

A GROWER'S THOUGHTS ON AREA WIDE MANAGEMENT IN THE OJAI VALLEY:

Jonathan Katz Ojai Orange Grove LLC
jonathank@cinnabar.com

ACP/HLB IN VENTURA COUNTY

Citrus Huanglongbing (HLB), also known as citrus greening disease, was recently introduced into the Americas, first to Brazil, and then to Florida, Texas, and now California. It is caused by a bacterium, *Candidatus Liberibacter*, and there is no known treatment at this time. The pathogen is transmitted to citrus trees by an invasive insect, the Asian Citrus Psyllid (*Diaphorina citri Kuwayama*)(ACP), first reported in Florida in June 1998.

Once transmitted to a citrus tree, the disease has an apparent latency; it can take several years before symptoms of the disease are apparent. In its earlier stages, the presence of the pathogen in the tree can be difficult to detect. There have only been a few finds of trees infected with HLB disease in California, found in residential citrus in Los Angeles County.

Therefore, stopping the spread of this deadly disease is focused on control of the vector, the ACP. This insect can travel up to 8 km. over a 10-day period, but as knowledgeable epidemiologists have pointed out, ACP also travels at 55 mph, in human controlled motor vehicles. ACP has crisscrossed California in loads of bulk citrus or the personal effects of persons who have citrus foliage. Ventura Farm Bureau publications have stated that the ACP was most likely vectored into the county by trucks moving along the Hwy 126 corridor carrying citrus to packinghouses. Currently, ACP is found all over California, including in the Ojai Valley.

1. Area Wide Management (AWM). The proposed plan for AWM in Ventura County will involve spraying ALL CITRUS orchards a minimum of two times per year in Ventura County, starting in late spring, 2016. This is a solution with questionable documented justification or information. Agriculturalists, Epidemiologists and Entomologists have raised serious questions about AWM's scientific validity.
 - a. There is little or no evidence in the past that wide scale spraying of insecticides is an effective or affordable solution to control ACP. The rates of coverage required to be statistically effective are higher than the projected coverage that informed proponents of AWM suggest can be achieved in Ventura County: this implies that that we know, in advance, that AWM will not work.

- b. Poorly designed program. In order to be effective in suppression of the Asian Citrus Psyllid (ACP), the spray program (AWM) should be scheduled to match the times of maximum susceptibility of citrus trees as ACP hosts and the periods of high activity of the ACP itself. Instead, it has been designed in a manner that facilitates ease of implementation for the pesticide applicators over effectiveness, and is thus faulty methodology, resulting in diminished efficacy as a treatment.
 - c. Previous programs. Failure of the existing CDFA quarantine program of the past several years to limit the spread of ACP is indicative of a lack of diligence about how invasive pests like ACP are vectored, not to mention a level of complacency among growers and shippers. In any case, CDFA and its allies have shown limited ability to address a new pest that threatens the entire citrus industry in California.
 - d. Health & Environmental Issues. Any program of widespread application of toxic insecticides typically requires by law a CDFA *Statewide Plant Pest Prevention and Management Program*. Because AWM is a privately organized program attempting to cover all the citrus acreage of Ventura County, the criteria that insure the protection and well being of the people, and other living beings in the Ojai Valley are being completely avoided. This is a dangerous, undemocratic, and potentially destructive approach. Where is the PEIR? (Pesticide Environmental Impact Report)
2. Questionable Allocation of Resources. The key reason that ACP/HLB destroyed most of the citrus industry in Florida was the failure of the Florida Dept. of Agriculture (FIDA) to listen to scientists warning that FIDA procedures and tactics were ineffective and would in fact allow the disease to spread. Fortunately, this mistake has been recognized in California. CDFA is saying they are not making this same mistake. However, there appears to be no substantive difference between the failed quarantine program and the current proposed AWM and the ineffectual Florida quarantine and current control strategy. The approaches are strategically indistinguishable and simply perpetuate business as usual that eliminates any opportunity for innovation or bold new solutions. It is, however, a convenient approach that employs the existing pest control infrastructure.
 3. Cost to Citrus Growers. Recent estimates from registered Pest Control Advisors suggest an approx. cost of \$400 per acre per year for AWM to the Grower not including tests, abatement and other costs that may be incurred by Growers. Other costs may include those incurred by the various branches of government for administration or regulatory requirements. This will spell ruin for many small growers, especially if AWM proves to be ineffective.

Where are the studies, economic models, and other assessments of the economic impacts that costs of AWM will have on growers in the Ojai Valley?

4. The Possible Future

Emerging new science and technology suggests multiple solutions worthy of serious consideration and fast track applications- the risk of destruction of our citrus groves is a very real immediate threat and we should reach out to harness a wider range of experts and answers now, before it is too late.

ACP/HLB is a very serious issue- it is among a number of emerging threats from invasive insects and disease with no known treatments that threaten agriculture in California. The methods and programs required to solve these problems will require complex integrated solutions engaging many participants. Currently, in Ventura County, there is a lack of transparency and communication about ACP/HLB that excludes many interested parties, which will only make an effective solution more difficult and unlikely to be successful. **The current proposed Area Wide Management (AWM) spraying program in Ventura County is a private, VOLUNTARY project that has been construed to be “official” or required. This is not a factual representation.** Various members of the agriculture establishment - CDFA, the County Ag Commissioner, etc. have indirectly endorsed AWM, without any regulatory mandate or authority to do so. This is a case of “go along to get along” to not offend, in my humble opinion, key commercial agricultural constituencies, who, by and large, are not in the Ojai Valley. For AWM to be a State or County mandate, it would have to satisfy real standards of efficacy, sound science, fact, and methodology, and public input, and consider significant health and environmental factors that would be a negative consequence of wide spread repeated spraying of toxic pesticides.

ITEMS FOR IMMEDIATE ACTION:

1. Effective immediately, the proposed AWM Treatment plan for Ventura County should be put on hold:
 - a. There must be a rigorous and thorough review of the science and data behind the proposal to implement AWM, including an assessment of the quality, rigor and currentness of the science being utilized. Methods and justifications need to be explicit and elaborated, including margins of error, uncertainty and failure rates.

- b. Trapping. Plant pathologists suggest that the best preventive techniques are based on active and consistent inspection of orchards and trapping of ACP with methods that are clearly superior to the current reliance on yellow sticky traps, a random, dispersed, untimely method that is next to worthless. Ojai needs to organize locally based inspection of orchards, trapping, and testing of any ACPs found. This work can be well carried out by high school students, clubs, farm workers, etc. There is a new technology for testing ACP that is many more times effective, cheaper and faster than the current method that is being used by conventional applications. Then, if a psyllid is found, an immediate decision can be made by the orchard owner to deal with it. This local action may be a far more effective, and cheaper solution than spraying the entire county multiple times in a blind manner.

- c. For any proposed or subsequent Management Programs for ACP/HLB in Ventura County – especially those that suggest large scale application of toxic substances- public meetings must take place within the County to explain any proposed program, take public and expert testimony, and base a decision on sound science, and the collective wisdom of the residents with live in close proximity to citrus plantings, which includes virtually all of the Ojai Valley.

- d. Should the CDFA, other CA Departments and Offices, County Agricultural Commissioner’s office, UC Extension and any other local or statewide organizations participate, officially or unofficially, in the development or planning of AWM, there should be agreement that they must comply with the law and the intent of the Brown Act (with amendments), whereby all meetings will be open to the public. They will agree that the Brown Act will be consistently observed so that the public may be notified about and be allowed to attend any meetings or conferences in respect to the ACP/HLB situation in Ventura County.