CALIFORNIA DEPARTMENT OF
FOOD & AGRICULTURE
A. G. Kawamura, Secretary

September 28, 2007

The Honorable Janet K. Beautz, Chairperson
County of Santa Cruz Board of Supervisors
701 Ocean Street, Suite 500
Santa Cruz, CA 95060-4069

Dear Supervisor Beautz:

Thank you for your letter dated September 7, 2007, about the state and federal eradication plan to address the light brown apple moth (LBAM) infestation.

You raise a number of very important issues, and I greatly appreciate the opportunity to provide you with this response. Additionally, I hope you received my voice mail message yesterday to give you an update on our plans. I look forward to meeting with you personally on Wednesday, October 3 to talk about these important matters in greater detail.

You make very clear that it is "critically important that more information is made available," and I couldn't agree with you more. My staff and I are fully committed to increasing our public outreach effort in order to get information to local city and county governments, growers and residents. We have heard the message that this will require a greater presence in the area and more opportunities to talk with all concerned about this eradication program.

We are currently planning public outreach in your area:

- Townhall meetings and informational open houses on October 22-25, 2007. Meeting details will follow as quickly as possible.
- Fact sheets are currently being developed for our website. Copies will be available at the meetings for your local residents and media.
- The CDFA website now has a direct link to LBAM information at www.cdfa.ca.gov/LBAM. A direct email account to the department is available at LBAM@cdfa.ca.gov.
- Notices for the November 4-9, 2007, treatment will be mailed to all homes in your area on October 26, 2007. The three treatment zones are:
    - North Santa Cruz (Aptos, Soquel, Capitola, Live Oak and Santa Cruz)
    - North Salinas/Boronda
    - Prunedale/Royal Oaks
- Media opportunities are being planned during the month to explain the program.

One question we are frequently asked is, "Just how serious is this pest?" LBAM, which is not native to California, is an extremely serious insect that threatens our state's natural environment and food systems. Entomologists tell us the larvae of this prolific moth can feed on more than 1,000 different types of native and ornamental plants and trees, including 250 different food crops. It reproduces at an alarming rate with females laying clutches of more than 500 eggs as often as five times per year. The moth's larvae would severely impact plants ranging from native redwoods and cypress to fruits and vegetables to endangered species like the saline clover.

Not surprisingly, there is significant concern from other counties, states and nations as to how rapidly we move to eradicate this pest, since ours is the only known infestation in North America.

Your county agricultural commissioner, Ken Corbishley, has provided you with an accurate description of the nature of the pest and serious impact it will have on your community and the rest of the United States, if left unaddressed.

Californians are justifiably proud and protective of the natural beauty and sensitive environment along our state's Central Coast. Further, the health of every resident in Santa Cruz County is as important and valued as that of anyone living in our great state. For these reasons, we are very fortunate to have a method of fighting LBAM that is effective and safe for the environment and the health of people in affected areas.

This particular treatment is the most environmentally friendly and sensitive eradication program in the history of the state. Finding treatment methods such as this could not be possible without dedicated research taking place in our universities and integrated pest management specialists working on innovative approaches.

As we began to determine our treatment protocols, we reached out to the U.S. Environmental Protection Agency and California Department of Pesticide Regulation for their assessments of this eradication program. Both of these agencies reviewed and approved of the releases of this pheromone based on the overwhelming scientific data showing that it does not constitute a threat to either human or animal health. Even the Office of Environmental Health Hazard Assessment has stated that, "there is minimal health risk from the proposed application of Checkmate, the light brown apple moth pheromone."

Because of this clear and convincing evidence, both environmental and organic farming groups support this program. We were gratified that executive director of the California Certified Organic Farmers complimented our efforts in the Monterey area saying we were "responsive and considerate of the community's concerns, protective of the area's special environmental circumstances, and respectful of the needs of organic farmers."

Dr. Carl Winter, director of the Foodsafe program at UC Davis backs up these judgments saying that "as humans, our bodies are unable to recognize and/or even react to [scents] produced by insects."

It may be worth noting that, although the Monterey city council voted to oppose our operation, the council acknowledged that no "credentialed individuals or analyses" believed that the operation would be harmful. Monterey County's health officer, Dr. Hugh Stallworth stated that, "This material does not appear to be toxic to people, pets or plants." Nor, in fact, is it toxic to insects. Dr. Chip Taylor, a Kansas University entomology professor and monarch butterfly specialist who is director of the conservation group, Monarch Watch, concluded, "the spraying is not an immediate threat to the monarchs at Pacific Grove."

In addition to an environmental impact from this pest on the coast and all of California, we must also note the impact of infestation on our economy, particularly to our agricultural and horticultural sectors. Both our domestic and international trading partners have already placed quarantine restrictions on the movement of host plants out of the infested areas of California. Without the local quarantine efforts—and the efforts of our nursery industry in the area—to prevent LBAM's spread the entire state would fall under similar quarantine restrictions.

Since our goal is to eliminate this pest, the quarantine measures must be commensurate with that goal. Live stages of light brown apple moth must not leave the area. For the nursery industry, this means that plants cannot carry viable life stages, including eggs. Existing quarantine requirements already provide local growers with alternatives to the use of broad-spectrum pesticides. Use of these "softer" alternatives will lead to shipping delays, because of the length of time needed to ensure egg-free status. We understand the hardship these measures impose, particularly on the nursery industry, and that is why we immediately initiated—and are fast tracking—research abroad to find more workable alternatives.

Doing nothing will not free the local nursery growers and farmers of these quarantine restrictions. In fact, these businesses will be permanently burdened with these treatments in order to ship out of the area. Moreover, a decision to abandon this program will also mean a quarantine of the entire state. In all likelihood countries that, to date, have accepted our restrictions will then impose their own. Instead, it is our intent to eliminate this moth so that these businesses can resume normal operations as soon as possible.

My department and I are committed to keeping Californians fully informed about the harm caused by invasive species and how we can work to prevent their introduction. When faced with the need to address new invasions, we will always use the safest and most environmentally responsible strategy available. As this program continues, I assure you that we will continue to be sensitive to the unique local environmental and public concerns.

CDFA understands it is critical that people be as fully informed as possible when actions like these are undertaken. Please let me know your suggestions on how we can do a better job to accomplish this in your area.

Again, thank you for sharing your concerns; I look forward to working with you and the board on these matters.

Sincerely,

A.G. Kawamura
Secretary

cc: Ms. Helene Wright, State Plant Director, California, USDA-APHIS
Mr. Ken Corbishley, County of Santa Cruz Agricultural Commissioner and Sealer