

APHIS acknowledges the concerns of National Plant Board members and the desire for additional survey to better understand the establishment of *Phytophthora austrocedri* in the United States. APHIS evaluated the feasibility of an official control program and determined it would not be economically or technically feasible, and that a Federal survey program would not contribute to limiting the spread or eradicating the pathogen in the United States.

Potential costs of a regulatory response would be very high for both APHIS and impacted nurseries because it requires time-consuming destructive sampling of plants, with costly diagnostic testing protocols. To delimit (survey the extent of the infestation) just one of the impacted nurseries in Oregon, APHIS estimated the shared cost to be over \$9.4 million. To achieve ideal testing levels at that location, officials would need to destructively sample at least 40,000 plants at a cost of \$190 per sample. This would cost APHIS about \$8.7 million for the contractual diagnostic testing alone. The plants destroyed for testing would amount to 4.6 percent of the nursery's total Cupressaceae stock, with an estimated value of \$800,000. This does not include any additional plant destruction due to positive detections, survey crew costs, or the cost of shipping and administrative costs.

Eradication of invasive species is likely to be successful when the affected areas are under ten hectares. *P. austrocedri* has been officially detected in two large nurseries in Oregon that encompass nearly 600 hectares. When affected areas are over 100 hectares, the likelihood of successful eradication drops to only ten percent. It is also worth noting that during responses to detections at the two Oregon nurseries, the pathogen was isolated from plant species previously not known to be hosts of the pathogen. This indicates that the pathogen may be capable of infecting a broader range of plant species, thus making eradication more unlikely.

Containment is also unlikely to be successful. Containment requires knowing which plants are infected and stopping their movement. Because *P. austrocedri* infections cannot be diagnosed visually and without destructive sampling, host plants with infections may go unnoticed. Also, since thousands of potentially infected plants were shipped nationally for up to two years from the impacted nurseries, the window for regulatory restrictions of host material has closed and would not be effective in limiting the spread of *P. austrocedri*.

Given these technical and economic considerations, APHIS believes that data obtained from a Federal survey program for *P. austrocedri* would not contribute to ultimately controlling the spread or eradication of this pathogen. While knowing the current distribution of this pathogen would be informative, it is enough to know that it is distributed widely to determine that a program would not be cost-effective. In the nursery setting, the effort and expense incurred to determine presence of the pathogen and eliminate it are prohibitive. In the environment, slowing the spread with a protective-style approach, focused on natural ecosystem management and actively managing highest-value natural sites is the best control option available. APHIS will continue to support projects directly related to improving diagnostic methods and best management practices for controlling the spread of this pathogen.