

Attention: Docket APHIS-2006-0127: Asian Longhorned Beetle; Additions to Quarantined Areas

Dear Sir or Madam:

On behalf of the Ecological Society of America (ESA), I write to offer comments on the implications of the U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) interim rule, docket APHIS-2006-0127, for control of the Asian Longhorned Beetle (ALB).

While the increase in quarantined areas of New Jersey and restricted interstate travel are a step in the right direction, the new regulations should include quarantine of the entire state of New Jersey and a more comprehensive control regime. Statewide quarantines are in accord with current federal regulations, which state that APHIS will quarantine each State, or each portion of a State, where ALB has been found by an inspector, where the Administrator has reason to believe that ALB is present, or where the Administrator considers regulation necessary because of its inseparability for quarantine enforcement purposes from localities where ALB has been found. While provisions exist that allow the quarantine of less than an entire state, the spread of ALB is too unpredictable to not quarantine the entire state of New Jersey. It burrows deeply into treated and untreated wood and was unknowingly spread as recently as 2004 into areas outside quarantined areas. If it were to become widespread in the U.S., it would cause an estimated \$41 billion in damage, according to USDA analysis.

Additionally, ESA would like to encourage a more comprehensive approach to ALB and other invasive species regulation. These recommendations include:

- Use new information and practices to better manage commercial and other pathways to reduce the transport and release of ALB and other potentially harmful species.
- Adopt new, more quantitative procedures for risk analysis and apply them to ALB and other species that pose invasion risk.
- Use new, more cost effective diagnostic technologies to increase active surveillance and sharing of information about ALB and other invasive species so that responses to new invasions can be more rapid and effective.
- Create new federal legal authority and provide emergency funding to support rapid responses to emerging ALB invasions.
- Provide funding and incentives for cost effective programs to slow the spread of existing ALB populations in order to protect still uninvaded ecosystems, social and industrial infrastructure, and human welfare.

More details can be found in, "Biological Invasions: Recommendations for U.S. Policy and Management" at [http://www.esa.org/pao/esaPositions/pdfDocuments/Lodge%20paper%20no%20line%20numbers%20\(final\).pdf](http://www.esa.org/pao/esaPositions/pdfDocuments/Lodge%20paper%20no%20line%20numbers%20(final).pdf)

The well-documented effects of invasive species are serious and widespread. Design of an effective regulation program could prevent or mitigate some of these effects. While a step in the right direction, the proposed rule is insufficient to prevent the spread of the ALB.

Sincerely,



Alan Covich
President