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April 8, 2013

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 March 15, 2013

Dear Ms. Schuble:

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

- *Acutaspis aliena*, alien scale
- *Aulacaspis yasumatsui*, cycad Aulacaspis scale
- *Cenopalpus pulcher*, flat scarlet mite
- *Ceroplastes sinensis*, Chinese wax scale
- *Coccus capparidis*, Capparis sort scale
- *Duplachionaspis divergens*, sugarcane scale
- *Dysmicoccus texensis*, coffee root mealybug
- *Operophtera brumata*, winter moth
- *Penthelus major*, winter grain mite
- *Philephedra lutea*, a soft scale

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

However, several states had an issue with *Operophtera brumata*, winter moth. Following are the specific comments received:

EPB – “of all these pests, potential deregulation of *Operophtea brumata* caused the most concern. Even though it is widespread and has caused substantial damage in many areas of the northeast, CT, MD, and WV a expressed concern about deregulation. This moth also will hybridize readily with the native bruce spanworm, *Operophtera bruceata*, and there is concern over the potential introduction of fresh genes to the mix.” HI and WI also feel that this pest should not be deregulated. WI comments are attached and HI basically feels

that they do have high altitude areas where this pest could become established and impact the native ecosystem.

IN - After reviewing Brian Kuhn's (WI) reply, we agree on 9 of the 10 species. I'm still ok with the DEEP recommendations for the international borders for winter moth. I am concerned, as Brian is, for the intrastate movement into the Midwest of Winter Moth and we should perhaps keep these as pest of state concern for the international border and interstate borders.

CA – has four of the 10 they might consider for FRSMP

Please see Attachment1 for WI and CA comments

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,

A handwritten signature in black ink that reads "Michael E. Cooper". The signature is written in a cursive, slightly slanted style.

Michael E. Cooper, President  
National Plant Board

cc: Alan Dowdy, USDA APHIS PPQ  
Aurelio Posadas, Executive Secretary  
NPB Board of Directors



State of Wisconsin  
Governor Scott Walker

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## Department of Agriculture, Trade and Consumer Protection

Ben Brancel, Secretary  
Bureau of Plant Industry Laboratory

March 12, 2013

Dear Mike and Aurelio,

Our staff has reviewed the Deregulation Evaluation of Established Pests (DEEP) reports on behalf of the State of Wisconsin. After consideration of the host range, potential distribution and spread, as well as the economic and environmental impacts of the ten insects included in the list, we concur with the USDA APHIS PPQ in its decision to deregulate the following nine species:

*Acutaspis aliena*, alien scale  
*Aulacaspis yasumatsui*, Cycad aulacaspis scale  
*Cenopalpus pulcher*, flat scarlet mite  
*Ceroplastes sinensis*, Chinese wax scale  
*Coccus capparidis*, Capparid sort scale  
*Duplachionaspis divergens*, sugarcane scale  
*Dysmicoccus texensis*, coffee root mealybug  
*Penthaleus major*, winter grain mite  
*Philephedra lutea*, a soft scale

As you know, the USDA APHIS PPQ has asked state representatives to respond with additional or different information which impacts PPQ's conclusion. We have no contrary information to provide on nine of the species.

Of the ten species proposed for deregulation, only one is at risk of becoming established and causing environmental and economic harm in Wisconsin based on climatological suitability and host range: *Operophtera brumata*. Winter moth is established in Maine and New Hampshire, states with similar climates to Wisconsin. Winter moth is an economic pest of blueberries and deciduous trees in Washington, and it has caused serious defoliation of oaks in Massachusetts. These are among the host species that are of economic and ecological importance in Wisconsin.

Several factors make winter moth a pest worthy of reportable, actionable status. First, the female does not fly, which makes human-assisted movement necessary for long distant travel. Movement with nursery stock, a likely pathway, is already a regulated industry. Additionally, pheromone traps are readily available to survey for this pest. Numerous chemical products are available for control and natural enemies contribute to control.

Winter moth has not yet established in the middle of the U.S. Perhaps we could continue to delay this establishment if we continue to regulate this damaging pest.

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

Sincerely,

Brian D. Kuhn, Director  
Wisconsin DATCP, Plant Industry Bureau

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## March 2013 DEEP Comments - California

### ***Acutaspis aliena* (Newstead): Alien scale**

Alien scale primarily attacks orchids but is also reported from other hosts including avocado and mango. It is established in Hawaii, Florida, Mexico, and Central and South America. From 1984 to 2004 the scale was intercepted by USDA 34 times, mostly on orchids from Mexico and Central America. Orchids are an \$89 million component of California's nursery system. This industry can expect to be contaminated by alien scale if it is deregulated. However, alien scale has not been documented as a pest. The host range of this scale does not include any plants listed as threatened or endangered in California. CDFA has no opinion on the deregulation of alien scale.

### ***Aulacaspis yasumatsui* Takagi: Cycad aulacaspis scale, CAS**

CAS is a major pest of cycads in the southern U.S. where it kills plants within 1 year of infestation, if they are untreated. Since the pest was detected in Florida in 1996, it has killed 70-80% of sago palms. Since sago palms are high value plants in California and are iconic parts of urban landscapes, incursions of CAS are eradicated when detected. If this pest were to establish in California it could be expected to lead to a significant, permanent increase in the amount of pesticides used in urban environments. California may petition to add CAS to FRSMP in the future.

### ***Cenopalpus pulcher* (Canestrini & Fanzago): Flat scarlet mite**

Flat scarlett mite is a polyphagous pest that attacks many crops including stone fruit, apple, and pomegranate. Although it has been in Oregon since 1990, it has not caused economic damage in commercial orchards because it is controlled by existing pest management techniques. However, this mite is considered a pest of quarantine concern in Australia and New Zealand and could have trade implications for California. Furthermore, *Rosa* spp. is listed as a host of flat scarlet mite and Small-Leaved Rose (*Rosa minutifolia*) is listed as an endangered species by the state of California. California may petition to add Flat scarlet mite to FRSMP in the future.

### ***Ceroplastes sinensis* Del Guercio: Chinese wax scale**

CDFA concurs with the deregulation of Chinese wax scale. This is a C-rated scale that is established in California where it has been of no economic importance and has had no significant environmental impact.

### ***Coccus capparidis* (Green): Capparis soft scale**

Capparis soft scale is a polyphagous scale insect with a wide host range that includes *Citrus*. It has become established in Hawaii and Florida where it does not cause economic damage. It is not known to be established anywhere in California. The host range of this scale does not include any plants that are listed as threatened or endangered in California. However, *Croton* spp. is listed as a host and Wiggins' croton (*Croton wigginsii*) is listed on the state's rare plant list. *C. capparidis* is considered a pest of quarantine concern in Australia and may therefore have trade implications if it were to establish in California. CDFA has no opinion on the deregulation of Capparis soft scale.

### ***Duplacionaspis divergens* (Green): Sugarcane scale**

Sugarcane scale is only known to attack grasses and is sometimes considered a potential pest of sugarcane. However, it has not caused economic damage to sugarcane since its arrival in Florida. None of the hosts listed for sugarcane scale are threatened or endangered species in California. The scale is therefore expected to have no significant economic or environmental impact on the state. However,

there are uncertainties over the pest potential of this scale on ornamental grasses. CDFA concurs with the deregulation of sugarcane scale.

***Dysmicoccus texensis* (Tinsley): Coffee Root Mealybug**

Coffee root mealybug is primarily a pest of coffee. However, it is a polyphagous species with a wide host range including economically important crops such as citrus and avocado. The mealybug has shown a propensity to move through the international trade of fruit and is regularly intercepted on shipments of bananas and much less frequently on citrus. Fruit for consumption is a low risk pathway and the mealybug has never been found in the environment of California. However, if the mealybug were to establish it could have trade implications for our fruit since it is only known from the New World. It is listed as an “injurious animal” on Japan’s quarantine list and has been reported taken on bananas by quarantine officials in Korea. Furthermore, *Trifolium* sp. is listed as a host for the mealybug. There are two endangered species of *Trifolium* in California that could be directly affected by this mealybug: Showy Indian Clover (*T. amoenum*) and Monterey Clover (*T. trichocalyx*). Due to trade implications and the potential direct threat to endangered species, California may petition to add coffee root mealybug to FRMMP in the future.

***Operophtera brumata* (L.): Winter moth**

Winter moth is considered a major pest of blueberries (an \$82 million industry in California) and deciduous trees. It attacks a number of other economically important crops including raspberries (\$223 million), pears (\$98 million), and apple (\$58 million). The moth is therefore expected to have a significant economic impact on California. Although the moth is found in other parts of the United States it has not been found in California and, because of its biology, natural dispersal to the state is improbable. It is likely to be able establish in the state: large areas do not experience the 27°C (80°F) winter temperatures necessary to kill eggs. Furthermore, *Rosa* spp. is listed as a host of winter moth and Small-Leaved Rose (*Rosa minutifolia*) is listed as an endangered species by the state of California. Due to potential threats posed to both our agricultural industries and one of our endangered species California may opt to petition to add winter moth to FRMMP in the future.

***Penthaleus major* (Dugès): Winter Grain Mite**

CDFA concurs with the deregulation of winter grain mite. This mite is a C-rated pest that has already established in California and most of the continental United States.

***Philephedra lutea* (Cockerell): A soft scale**

*P. lutea* is a polyphagous species whose host range includes the valuable crop avocado. However, the scale is not documented to be a pest anywhere it is found. None of the hosts listed for *P. lutea* are threatened or endangered species in California. The scale is not expected to have a significant economic or environmental impact on California. CDFA concurs with the deregulation of *Philephedra lutea*.