



FARM BUREAU SAN DIEGO COUNTY

1670 East Valley Parkway, Escondido CA 92027-2409

Phone: (760) 745-3023 • Fax: (760) 489-6348

E-mail: sdcfb@sdfarmbureau.org • Website: www.sdfarmbureau.org

August 5, 2010

Rebecca A. Bech
Deputy Administrator
Plant Protection and Quarantine
Animal and Plant Health Inspection Service
U.S. Department of Agriculture
Whitten Building, Room 302 E
1400 Independence Avenue, SW
Washington, DC 20250

Dear Deputy Administrator Bech:

As you are certainly aware, four light brown apple moths (LBAM) were discovered in San Diego County on or about July 29, 2010. The discovery of these pests meets the trigger for both state and federal quarantines.

In preparation for the imposition of the quarantine we have had a quick education on LBAM quarantine parameters. To our dismay, we have learned that the current federal quarantine standard calls for the boundaries to include the entire county.

At 4200 square miles, San Diego County is extremely large and includes farms in coastal, foothill, mountain, and desert regions. The discovery was in an urban neighborhood in the City of San Diego, many miles removed from the concentration of farming in the northern area of the county. While countywide quarantines might have a practical application in smaller counties, it would be excessive in here. Therefore, we are respectfully asking for a change in the federal quarantine boundaries for LBAM from countywide to a fifteen mile radius. In support, we offer the following points:

- County lines are political boundaries.
- It is our understanding that the LBAM Technical Working Group endorses the change to 15 miles.

- Federal, state, and local officials have experience setting boundaries that are scientifically based and expressed as distance from the find site.
- It has been shown that the 99 percent of female LBAM disperse 100 meters or less with just one percent traveling a maximum of 275 meters. 80 percent of the males disperse within 100 meters with the maximum distance of 600 meters, one-third of a mile (Suckling et al. 1994).
- San Diego County began placing LBAM traps at five traps per square mile in April 2007 using a very effective pheromone that would lure adult moths up to 100 meters. Should additional moths be discovered in an area distant from the current find, appropriate action would be taken.
- Use of county borders does not take into account geographic separations. For example, in the County of San Diego crops are produced in the Anza-Borrego Desert which is separated from other production areas by portions of the Santa Rosa Mountain Range. Yet, a countywide quarantine based on a LBAM discovery along the coast would include growers in Borrego Springs.

From a practical standpoint, it seems to us that the best use of resources to control and eradicate a pest such as LBAM would be within a reasonable and scientifically based regulated area. If that area is expanded to an illogical size based on political boundaries then the entire program is at risk because regulatory resources would be spent in portions of the county with no rational connection to the find. Also, undue burden, expense, and marketing restrictions would be placed on agricultural producers who are a safe distance from the find site.

Please give immediate attention to our request. Time is of the essence as we expect the declaration of a countywide quarantine in San Diego County at any time.

Sincerely,



Michael A. Mellano
President

Cc: Helene R. Wright, United States Department of Agriculture
Andrea Simao, United States Department of Agriculture
A.G. Kawamura, California Department of Food and Agriculture
Robert Atkins, San Diego County Department of Agriculture Weights & Measures
Cynthia Cory, California Farm Bureau Federation