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August 29, 2016

U.S. Department of Agriculture  
Regulatory Analysis and Development  
PPD, Animal and Plant Health Inspection Service  
4700 River Road, Unit 118  
Riverdale, MD 20737-1238

**Re: Docket No. APHIS 2013-0081 Standardizing Phytosanitary Treatment Regulations**

The National Plant Board (NPB) is an organization of all U.S. state plant regulatory agencies working together to help ensure a wholesome and abundant supply of agricultural commodities. A significant component of that responsibility includes excluding, eradicating, and managing exotic pests that threaten the American food supply and protecting our critical Natural Resources.

This docket was circulated to the NPB membership for review and comment. Generally, the NPB is supportive of these proposed amendments to the phytosanitary treatment regulations that apply to cold treatment and irradiation facilities, cold treatment schedules, and fumigation and cold treatment compliance agreements, with the following considerations:

1. The NPB encourages USDA to develop work plans whenever possible that require irradiation and other treatments for quarantine pests to be performed at point of origin or in transport route rather than at point of destination to prevent accidental introduction of these pests.
2. The State of Florida requests, due to its wide range of diverse habitats and climate ranges and therefore the significant likelihood of accidental exotic plant pest introduction and establishment, that import cold treatment facilities not be located with that State.

We appreciate the opportunity to review and comment on these proposed amendments to the phytosanitary treatment regulations. Please feel free to contact me if you have questions regarding these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Collins".

Joe Collins, President

National Plant Board