

Carl Schulze, President, National Plant Board

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

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