



**CDFA 2007-08 Light Brown Apple Moth Action Plan**  
**Issue Brief**  
**March 2008**  
**San Francisco Department of Public Health**

The Light Brown Apple Moth (LBAM) is an exotic plant pest native to the Country of Australia that was discovered in California in winter 2007. Subsequent trapping for LBAM in California has detected in San Francisco as well as 10 other counties.

In May 2007, the USDA required CDFA to establish a quarantine of areas in California with LBAM infestation. The spread of LBAM could require the extension of quarantines. The LBAM quarantine affects the viability of farms and livelihood of all agricultural producers including organic farmers.

In September 2007, CDFA initiated program to eradicate LBAM in Monterey which involved aerial application of a pheromone, Checkmate. Pheromones are naturally occurring agents that disrupt the LBAM mating cycle. Checkmate is one commercially available (synthetic) pheromone product.

The California Department of Health and other State Agencies have investigated health complaints associated with aerial application in Santa Cruz and Monterey. Mating disruption technologies such as pheromones, by themselves, are not believed to pose a threat to environmental or human health; however, some concern centers around inert ingredients. While the product was applied at extremely low rates, there is limited practical experience and human health hazard information on the aerial application of pheromone-based products in urban areas.

Alternatively, the spread of LBAM into California may result in potential harm to the environment and health via the application of hazardous synthetic pesticides to control LBAM on economic crops.

On February 15<sup>th</sup>, 2008, CDFA released a "2008-2009 LBAM Action Plan" to control the spread of LBAM. The plan relies on aerial dissemination of a LBAM pheromone along with ground-level programs including pheromone "twist ties" and the Trichogramma parasitic wasp. The California Department of Food and Agriculture (CDFA) currently plans to begin an LBAM aerial spraying of pheromones in San Francisco and surrounding areas in summer of 2008 as part of its action plan.

CDFA has not yet selected a pheromone product for aerial application in San Francisco. Currently, CDFA is conducting research on four alternative products for longevity and efficacy.

There is limited public awareness about the issues related to LBAM. There is also some expert debate about the ecologic and economic problems posed by the LBAM and the effectiveness of pheromones in eradicating LBAM. There is also significant public controversy exists regarding the hazard of the aerial applications of pheromone products over urban areas.

The USDA will complete an environmental assessment as required by NEPA before any aerial application of a pheromone product in San Francisco. CDFA intends to prepare and certify an environmental impact report on the action plan but has declared that an emergency exemption allows it to commence aerial spraying of pheromone products before completing its review. Before the use of any method of control in any jurisdiction, CDFA will provide notice to the public and to public officials and hold at least one public meeting to discuss control efforts.

The City and County of San Francisco has been engaged in the LBAM issue through regular communication with CDFA staff; review of available health effects research on pheromone products; participation in the NEPA and CEQA processes; communication with State of California legislative representatives; and dialogue with State public health officials.

Several current bills in the California State Legislature address the LBAM issue. These include:

1. SCR 87 (Migden) is a non-binding resolution requesting a moratorium on aerial spraying of pheromones in connection with LBAM.
2. AB2760 (Leno) would require the preparation of an environmental impact report under the requirements of CEQA before the state agricultural department could apply pesticides in urban areas for the eradication of the light brown apple moth.
3. AB 2763 (Laird) would require the CDFA to conduct invasive pest planning, including the preparation a list of invasive species that might enter the state and pesticides might be used in eradication of those pests.
4. AB2765 (Huffman), would require prior to an aerial application of pesticide for a pest eradication project, public notification; a hearing to consider alternatives; a full disclosure of all substances in the products and the certification of the safety of all elements of any proposed pesticide by an appropriate state department or agency that is independent of CDFA.
5. AB2764 (Hancock) would prohibit the California Secretary of Food and Agriculture from approving the application of a pesticide in an urban area as part of an eradication project unless the governor has proclaimed a state of emergency.
6. AB 2892 (Swanson) would require the CDFA to obtain the consent of 2/3 of the registered voters in the county before aurally applying a pesticide in an urban area.

The Department of Public Health understands the purpose of CDFA's program to control the LBAM would like to ensure the State take following precautionary actions in their efforts.

1. CDFA should prepare and certify an Environmental Impact Report (EIR) on the 2008-09 LBAM action plan prior to deciding to use any aerial approach in an urban area. The EIR should identify, consider, and analyze at least one additional alternative program of control that limits aerial application in urban areas defined on the basis of population density. CDFA should also include in its EIR an assessment of anticipated damage, including the likely distribution of risks, harms and benefits across different groups and individuals of implementing a variety of control measures or of taking no action; and
2. CDFA should document the efficacy of proposed LBAM control methods in particular contexts prior to their use.
3. The State of California Environmental Protection Agency Office of Environmental Health Hazard Assessment (OEHHA), should conduct an independent risk assessment of aerial LBAM control modalities proposed in the action plan, utilizing oversight by experts in relevant disciplines and considering how human health hazards may vary depending on individual vulnerabilities and geographical context.