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February 4, 2011

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

Dear Ms. Schuble:

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

- *Aleuroclava jasmini* jasmine whitefly
- *Eulecanium kunoense* (Kuwana): kuno scale
- *Neolochmaea dilatipennis* (Jacoby):
- *Pseudaonidia trilobitiformis* Trilobite Scale

The National Plant Board concurs with those recommendations. Currently no states are considering implementing additional official actions to control these organisms.

However, some concerns have been raised concerning changing the status of *Rhyarochromus (Xanthochilus) saturniu*: (Kiritschenko). As a generalist seed feeder which can aggregate in large numbers and frequently invade homes, there were concerns this could become at minimum a nuisance pest.

Our agencies and state extension services are being bombarded with calls from homeowners regarding Brown Marmorated Stink Bug., and we are seeing serious economic damage in the mid-Atlantic region now 10 -12 years down the road following deregulation. With that in mind we do not support changing the status to non-actionable at ports of entry at this time.

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

Sincerely,

A handwritten signature in black ink that reads 'Carl P. Schulze, Jr.' in a cursive script.

Carl P. Schulze, Jr.
President

Cc: Alan Green, USDA APHIS PPQ Plant Health Programs
Aurelio Posadas, Executive Secretary