

California Agricultural Commissioners and Sealers Association

December 10, 2010



A.G. Kawamura, Secretary
Division of Plant Health and Pest Prevention Services
California Department of Food and Agriculture
1220 N Street, Room A-372
Sacramento, CA 95814-5607

RE: *Duponchelia fovealis*

Dear Mr. Secretary:

On behalf of CACASA let me thank you for your staff's excellent cooperation in thoroughly and quickly assessing the distribution of *Duponchelia fovealis* in California. By trapping nurseries that had received host material from the two nurseries where the pest was first reported, we rapidly and inexpensively determined that this pest was widespread.

As a result, we are able to offer similar thanks to Helene Wright and USDA for trapping at nurseries in other states that had also received host plants from these infested nurseries. That survey also demonstrated that this moth is widely distributed in the Southwest, Pacific Northwest and the Southeastern states.

CACASA's Pest Prevention Committee has reviewed this information and has recommended the following action items:

Urge CDFA and USDA to decline to impose a quarantine for *Duponchelia fovealis*, because these surveys indicate this pest has already become widespread.

Urge CDFA and USDA to down rate this moth to "C" and "non-actionable" respectively so that it falls under commercial pest cleanliness regulation in nurseries.

Finally, San Diego's nursery inspections and Jim Bethke's UC Extension work has discovered that this pest does substantial damage to its host. It also may be difficult to control because it burrows inside the stems of the host plant which protects it from pesticide applications. Therefore, we urge CDFA, USDA, University of California and the nursery industry to combine and coordinate resources to develop a biological control as part of an integrated pest management strategy.

Thank you for your consideration.

Regards,

Robert G. Atkins
President, CACASA

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