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May 28, 2008

Edward Schafer, Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

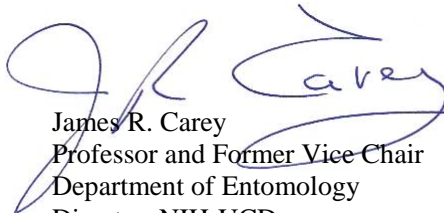
Dear Secretary Schafer:

We are writing to express our concerns with the eradication program in California directed against the light brown apple moth (LBAM) that the California Department of Food and Agriculture (CDFA) and the U.S. Department of Agriculture (USDA) launched last year in Monterey County and that is scheduled to expand to other LBAM-infested counties in mid-August. We submit that: (1) the data supporting the argument that LBAM will become a pest that is more economically important than the species of tortricid leafrollers that are already in California is unconvincing; and (2) there is no scientific evidence that using the method of mating disruption via pheromones either alone or with augmentative methods (e.g. release of natural enemies) is capable of eradicating any insect population.


Although we do not present ourselves as experts on the biology and ecology of LBAM, as senior entomology faculty at the University of California, Davis we do claim collective expertise in areas central to the proposed eradication program including invasion biology (Carey), insect pheromones (Hammock), and integrated pest management (Zalom). In light of discussions among ourselves as well as with many of our entomological colleagues in California, we are perplexed by the claim by the USDA and CDFA that success (i.e. eliminating all LBAM populations throughout the state) using the proposed pheromone-based eradication program against LBAM in the state is achievable.

We respectfully ask that you urge CDFA Director A. G. Kawamura, his key staff members, and the USDA administrators who are directly involved with the LBAM program to revisit their decision to proceed with the proposed eradication program in California.

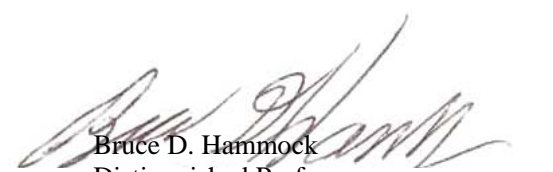
Sincerely yours,



James R. Carey
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Director, NIH-UCD
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Frank G. Zalom
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Director NIEHS-UCD Superfund Basic
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cc:

CDFA Director A. G. Kawamura
Governor Arnold Schwarzenegger
Senator Diane Feinstein
Senator Barbara Boxer
Congresswoman Nancy Pelosi
Congressman Sam Farr