

# PUBLIC SUBMISSION

<b>As of:</b> September 08, 2010 <b>Tracking No.</b> 80b3060e <b>Comments Due:</b> August 16, 2010
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**Docket:** [APHIS-2008-0015](#)

Citrus Greening and Asian Citrus Psyllid; Quarantine and Interstate Movement Regulations

**Comment On:** [APHIS-2008-0015-0006](#)

Quarantine and Interstate Movement Regulations: Citrus Greening and Asian Citrus Psyllid

**Document:** [APHIS-2008-0015-0013](#)

Comment from Ricky Becnel

## Submitter Information

**Name:** Ricky Becnel

**Address:**

Belle Chasse, LA,

**Organization:** Saxon Becnel and Sons, LLC

## General Comment

To whom it may concern:

I am addressing the interim rule "Citrus Greening and Asian Citrus Psyllid; Quarantine and Interstate Movement Regulations".

This rule states for no more than 30 days, and no fewer than 20 days before shipment. This simply will not work for our industry. The way the rule is written, when my customer asks for my citrus trees, I must reply to my entire customer base that I must wait at least twenty days. It would require me to possess acres and acres of a staging area in which I would still be worried about not only outside temperatures, but also adequate water supply in order to meet this rule. Otherwise all that I have is a ten day window for sales.

As the old rule states, the way we would work upon placement of order, we would both drench and spray upon the time of shipment. I can see how some people would think the drench chemical has not absorbed into the tissue of the plant upon shipment, however, at the time the rule was written, everyone agreed the sprays we were applying were more than adequate until the drench could reach the plant. If everyone is dissatisfied with the old rule, and there is no way of survival within the new interim rule; an alternative would be as part of the working group, with Mr. Osama El-Lissy, all agreed that if the nursery was drenched at least thirty days prior to shipment and the foliar spray applied within ten days of shipment may be the best procedure so far. This would allow all trees in the nursery to be drenched every five months, and would be eligible at any time for shipment. We are already spraying with great insecticides every ten days. This would also suffice for last minute orders, and damaged trees on times of loading.

I am speaking not only for Saxon Becnel and Sons, but also for my entire industry which is located twenty miles south of New Orleans, Louisiana. If this new interim rule stays in effect then

the industry and our entire customer base would be destroyed.

Sincerely,

Ricky Becnel, President  
Saxon Becnel and Sons, LLC