

**American Forest & Paper Association
American Nursery & Landscape Association
The Davey Institute
Florida Nursery, Growers & Landscape Association
Mulch & Soil Council
National Association of State Foresters
National Plant Board
Pennsylvania Department of Conservation & Natural Resources, Bureau of Forestry
Purdue University, Department of Entomology
Society of American Florists
The Nature Conservancy
Washington Invasive Species Coalition**

May 1, 2009

Peter Orszag
Director
Office of Management and Budget
725 17th Street, NW
Washington DC 20503

Dear Director Orszag,

The undersigned organizations are writing to encourage the Office of Management and Budget (OMB) to expedite its review of APHIS' proposed revisions to regulations governing imports of living plants (the Q-37 regulations). Our groups have come together with many others under the auspices of the Continental Dialogue on Non-Native Forest Insects and Diseases. The Continental Dialogue is a venue through which diverse interests, representing environmental, forestry, nursery and landscaping, government and academic groups, come together to work for improvements to our nation's efforts to address the threat of non-native insects and diseases to America's forests.

The APHIS proposal now before you for consideration represents the first and – in many ways – the most important step in the first comprehensive review of regulations governing plant imports in over 85 years. The proposed creation of the NAPPRA ("Not Authorized Pending Pest Risk Analysis) category is aimed at helping to prevent new invasive pests and pathogens from arriving on live plants. These improvements in the Q-37 regulations will help prevent new invasions – thereby helping protect private landowners, the general public, and plant-based industries as well as avoiding future governmental expenditures that would otherwise be required to contain or eradicate the pest.

In 2007, members of the Dialogue developed a set of consensus recommendations for the pending Q-37 rulemaking (see enclosed memo of October 3, 2007). These recommendations were included in the Transition package for the Obama Administration endorsed by 21 organizations active in the Dialogue (see enclosed cover letter of December 10, 2008).

The Dialogue's consensus recommendations support the concept of the NAPPRA category as a key step to curtail pest introductions immediately. They go beyond this specific proposal to address both short-term and long-term steps to prevent invasions.

- Short-term actions to curtail pest introductions immediately include: restricting imports of highest-risk plants; other improvements in risk reduction that focus on the highest-risk imports; and making risk assessments more efficient by focusing on broadly-defined plant/origin combinations
- Longer-term actions to ensure importation of only plants that are free of regulated pests and essentially free of other (potentially unknown) pests, including: supporting Plant Inspection Stations, providing incentives for importers to self-report pests and follow best management practices, and more frequent use of improved post-entry quarantine facilities

Once again, the undersigned members of the Continental Dialogue encourage the OMB to expedite its review of this component of APHIS' proposals to revise the Q-37 regulations.

If you would like to respond to the letter, please feel free to contact the Dialogue facilitation team at:

Continental Dialogue on Non-Native Forest Insects and Diseases c/o
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Sincerely,

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CC: Kevin Neyland, Acting Administrator, OMB Office of Information & Regulatory Affairs
 Enclosures