

Secretary A.G. Kawamura
Department of Food and Agriculture
1220 N Street
Sacramento, CA 95814

February 11, 2008

RE: Moratorium on Aerial Pesticide Spraying for the Light Brown Apple Moth (LBAM)

Dear Secretary Kawamura,

On behalf of our members throughout California, we urge you to stop the spraying of pesticides over our communities, and seek safer, more effective alternatives to control the spread of the light brown apple moth.

Last fall, the California Department of Food and Agriculture (CDFA) proposed a series of aerial pesticide applications to control the spread of the invasive light brown apple moth (LBAM). As a result of those applications, CDFA has directly received over 330 adverse health complaints, and over 300 from other sources. Recommendations from the CDFA and U.S. Department of Agriculture's Technical Working Group (TWG) argued against aerial pesticide application, calling it "the least effective method." In addition, entomologists from across California oppose aerial spraying, including invasive species biology expert Dr. James Carey of UC Davis who recently stated, "The invasion of the LBAM is so widespread that eradication is not feasible regardless of the eradication tool used" (*Edna Williams v. CDFA*).

Due to the large number of adverse health complaints and the recommendations of the Technical Working Group, we respectfully urge you to place a moratorium on aerial pesticide spraying. Collectively, our organizations

- Oppose the CDFA program of aerial spraying as a first resort against the Light Brown Apple Moth in San Francisco Bay Area and other counties around the state.
- Support a moratorium on aerial spraying until the agency has conducted an alternatives assessment to determine that control strategies do not compromise human and environmental health. The assessment must be based on a realistic assessment of the feasibility of eradication.
- Support control strategies that adhere to least-toxic/Integrated Pest Management (IPM) principles requiring prevention of public exposure to pesticides, pesticide residues, or by-products of pesticides that cause cancer, birth defects, mutations, reproductive effects, or alter the immune system or behavior of non-target organisms.
- Support disclosure of all ingredients to be sprayed and the informed consent of the residents affected by the spraying.

We respectfully urge you to lead CDFA in the right direction by placing a moratorium on further aerial pesticide applications, and modify the control program to use the least-toxic or Integrated Pesticide Management (IPM) options.

Sincerely,

Barbara A. Brenner
Executive Director
Breast Cancer Action

Jeanne Rizzo, R.N.
Executive Director
Breast Cancer Fund

Emily Rusch
Advocate
CALPIRG

Caroline Cox
Staff Scientist
Center for Environmental Health

Frank Herd
Executive Director
Citizens for Health

Luis Cabrales
Senior Campaign and Outreach Associate
Coalition for Clean Air

Rachel Gibson
Environmental Health Advocate and Staff Attorney
Environment California

Bradley Angel
Executive Director
Greenaction for Health and Environmental Justice

Deborah Moore
Executive Director
Green Schools Initiative

David Dilworth
Executive Director
Helping Our Peninsula's Environment (HOPE)

Dot Boyd
Executive Director
Natural Products Association West

Frank Egger
President
North Coast Rivers Alliance

Jim Stewart
Executive Director
People for Parks

Ginger Souders-Mason
Director
Pesticide Free Zone Campaign

Paul Schramski
State Director
Pesticide Watch Education Fund

Katherine Attar
Health and Environment Program Coordinator
Physicians for Social Responsibility-Los Angeles

René L. Guerrero
Program Manager, Public Health and the Environment
Planning and Conservation League Foundation