

COUNTY OF SONOMA
BOARD OF SUPERVISORS

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May 11, 2009

The Honorable A.G. Kawamura, Secretary
Department of Food and Agriculture
1220 N Street, Suite 409
Sacramento, CA 95814

Re: Light Brown Apple Moth increased findings in Sonoma County

Dear Secretary Kawamura:

In December 2008 a letter was sent to you asking for your intervention to accelerate needed actions in combating the increased presence of the Light Brown Apple Moth (LBAM) in our region. As of May 5, 2009, there still have been no treatment or control measures established for LBAM in Sonoma County. Your prompt attention to this matter is needed now to reduce the impact to the agricultural industry and prevent LBAM from becoming firmly established in Sonoma County.

The number of finds in Sonoma County over the past couple of months has escalated to unprecedented levels. In 2008 we had two quarantine areas in the Sonoma/Carneros wine grape region, one of which was deregulated. Since February 2009, we have had several new quarantine areas established, and the Carneros wine grape region has dramatically expanded. These quarantine areas include over 15,000 acres of grapes, 100 acres of apples, 64 nurseries, a variety of other crops, and covers approximately 165,000 square miles. We are now entering a time in the season where the numbers of LBAM are increasing exponentially due to peak reproductive cycles. If no action is taken within the next few months, a much greater portion of Sonoma County is expected to be under quarantine.

In our December 15, 2008 letter, we urgently requested the rapid completion of the environmental review process to identify effective tools to manage and eradicate LBAM. We are now faced with numerous quarantine areas to manage, further impacting growers and taxing limited county, state and federal resources. We are well aware of the pressure that CDFG is under regarding the environmental review process; however, we believe placing twist ties within most quarantine areas in Sonoma County would be a prudent course of action. There is broad support to use twist ties in Sonoma County from agricultural and environmental groups. This is also supported by the Napa and Sonoma Counties Stakeholders LBAM Consensus Document, including an endorsement list of its supporters (Attached).

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The sooner the environmental review process is completed, the sooner we can contain and control this pest. This is an urgent matter, and we again ask that the environmental review process be expedited and completed as rapidly as possible to allow the next appropriate steps in the project to be taken. Not completing the environmental review process in a timely manner has proven to be a mistake. There is still an opportunity to slow or prevent the spread of this pest throughout the state, though this window of time is swiftly closing.

As you know, California agriculture continues to be a stalwart and viable industry, feeding millions and providing thousands of jobs, even in tough economic times. Any threat to this vital industry must be effectively and immediately responded to before the problem is compounded. Delaying appropriate action is unacceptable and is in direct contradiction with CDFA's mission to effectively handle pest threats.

If the current approach of taking "no action" to manage LBAM is continued, many other counties will fall under quarantine further exhausting our limited resources and greatly impacting California's economy. It is USDA's, CDFA's, and the County Agricultural Commissioner's responsibility to take all appropriate actions when confronted with serious pest risks. The risk of allowing LBAM to continue to spread uncontrolled is irresponsible.

Please understand we appreciate CDFA's and USDA's efforts to date in ensuring ongoing funding for this mandated quarantine program, for the deployment of the delimitation trapping, and developing of and assisting in the inspections within the interior quarantines.

Thank you for your attention to this matter. If you need additional information, please contact Cathy Neville, Sonoma County Agricultural Commissioner, at (707) 565-2371.

Sincerely,



PAUL L. KELLEY
Chair and Fourth District Supervisor

PLK:br:23004
Attachment

C: Governor Arnold Schwarzenegger
Assembly Member Noreen Evans
Assembly Member Jared Huffman
Assembly Member Wesley Chesbro
Senator Patricia Wiggins
Senator Mark Leno

LBAM Stakeholders Endorsement Status

(As of May 4, 2009 per Assemblymember Noreen Evans Office)

The Following Stakeholders Endorse the Consensus Document

Occidental Arts and Ecology Center

Dave Henson, Executive Director

dhenson@oaec.org

707.874.1557 ext. 214

Sonoma County Conservation Action

Dennis Rosatti, Executive Director

denny@conservationaction.org

707.571.8566

California Certified Organic Farmers

Claudia Reid, Policy and Program Director

Claudia@ccof.org

916.443.6480

Community Alliance with Family Farmers

Wendy Krupnick

wendyk@pon.net

707.544.4582

California Native Plant Society, Milo Baker Chapter

Lynn Houser, President

housers@sonic.net

707-568-3230

Sonoma County Winegrape Commission

Nick Frey, President

frey@sonomawinegrape.org

707.522.5861

Napa Valley Grape Growers

Jennifer Kopp Putnam, Executive Director

jputnam@napagrowers.org

707.944.8311

Napa County Farm Bureau

Sandy Elles, Executive Director

selles@napafarmbureau.org

707.224.5403 x 103

California Land Stewardship Institute, Fish Friendly Farming

Laurel Marcus

LaurelM@fishfriendlyfarming.org

707.253.1226

Sonoma County Farm Bureau

Lex McCorvey, Executive Director

lex@sonomacountyfarmbureau.com

707.544.5575

The Following Stakeholder Endorsement is Currently Pending

Napa Valley Vintners

Anne Steinhauer

707.944.0290/707.963.3388

asteinhauer@napavintners.com

Napa and Sonoma Counties Stakeholders Consensus Document
On the Light Brown Apple Moth
April 14, 2009

A coalition of environmental and agricultural interests in Napa and Sonoma counties have met numerous times and have reached wide-ranging consensus regarding the Light Brown Apple Moth (LBAM). State and federal elected officials who represent these counties have also contributed to the formation of this document.

The undersigned agree to the following principles and recommendations to achieve what we believe is the most appropriate approach to preventing LBAM from becoming permanently established in Napa and Sonoma counties, and to address the imposition of state and federal quarantines in affected areas of our counties.

Principles:

The California Department of Food and Agriculture (CDFA) and United States Department of Agriculture (USDA) have classified LBAM as a pest of significant environmental and economic importance. When LBAM is found in an area, state and federal quarantines are placed on agricultural producers, including restrictions on the movement of host plants, fruits and vegetables by residents and businesses located within the quarantine areas.

LBAM quarantine has already caused environmental and economic impacts in our counties. Our immediate goal is to support actions that will detect, manage and, if possible, eradicate LBAM and allow state and federal quarantines to be lifted. A collaborative effort between the counties of Napa and Sonoma, CDFA, USDA, and local stakeholders is necessary to effectively respond to LBAM and the quarantine.

We believe it is in the interest of all stakeholders that CDFA and our counties adopt management tools and practices that are safe to the public and have minimal agricultural and environmental impact.

We also believe that a transparent community dialogue in combination with public outreach and education are imperative to implementing a safe and effective response to the local economic and environmental impacts of the LBAM quarantine.

Recommended Actions:

1. We support the recent commitment by the National Academy of Sciences (NAS) to conduct an in-depth examination of the biological, economic, and regulatory consequences that may occur if LBAM was deregulated. We request that this examination process be expedited. We also urge NAS to include a site visit to Napa and Sonoma Counties as part of their fact finding examination process.
2. We request that CDFA expedite and complete the environmental review process on the methods to be used to control and eradicate LBAM.
3. We request that the treatment methods reviewed and supported in this Napa and Sonoma Stakeholders Consensus Document (below) be expedited in the management of LBAM.
4. We support CDFA's Exhibit "L" of the Compliance Agreement for the movement of grapes as a robust integrated pest management strategy that allows growers to move their grapes with less stringent

requirements. The group recommends approval from CDFA and USDA to implement these practices as soon as possible.

5. We support local, state, and federal outreach and educational efforts to communities (including homeowners and landscapers) to guide them in appropriately handling green waste and garden produce in a manner that prevents the spread of LBAM.
6. We support local, state, and federal efforts to enhance programs to detect exotic pests as early as possible. The detection and eradication of an exotic insect before an infestation and imposition of quarantines saves money and lessens disruption to farmers and communities.
7. We request that the Chairs of the Boards of Supervisors of Napa and Sonoma counties immediately forward letters of support for the Napa and Sonoma Counties Stakeholder's Consensus Document to CDFA and USDA.

Recommendations to CDFA on their LBAM Program Plan of Action:

The following are the consensus positions of the Napa and Sonoma LBAM Stakeholders Group in response to the five CDFA options under its LBAM program review dated July 21, 2008:

1. Sterile Insect Technology (SIT) – SIT involves the release of sterile moths to disrupt the mating pattern of LBAM, with the goal of eradication.

We support this pro-active method and strongly urge CDFA and USDA to move forward in the two counties as soon as possible.

2. Mating Disruption Pheromone – Twist ties or cards with pheromones attract the male LBAM, confuses the moth, thereby preventing them from mating with females. It does not kill the moth.

We support ground treatments using pheromone twist ties or cards for urban infestations and for small and isolated areas with ample advance notification as required by law. We support CDFA's current policy regarding aerial spraying, which states, "Aerial applications for LBAM pheromone mating disruption are not being applied in California."

CDFA also stated in that policy, "Aerial applications of pheromone mating disruption techniques will only be utilized in forested or inaccessible areas, which the department has not identified at this time." The Stakeholder Group is unable to reach consensus on the use of aerial spraying in forested or inaccessible areas for the control of LBAM, but all parties agree that it is not a preferred option.

3. Male Moth attractant treatment – This method uses small amounts of pheromone and pesticide (permethrin) in a thick mixture, which can be applied to poles and trees for use in urban and non-urban areas. Currently, this method does not use an organically approved insecticide.

We would agree to support this method only if organic alternative(s) were found effective against the LBAM adult stage (the organically approved pesticides *Bacillus thuringiensis kurstaki* [Btk] and Spinosad are only effective for larval stages). Organic insecticide alternatives are currently being investigated.

As is the case with other pesticide use in general, this option remains an opt-in for private landowners with their consent.

4. Biological Control with Parasitic Wasps – Parasitic wasps involve the release of an egg parasitoid, which is a native wasp (*Trichogramma spp.*). The wasp will parasitize the egg masses, and this technique may be used in all infested areas.

We support this method and recommend the wasp breeding program be expedited.

5. Foliar Ground Treatments for LBAM Larval Life Stages – Use of the biologically based and organically approved pesticides *Bacillus thuringiensis kurstaki* (Btk) and/or Spinosad to control the larval stage. This method would be by ground application in heavily infested areas where economic damage to crops, landscape plants, and native plants is determined to be occurring.

We support this method.