

**California Department of Food and Agriculture (CDFA) Public Hearing on the Draft  
Programmatic Environmental Impact Report (PEIR) for the Light Brown Apple Moth (LBAM)  
Eradication Program:**

**Stop the Spray Alameda County Statement**

**Oakland, September 1, 2009**

My name is Helen Kozoriz, founder of Stop the Spray Alameda County. We stand opposed to CDFA's LBAM eradication program.

According to the draft EIR, "There are no significant and unavoidable impacts associated with any of the program alternatives." At its face, this is a preposterous conclusion which defies rationality.

The so-called "program alternatives" include chemicals such as permethrin, a harmful neurotoxin that is classified by the EPA as a possible human carcinogen. Btk and spinosad contain undisclosed inert, which are often more toxic than the disclosed active ingredients. Disrupt Bio-Flake LBAM is an untested pesticide containing synthetically manufactured pheromones and other undisclosed inert ingredients dispersed in the form of plastic flakes.

Recall that CDFA claimed Checkmate was safe before they aerially sprayed Monterey and Santa Cruz Counties in fall 2007, which resulted in 643 illness reports, including two children that almost died. Checkmate was not tested for safety before it was sprayed. The aerial spray was essentially a grand experiment.

To-date CDFA has not claimed responsibility for the harm done during the aerial spray campaign. On the contrary, CDFA still continues to say that there was "no link" to the aerial spray and reported symptoms. CDFA has violated public trust. To spray without consent is a violation of our human rights as defined in California's Constitution which guarantees citizens the right to safety.

CDFA/USDA "eradication teams" terrorize farmers with LBAM inspections. LBAM is not a demonstrable threat to crops, but farmers are afraid to speak out in fear of retribution. In fact, CDFA's 2008 Report to the Legislature admits that DNA testing for LBAM is inconclusive. It states that further research funds are needed to "develop an effective DNA fingerprint and identification technology for LBAM." In essence, farmers are forced to spray with chemicals and destroy their crops based on questionable LBAM finds. Quarantines, not LBAM, hurt our farmers and growers.

Dr. Derrell Chambers, retired entomologist and pheromone development specialist with USDA for over 45 years said, "I am extremely disappointed as a professional...in what is essentially a smoke and mirrors effort to conduct a program that is in no way what it reports to be. ...(LBAM) is...beyond the veil of eradication (and)...it's really not a problem anywhere that its been well-established or endemic. The technologies of pheromone application and SIT as reported to be applied here cannot work. This is an issue about trade, it's not about eradication."\*

Stop the Spray Alameda County supports the scientific findings in the Upton/Harder LBAM Reclassification Petition. The LBAM eradication program is not safe, necessary or effective, and is a waste of taxpayer dollars. We demand CDFA halt the program immediately, and issue a formal apology to the people of Monterey and Santa Cruz Counties who were injured by the aerial spray.

Thank you.

\*Footnote: California Legislature Senate Committee on Food and Agriculture, "Evaluating the Sufficiency of CDFA's LBAM Environmental Impact Report: Is It Supported by the Facts?", August 25, 2009 (link to Dr. Derrell Chamber's testimony, "Florez Hearing: CDFA's LBAM EIR Part 1 of 3" [31:50 - 37:26]: [http://www.youtube.com/watch?v=P32UsXa3V94&feature=channel\\_page](http://www.youtube.com/watch?v=P32UsXa3V94&feature=channel_page))

Contact:

Helen Kozoriz  
Stop the Spray Alameda County  
helen@stopthespray.org  
helenkozoriz@sbcglobal.net  
(510) 336-0499