

Approved: _____

Date

January 10, 2001

MINUTES OF THE SENATE COMMITTEE ON AGRICULTURE.

The meeting was called to order by Chairperson Derek Schmidt at 8:30 a.m. on January 9, 2001 in Room 423-S of the Capitol.

All members were present except:

Committee staff present: Raney Gilliland, Legislative Research Department
 Jill Wolters, Revisor of Statutes
 Betty Bomar, Secretary

Conferees appearing before the committee:

Jamie Clover Adams, Secretary, Kansas Department of Agriculture

Others attending: See Attached List

Chairman Schmidt submitted a letter addressed to John Simons, President, ConAgra Beef Company, to be signed by members of the Committee, supporting and encouraging the reconstruction and return of operation of the ConAgra processing facility in Finney County.

Doug Wareham, Kansas Grain and Feed Association, urged members of the Committee to participate in the Ag Information and Technology Tour January 18, 2001. The Chair advised the Committee arrangements had been made with leadership to be excused for the day.

Jamie Clover Adams, Secretary, Kansas Department of Agriculture (KDA), introduced members of her staff, Greg Foley, Assistant Secretary, and Rebecca Reed, an assistant, and submitted a Kansas Department of Agriculture Briefing Book (A copy on file in the office of Legislative Research Department) Ms. Adams further submitted a copy of a letter addressed to the Environmental Protection Agency over the signature of the Secretary of the Department of Agriculture and Tracy Streeter, Executive Director, State Conservation Commission (Attachment 1) and an Issue paper on the Establishment of Permanent Laboratory Equipment Fee Fund (Attachment 2)

Ms. Adams presented an overview of the Department, stating KDA is primarily a regulatory agency charged with ensuring the safety of the meat, milk and egg supply; ensuring responsible and judicious use of pesticides and nutrients; ensuring the integrity of weighing and measuring devices in commerce; and ensuring that the waters of the state are put to beneficial use.

Ms. Adams reviewed proposed legislative initiatives as follows: 1) update, clarify and streamline the Kansas Dairy law; 2) technical amendments to the Kansas Meat and Poultry Inspection Act; 3) repeal of the Statistics Division requirement to aid county census; and 4) cleanup of the Weights and Measures Law.

The Starlink genetically modified organism and biotechnology in agriculture was discussed. Ms. Adams stated that Kansas farmers planted less than one percent - 21,390 acres - of its corn acres to Starlink, and KDA inspectors surveyed counties where most of the StarLink was grown after which they estimated that as many as 4.6 million bushels of corn in state-licensed elevators could contain traces of StarLink. This did not pose a disposal problem in Kansas as there was a market ready to accept it as animal feed. Biotechnology has led to crop varieties that resist herbicides, saving the agricultural industry about \$200 million a year. Since 1996, the percentage of US crops planted to biotech varieties has grown to about a fourth for corn and more than half for soybeans. Ms. Adams stated that rather than eliminate biotech crops, it is more important to educate the consuming public about biotechnology's benefits. To this end, KDA has accepted an invitation from Kansas, Inc., to help coordinate a two-day biotechnology symposium in an effort to education agricultural producers and to disseminate scientifically valid information about biotechnology.

CONTINUATION SHEET

Ms. Adams reviewed the Environmental Protection Agency (EPA) proposed water quality standards for the State, and stated the proposal appears to be a blatant attempt to impose the will of federal bureaucrats on Kansas. The proposal would divert scarce resources away from Kansas programs to improve water quality. In each area of the proposed rule, EPA has overstepped its jurisdiction, pushing the envelope of the Clean Water Act to expand the power of the federal government.

The EPA proposed water quality standards are important to Kansas agriculture and the proposals attempt to circumvent the work of Kansas and put nonpoint source pollution efforts under the umbrella of command and control of point source solutions developed by the federal government. Ms. Adams stated she was gratified by the number of people who turned out for the hearings and is of the belief that it may have had an impact on the EPA.

Ms. Adams stated KDA, at the direction of the Governor, has conducted a comprehensive review of the rules and regulations within its jurisdiction, and found that regulations are often affected by rapid changes in technology and the agricultural industry. The review teams highlighted the following changes that need attention soon: 1) formation of a technical workgroup to assess all anhydrous ammonia regulatory policy, regulations and safety equipment requirements; 2) the Kansas Noxious Weed law needs to be reviewed; 3) clarify and streamline the Kansas Dairy Law, 4) the Meat and Poultry Inspection Act will require regulation changes as a result of technical amendments made in 2001; and 5) the Kansas Weights and Measures Law will require adjustments to regulations as a result of technical amendments made in 2001. The team further suggested the Kansas Seed Law, the Kansas Egg Law, the Kansas Feeding Stuffs Law, the Kansas Dairy Law, the Grain Warehouse Program, and the Meat and Poultry Inspection Program be assessed for suitability and compatibility.

The team suggested specific changes to the Environmental Protection Program Regulations and the Water Program Regulations.

Ms. Adams stated 76% of the Department's budget is for personnel and travel, 13% for contractual services and 11% for all other expenditures.

Senator Umbarger moved, seconded by Senator Downey that the three bills proposed by the Secretary be introduced as Committee Bills. The voice vote was in favor of the Motion.

The meeting adjourned at 9:30 a.m.

The next meeting is scheduled for January 10, 2001.

STATE OF KANSAS

Bill Graves, Governor

Jamie Clover Adams, Secretary of Agriculture
109 SW 9th Street
Topeka, Kansas 66612-1280
(785) 296-3556



Tracy Streeter, Executive Director
State Conservation Commission
109 SW 9th Street
Topeka, Kansas 66612-1280
(785) 296-3600

January 2, 2001

W-00-31 Comment Clerk
Water Docket (MC 4101)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: Docket Number W-00-31

The following comments and cost estimates, which specifically address the nonpoint component of TMDL implementation in Kansas, are submitted on behalf of the State of Kansas by the Kansas Department of Agriculture and the Kansas State Conservation Commission.

The cost estimates are premised on the Kansas experience that illustrates voluntary, incentive-based approaches are the appropriate mechanisms to address nonpoint source pollution and to improve water quality. Kansas has spent a decade developing, implementing and perfecting this approach. Success hinges on three key areas: (1) implementing an effective water quality monitoring program; (2) researching effective on-farm management practices; and, (3) providing information and outreach to farmers and other property owners. The biggest lesson we have learned, however, has more to do with human nature than any policy or program – the only way to address nonpoint source pollution, and effectively improve water quality, is to encourage cooperation, obtain buy-in, and change habits and attitudes. The TMDL process should not substitute the judgement of the federal government for the judgement of Kansas by prescribing rigid processes. EPA should set the goal – improved water quality – and allow states, including Kansas, to use the mechanisms we know will work to achieve the goal.

The following information provides cost estimates associated with state agency work on nonpoint source TMDLs, as well as cost estimates to the private sector – particularly agriculture – to implement TMDLs. No comment or information is provided regarding the theory put forward by EPA that TMDLs will reduce costs. We believe that Kansas' experience over the last decade shows that our approach, upon which the cost estimates are based, is the most efficient and effective manner to address nonpoint source pollution.

Senate Agriculture Committee

Date 1-09-01

Attachment # 1 thru 1-8

Costs to the State of Kansas – Three Categories

Personnel. The Kansas Department of Health and Environment (KDHE), the Kansas lead agency, will need five more FTEs to develop TMDLs under the regiment outlined in the July 2000 rule, as opposed to the regiment already developed and implemented by Kansas. The estimated annual cost for these five FTEs is \$260,000. The Kansas State Conservation Commission (SCC), the agency primarily responsible for Best Management Practice (BMP) implementation in high-priority TMDL areas, will require two more FTEs to handle enhanced administrative tasks associated with targeting resources to multiple watersheds and to track program accomplishments relative to TMDL implementation. The additional cost to the SCC is estimated at \$161,150 annually.

Finally, Kansas State University (KSU) has been intimately involved in the implementation of current voluntary, incentive-based programs to address nonpoint source pollution in Kansas. Kansas' experience in implementing the voluntary, incentive-based approach for the past decade clearly shows that no regulation or program can be implemented on the ground without technical experts available to help landowners with the details of best management practices. Their help will also be necessary to implement the added burdens of the July 2000 rule. Currently, through funding from a 319 grant, the SCC and the Kansas Department of Agriculture, five watershed specialists have been deployed to the three Kansas river basins where TMDLs have been developed. The need for on-the-ground technical specialists is expected to increase substantially under the requirements of the July 2000 rule. We estimate Kansas will need between four and eight more watershed specialists, which will cost from \$300,000 to \$600,000 annually.

Data Collection. The second component to implementing TMDLs that improve water quality is good water quality and quantity data. Currently, Kansas operates an extensive water quality sampling network with more than 250 sampling sites operating for more than 20 years. However, during implementation of the Delaware Pesticide Management Area (PMA), the Big Blue Basin project coordinated with the State of Nebraska and the Governor's Water Quality Initiative, Kansas discovered that more water quality sampling was necessary to effectively deploy resources to improve water quality. For example, additional monitoring for the Delaware PMA cost \$281,500 over three years. Additional monitoring costs in the Big Blue basin are approximately \$125,000 per year and in the Kansas Lower Republican Basin, the additional cost for water quality sampling in targeted areas were approximately \$250,000 over three years. None of these figures include the start-up costs associated with automatic samplers of approximately \$7500 each. Kansas has 12 river basins, so the estimate for additional water quality start-up sampling data necessary to implement the requirements of the July 2000 rule are between \$1.6 million and \$2.35 million annually for three years.

Water quantity data, or flow data, is critical to the successful development of TMDLs. Currently, Kansas operates stream gages across the state in cooperation with the United States Geological Survey (USGS), which cost \$1.25 million annually. Cutbacks in USGS budgets in recent years has caused nearly one-third of the burden to be shifted to the State where at one time USGS paid the entire cost. There is no reason to believe this shifting will not continue. TMDL development will require Kansas to find the additional funds – possibly \$500,000 annually – to pay for this important activity.

Development of Best Management Practices. The state of Kansas will also bear the burden of additional BMP development. Without providing the tools to address nonpoint source pollution, all the TMDLs in the world are worthless. Much of this burden falls to the SCC, KDA and KSU. To date, Kansas has provided the necessary resources to develop BMPs as part of our water quality improvement efforts. For example, the SCC and KDA spent \$345,399 on fecal coliform BMP research over the past

two years. However, Kansas' experience during the past decade illustrates a need to refine BMPs for the region of the state where they will be used. For example, KSU developed and instrumented a field site to evaluate land management practices and agricultural techniques in relation herbicide movement, and to mitigating or promoting runoff. This site, which came to be known as the Foster Farm Site, was the first of a group of on-farm research facilities designed to screen, or field test, area-wide farming practices and to measure the effectiveness of water quality best management practices. Once in operation, the Foster Farm also became an excellent demonstration tool to educate area farmers, chemical dealers and extension personnel. KSU has created six more BMP development sites to provide refined BMPs for those in other parts of Kansas. Currently, funding is from a hodgepodge of temporary sources. The annual cost is approximately \$300,000.

Costs to the Private Sector – Nonpoint Source Pollution

The SCC completed an inventory of the implementation needs for the Kansas Lower Republican River Basin (KLR), the first river basin for which TMDLs have been developed. Located in northeast Kansas, the KLR encompasses approximately 10,500 square miles. Watersheds designated high-priority for TMDL implementation encompassed 4,575 square miles. The map in attachment A illustrates the high-priority TMDL areas.

The inventory is a standard process for quantifying the cost of Best Management Practices (BMP) and technical assistance. The inventory addresses fecal coliform bacteria, nutrients, pesticides, sediment and dissolved oxygen impairments in TMDL high-priority watersheds. It uses data from the following sources: Natural Resources Conservation Service (NRCS); National Resources Inventory (NRI); Kansas Riparian Inventory; Input from local NRCS, Conservation District and KSU Research & Extension Personnel; Input from Local Environmental Protection Program Personnel; County Appraisers Office; KDHE Livestock Census & Confined Animal Feeding Operation Data; Historical Cost Data - SCC Programs; and, NRCS Workload Analysis. The inventory captures only costs associated with nonpoint source contributions and does not include TMDL-designated watersheds identified as medium or low priority. The methodology is outlined in attachment B.

The total cost to implement high-priority TMDLs in the KLR, including technical assistance, is slightly more than \$87 million. It is also important to point out that in the KLR the 1997 average market value of agricultural products sold per farm – the individuals who will pay for practices to improve water quality – was a little more than \$71,000. If the July 2000 rule requires more priority areas, this cost will increase accordingly. Following is a table illustrating the costs associated with TMDL implementation in the KLR.

Summary of Implementation Costs for the KLR:

| RESOURCE NEED | UNITS | AMOUNT |
|---|------------|----------------------|
| Cropland Treatment (Acres) | 195,715.00 | \$ 30,169,260 |
| Grassland Treatment (Acres) | 502,354.00 | 12,558,860 |
| Failing Septic Systems (Number of) | 5,165.00 | 23,598,885 |
| Livestock Waste Systems (Number of) | 1,671.00 | 10,817,800 |
| Riparian Area/Stream Buffer Restoration (Miles) | 2,691.00 | 2,299,576 |
| Technical Assistance - On-Site Wastewater @ \$228/System | 5,165.00 | 1,177,620 |
| Technical Assistance - All Other Practices (Staff Years) | 13.22 | 6,612,466 |
| TOTAL | | \$ 87,234,467 |

While it is difficult to extrapolate the cost to the private sector for TMDL implementation in the remaining eleven river basins, the \$87 million provides a good starting point. It is also important to put this cost into perspective. Kansas is a state with 2.7 million people, 10 percent of which are responsible for land stewardship. We cannot expect 250,000 individuals to shoulder the entire burden of implementing TMDLs. Money, in the form of cost-share, must be available to ensure BMPs are installed and implemented. Kansas cannot do this alone.

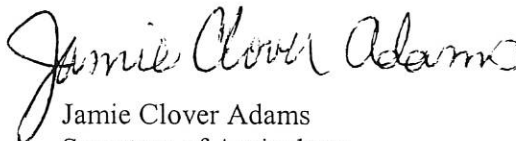
The SCC has started the needs inventory for the Cimarron and Arkansas river basins, which will be complete early in 2001.

Conclusion

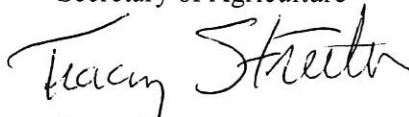
Kansas will need between \$1.6 million and \$2.35 million annually over three years to collect the necessary baseline data in all river basins except the Kansas Lower Republican to effectively target cost-share resources and educational efforts. The total annual cost to the state of Kansas to effectively develop and implement TMDLs is between \$1.5 and \$1.8 million annually. The cost to the private sector – primarily agriculture – will clearly exceed \$87 million.

As outlined above, these cost estimates are premised on the Kansas experience which illustrates that voluntary, incentive-based approaches are the appropriate mechanisms to address nonpoint source pollution and to improve water quality. Kansas will need to continue to marshal the resources necessary to implement TMDLs. The SCC needs assessment for the KLR clearly illustrates that Kansas currently does not have the necessary resources to fully implement TMDLs. Further, the current state of the farm economy clearly illustrates that Kansas producers aren't likely to have the necessary resources either.

Sincerely,



Jamie Clover Adams
Secretary of Agriculture

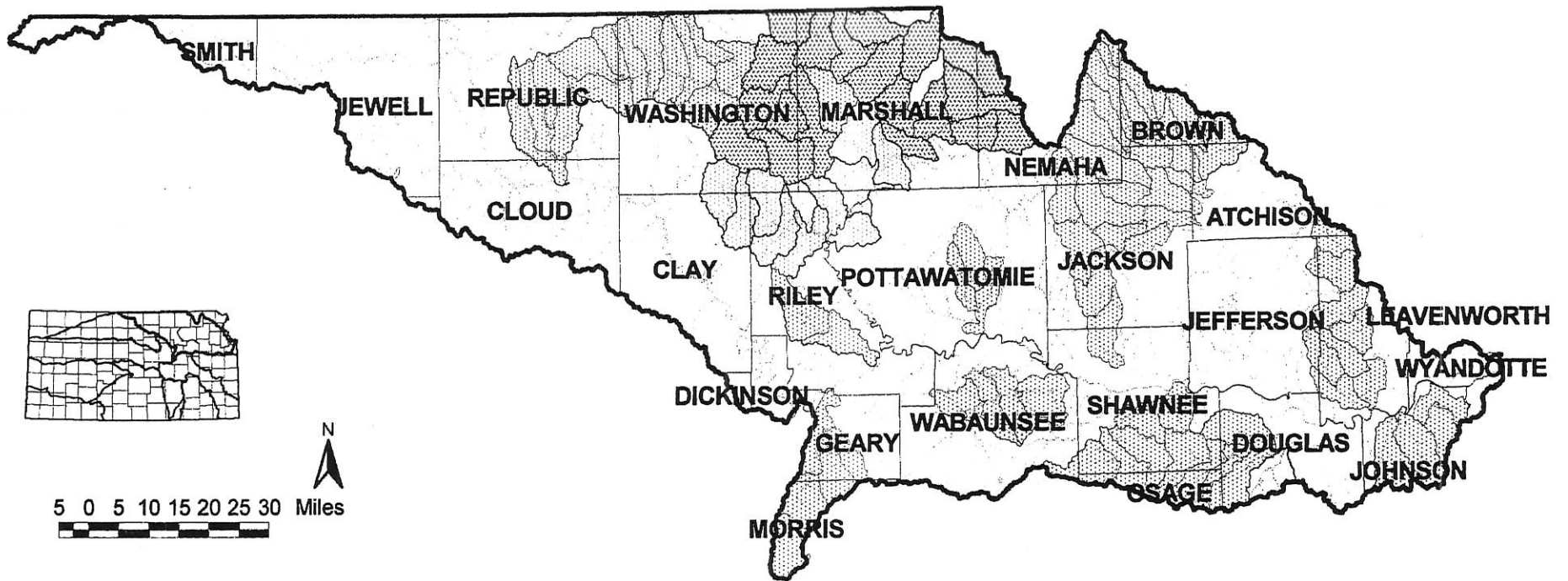


Tracy Streeter
Executive Director, SCC

cc: Tom Stiles, KDHE

Attachments

HIGH PRIORITY TMDLS IN KLR



□ county boundary
□ hydrology
□ basin boundary

Attachment B

Kansas Lower Republican Needs Inventory Data Sources and Methodolgy

Inventory Data Sources:

- Natural Resources Conservation Service (NRCS), National Resources Inventory (NRI)
- Kansas Riparian Inventory
- Input from local NRCS, Conservation District and KS State University Research & Extension Personnel
- County Appraisers Office
- Input from Local Environmental Protection Personnel
- KDHE Livestock Census & Confined Animal Feeding Operation Data
- Historical Cost data - SCC Programs
- NRCS Workload Analysis

How the Data Was Used:

Eutrophication & Pesticides

The 1992 NRI was used to provide percent of cropland needing treatment, by county. The data was updated through 1999 by the local conservation district and NRCS office. The percent of cropland needing treatment was applied to the total acres of cropland in the high priority TMDL watershed to arrive at the number of acres needing treatment in the watershed. The local conservation district and NRCS office provided the cost per acre to treat cropland to arrive at the total cost.

The Riparian Inventory is completed in the nine of the 20 counties having high priority TMDL watersheds. In those counties, the Inventory measured, on a per mile basis, the different land uses within 100 feet of both sides of all perennial and intermittent streams. The streams with cropland only or a mix of cropland and permanent vegetation was measured to arrive at the miles of riparian areas in need of permanent vegetation. 11 digit hydrologic unit boundaries were added to this GIS database to calculate the need by watershed. These miles were multiplied by an average cost to establish different types of vegetation likely to be used in that county to arrive at the total cost. This cost does not include any costs to state or federal government should these areas be enrolled in the Conservation Reserve Program and the Kansas Water Quality Buffer Initiative. NOTE: Some of the TMDL high priority watersheds are mapped on a 14-digit hydrologic unit basis. As a result, some of the riparian inventory data does not accurately reflect the actual TMDL watershed.

Fecal Coliform Bacteria & Dissolved Oxygen

Livestock Waste

Livestock operations ranging from cow/calf to confined animals under 1,000 animal units were evaluated to determine the operations in need of some form of BMP. Those BMP's range from removing cattle from streams and proper grazing management to total containment of confined livestock waste.

The NRI was utilized to determine the percent of the grassland needing treatment, by county. The grassland costs were established using the same process as that used to determine cropland needs

Local input was used to determine the confined livestock operations in need of BMP's. This includes wintering areas; temporary background feeding operations, permanent confined feeding facilities and dairies. These operations were placed in two groups; those under and those over \$5,000 in BMP costs. The local NRCS, conservation district and Extension agent jointly determined the number and type of operations falling into these two categories. This local group also determined the average cost for BMP's in their county for small and large operations, and dairies. KDHE Registered and Permitted sites were reviewed to determine if adequate pollution control measures existed and to ensure facilities with adequate pollution controls were not included in the inventory.

The Riparian Inventory in the same method described above in watersheds impaired by fecal coliform bacteria and dissolved oxygen.

Human Waste

The inventory quantified the number of failing or non-existent onsite wastewater (septic) systems to determine the costs resulting from human wastes. The county appraiser identified all rural households in the high priority TMDL watersheds. The county sanitarian utilized existing data and sampling techniques to determine the percent of total households with failing or no septic systems. The sanitarians also sampled to determine the number of systems adjacent to receiving water bodies (100 meters). The estimated number of failing systems were multiplied by the average system installation cost obtained from SCC cost-share data to determine the total cost.

Technical Assistance (All impairments)

The technical assistance needs for agricultural BMP's was obtained from the 1999 Kansas Workload Analysis, conducted by NRCS. This analysis determined the number of staff years needed, by county, to address the natural resource needs identified in the NRI described earlier. The analysis subtracted the number of existing staff in each

county to arrive at the additional staffing need or gap. To arrive at the number of staff needed for TMDL implementation, the gap for the entire county was multiplied by the percent of the county acres in a high priority TMDL watershed. For example, if the Workload Analysis indicated a county gap of 4 staff years and 40 percent of the county is in a TMDL watershed, the TMDL technical need is 1.6 staff years ($4 * .4$). NRCS costs per staff year of \$50,000 were used to establish the inventory's technical assistance costs.

The Local Environmental Protection Program personnel estimated the technical assistance costs per failing onsite wastewater system to equal 5 percent of the system's cost. Based upon the SCC average cost per system of \$4,569, the technical assistance cost per system is \$228. The cost per system was multiplied by the total number of failing systems to arrive at the total inventory cost for this BMP.

Summary of Implementation Costs:

| RESOURCE NEED | UNITS | AMOUNT |
|--|------------|----------------------|
| Cropland treatment (Acres) | 195,715.00 | \$ 30,169,260 |
| Grassland treatment (Acres) | 502,354.00 | \$ 12,558,860 |
| Failing Septic Systems (Number of) | 5,165.00 | \$ 23,598,885 |
| Livestock Waste Systems (Number of) | 1,671.00 | \$ 10,817,800 |
| Riparian Area/Stream Buffer Restoration (Miles) | 2,691.00 | \$ 2,299,576 |
| Technical Assistance - On-Site Wastewater @ \$228/System | 5,165.00 | \$ 1,177,620 |
| Technical Assistance - All Other Practices (Staff Years) | 13.22 | \$ 6,612,466 |
| TOTAL | | \$ 87,234,467 |

Establishment of Permanent Laboratory Equipment Fee Fund

Issue: The Department Laboratory is an integral part of the KDA enforcement program because without accurate testing, enforcement cases cannot move forward. For example, new products mandate the use of new technologies to analyze samples submitted to the laboratory by KDA's regulatory programs. However, KDA does not have a systematic way to update and /or obtain necessary equipment. Additionally, all equipment eventually requires repair or replacement. KDA proposes to establish a fee fund to purchase, rebuild and repair equipment for the Laboratory. The fee fund will be established by increasing and redistributing fees currently charged in the following funds: Feeding Stuffs, Livestock Remedy, Dairy, Pesticide and Chemigation Safety. (This fee fund with identical funding sources was authorized on a temporary basis from FY 1995-1999.) The establishment of a laboratory fee fund will permit the Laboratory to better plan and budget for new equipment and thus, keep pace with changes in the agricultural industry.

Fiscal Implications

KDA estimates \$70,000 will be generated annually. This will be accomplished by amending fee funds as follows: increase the Livestock Remedy fee \$2 – from \$10 per year to \$12 per year per product annually; increase the Dairy Inspection fee ten percent – from \$.01 per hundred to \$.011 per hundred; increase the Pesticide Applicator Business License fee \$12 – from \$100 per license category to \$112 per license category; increase the Chemigation permit fee \$5 – from \$50 to \$55; and redistribute the Feeding Stuffs Inspection fee – \$0.095 per ton to run the program and \$0.005 per ton for the Laboratory fee fund.

Policy Implications

The Laboratory supports KDA's regulatory programs. These regulatory programs (ACAP, Dairy, Meat & Poultry and Pesticide & Fertilizer) are responsible for protecting food consumed by Kansas citizens and the Kansas environment. Dairy and meat products are tested daily for harmful pathogens that could lead to food-borne illnesses or death. Animal feed samples are monitored for adulterants which could result in unsafe food products. Pesticide samples are analyzed to detect minute quantities of pesticides that may cause illnesses or inadvertently destroy crops. These activities are essential for the health and well-being of Kansas citizens. However, none of these programs can function effectively if the Laboratory does not have the proper equipment to conduct analyses of samples.

The Kansas Performance Review Board (KPRB) conducted a review of KDA's laboratory and reported that the elimination of the original Laboratory Equipment Fee Fund "will likely have an adverse effect on the replacement of old and obsolete instruments." They went on to report, "...the laboratories will not be able to take full

Senate Agriculture Committee

Date 01-09-01

Attachment # 2-1 then 2-2

advantage of the introduction of new technologies without the infusion of additional state general funds." This is especially important in light of the fact that KPRB reported that "in Kansas there are no private laboratories that test agricultural products."

The establishment of a stable funding source for the purchase and repair of laboratory equipment is essential to the effective and efficient operation of KDA's regulatory programs and ultimately to the protection of Kansas' citizens and environment.

Establish a Plant Pest Emergency Response Fund

Issue: The movement of nursery stock shipped in commerce is one of the highest risk pathways of new pest introduction. Kansas is a net importer of nursery stock and each year imports plant materials from over 30 states to satisfy consumer demand. Each state supplying nursery stock to the Kansas nursery industry has unique pest problems that do not occur in Kansas. Regulatory pest exclusion authority and techniques provided in the Kansas Plant Pest Act such as quarantines, host plant inspection, and pest detection are utilized by the department to direct activities towards regulation of high-risk pests. However, the department's ability to mitigate new pest introductions is limited. Establishment of a plant pest emergency response fund will allow the Kansas Department of Agriculture to more effectively fulfill its responsibility to protect the state's natural and cultivated plant resources from plant pests by providing the capability to rapidly respond to the introduction of harmful plant pests (insects, plant disease, and weeds) into the state.

Fiscal Impact

A surcharge of \$5 for each nursery dealer license and certificate of nursery inspection issued by the department to generate emergency response funds is proposed. The current annual fees for a nursery dealer license and a certificate of nursery inspection are \$40 and \$30, respectively. The surcharge would generate approximately \$7,000 annually. The surcharge would be suspended when the fund accumulates \$15,000 and would be reinstated when the balance was less. Funds would be expended only to mitigate pests that have been identified as high-risk; e.g., those with the potential to damage Kansas agriculture, horticulture, or environment. Similar surcharges have been implemented in some states. For example, Wisconsin has implemented surcharges to combat the gypsy moth and Oregon has established a surcharge to fund research nursery stock pest control techniques.

Policy Implications

Currently, these issues are addressed on an ad hoc basis depending on savings and year-end fund availability, as well as our participation in the Interstate Pest Control Compact**. However, with the rapidly increasing amount of nursery stock entering the state and therefore increased risk, a more methodical approach should be used. No federal funds are available for this purpose.

** Kansas is a member of the Interstate Pest Control Compact. This organization remains a potential source for pest mitigation funds. However, not all plant pest control applications are approved and the length of time to prepare and process an application seldom takes less than four to six months.