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September 28, 2010

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AURELIO POSADAS  
P.O. BOX 847  
ELK GROVE, CA 95759  
916-709-3484  
AURELIOP@ELKGROVE.NET

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Ms. Rebecca Bech  
Deputy Administrator for Plant Protection and Quarantine  
USDA, APHIS, PPQ  
Jamie L. Whitten Federal Building  
14<sup>th</sup> Street and Independence Avenue, S.W.  
Room 301-E  
Washington, D.C. 20250

Dear Rebecca:

The boll weevil has officially been eradicated east of the Mississippi River and eradication is projected in all states west of the river within the next 2-3 years. Despite this significant progress, the USDA-APHIS-PPQ has not yet adopted federal boll weevil regulations critical in preventing re-infestation from Mexico and with the interstate movement of regulated articles. When the full eradication effort is complete, the boll weevil will no longer be considered an established pest in the United States. Rather, it will be designated as an actionable pest.

Since original detection, billions of dollars have been spent on the eradication effort. To protect this investment of resources, it is imperative federal regulations be implemented to efficiently safeguard cotton production. While most cotton-producing states have enacted regulations, they do not appear to be uniform or fully adequate to prevent boll weevil introductions from other states. Likewise, some states lack adequate regulations to prevent the intrastate spread of boll weevil.

The National Plant Board requests USDA-APHIS-PPQ move forward and finalize federal regulations in advance of boll weevil eradication and to budget those funds necessary to provide for enforcement and to safeguard the industry from re-infestation.

The National Plant Board will also work to encourage all cotton-producing states to adopt standard regulations necessary to adequately restrict the interstate and intrastate movement of regulated articles and to protect their borders until such time as federal regulations become effective.

Rebecca Bech  
Boll Weevil  
September 28, 2010  
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I sincerely appreciate the opportunity to share the concerns of the National Plant Board regarding this issue. If I can provide additional information or support, please do not hesitate to let me know.

Sincerely,

A handwritten signature in black ink that reads "Carl P. Schulze". The signature is written in a cursive style with a large, stylized initial "C".

Carl Schulze, President

cc: Vic Harabin, Eastern Regional Director, USDA, APHIS, PPQ  
Phil Garcia, Western Regional Director, USDA, APHIS, PPQ  
Regional Plant Board Presidents