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California Department of Food & Agriculture
LBAM Eradication Program -
A Fraudulent Program

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Prepared For The People by Professor Glen Chase
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The CDFA Light Brown Apple Moth (LBAM) Emergency Eradication Program is fraudulent. The moth is not a problem in California and there is no way to eradicate the moth from California. Recent methods CDFA used made thousands sick and the proposed methods CDFA is planning are dangerous to people, pets, wild animals, the environment and natural balances in nature.

CDFA claims the moth is an emergency and pretends that they can eradicate it in order to steal \$100's of millions from taxpayer emergency funds, set aside for real emergencies.

CDFA's fraudulent goal of eradication based on the fake emergency is an invalid goal. Therefore all aspects of the CDFA program, aerial spray, ground spray, splat, twist ties, sterile moth release, etc. are also invalid, since all are intended to accomplish the invalid goal.

CDFA claimed an "Emergency" in 2007/2008 claiming the window of opportunity for eradication was just months. Now, after CDFA was forced to stop the aerial spray over populated areas due to overwhelming public pressure, they are substituting a sterile moth eradication plan that won't be operational for three years, well outside their own claim of window of opportunity to eradicate. This inconsistency demonstrates CDFA's relentless attempt to hang on to an unnecessary and fraudulent eradication program that CDFA perpetuates to access emergency funding.

\$\$\$\$ LBAM Eradication Program - A Fraudulent Program \$\$\$

1. The Light Brown Apple Moth (LBAM) is not a significant pest

any more than thousands of other insects including 300 species of native Tortricidae (leaf-roller) moths in California. Most do not require treatment, unless some balance goes out of control, generally caused by a pesticide induced kill-off of their predators. The European Union doesn't even monitor LBAM. They just live there, like ants or crickets live here. After 30-50 years in California, we see that LBAM is already well balanced in nature being eaten by the same predators (birds, earwigs, spiders, beetles, bats, etc) as its cousins.

2. The Light Brown Apple Moth has been in California about 30-50 years

based on location spread and population density of the LBAM in California and scientifically comparing it to other moth movement and then adjusting for specific LBAM characteristics.

3. LBAM has done NO damage in California.

CDFA confirms it, courts have ruled it, no one denies it.

4. LBAM in California requires NO treatment, certainly not eradication

based on #2 and #3 above, and so much supporting independent scientific information.

However:

5. If the California Department of Food and Agriculture (CDFA) is able to establish and maintain an emergency status and resulting eradication effort for this moth, the CDFA will be able to access approximately \$500 million of emergency funding over the next five years, increasing its annual budget approximately 40%. And with control of delivery and monitoring for such a program, CDFA will almost certainly be able to substantiate continuing the program for at least another five years at about another \$100 million per year.

6. It is impossible to eradicate the LBAM and there is no reason to.

Maybe, if all the people were moved out of the entire state of California and all remaining life in California was exterminated, that might do it, but even that is not certain as such an experiment has never been performed. It would be similar to trying to eradicate ants or cockroaches. It simply cannot be done.

7. The CDFA created a huge charade using science like a shell game.

There is probably not a single independent Entomologist in the state that thinks that LBAM can be eradicated from California. CDFA handpicked a group of people for their Technical Working Group (five of ten members are from the USDA). Most are willing to consider only the information that CDFA provides them and many have an interest in the program proceeding. Independent Scientists with alternate known opinions were intentionally and aggressively left off. The University of California recently offered a panel of experts to look at the eradication program of LBAM, but CDFA refused.

8. There is no problem managing LBAM as 100's of other pests. New Zealand has shown how successful that is, given they are forced to ship their goods to the U.S. with a zero tolerance for LBAM. They successfully use modern safe integrated pest management techniques, so their methods control LBAM, while they are controlling many other more significant pests. California can do the same if ever need be, but after 30-50 years or more with this moth, natural balance with no controls is working fine.

9. But CDFA needs an "Emergency Eradication" program to obtain the \$\$\$ emergency funding.

- a. That included aerial sprays of pesticides over populated areas in the Fall of 2007.
- b. CDFA claimed aerial spray as a state of the art technology using pheromones, a less toxic alternative that the people had asked for.
- c. Toxic synthetic pheromone based pesticides are sometimes preferred in agriculture fields to the more toxic WWII derivatives, but not sprayed over people and intentionally time released to stay in the air for 24 hours per day every day until they spray again.
- d. Tens of thousands of people got sick of which 643 managed to get an illness report filed when no government agency wanted to accept a report. An 11-month-old boy, perfectly healthy son of an air force major, went into respiratory arrest following the spray. He was airlifted to an out-of-area specialty pediatrics hospital where his life was saved, though he may be on steroid cocktails now for the rest of his life to keep his airway clear.
- e. CDFA had reports done using only the information that the CDFA gave to the analysts. Then the results/press releases were manipulated to tell the public that there were no links found between the spray and the illnesses, when in fact, the relationships between the spray and the illnesses could not be disproved by even their own manipulated reports.
- f. CDFA claimed that the window for eradication was only months and that they could not wait to do an Environmental Impact Report.
- g. CDFA claimed that aerial spray on populated areas was essential for eradication.
- h. Stewart Resnick had recently purchased the chemical company that won the contract for the aerial spray pesticide. Resnick, a life long democrat, gave Governor Schwarzenegger \$144,600 for his reelection campaign, and previous USDA reviews of the same moth have worked in Resnick's favor.

10. After Santa Cruz and Monterey Superior Courts ruled CDFA had violated the emergency exemption of CEQA law, after 31 cities representing 2.4 million people passed resolutions against the spray, after 90 additional labor unions, school boards and other organizations passed resolutions against the spray, after almost all elected officials in the region took positions against the spray, after bills to stop the spray finally made it through committee, after the governor did a 180 degree turn and directed CDFA not to use the spray, the CDFA created another lie and on June 19 announced: they were now going to discontinue the aerial spray over populated areas based on a Breakthrough in Science (BS) that would suddenly allow sterile moths to eradicate the moth.

- a. Up to that moment, only aerial spray was possible to eradicate the LBAM per CDFA claims.

b. CDFA announced sterile release testing will start in 2009 and be fully operational in three years from now, in 2011, but CDFA never mentioned that was inconsistent with their previous 2007 / 2008 claim that the window of opportunity to eradicate the moth was just months and inconsistent with their fraudulent basis of claiming emergency.

c. Sterile moth release has never eradicated any widely dispersed moth, such as LBAM in California, and for LBAM, there are further reasons it cannot possibly work:

- Male moths guard over female pupae and mate when the female matures to a moth.
- LBAM females are promiscuous mating multiple times.
- LBAM females will live longer to successfully mate in order to produce fertilized eggs.
- This method has never been tested on the Light Brown Apple Moth (LBAM).
- To rely on this method, therefore, is scientifically absurd.

d. Releasing 20 million sterile moths per day could interfere with the natural balance involving predators and ultimately cause serious problems with unlimited and unknown numbers of other insects and pests.

11. CDFA needs a full-speed-ahead eradication program to keep the fake emergency money flowing. \$\$\$\$\$\$\$\$\$\$\$\$\$

a. CDFA needs lots of activity and hoopla to substantiate just this years approximate \$100 million that was already allocated to the LBAM emergency within the aerial program.

b. Previously, every item of CDFA's fraudulent eradication program that was documented was refuted by qualified independent scientists.

c. Now, after the announcement of the sterile moth scientific breakthrough, and to avoid independent scientist review, CDFA is representing their eradication as a toolbox of methods containing many tools that they alone know which one to use under which circumstance, and they no longer detail or document any of them. This CDFA strategy avoids scientific review, since scientists generally want to review written documents rather than verbal statements of possibilities made by PR people to the media, etc.

d. At least one tool in their box, SPLAT, is potentially more toxic than the aerial spray. Combinations of permethrin and synthetic pheromone attached to 3,000 fixed objects in each square mile of populated areas, such that the chemicals permeate the same air children breath 24 hours per day, and maintained that way with repetitive applications.

e. This means that people will live between 0 and 48 feet away from multiple poison sources surrounding them 24 hours of their day, whether they are at home, work, school, the park, the playground, the pool, etc. The air is permeated from these poison sources. The poison source is cancer causing and a reproductive effector in that it affects the ability to reproduce, and it impacts newborn survivability and impacts pregnancy loss. It can cause genetic damage as demonstrated in a lab study using human cells. Women on farms using permethrin get asthma at higher rates than those not exposed to permethrin and permethrin is more dangerous for children than adults. These problems do not include the additional effects of the toxic synthetic pheromone pesticide or the effects of the two in combination, the manner in which they will be deployed.

f. Mobile fogging of pesticides in populated areas is little known to the public at this time, but there is no limit that the CDFA will put on themselves. There isn't any amount of dishonesty, intentional deception or harm to children and adults that CDFA will avoid to accomplish garnering the funds that an emergency eradication can provide them.

g. A proper management program of LBAM and other insects will not bring emergency funds to CDFA's normal annual budget. The LBAM "Fraudulent Eradication" represents a potential increase in CDFA annual funding of approximately 40%, about \$100 million per year, and doing absolutely nothing other than seriously hurting children, adults, pets, wild animals, the environment and natural balances in nature.

Recent videos relating to the newly packaged fraudulent LBAM eradication program:

1. State Drops Plan For Bay Area Moth Spraying
June 19, 2008 first video, 3 minutes, 1 second
<http://cbs5.com/investigates/apple.moth.spraying.2.752554.html>
2. Moth Spraying Critics Celebrate State's Decision
June 19, 2008 second moth video, 3 minutes exactly
<http://cbs5.com/investigates/apple.moth.spraying.2.752554.html>
3. Daniel Harder, Ph.D. Executive Director, The Arboretum, University of California at Santa Cruz. June 23 Oakland Town Hall Meeting
14 minutes, 2 seconds
<http://www.youtube.com/watch?v=16UAaC4jQ6Y>
4. Foster Gamble: Behind the LBAM Spraying Headlines, June 2008
<http://www.youtube.com/watch?v=AGp5KoiZ6ro>

Recent relevant document:

1. One page letter from University of California, Davis, Department of Entomology, College of Agricultural and Environmental Sciences, Agricultural Experiment Station to USDA. May 28, 2008
<http://www.hopefortruth.com/UCDavisExpertsLetter.pdf>

There are scientists in Entomology, Botany, Invasive Insect Biology, Physics, Statistics, Systems Management, Economics and Medical Doctors available to scientifically support the summary information above.

For questions, comments, speakers for your organization, or to participate in a lawsuit to stop this violation beyond a few more months, please send an email to: glenchase@aol.com

Glen Chase is a Professor of Systems Management specializing in Environmental Economics and Statistics. Glen served as an Associate Professor teaching graduate level courses in Systems Management at USC for eight years. He has taught at multiple universities in the Central Coast area, including The Naval Post Graduate School, The Monterey Institute of International Studies and Cal State University, Monterey Bay. Glen is also a Management Consultant. Currently, Professor Chase develops management systems to assist organizations that cater to the improvement of life for children with disabilities.

Professor Chase is calling for a truly independent State investigation of this program and asking that charges be brought against those who are guilty of violating the public trust and guilty of child endangerment by endangering children's lives with toxins applied directly onto their bodies and into the air they must breath.