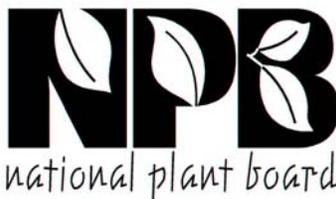


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March 24, 2016

Ricardo Valdez
National Coordinator for Official Control
USDA APHIS PPQ
PM-Pest Management
4700 River Road
Riverdale MD 20737

Dear Mr. Valdez:

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.

- *Ditylenchus dipsaci*, stem or stem and bulb nematode
- *Neofusicoccum luteum*, Dothiorella canker
- *Sarasinula plebeia*, Caribbean leatherleaf slug

Based on the responses received from National Plant Board members, the National Plant Board agrees with the recommendations proposed for these three pests. However, the states of Arizona and Florida have expressed concerns about *Sarasinula plebeia* and Florida also expressed concern with *Ditylenchus dipsaci*. The comments received are provided in attachment 1.

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

Sincerely,

Joe Collins
President, National Plant Board

Comments on DEEP Review List Due May 24, 2016

Virginia

"Virginia concurs with PPQs evaluation and intent to move forward with deregulation."

Arizona

"Arizona believes the slug *Sarasinula plebeian* should continue to be regulated because of ag and human health concerns. We do not have comments on the other two."

Florida

"After review of the DEEP pest reviews for *Neofusicoccum luteum*, *Sarasinula plebeian* and *Ditylenchus dipsaci*, the Florida Department of Agriculture and Consumer Services-Division of Plant Industry (FDACS-DPI) agrees with the recommendation to change the status for *Neofusicoccum luteum* from reportable/actionable to non-reportable/non-actionable.

From review of the DEEP report for *Sarasinula plebeian*, FDACS-DPI recommends maintaining the status of reportable/actionable as this pest is not confirmed to be established in Florida. FDACS-DPI also recommends that *Ditylenchus dipsaci* remain reportable/actionable as this nematode does not occur in Florida and could be a serious pest for Florida agriculture."

North Carolina

"North Carolina is in full agreement with APHIS recommendations to change the regulatory status of *Sarasinula plebeian* to non-reportable/non-actionable in the continental US. Although the slugs are of great economic importance in tropical regions, in the US they are not. The slugs are intercepted very infrequently and have shown little potential to spread beyond the states of Texas and Florida. Because of this low risk of establishment and low economic impact this pest should be deregulated in the continental US.

Neofusicoccum luteum - a potentially important pathogen of grapevines and trees, wide host range. We do not see any issues with deregulation at ports because this pest is so seldom intercepted (2x in 20+ years). Because this pathogen is established in parts of the US, it is just as likely to arrive via interstate movement as through foreign trade. NC would have no issues with PPQ changing their port policy regarding this pest.

Ditylenchus dipsaci - NC would have no issues with PPQ changing their port policy regarding this pest. This pest has been reported from North Carolina as well as most of the US."