

DEPARTMENT OF FISH AND GAME

<http://www.dfg.ca.gov>

October 3, 2007

The Honorable John Laird
99 Pacific Street, Suite 555D
Monterey, California 93940
Attn: Colleen Freeman, District Director

Dear Assemblyman Laird,

This letter is in response to an inquiry from your office regarding the recent activities undertaken by the California Department of Food and Agriculture to combat the Light Brown Apple Moth (LBAM) in your district. The California Department of Fish and Game (DFG) is following the LBAM eradication program closely and welcomes the chance to respond to you.

LBAM is a non-native species which has recently been detected in several counties in California. It has a wide range of plant hosts, including several species of concern in the project area such as endemic cypress and rare or threatened cypress, pine, and lupine species. If allowed to establish permanent residence, LBAM has the potential for disrupting these sensitive native communities. CDFG supports the early eradication of LBAM because this will result in the lowest impact to the environment from LBAM and its treatment measures.

The California Department of Food and Agriculture have elected to use Checkmate OLR-F and Checkmate LBAM-F to aerially treat portions of Monterey and Santa Cruz Counties. These pheromone formulations are both registered by the California Department of Pesticide Regulation and U.S. Environmental Protection Agency. PIU staff has evaluated the potential impacts to fish and wildlife of aerially applying these materials. Both active and inert ingredients were included in the analysis.

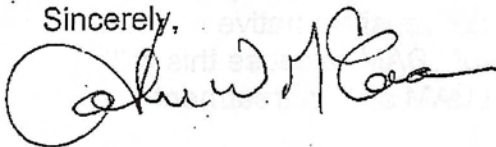
Checkmate formulations are not toxic to animals or plants at the application rates that they will be applied. As the pheromone formulation is fairly specific, there is potential for Checkmate formulations to disrupt mating behavior only in closely related species to the LBAM. However, none of these closely related species (approximately five) is likely to be impacted by these treatments as they have well-established populations in the area. Smith's Blue Butterfly, *Euphilotes enoptes Smithi*, a federally endangered species, is not in the same family as LBAM and will not be impacted by the pheromones. Likewise, inert ingredients in the formulation do not pose any hazard to fish or wildlife species at the proposed application rates.

If this early eradication program is not successful, other less benign pesticides may be proposed to control the LBAM such as *Bacillus thuringiensis* (Bt) and chlorpyrifos. Use of Bt has the potential to impact other lepidopteran species in the treatment area such as the monarch butterfly *Danaus plexippus* and Smith's Blue Butterfly, *Euphilotes enoptes Smithi*. Chlorpyrifos, an organophosphate insecticide, will pose more of a hazard to fish and wildlife in the treatment area.

The Checkmate formulations being used in the eradication effort clearly pose the least possible hazard to fish and wildlife in the area. These appear to be the most environmentally benign alternative for eradication of LBAM.

Thank you for the opportunity to evaluate this project. If you have questions or wish to discuss our comments further please contact Senior Advisor to the Director Greg Hurner at (916) 653-7667 or Mr. Brian Finlayson of DFG's Pesticide Investigation Unit at (916) 358-2950.

Sincerely,



John W. McCamman
Acting Director

cc: Chris Mowrer
Resources Agency

Greg Hurner
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