from buildings, which may be contaminated? This commenter suggested that all irrigation water should be treated with ultraviolet irradiation or filtered to eliminate spread of pathogens.

Response: Under the proposed requirement, if rainwater is used it must be boiled or pasteurized, which would destroy pathogens.

Several commenters suggested that the height requirement for the raised growing benches is not sufficient to prevent something on the ground being spread by insects or by water splashing.

Response: The benches are not raised over "ground," but over concrete or gravel over plastic sheeting. The purpose of any elevation of the benches is to allow air circulation underneath, to separate the bench and its plants from the drainage off the bench, and to simplify cleaning and sanitation. The minimum height specified was necessary to accomplish these tasks. Some benches may use trickle irrigation for watering or contain approved growing media watered by a circulatory system. In either case there would be no splashing. If there were some splashing, there would be no soil that would serve as a source of contamination and spread. In addition, the height requirement for potted plants has been in effect for six different kinds of plants for about 20 years. No exotic pests have been found with shipments of these plants.

Several commenters stated that pesticides in the growing facilities will keep infestations at a low level making visual inspection useless; pesticide use should be prohibited to avoid this problem of masking.

Response: The use of pesticides and other safeguards, such as screens, are methods of reducing the risk of introducing exotic pests. We believe that the use of pesticides with other safeguards will result in a product that is essentially pest-free. Nineteen years of experience with six other genera of plants in growing media supports the concept of using multiple safeguards. This systems approach has long been used here and in foreign countries to reduce pest risk and to provide a horticultural product acceptable for domestic and international trade.

Other Safeguard Concerns

Several commenters stated that they have visited growing facilities that are likely candidates for growing articles under the regulations, and stated that the physical and procedural safeguards required by the regulations are not in place. *Response:* Shipments from growing facilities may not begin until after the required growing agreements have been signed. APHIS will not sign an agreement until the required safeguards and procedures are in place.

Concerns About APHIS Resources

Commenters raised the following questions and concerns about the level of APHIS resources for enforcing the proposed regulations: APHIS does not have adequate resources and commitment to fulfill its monitoring responsibility in foreign countries. The proposal has no specifications for APHIS funding or staffing for inspection of greenhouses, mother stock, and export plants. APHIS is understaffed and politically powerless as evidenced by problems with geraniums, poinsettia mildew, white rust, and the withdrawal from the U.S. market of Fisher Geraniums. APHIS does not have sufficient staff at ports of entry, as evidenced by unwanted pests that continue to be shipped in, e.g. Xanthomonas pelargonii and the cotton moth on geraniums. Budget cuts in USDA should prohibit any new products being considered for importation under the regulations. APHIS cannot control likely problems because USDA has been a primary target for budget reductions. It is inappropriate to propose additional importation of plant genera when many inspection positions at ports of entry are vacant. Current PPQ staffs are not able to adequately inspect and monitor disposition of imported plant materials. The APHIS Vision 2000 document projects continuing decreases in PPQ staff.

Response: It is true that many variables in the annual budget process can affect the level of resources APHIS can apply to any given program at any given time. APHIS intends to manage its resources to allocate the necessary number of staff hours to this program to ensure the level of inspection and enforcement necessary for its safe operation. If at any time we are unable to provide the resources necessary for full implementation of the proposed requirements, we will discontinue or limit importations under the regulations. Our statutory authority allows us to take such action whenever it is necessary.

Several State governments indicated their desire for a system by which APHIS would notify them of all importations destined for their States, especially since they believe USDA has no plans to increase port of entry inspection staff and may have to decrease current staff. *Response:* APHIS has a system to notify State Departments of Agriculture of the arrival in the United States of plants destined for their States. Any State may request and receive notification from APHIS of the arrival of plants imported in accordance with these regulations.

Pest Risk Analysis Methodology

Some commenters believed the database of pest/host information APHIS assembled in the course of pest risk assessment was too narrow and exclusive. Several felt that because the automated databases employed do not contain reports from before 1970, applicable historical information about possible pest risks was not included. Two commenters cited specific pests that were not identified by the database (pathogens from Israel and Egyptian cotton moth) and stated that these pests should have been considered in evaluating the proposed importations.

Some commenters felt that published reports of pests associated with particular plant articles are an insufficient source of data for pest risk decisionmaking. One stated that ignoring a pathogen until it does enough damage to be noticed in research articles does not ensure safety of our agriculture; we can't assume an organism is not of quarantine significance only because there is little or no economic damage or biological information or data published in scientific journals. Another stated that a lack of information in scientific papers on a particular pest does not constitute proof that there is no problem with that pest. Another cited the comparative paucity of reports in the scientific and regulatory literature of pests in Asia and parts of Europe as a sign that the database employed by the regulations is incomplete.

Response: The scientist obtained an excellent coverage of the worlds' scientific literature by using the data bases in their search for literature. In addition, PPQ furnished copies of important papers for use in the assessment. Furthermore, scientists had the option to consult the references to older papers that are found at the end of the scientific articles that appear after 1970. The outside scientists had their own references and their University libraries as well.

We agree that the pest and potential host data employed were not and cannot be comprehensive. However, we believe the database assembled the best feasible collection of data relevant to the decisionmaking process required for the proposal of regulations. To address the fact that unknown or underreported