



Southern Plant Board

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Contact Address: Plant Industry Division
North Carolina Department of Agriculture & Consumer Services
1060 Mail Service Center
Raleigh, NC 27699-1060

May 5, 2008

Ms. Cindy J. Smith
Administrator
United States Department of Agriculture
Animal and Plant Health Inspection Service
1400 Independence Avenue SW, Room 312-E
Washington, D.C. 20250

Dear Ms. Smith:

On behalf of the membership of the Southern Plant Board (SPB), I am writing to encourage USDA, APHIS, PPQ to convene a meeting of the *Phytophthora ramorum* working group and other interested stakeholders for the purpose of conducting a comprehensive review. As part of the review, the working group would develop recommendations to improve the current policies and procedures necessary to protect areas of the United States that are currently free from *P. ramorum*. Additionally, the SPB membership is requesting that USDA, APHIS continue to provide adequate funding and resources necessary to conduct a *P. ramorum* survey and to assume an active leadership role in responding to *P. ramorum* regulatory incidents in those states considered to be *P. ramorum*-free.

Since 1995, *Phytophthora ramorum*, the causal agent of sudden oak death, has been a plant pathogen of regulatory significance. Causing oak mortality in coastal California, Oregon and Washington, the host range and number of nurseries found to be positive continues to expand. The regulated host and associated host list now numbers 115, and of which 5 are for the whole genus. Eradication efforts remain less than successful. While there has been an ongoing effort to regulate nursery stock and other regulated articles from known infested areas of California, Oregon and Washington, there have been ongoing problems with infected nursery stock shipments to other regions of the United States. The National Plant Board, in cooperation with the USDA, APHIS, PPQ, appointed a *P. ramorum* working group in 2005 to provide National Plant Board input into the federal regulatory process. In addition, the National Plant Board developed a *Phytophthora ramorum* position paper in December of 2006 that clearly states the National Plant Board concerns regarding the significance and potential impact of *P. ramorum* on areas of the U.S. presently free of sudden oak death. In August of 2007, a research article published in Plant Management Network set forth new information that *P. ramorum* can be present in potting media of asymptomatic non-host plants. This new information must be fully evaluated along with other information relevant to pathways that allow this pathogen to spread via the movement of nursery stock and related regulated articles.

Member States

Alabama – Arkansas – Florida – Georgia – Kentucky – Louisiana – Mississippi
North Carolina – Oklahoma – Puerto Rico – South Carolina – Tennessee – Texas – Virginia

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The Southern Plant Board sincerely appreciates your consideration of this request and looks forward to working cooperatively with you and your agency in tracking this issue.

Sincerely,

Gene B. Cross
President

c: Rebecca Bech, Deputy Administrator, USDA, APHIS, PPQ
Vic Harabin, Eastern Regional Director, USDA, APHIS, PPQ
Phil Garcia, Western Regional Director, USDA, APHIS, PPQ
Bob Ehart, NASDA
Gray Haun, President, National Plant Board
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