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February 12, 2015

Diane L. Schuble
National Coordinator for Official Control
Federally Recognized State Managed Phytosanitary Program
USDA APHIS PPQ
4700 River Road
Riverdale, MD 20737

Re: DEEP List due December 15, 2014

Dear Ms. Schuble:

The National Plant Board has reviewed the proposal put forth by your agency to change the status of the following pests currently regulated in foreign trade to non-actionable at ports of entry:

- *Acrolepiopsis assectella,* Leek moth
- *Aleurocanthus woglumi,* Citrus blackfly
- Blueberry scorch virus
- *Cacopsylla mali,* Apple sucker
- *Clepsis spectrana,* Cyclamen tortrix
- *Colletotrichum phormii,* Leaf spot on Phormium
- *Coptoborus pseudotenuis,* an Ambrosia beetle
- *Cryptocarenus diadematus,* a Bark beetle
- *Dactylotrypes longicollis,* Palm seed borer
- *Dreissena bugensis rostriformis,* Quagga mussel
- *Hecatera dysodea,* Small ranunculus moth
- *Horidiplosis ficifolii,* a Gall midge
- *Nipaecoccus viridis,* Lebbeck mealybug
- *Oebalus insulates,* Island stinkbug
- *Polytus mellerborgii,* Small banana weevil
- *Prodiplosis longifila,* Citrus gall midge
- *Thrips palmi*, Melon thrips
- *Toxoptera citricida,* Brown citrus aphis
- *Vinsonia stellifera,* Stellate scale

Based on responses received from our members the National Plant Board concurs with those recommendations.

However, five states have issues with certain pests. The states of Arizona, Florida, Texas, Minnesota, and Oregon have provided comments regarding the pests they have issues with. Please see the attachments for the specific comments provided by these states.

The National Plant Board looks forward to continued close cooperation with USDA APHIS PPQ to improve the safeguarding of the agricultural and horticultural resources of states, and appreciates the opportunity to provide comments on the potential de-regulation of plant pests of mutual concern.

Sincerely,

Geir Y. Friisoe, President
National Plant Board

Attachments

cc: Aurelio Posadas, Executive Secretary
NPB Board of Directors

Florida Comments

From: Hamm, Denise **On Behalf Of** Gaskalla, Richard
Sent: Tuesday, November 04, 2014 4:39 PM
To: 'Schuble, Diane L - APHIS'
Cc: Hodges, Greg; Dixon, Wayne; Hamm, Denise
Subject: FW: ACTION REQUESTED: 19 Pests to consider for deregulation at ports of entry or FRSMP with due date of December 15, 2014

Diane and Geir,

The Florida Department of Agriculture and Consumer Services' Division of Plant Industry (FDACS' DPI) reviewed the DEEP (Deregulation Evaluation of Established Pests) reports for nineteen pests that include: *Acrolepiopsis assectella, Aleurocanthus woglumi,* Blueberry Scorch Virus*, Cacopsylla mali, Clepsis spectrana, Collectotrichum phormii, Coptoborus pseudotenius, Cryptocarenus diadematus, Dactylotrypes longicollis, Dreissena bugensis rostriformis, Hectera dysodea, Horidiplosis ficifolii, Nipaecoccus viridis, Oebalus insularis, Polytus mellerborgii, Prodiplosis longifilia, Thrips palmi, Toxoptera citricida* and *Vinsonia stellifera*.

Although each of these pest species is noted as being established in the United States, the distribution for each pest is limited and not actually widely distributed. Deregulating each of these species to allow for entry into and free movement within the United States may have a greater impact on agricultural crops by increasing the population load for these pests and possibly allowing for the entry of pesticide-resistant populations.

In the case of *Acrolepiopsis assectella* (Lepidoptera: Acrolepiidae), the leek moth is only established in New York and a few counties of Vermont. It is a pest of limited distribution that is spreading slowly. Deregulation of this pest would allow for the possible establishment over a large area much sooner than it would naturally. According to the DEEP write-up, *A. assectella* has the potential to establish over a large portion of the United States and several hundred species of *Allium* that would be suitable as hosts exist in the United States. FDACS' DPI disagrees with the PPQ recommendation to change the port policy to non-reportable/non-actionable as the leek moth could be a pest of significance to *Allium* agricultural commodities.

The recommendation to change the port policy to non-reportable/non-actionable for the citrus blackfly (*Aleurocanthus woglumi* (Hemiptera: Aleyrodidae)) may appear warranted as the United States' distribution include records from AZ, CA, FL, LA, MS and TX. However, *A. woglumi* is a known pest of citrus and AZ, CA, FL and TX all have citrus industries. A change of status to non-reportable/non-actionable would allow for an increase in population load of this pest in states where it is already present, allowing for movement of possible pesticide-resistant populations as well as the entry of cryptic species such as *Aleurcanthus spiniferus, A. t-signatus* and others that do not occur in the United States.

A similar case can be made for *Cacopsylla mali* (Hemiptera: Psyllidae) in that although it has been detected in Maine and may be a poor vector of apple pathogens, deregulation could allow for cryptic species that may either be present on other hosts or as hitch-hikers to enter the United States. There are several species of Cacopsylla present in Europe and differentiating the species would require slide

mounting of specimens and identification by a psyllid specialist. A pictorial guide of the European species can be found at: http://www.psyllidkey.com/species.html.

Clepsis spectrana (Lepidoptera: Tortricidae) has a limited distribution that only includes Washington. This species is polyphagous on many ornamental plants and there is currently a known biotype in Europe that is adapted to living in greenhouse conditions. This species breeds continuously and has no recorded diapauses in its life cycle. Additionally, this species also is listed as having Vitis species as a host. Accidental/Incidental introduction of this species into Florida could have severe negative impacts on Florida's ornamental industry as well as grape industry.

The port policy for brown citrus aphid (*Toxoptera citricida*, Hemiptera: Aphididae) should not be changed to non-reportable/non-actionable. Although the brown citrus aphid is established in both Florida and Hawaii, deregulating it at ports of entry would allow for the importation of populations with more virulent stem-pitting strains of the citrus tristeza virus (CTV). Citrus production in Florida is challenged with a wide array of pests and diseases and the accidental/incidental introduction of a more virulent strain of CTV could push a struggling industry into further disarray.

To summarize, FDACS' DPI cautions USDA's APHIS in their evaluation process for determining deregulation of pests that have a limited distribution within the United States. Decisions to deregulate should incorporate good scientific data as well as maintaining a good regulatory decision matrix to help protect agricultural industries statewide. High-risk sentinel states such as CA, FL, and HI have both experience and expertise in understanding pest/host relationships and taxonomic challenges with target pests that could affect their agricultural industries. Consultation with the State Departments of Agriculture on these pests should be conducted when constructing DEEP reports for pests that either occur in those states or would threaten industries in those states. FDACS' DPI disagrees with the DEEP assessments for *Acrolepsis assectella, Aleurocanthus woglumi, Cacopsylla mali, Clepsis spectrana* and *Toxoptera citricida* and further recommends to maintain the status of reportable/actionable for each of those pests.

We appreciate the opportunity to provide feedback. Feel free to contact my office if you have further questions or concerns.

Regards,
Richard

Texas Comments

From: Awinash Bhatkar [mailto:Awinash.Bhatkar@TexasAgriculture.gov]
Sent: Thursday, October 30, 2014 4:02 PM
To: Evans, Mike
Cc: Schuble, Diane L - APHIS; Friisoe, Geir (MDA)
Subject: FW: ACTION REQUESTED: 19 Pests to consider for deregulation at ports of entry or FRSMP with due date of December 15, 2014

Mike,

The following is the response from Texas to USDA deregulating some of the pest organisms:

According to Dr. John de Graca, Director of the Texas Citrus Center, brown citrus aphid (*Toxoptera citricida*) has not been found in Texas. It is an efficient vector of Citrus tristeza virus and should not be deregulated. Since most of the citrus trees are grafted on sour orange, which is highly susceptible to tristeza virus, there is a serious pest risk. It is found in Mexico. Citrus blackfly is already present in Texas and can be deregulated.

Dr. Ron Billings, Director, Forest Health Management, Texas Department of Forestry, wanted not deregulating any ambrosia beetle or bark beetle, such as: *Coptoborus pseudotenuis,* an Ambrosia beetle *Cryptocarenus diadematus,* a Bark beetle. Ambrosia beetles and bark beetles are difficult to identify, particularly as immatures, so deregulating some species may open the door to the entry of more destructive ones.

According to Dr. Kevin Ong, Director of the Texas Plant Disease Diagnostic Laboratory, Texas A&M University, Blueberry Scorch Virus, *Colletotrichum phormii,* Leaf spot on *Phormium* are not detected in TX, and should not be deregulated.

Awinash Bhatkar, *PhD*
SPRO, & Coordinator for Biosecurity &
Agriculture Resource Management
Texas Department of Agriculture
P.O. Box 12847
Austin, Texas 78711
Phone: (512) 463-5025
Fax: (888) 205-7224
Email: Awinash.Bhatkar@TexasAgriculture.gov

MINNESOTA DEPARTMENT OF AGRICULTURE

December 9, 2014

Dear Diane,

Thank you for the opportunity to provide feedback regarding the regulatory status of the following plant pests:

Acrolepiopsis asectella, leek moth
Aleurocanthus woglumi, citrus blackfly
Carlavirus, blueberry scorch virus (BlScV)
Cacopsylla mali, apple sucker
Clepsis spectrana, cabbage leafroller
Collectotrichum phormii, leaf spot on Phormium
Coptoborus pseudotenuis, an ambrosia beetle
Cryptocarenus diadematus, a bark beetle
Dactylotrypes longicollis, palm seed borer
Dreissena rostriformis bugensis, Quagga mussel
Hecatera dysodea, small ranaunculus moth
Horidiplosis ficifolii, a gall midge
Nipaecoccus viridis, Lebbeck mealybug
Oebalus insularis, island stinkbug
Polytus mellerborgii, small banana weevil
Prodiplosis longifila, citrus gall midge
Thrips palmi, melon thrips
Toxoptera citricidus, brown citrus aphid
Vinsonia stellifera, stellate scale

My staff and I have reviewed the biology of these organisms and concluded that most pose no risk to the agricultural or natural resources of Minnesota that is reduced by maintaining their current actionable status.

Of the listed species the only ones that appear to pose a potential threat to Minnesota include *Acrolepiopsis assectella* (leek moth), *Clepsis spectrana* (cabbage leafroller), *Hecatera dysodea* (small ranunculus moth), Blueberry scorch virus (BlScV) and possibly *Cacopsylla mali* (apple sucker). Blueberry scorch virus appears to be already established in the United States on both east and west coasts, but state phytosanitary regulations for nursery stock should limit interstate spread. The pathogen does not appear to be related to international trade so discontinuing regulation at the ports is unlikely to have an impact. Both *Acrolepiopsis assectella* and *Cacopsylla mali* are already present in eastern North America, so regulation at ports of entry may not be relevant in determining whether or not they reach Minnesota. *Cacopsylla mali* could be an ongoing concern for introducing apple proliferation phytoplasma from Europe, but the DEEP indicates that is unlikely. It has also been reported to feed on potato which could be a concern for Minnesota however it was reported only as occasional. *Clepsis spectrana* and *Hecatera dysodea* are only present in western North America and may be the only species where continued regulation at ports may be beneficial to Minnesota as these

species may not reach the eastern U.S. on their own. While neither have become significant pests in western North America, the same may not be true in eastern North America. Both species attack a variety of specialty crop hosts grown by both private and commercial growers in Minnesota and appear capable of thriving in Minnesota's climate.

Because growth of *Phormium* species (flax) in Minnesota is very limited and these are the only known hosts of *Colletotrichum phormii*, and because it appears to be already established in the U.S., deregulation at the ports will have little impact on Minnesota.

Other species on the list are unlikely to survive in Minnesota due to climate and / or lack of hosts and consequently are not a concern for Minnesota regardless of regulatory status - these include *Coptoborus pseudotenius, Cryptocarenus diadematus, Dactylotrypes longicollis, Horidiplosis ficifolii, Nipaecoccus viridis, Oebalus insularis, Polytus melliborgii, Prodiplosis longifilia, Thripos palmi, Toxoptera citricidus* and *Vinsonia stellifera*.

In summary and having reviewed the threat these organisms pose to Minnesota as well as the relative value of maintaining their actionable status, we concur with the recommendations of the New Pest Advisory Group (NPAG) regarding these organisms with the provision that continued regulation of *Clepsis spectrana* and *Hecatera dysodea* may be beneficial to Minnesota.

Thanks for the opportunity to provide input concerning the regulatory status of these plant pests. If you have questions or require other information, please call or email.

Sincerely,

Mark Abrahamson
Pest Detection and Response Unit Supervisor
Plant Protection Division
Minnesota Department of Agriculture
625 Robert Street North
Saint Paul, MN 55155-2538

ATTACHMENT 3

Oregon Department of Agriculture

Comments on DEEP reports and recommendations for:

***Acrolepiopsis assectella, Aleurocanthus woglumi,* Blueberry scorch virus, *Cacopsylla mali, Clepsis spectrana, Colletotrichum phormii, Coptoborus pseudotenuis, Cryptocarenus diadematus, Dactylotrypes longicollis, Dreissena bugensis rostriformis, Hecatera dysodea, Horidiplosis ficifolii, Nipaecoccus viridis, Oebalus insulates, Polytus mellerborgii, Prodiplosis longifila, Thrips palmi, Toxoptera citricida,* and *Vinsonia stellifera*.**

Oregon Department of Agriculture agrees with the recommendations in the DEEP reports regarding *Aleurocanthus woglumi, Cacopsylla mali, Clepsis spectrana*, *Coptoborus pseudotenuis, Cryptocarenus diadematus, Dactylotrypes longicollis, Dreissena rostriformis bugensis, Hecatera dysodea, Horidiplosis ficifolii, Nipaecoccus viridis, Oebalus insularis, Polytus mellerborgii, Prodiplosis longifila, Toxoptera citricidus,* and *Vinsonia stellifera.*

We disagree with the recommendations for *Acrolepiopsis assectella,* Blueberry scorch virus, *Colletotrichum phormii*, and *Thrips palmi*.

Acrolepiopsis assectella is a serious threat to several important Oregon commodities, onions and garlic, and poses a significant threat to threatened and endangered native *Allium*, such as Geyer's onion (*A. geyeri geyeri*) and the peninsular onion (*A. peninsulare*), both critically imperiled in Oregon, and the globally and state imperiled Blue Mountain onion (*A. dictuon*). Furthermore, it is a major threat to garlic and onion growers nationwide as well as threatened and endangered *Allium* throughout the country. This pest is only known from two states in the U.S., New York and Vermont (and only in limited areas therein) and adjacent Canada. This is a perfect example of a pest whose limited distribution is an excellent reason for continued regulation to prevent rapid dissemination from infested areas. Oregon has surveyed for this pest before and will continue to do so.

Blueberry scorch virus is a serious threat to a major Oregon commodity. We have a state quarantine in place for this pathogen because there is a more virulent strain present in Canada and on the U.S. East Coast that we do not want in Oregon (OAR 603-052-1245). This pest should not be deregulated.

Colletotrichum phormii has not been detected in the continental U.S. outside of California. As with the many other species known only from a single state, and often only a limited area therein, such an extremely limited distribution is actually a good case for continued regulation. Limited distribution is not a substitute for assessing future impact and does not justify deregulation.

Thrips palmi is a serious threat to Oregon's nursery industry, the state's number one agricultural commodity. It is a highly polyphagous species acknowledged in the DEEP report as a known greenhouse pest. It also poses a substantial threat to the

greenhouse and nursery industries of states throughout the country. Despite being reputedly widespread in Florida ("long-established" is a misnomer for a period of slightly more than two decades), it is still known only from that state. That it is cryptic and can be presumably be dispersed great distances by wind are not valid reasons for deregulation. Many regulated organisms are cryptic and can be transported over long distances by natural or human agents, for instance, many plant pathogens and wood borers such as Asian longhorned beetle and emerald ash borer. The Oregon Department of Agriculture routinely examines plant shipments for this pest and it is and has been a target of several surveys. Given the limited distribution, this species should not be deregulated.

Thank you for the opportunity for Oregon's concerns to be considered with regard to these pests.

Arizona Response To DEEP Proposals for Pests for Deregulation – 11/3/14

Common Name	Genus	Species	Agree to Deregulate	Comments
Leek Moth	*Acrolepiopsis*	*assectella*	No	Arizona has both Garlic and Onion as important crops that total $1.2 Billion in production in 2013. This moth is a known pest in Europe and its current distribution includes some habitats very similar to Arizona. This pest is relatively new to the US (2009) and so current control practices are still inconsistent and under testing.
Citrus Blackfly	*Aleurocanthus*	*woglumi*	No	We performed a PRA in April 2014; recommended adding this pest to the Citrus pest regulations. Considered a major pest worldwide (A1 rating in Europe) and not currently established in AZ, this blackfly could have big impact to Arizona agriculture. It would be costly to establish bio control program to have it come under same control as in FL.
Apple Sucker	*Cacopsylla*	*mali*	Yes	
Cabbage leafroller	*Clepsis*	*spectrana*	Yes	
Ambrosia Beetle	*Coptoborus*	*pseudotenuis*	Yes	
Bark Beetle	*Cryptocarenus*	*diadematus*	Yes	
Palm seed borer	*Dactylotrypes*	*longicollis*	Yes	
Quagga Mussel	*Dreissena*	*rostriformis bugensis*	Yes	
Small Ranunculus moth	*Hecatera*	*dysodea*	Yes	
Gall Midge	*Horidiplosis*	*ficifolii*	No	This midge has not yet been documented as causing economic damage, however it has only been in N. America for the past 6 years and its host, *Ficus benjamina*, is an important ornamental plant in Arizona. EPPO considers this pest possibly not able to survive where it is introduced, however Arizona has a unique habitat that might be ideal for this pest. Might be wise to keep an eye on this pest until further documentation can be presented for its long term impacts.
Lebbeck mealybug	*Nipaecoccus*	*viridis*	No	Although this mealybug has not shown to expand its current distribution in Florida, it has only been present in that state for 5 years. Its severity of being a citrus pest in other countries merits a more cautious approach to protect Arizona agriculture. There are viable pathways for this pest to be introduced into Arizona and many hosts for it to colonize once it arrives.
Island stinkbug	*Oebalus*	*insularis*	Yes	
Small banana weevil	*Polytus*	*mellerborgii*	Yes	
Citrus gall midge	*Prodiplosis*	*longifila*	Yes	
Melon thrips	*Thrips*	*palmi*	No	This pest is considered an A1 / Quarantine pest worldwide except for its native range of Asia. This thrip is a serious pest of a variety of different vegetables and is expected to be able to become established in Arizona. This thrip poses a serious risk to Arizona agriculture.
Brown Citrus Aphid	*Toxoptera*	*citricidus*	No	This aphid is still considered a serious pest of citrus and an efficient vector of *citrus tristeza closterovirus*. It is still a regulated pest through most of the world (A1 list through most of Europe) and would pose a threat to Arizona agriculture if it became established.
Stellate scale	*Vinsonia*	*stellifera*	Yes	This scale is unlikley to be considered a serious pest in Arizona, however there is little documentation that this pest causes or does not cause serious damage to its host.

22 December 2014

Diane L Schuble
National Coordinator for Official Control
The Federally Recognized State Managed Phytosanitary Program
USDA APHIS PPQ
PHP - Pest Detection & Emergency Programs
4700 River Road
Riverdale MD 20737

Dear Diane:

The Minnesota Department of Natural Resources is requesting that *Dreissena rostriformis bugensis (*quagga mussel) remain on the U.S. Department of Agriculture Plant Protection and Quarantine list.

The DEEP Report for this invasive species recommends removal because:
"*. . . Introductions from ports of entry do not impact the dispersal and spread of the species as it is already established throughout most of the United States, is being managed in environments as necessary. . . "*. We disagree with these conclusions.

First, in the document it states that "*there have been 12 interceptions . . . Cladophora aegagropila, a popular aquarium algae, was the most frequent host associated with these interceptions . . .*". The commercial plant trade is not highly regulated, and few if any states have Invasive Species programs that effectively monitor and address purchase of aquatic plants, not only over the counter but through the internet. The potential for prohibited aquatic plant species or unknown aquatic invertebrates in plant orders can be significant (Maki and Galatowisch 2004, Biological Conservation 118). Thus, the occurrence of quagga mussels on a popular aquarium plant raises serious concerns for inadvertent spread through the aquarium trade. It would seem that introductions at ports of entry on such aquatic plants potentially could have a significant impact on dispersal.

Next, the document states that *". . . D. rostriformis bugensis has been found in most of the Great Lakes . . . and in freshwater sources in the following states; . . . Minnesota . . . "*. However, while it is accurate that quagga mussels have been documented in the Duluth Harbor and in isolated pools in the Mississippi River along the southeast border of our state, the numbers collected were extremely low and do not necessarily indicate a widespread established population (http://nas2.er.usgs.gov/viewer/omap.aspx?SpeciesID=95). Additionally, there are no known occurrences in our inland waters within Minnesota. Yet as stated above, the possibility of movement via aquarium plants in commercial trade could bypass our efforts in watercraft inspection and create new infestations.

Lastly, there have been very few recorded examples of "management" of quagga mussels, let alone zebra mussels, once they are established in natural waters. The DEEP Report discusses some of the significant ecological impacts that quagga mussels can have in lakes. However, few control options are available for use in open water systems, and those that are being tried are

both extremely costly and seldom are completely effective. Thus, once an introduction of this invasive occurs, the potential for ecological damage is high while the potential for environmental control in a lake is very low.

Due the facts that the presence of quagga mussels on common aquarium trade plants represents an unmonitored and unenforced pathway, that the quagga mussels are not established within inland waters in Minnesota and that control in natural systems is still, for the overwhelming majority of cases, not viable, we request that this organisms status on the PPQ Port Policy remain as currently listed.

Thank you for the opportunity to comment and your consideration of our request.

Sincerely,

Heidi Wolf
Invasive Species Program Supervisor
Minnesota Department of Natural Resources
Division of Ecological and Water Resources