DEPARTMENT OF FORESTRY AND FIRE PROTECTION
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October 2, 2007

The Honorable John Laird
State Capitol, Room 6026
Sacramento, California 94249-0027

Dear ~~Assemblymember Laird~~ John:

Thank you for your letter to Director Ruben Grijalva requesting the California Department of Forestry and Fire Protection (CAL FIRE) review the Department of Food and Agriculture (CDFA) and US Department of Agriculture's (USDA) program to aerially release to pheromone attractants for the light brown apple moth. The light brown apple moth has an extremely broad host range, including 250 known host species in over 50 families and 120 plant genera. It is a serious pest of agricultural crops, and many of California's native trees, including major timber species, are on the host list. The State of California has a significant duty and responsibility to evaluate health and human safety considerations and the integrity of its food supply and environment when addressing the threats posed by the light brown apple moth.

The light brown apple moth infestation in California is the first record of this pest in North America. California has a wealth of endemic plants and an incredibly diverse agricultural industry. If the apple moth were to become established, it would undoubtedly encounter and feed on many new hosts, including some native plants that are threatened or endangered. The risk to California's natural environment is significant. Experience in New Zealand indicates that Monterey pine is susceptible to the light brown apple moth. Monterey pine is an important native component of California's Central Coast forest ecosystem and is already threatened by a number of exotic pest and environmental stressors.

The CDFA eradication treatment program involves aerial application of microencapsulated pheromones in a water-based delivery system. The pheromones disrupt moth mating by confusing male apple moths and a small number of closely related moth species. No other moths or butterflies are affected by the pheromone, including the monarch butterfly or any threatened or endangered species. The pheromones are naturally present in the environment, are biodegradable, and are being applied at very low concentration. The product being applied is rated at very low toxicity and is approved for use in organic farming.

Review of scientific materials by CAL FIRE staff indicates that the exposure to the environment is expected to be minimal.

Pheromone treatments are most effective at controlling small populations; such is currently the situation for the light brown apple moth in California. Their low toxicity, effectiveness at low doses, and high target specificity make pheromones an extremely safe treatment option. We know of no other eradication treatment options that would be safer and equally effective. Based on the information reviewed by CAL FIRE, I believe that the CDFA, in cooperation with the USDA, by its use of pheromone for mating disruption, has designed the most environmentally benign program possible for the eradication of this potentially very harmful insect.

As the light brown apple moth numbers can increase quickly, a rapid response is needed to curtail populations as soon as possible. Because of the potential environmental and economic impacts of this pest, CAL FIRE supports CDFA's eradication program as a prudent and justified response.

I appreciate the opportunity to provide this information to you. If I can be of further assistance, please feel free to contact me, or Russ Henly, Ph.D., Assistant Deputy Director for Resource Protection and Improvement at (916) 653-7772.

Sincerely,

CRAWFORD TUTTLE
Chief Deputy Director

cc: Mike Chrisman, Secretary, Resources Agency
A.G. Kawamura, Secretary, Department of Food and Agriculture
Ruben Grijalva, Director, CAL FIRE
Bill Snyder, Deputy Director, CAL FIRE Resource Management