

(1/29/2008) Dortehea Zadig - Fwd: Fw: Requesting TWG Input

**From:** Larry Bezark  
**To:** Zadig, Dortehea  
**Date:** 8/20/2007 9:27 AM  
**Subject:** Fwd: Fw: Requesting TWG Input

>>> <[Helene.R.Wright@aphis.usda.gov](mailto:Helene.R.Wright@aphis.usda.gov)> 8/20/2007 8:25 AM >>>

FYI

----- Original Message -----

From: David R Lance  
 Sent: 08/20/2007 09:01 AM EDT  
 To: Helene Wright  
 Cc: Osama El-Lissy; "Johnson, Marshall W." <[mjohnson@uckac.edu](mailto:mjohnson@uckac.edu)>; "Ring T. Carde" <[ring.carde@ucr.edu](mailto:ring.carde@ucr.edu)>; [dmcinnis@pbarc.ars.usda.gov](mailto:dmcinnis@pbarc.ars.usda.gov);  
[Eckehard.Brocknerhoff@ensistv.com](mailto:Eckehard.Brocknerhoff@ensistv.com); Kenneth Bloem; "Max Suckling"  
 <[msuckling@hortresearch.co.nz](mailto:msuckling@hortresearch.co.nz)>; Vic Mastro; [bwoods@agric.wa.gov.au](mailto:bwoods@agric.wa.gov.au)  
 Subject: Re: Requesting TWG Input

Helene, I'm forwarding this to the rest of the TWG for comment but here are mine off the top of my head (remembering I'm still on my first cup of the morning).

Rationale for treating Seaside:

1. At this point, Seaside appears to be the southernmost limit of the area that's generally infested by LBAM. Treatment of Seaside will help limit the further spread of the population (e.g., into critical agricultural areas) and hopefully will actually reduce the area that is infested (local eradication).
2. The effectiveness of mating disruption is known to be inversely related to population density. At this point, we're still not really sure how dense a population we can go after with disruption and still get control to the point where local eradication is a feasible goal, but we will have a better shot (higher probability of success) in Seaside than Soquel.
3. We are not ignoring Santa Cruz County - it is also being treated, at least in part. I would have to defer to the program folks for information on acreage that needs to be treated vs. current availability of product, but it's quite possible that we don't have enough material to treat all of the Santa Cruz area that needs treatment even if we used both the Suterra and Hercon product there.
4. Although mating disruption is a proven control technique with LBAM, using it for eradication of LBAM, as well as use of aerially applied formulations, are both largely untested strategies. We need to gather experience in different types of situations (e.g., higher density populations for initial suppression and lower density in working toward eradication).

This season, we have a shortage of material to work with and there are competing program goals (suppression of high-density population areas vs. containment/eradication of the overall infested area). I realize that arguments can be made to go after the highest density populations full-bore (e.g., reduce threat of human transport of LBAM on commodities such as nursery stock), but we can also make the arguemen that if we can

(1/29/2008) Dortehea Zadig - Fwd: Fw: Requesting TWG Input

get a feel for how disruption will work in both types of situations we'll be ahead of the game here.

- Dave

----->  
 Helene R Wright |  
 08/17/2007 09:44 |  
 PM |  
 ----->

>  
 ----->  
 To: Vic Mastro/MA/APHIS/USDA, "David Lance" <David.R.Lance@aphis.usda.gov>  
 cc: Osama A El-Lissy/MD/APHIS/USDA  
 Subject: Requesting TWG Input  
 ----->

I would appreciate some input before I respond.

Thanks!

Helene

----- Original Message -----

From: "Ed Show" [ed.show@driscolls.com]  
 Sent: 08/17/2007 01:39 PM MST  
 To: <pdepinfo@cdfa.ca.gov>; <ncondos@cdfa.ca.gov>; Helene Wright  
 Cc: <agc001@agdept.com>  
 Subject: LBAM Conference Call 8.17.06 Comment

Nick / Helene -

I listened in on the LBAM conference call today.

Part of the discussion involved the plan to treat the Seaside community with Concept OLR pheromone in the near future. Apparently there is only a very limited amount of this product, and although it is not specifically for LBAM, it was determined by the TWG that it should be used at this time.

My question concerns the wisdom of the decision to use this limited resource on the Seaside LBAM population. Here's why: According the Daily Situation Reports, there have been only 5 male LBAM captured in traps over the past 3 weeks (7/31 total = 414; 8/6 total = 418; 8/14 total = 419) across all 2,098 Monterey county traps. If this is true, why "waste" the use of the pheromone at this location when there have been 483 LBAM caught in Santa Cruz county traps over the same time period?

If you believe or trust your own trapping data, it would appear that there are very few male moths to confuse in Monterey County, while there's lot

000240

**Dorthea Zadig - Fw: SPRO DA-2007-11, Light Brown Apple Moth**

---

**From:** <David.R.Lance@aphis.usda.gov>  
**To:** "Dorthea Zadig" <DZadig@cdfa.ca.gov>, "Kevin Hoffman" <KHoffman@cdfa.ca.gov>  
**Date:** Thursday, March 22, 2007 11:54 AM  
**Subject:** Fw: SPRO DA-2007-11, Light Brown Apple Moth  
**Attachments:** SPRO DA-2007-11 Lt Brn Apple Moth.pdf

---

fyi this landed in my inbox while I was typing the previous email. it will probably filter down to you thru your SPRO, but here's an advance copy just in case that takes a while. -d.

----- Forwarded by David R Lance/MA/APHIS/USDA on 03/22/2007 02:43 PM -----

Victoria C Serfass

To: SPRO

03/22/2007 01:28 PM

CC:  
 Subject: SPRO DA-2007-11, Light Brown Apple Moth.

FOR INFORMATION  
 DA-2007-11  
 March 22, 2007

**SUBJECT:** Light Brown Apple Moth in Alameda and Contra Costa Counties, California

**TO:** STATE AND TERRITORY AGRICULTURAL REGULATORY OFFICIALS

The purpose of this SPRO memorandum is to provide notification that on March 16, 2007, an outbreak of light brown apple moth (LBAM), *Epiphyas postvittana*, was positively confirmed in adjacent areas of Alameda and Contra Costa counties, California. Confirmation of this outbreak was made through diagnostic testing by the Agricultural Research Service's Systematic Entomology Laboratory in Washington, D.C.

APHIS is currently cooperating with the California Department of Food and Agriculture and local county agricultural commissioners to carry out a LBAM delimiting survey in Alameda and Contra Costa counties. These survey activities were initiated in response to a February 6, 2007, report from a private citizen, near Berkley in Alameda County, indicating that two suspect moths were captured in a blacklight trap on his property. Pheromone-baited traps were placed on March 1, 2007, in Alameda and Contra Costa counties, and weekly inspections began March 7, 2007. All subsequent LBAM detections have occurred in urban areas within approximately 7 ½ miles of the original detections.

On March 15, 2007, APHIS convened a technical working group of experts to discuss survey and control strategies in response to LBAM. This group will continue to meet on a regular basis to address this developing situation and consider mitigation strategies.

LBAM is native to Australia and is found in New Zealand, Ireland, the United Kingdom, and Hawaii. The host range for LBAM is broad, there are over 250 plant species known to be susceptible to attack

file://C:\Documents and Settings\lbaum\Local Settings\Temp\XPgrpwise\46026E82CDFA... 1/29/2008

by this pest. The major domestic hosts of concern are stone fruit (cherries, peaches, plums, nectarines, and apricots), pip fruit (apples and pears), grapes, and citrus.

LBAM, if left unchecked, has the potential to cause significant economic losses to California due to increased production costs and the possible loss of international and domestic export markets. However, these impacts can be effectively mitigated through production-level management practices. At this point, this pest is considered to be transient: actionable and under surveillance. Regulatory strategies are being developed.

For additional details on the Federal response to the detection of LBAM, you may contact, Osama El-Lissy, Director of Emergency Management, at (301) 734-5459.

*Richard L. Dunkle*

Richard L. Dunkle  
Deputy Administrator  
Plant Protection and Quarantine

001636

Tel.: (+64)-(0)3-364 2949  
 Mobile (NOTE NEW NUMBER): (+64)-(0)21-784 750  
 Fax: (+64)-(0)3-364 2812  
 www.ensisjv.com

\* Ensis is a joint venture between CSIRO and SCION/New Zealand Forest Research Institute Ltd.

David.R.Lance@aphis.usda.gov

David.R.Lance@aphis.usda.gov

08/09/2007 03:43

To "Johnson, Marshall W." <mjohnson@uckac.edu>, "Ring T. Carde" <ring.carde@ucr.edu>, dmcinnis@pbarc.ars.usda.gov, Eckehard.Brockerhoff@ensisjv.com, Kenneth.Bloem@aphis.usda.gov, "Max Suckling" <msuckling@hortresearch.co.nz>, Vic.Mastro@aphis.usda.gov, bwoods@agric.wa.gov.au

cc

Subject: LBAM program activity update

Guys, Vic and I wanted to give you an update to make sure you're aware of some recent happenings with the LBAM project in CA.

As you're aware by now, they are planning to treat the Seaside area in Monterey County with the Suterra OLR (omnivorous leaf roller) formulation starting Sunday night. This is a microcapsule-based formulation that contains the monoene (11-tetradecenyl acetate, 83% E/17% Z) but no diene. The application will go on with only water (no sticker).

They are planning to fly 500 to 800 feet up when applying the materials. I asked Suterra if this concerned them, and their response was that the droplets might tend to splatter when coming down from that height but that it should be okay in that their material works fine when blown out of an air blast spray rig onto foliage at high velocity. In our minds, this response is either extremely naive or at attempt to deflect worry about whether their product is suitable for use in what looks to be a potentially lucrative market. One of the two planes that will be used for the upcoming treatment went through our Mission, TX, aircraft operations facility this week for check-out and calibration. Our head honcho at that facility, Tim Roland, said that the contractor brought the plane in with a dozen nozzles that basically produced a fine aerosol when the plane flew a "spray" speed. Tim talked them into reconfiguring the apparatus basically using 5 straight tubes for release and still felt that the spray mist at the velocity they are flying would be much finer than what would be ideal for mating disruption purposes. With very small droplets being released at that height, we're more worried about where they will come down and what condition they will be in when they get down (wet or dry) than how much they will splatter after the long fall. The second plane didn't make the pass through TX and will have to have any reconfiguring and calibration done on-site in California. Due to local regulations, any calibration will have to be done with water rather than product.

We had hoped to put out cards on or near the runway and have the plane make several passes over them in an attempt to get enough droplets on the cards to measure release rates. Unfortunately, they won't allow either the extra passes or the low flights, so we are going to have to have the plane return to Texas on its way home to do this (this came up after the plane had already left TX). We also want to look at what happens with a 500-ft release, though extrapolating Texas data on this to the California situation may be a stretch. Tim didn't feel that trying to characterize the spray from a 500-ft operational

application (i.e., the application in Monterey) was worth even attempting. We have a good chemist with USDA-ARS in Maryland who is helping with the product QC and release-rate testing.

For the Soquel area (the area with by far the highest LBAM population in CA), the original plan was to spot-treat areas of high LBAM capture with ground applications of BT and then use aerial applications of Hercon flakes. Pre-mating-disruption treatments with Bt have apparently been ruled out for Soquel, even using ground-based equipment. Also, Santa Cruz County apparently has regulations on plastic pollution, and the Hercon flakes are largely plastic. The response of the program to this issue was to pledge (publicly) that they would not use Hercon flakes anywhere in California (not just Santa Cruz County) until Hercon delivered a biodegradable flake. The back-up at this point is the Suterra formulation. I have also been told (haven't independently confirmed) that Santa Cruz has a restriction against flying under 1000 feet, so the product may be delivered from an even higher altitude on the north side of Monterey Bay.

Some additional information here:

Vic, along with the USDA-ARS and Forest Service people who work with him on gypsy moth, probably have more experience than any other group in the development and application of aerially applied mating disruption treatments. The Hercon flakes have worked well for them over the years and are the mainstay of the Slow-The-Spread program, which stretches from the Southeastern U.S. up into and through the northern Midwest. Cumulatively, these flakes have been applied to millions of acres (and contrary to what the Californians seem to think, not all of the area was rural by any means) with very few if any complaints (Donna Leonard of the USFS told us that she has never had a complaint about the flakes on car finishes, for example). The GM group has also put a lot of time and energy into working with a number of companies on the development of microcapsule-based disruption formulas, and has never come up with a product that performed as well as the flakes in terms of longevity, release-rate characteristics, etc. Vic tells me that Agrisense got closest before they went under, and Suterra may well be using the same or similar technology, which would be a good thing. Hercon meanwhile has been working on the development of a biodegradable flake for several years. When asked yesterday, they told us that they have made significant headway recently; from a lot of companies, we'd suspect this was just smoke, but most of the folks at Hercon tend to be pretty straight shooters so there's a good possibility they may be getting ahead here. Still, it will be at least spring (if all goes very well) until a product will be available. We have also re-initiated contact with Isca, whose Splat product performed pretty well in initial trials with gypsy moth. BTW, some of this information may be at least semi-proprietary, so please don't discuss it across companies.

For now though:

- Aerial application of Bt has been taken off the table,
- Ground-based application of Bt may also be off the table, though I'm assuming they might reconsider for specific circumstances (and at \$800/acre, it's difficult to go too far with it),
- Use of spinosad for broadcast application (i.e., other than regulatory treatments) apparently never was on the table in the first place, despite the organic labeling,
- Hercon flakes have been taken off the table, at least in the short term,
- the Suterra formulation is being applied in a way that we believe may seriously compromise its effectiveness, which may have been problematic to start with,
- pheromone "ropes" are still OK, but have some obvious limitations on acreage that can reasonably be applied.

We should probably get together on a call in the near future

May 10, 2007

Dr. Javier Trujillo  
Director General De Sanidad Vegital  
Servico Nacional De Sanidad, Inocuidada  
Y calidad Agroalfimentaria  
Guillermo Perez Valenzuela 127  
Col. Del Carmen, Coyoacan  
C.P. 04100 Mexico D.F.

Dear Dr. Trujillo:

We are responding to Letter #B00. - 0734, from SENASICA Chief Director Enrique Sanchez Cruz, which we received yesterday, May 9, 2007. This letter specifies Mexico's intended risk mitigation measures due to the recent Light Brown Apple Moth (LBAM) (*Ephiphya postvittana*) detections in California, which were to be made effective today, May 10, 2007.

Thank you for graciously providing a two week extension for the effective implementation date of those measures, from May 10, 2007 until May 24, 2007. We appreciate your consideration.

We wish to reiterate that it is our priority that Mexico and the United States establish a trusting and transparent trade relationship based on science-based risk mitigation measurements. To that purpose, we provided the initial notification, on March 16, 2007, regarding detection of *E. postvittana* in Alameda and Contra Costa counties in California, and continued to provide quarantine action updates on April 19, April 25, and May 2, 2007.

We appreciate Mexico's quarantine concern for *Ephiphya postvittana*, because it is a quarantine pest concern for the United States as well. Consequently, Dr. Richard Dunkle, Deputy Administrator, Plant Protection and Quarantine, issued a LBAM Federal Order on May 2, 2007, establishing a quarantine to prevent dissemination, which we have included as an attachment.

Although 1,904 moths have been confirmed to date, most of the captures (95%) are from traps located in two specific geographical areas. The first area, representing 83% of the captures, is restricted to a small section of southern Santa Cruz County. The second area, which represents approximately 12% of all LBAM captures, includes contiguous northwest Alameda, western Contra Costa, southeastern Marin, and northern San Francisco counties. The remainders (5%) are from single trap captures in Monterey, San Mateo, and Santa Clara counties. Presently, there are 17,204 pheromone baited traps deployed as part of our rigorous detection and delimiting survey. We have included map as an attachment for illustration.

000751

Based on scientific consideration, *Ephiphyas postvittana* is a Tortricid moth, and is a leaf tier that sometimes feeds externally on fruit. It is a transient pest, and through our standard phytosanitary export procedures, *E. postvittana* will not pose a threat to any of our importing countries.

We hope that you will accept our invitation for a bilateral meeting, scheduled May 24 and 25, 2007, in San Francisco, California. We would like to have the opportunity to arrange a visit to the LBAM quarantine area at that time, so that you may see first-hand the risk mitigation actions that have been implemented. Therefore, we respectfully request Mexico to hold all restrictive actions as outlined in the SENASICA Letter B00. - 0734, dated May 4, 2007. It is our belief that the restrictions outlined in Letter B00. - 0734 are too restrictive considering the biological nature of *Ephiphyas postvittana*.

As a means to progressively and constructively harmonize the sanitary and phytosanitary measures of Mexico and the United States, it is our sincere hope that we can conduct an open discussion on this quarantine pest issue for an amenable resolution. We are dedicated to conducting trade facilitation that is mutually beneficial to both countries, and we are hopeful for your favorable response.

Sincerely,

Craig Fedchock  
Assistant Deputy Administrator  
Phytosanitary Issues Management  
Plant Protection and Quarantine

cc:

R. Dunkle, PPQ, Washington, DC  
T. Jankowski, PPQ, Washington, DC  
N. Gutierrez, IS, Washington, DC  
J. Greifer, SMT, Washington, DC  
E. Nichols, SMT, Washington, DC  
A. Green, PPQ, Riverdale, MD  
J. Sills, IS, Riverdale, MD  
K. Preston, IS, Mexico City, MX  
M. Gilkey, IS, Mexico City, MX  
A. Ramos, IS, Mexico City, MX  
A. Santamaria, IS, Mexico City, MX  
M. Guidici Pietro, PPQ, San Francisco, CA  
L. Campbell, PPQ, Raleigh, NC  
R. Bailey, PPQ, Ft. Collins, CO  
M. Martin, PPQ Riverdale, MD