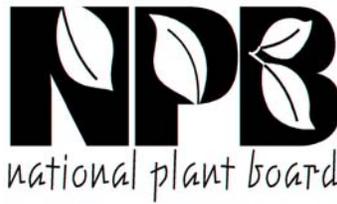


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July 6, 2015

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 June 24, 2015

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:

- *Opogona sacchari*, Banana moth
- *Orthomicus erosus*, Mediterranean pine engraver
- *Pachymerus nucleorum*, Coconut borer
- *Phoracantha recurva*, Yellow longicorn beetle
- *Quadrastichus erythrinae*, Erythrina gall wasp

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 (*Quadrastichus erythrinae*), Florida (*Phoracantha recurva*), Michigan (*Opogona sacchari*), North Carolina (*Orthomicus erosus*), and Pennsylvania (*Orthomicus erosus*) have provided comments regarding the pests they have issues with. Please see the attachment for the specific comments provided by these states. The NPB expects the FRSM Program to have additional discussions with these states regarding their concerns.

The National Plant Board also, 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, appearing to read "Geir Y. Friisoe". The signature is written in a cursive style with a large initial "G" and "F".

Geir Y. Friisoe, President
National Plant Board

Attachment

cc: Aurelio Posadas, Executive Secretary
NPB Board of Directors

ARIZONA

Geir/Aurelio,

Arizona has conducted its review of the pests on the DEEP list. We concur with the determinations on all except:

We suggest a different course for the Erythrina gall wasp (EGW). The EGW is a very serious pest in places like Hawaii and Florida, but for only one genus of tropical and subtropical plant, the genus *Erythrina*, the Coral bean (aka Chilicote or Indian coral tree). Arizona has at least one native species and one likely naturalized species of *Erythrina* known from rocky desert areas of southern and southeastern Arizona (in areas not prone to freezing) that would be threatened by an established introduction of EGW. Additionally, *Erythrina* are not uncommon as ornamental plantings.

John

G. John Caravetta
Associate Director
Arizona Department of Agriculture
(602) 542-0996
jcaravetta@azda.gov

FLORIDA

Dear Aurelio and Geir,

The Florida Department of Agriculture and Consumer Services' Division of Plant Industry reviewed the five PPQ pests designated for consideration of deregulation at ports of entry and concurs with the assessment for deregulation for *Opogona sacchari*, *Pachymerus nucleorum* and *Orthotomicus erosus*. FDACS' DPI does have concerns over the possible deregulation of *Phoracantha recurva* as it feeds on Eucalyptus trees which are grown in Florida and other southern states. This beetle is reported as being established only in California at this time. FDACS' DPI recommends maintaining the status of reportable/actionable at this time.

Regards,
Richard

Richard Gaskalla
Division Director
Division of Plant Industry
Florida Department of Agriculture and Consumer Services

Phone: (352) 395-4628
Richard.Gaskalla@FreshFromFlorida.com

Post Office Box 147100
Gainesville, Florida 32614-7100

www.FreshFromFlorida.com

MICHIGAN

From: Rosenbaum, Robin (MDARD) [<mailto:rosenbaumr@michigan.gov>]

Sent: Monday, May 18, 2015 8:44 AM

To: Van Meter, Julie; cpb@nationalplantboard.org

Subject: RE: DEEP List FW: Action Requested: 5 pests to consider for deregulation at ports of entry or FRSMMP.
Due date June 24, 2015

Comments from Michigan:

***Opogona sacchari*:** A tropical/sub-tropical species that won't survive Michigan winters, but it is well-established in greenhouses in Europe. EPPO calls it "a troublesome greenhouse pest which should not be allowed to establish in new areas." It has become a pest in Florida and Hawaii. **If there's a pathway from port to greenhouse, it should remain regulated.**

***Orthotomicus erosus*:** This is clearly a secondary bark beetle and if established in Michigan, would have to compete with a complex of native phloem-feeding insects that colonize stressed or dying pines including native bark beetles. the invasive *Tomicus piniperda*, plus cerambycids (e.g., *Monochamus* spp.) and weevils. Fungi vectored by this beetle would similarly have to compete with fungi vectored by native phloem- and wood-boring insects. Based on our studies with *T. piniperda*, we are confident that most, if not all, native natural enemies that attack bark beetles in this region would also attack *O. erosus*. In the case of a severe drought, heavy defoliation or other event resulting in stressed pines, the management practices implemented to mitigate damage by *Ips* spp. and related insects would likely exert similar effects on *O. erosus* populations. **Recommend deregulation.**

***Pachymerus nucleorum*:** This species feeds solely on palm, which isn't found in Michigan. It is not even a pest where established. **Recommend deregulation.**

***Phoracantha recurva*:** The *Phoracantha recurva* beetle has been a pest in California on stressed eucalyptus trees. We do not expect this cerambycid to become established or to pose a risk in this region, given its limited host range. Other states, such as Arizona, where eucalyptus are widely planted in landscapes, may remain concerned. While individual states may elect to enact state quarantines, **we support deregulation of this pest at the federal level.**

***Quadrastichus erythrinae*:** This species attacks only one tree genus, and it does not occur in Michigan, nor does it appear to be sold in Michigan's nursery trade. Therefore, from a Michigan perspective, **we recommend deregulation.**

PENNSYLVANIA

Aurelio and Geir,

In response to your request regarding DEEP. PA is fine with all, but *Orthotomicus erosus*. PA has a valued Christmas tree industry, the effect of introduction of this pest has varied in different places <http://www.cabi.org/isc/datasheet/37954>, but it demonstrates an ability to attack a wide range of coniferous hosts. It is not currently widely distributed. PA has documented surveillance going back for a decade showing it to be absent. Detections in other states have kept it out.

Dana D. Rhodes | State Plant Regulatory Official
PA Department of Agriculture
2301 N. Cameron St. | Harrisburg, PA 17110
Phone: 717.772.5205 | Fax: 717.783.3275

NORTH CAROLINA

Aurelio,
Please see North Carolina's comments below regarding the deregulation of the 5 listed pests at US ports of entry.

Thanks,
Phil

Species	Risk of introduction and establishment in NC	Potential hosts in NC	Comments
<i>Pachynerus nucleorum</i>	VERY LOW. This is a tropical/subtropical species.	<i>P nucleorum</i> is primarily a pest of palm trees. Palm trees are not an economically important group of plants in NC.	Because the likelihood of this pest to get introduced and established in NC is very low and affect a group of plants with little economic importance to NC, the NCDA&CS does not see this pest as a potential pest in the state. <u>We fully agree</u> with the PPQ authorities to change the regulatory status of this pest to non-reportable / non-actionable.
<i>Opogona sacchari</i>	LOW. Although there is a potential for introduction and establishment in NC, the risk is very low. <i>O. sacchari</i> has been in FL for several years without spreading to other states.	Primarily a scavenger feeding on decaying plant matter and a pest of greenhouses. It is not considered an economically important pest in spite its large host range.	<u>We fully agree</u> with the PPQ authorities to change the regulatory status of this pest to non-reportable / non-actionable.
<i>Quadrastichus erythrinae</i>	VERY LOW. Tropical species. Not likely to get established in NC.	The host range of this pest is restricted to plants of the genus <i>Erythrea</i> of which most species are tropical and subtropical.	<u>We fully agree</u> with the PPQ authorities to change the regulatory status of this pest to non-reportable / non-actionable.
<i>Orthomicus erosus</i>	MEDIUM. This pest can potentially be introduced in WPM and adapt to the climatic conditions in NC. If introduced and established in NC it can potentially be a pest of economic importance due to the damage it can cause to economically important coniferous species in the state.	Numerous species of conifers including pine and cedars.	The DEEP report suggests there is no reported impact of this pest in the US, however, these conclusions are based on the data provided from current populations in California. The conditions in NC are very different with respect to host availability and climate. <u>We DO NOT agree</u> with the PPQ authorities to change the regulatory status of this pest to non-reportable / non-actionable.

<i>Phoracantha recurva</i>	LOW. Very little risk of introduction and establishment in NC. Climatological conditions are also not suitable for this pest in the state.	Primarily a pest of Mirtaceaes including Eucalyptus. In NC, the most important impact could be with the nursery industry on species like crape myrtle.	<u>We fully agree</u> with the PPQ authorities to change the regulatory status of this pest to non-reportable / non-actionable.
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Phil Wilson
State Plant Regulatory Official
Plant Pest Administrator/NC Department of Agriculture & Consumer Services
Plant Industry Division
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