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RE: Comments to be included, Draft Light Brown Apple Moth Programmatic Environmental Impact (PEIR) in California

Jim Rains, Staff Environmental Scientist
California Department of Food and Agriculture Plant Health and
Pest Prevention Services,
1220 N St., Room A-316, Sacramento, CA 95814
by email
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and

Osama El-Lissy
Director, Emergency Management
Emergency and Domestic Programs
Animal Plant Health Inspection Service
U.S. Department of Agriculture
4700 River Rd. Unit 134
Riverdale, MD 20737
by mail

Dear Mr. Rains and Director El-Lissy,

First, this program would have not come up had the programs to stop imports of invasive species been conducted effectively. It comes about and grew to the scale we now see by initial and years of on-going failure.

The Light Brown Apple Moth, just as the Mediterranean Fruit Fly, has emerged as an invasive species in California due to liberal importation policies without the requisite, effective inspection and controls. California has the capacity to feed itself all year. It does not need to import food out-of-season from remote lands risking exotic pests in the process and adding to CO2 in our atmosphere. How many times will we in California spend our precious resources and undergo poisoning of ourselves and the environment because Federal and State agencies have been unwilling or unable to act effectively in the first place to stop these dangerous importation practices that may threaten and alter our environment or may scare us to cause us to allow our own health undermined in response to CDFA failure.

Why can tariffs not be imposed to cover the cost of an effective program to exclude exotics pests?

Direct response to the Draft PEIR:

The DRAFT Light Brown Apple Moth Programmatic Environmental Impact Report (PEIR) fails to address the points required of an EIR as set forth in my timely submitted letter of 8/19/08, a copy of which is here attached.

The Draft PEIR fails to provide or present scientific underpinning for critical aspects of the program it announces, either for the damages projected, the damages claimed, the justification for any quarantines, the justification for any chemical spreading by any method, the effects of contaminating the biological environment with hormone-affecting chemicals or other toxic chemicals, radiated moths, the controllability of the moth breeding program or any other aspect of the actions of CDFA, past, on-going or here planned with respect to the LBAM. (See CH. 8.2.1, #7, for one example.)

A "scientific review" panel presented no actual scientific studies to review, and no factual basis to make their determinations, is not actually scientific review. While a scientific review panel can direct the preparation of scientific studies, the "Technical Working Groups" did not do so in any meaningful way and thus most of the studies CDFA could have commissioned were not done and do not appear in this PEIR. The most critical of all with respect to environmental alteration, for example, should have been a study of the effect of the various chemicals being used and proposed for use on bees, one of the most important parts of agricultural success, and now this part of the local environment failing. It is still missing in the analysis. Are the CDFA projects and their miss-named NO Project Alternative killing the bees?

Some critical research was done outside the CDFA (and does not appear here), but due to non-disclosure even of chemicals used or potential radiation residuals, most scientific studies have not been done, thus there is no scientific basis for assertions of impacts. Unbiased, scientific review must be based on the actual scientific studies. In fact the Draft PEIR admits that their "Technical Working Group" was not asked to determine how long the LBAM had been in the California environment, if eradication was necessary, if eradication is possible from a scientific view, or from other's experience elsewhere, or which methods proposed would impact people's health or the environment and how. CDFA admits the Technical Working Group was formed to "develop the most effective strategy and methods to achieve the overall goal of LBAM eradication from California." Thus the Technical Working Group decisions and findings, or any other work, based on no scientific studies have been improperly referenced in a Draft PEIR.

The Federal scientific review panel has confirmed that while USDA/CDFA has authority to make such determinations, it has entirely failed to provide the scientific evidence that the Light Brown Apple Moth has done or will do any of the economic damage or actual damage projected or asserted in the Draft PEIR.

Without doing any environmental analysis, CDFA chemically contaminated whole communities making hundreds of people sick, contaminating the environment, killing hundreds of birds and bees and other biological parts of the community, including the very most important predators required for actual long term natural control of all moths. Moth numbers increased following the "pheromones" applied from the air. Surprise, surprise. CDFA action knocked down the effect natural controls.

Now, without a Final PEIR yet properly certified and without decisions properly flowing from scientific environmental work, CDFA has gone ahead and signed contracts for "twist ties," thus intending without authority to jump the gun and AGAIN contaminate the environment without any evidence that this is necessary, effective or without significant environmental impact on people or other critical interlocking aspects of the biological community.

Specific Comments:

Ch 1-1, P. 1, ¶ 5

AERIALY APPLIED PESTICIDES DID NOT REDUCE THE LBAM POPULATIONS

The assertion "[G]rowing populations required aerial treatment with a microencapsulated pheromone" indeed is not true. After applications of aerially applied microencapsulated "pheromone," LBAM populations reported in those locations were higher than before the applications.

Ch. 1-1, P. 1, ¶ 2

SCIENTIFIC REVIEW OF THE LBAM NUMBERS SHOW IT HAS BEEN IN THE ENVIRONMENT OF CALIFORNIA FOR LONGER THAN THE Draft PEIR ACKNOWLEDGES AND IGNORES THE FACT THAT HAVING BEEN HERE A LONG TIME, IF ANY SIGNIFICANT DAMAGES WERE TO HAVE BEEN EVIDENT THEY WOULD HAVE LONG SINCE COME TO LIGHT BY NOW.

The reference to the unnamed professor's findings shifts primary focus, ignoring the scientific findings that have been presented to CDFA that the actual numbers of LBAM claimed, together with its breeding timing and pattern, means that it has to have been in the California environment for at least 30 years, meaning

that, if the LBAM were such a destructive pest as claimed, any damage the LBAM would be doing would have been long since evident and identifiable. This has not been the case, of course, as CDFA only became aware of the pest's presence two years ago, and not due to any reported damage, but due to microscopic identification.

In all these years (even in the last year and a half) only one and possibly two very minor instances of damage called "cane berry" damage has been alleged, but even these could not be confirmed as the insect causing the damage had long since gone. Published pictures of the damage showed less than 2 square inches of damage. Had that damage been to the 20% of the crop as alleged, this damage would surely have come to light in the harvest season in time to see the actual pest doing the damage. But even in these limited possibly two instances, whatever pest actually caused the damage was gone and thus what actually caused it are pure speculation.

Ch. 1-1, ¶ 1

LARGE SCALE DAMAGE ESTIMATES ARE ENTIRELY SPECULATIVE.

Unfounded speculation does not belong in an EIR. The projection "damage could be considerable," the whole justification for the program, is based on no local evidence whatsoever.

The past LBAM damage in New Zealand is now known to have been not caused by the LBAM per se but to the broadcast use of the very toxic, predator-killing pesticide Dursban in a misguided attempt to kill the LBAM. After that broadcast pesticide use was stopped in New Zealand, the LBAM came under control of native predators and is now considered as minor pest. The most important thing an EIR is supposed to teach is the value of and inter-dependency of natural systems. This Draft PEIR has failed to address these interdependencies.

This Draft PEIR is a further attempt to set up the sky is falling scare and then justify the sledge-hammer approach to pest control rather than acquiring the knowledge to see how natural systems can resolve these challenges and supporting these natural systems.

Ch 1.1.2.3

ENDANGERMENT OF NATIVE AND NATIVE ENDANGERED SPECIES MISS-STATED.

The PEIR Draft lists several endangered plants and insects and brazenly asserts the LBAM is a threat to the vegetation directly and is in competition for plant material with threatened butterflies. However it admits:

"While many, and perhaps all, of these species of concern have neither been encountered by nor tested against LBAM as of yet."

Thus the Draft PEIR tries to assert it may protect endangered species while admitting this assertion is WITHOUT A SINGLE SHRED OF EVIDENCE.

Many moths and other insects are trapped in the CDFA LBAM traps, this alone PROVING that the pheromones used are non-specific and attract native moths and other insects. Which ones? To what levels? We are not told. Does not their pheromone attractant thus endanger many species such as and especially those found in the traps? CDFA could provide this data as to what is trapped by the traps. They chose not to, and instead tried to use the meaning of the Endangered Species Act TO JUSTIFY THEIR PROGRAM which is now, and will soon expand to SERIOUSLY ENDANGER NATIVE SPECIES including native endangered species of moths and of course the native moths predators.

Ch. 1-3

INCORRECT NO PROJECT ALTERNATIVE MAKE THIS DRAFT PEIR DEFECTIVE FROM THE START.

Contrary to this Draft PEIR, a No Project Alternative is not expanded inspections and quarantine but no "treatments" (and a chemical free for all). (See 8.1.4.3 where toxic pesticides are listed for this "alternative.")

A proper No Project Alternative instead would recognize the scientific FACT that NO LBAM damage has been identified in the 30 or so years that the LBAM has been in the Bay Area environment, that by and large, natural predators appear to be controlling the moth just as those same predators control the native moths and that, as in New Zealand, the key to controlling damage is in making it possible for preservation of natural controls by LIMITING the use of poisons including pesticides and synthetic pheromones.

The proper No Project Alternative also recognizes that ever-expanded trapping is obviously the reason for increased "finds."

A proper No Project Alternative would not require endless inspections (which may actually provide excuse to force the use poisons) and quarantines, but recognize that natural predators need to eat, so some food must be available. Thus eradication is not only impractical, probably impossible, and trying to eradicate makes control more difficult.

There will always be some agricultural production loss. It goes with the territory. For too long agriculture has relied on public ignorance of and some toleration of poison in their food and environment. But the public knows now these poisons are very harmful. For those with low levels of glutathione and/or other liver enzymes, or poorly functioning kidneys, agricultural poisons are life limiting, allergy causing, cancer causing, diabetes promoting, fatiguing, and Alzheimer's causing, among their many effects some as admitted by this Draft PEIR.

GREENHOUSE GASSES:

Agricultural poisons put far more greenhouse gases into the air than equivalent combustion sources. The Draft PEIR, by their miss-designed NO Project Alternative has completely, 100% twisted the impacts of the Project vs. No Project Alternatives required of an EIR, and has not provided a true No Project Alternative from which to measure impacts. The Draft PEIR thus utterly fails on this critical issue.

Ch. 1.6.1.1

PESTICIDES - THIS DRAFT PEIR IS INCOMPLETE BY WITHHOLDING INFORMATION ON CHEMICALS TO BE USED AND SPECIFIC IMPACTS OF THOSE CHEMICALS.

Withholding toxic chemical information from the public who will be exposed to those chemicals makes this EIR INCOMPLETE AND UNACCEPTABLE. CDFA does not have authority under the Constitution of the State of California Article 1, Section 1 to make even a small number of people ill, to poison people or otherwise invade their privacy to protect an economic interest, in this case agricultural interest.

While pesticide manufacturers are not required under FIFRA to disclose "inert" ingredients, the requirement of public agencies to disclose what they are doing in an EIR, including the use of ingredients on the general public and the air, land and water, and the impacts of those actions ARE required. CDFA cannot hide behind the skirts of FIFRA. All ingredients must be disclosed BY CDFA together with the studies that show their impacts.

For those project alternatives including the CDFA's No Project Alternative currently being forced on the growers and public, which do not disclose the ingredients and their effects on people's health and the environment both short and long term, THE PEIR IS INCOMPLETE AND THUS THOSE CHEMICALS CANNOT BE USED UNTIL THE PEIR IS COMPLETE.

The collection of studies of the chemicals proposed are all deficient as they do not mention brain intelligence impacts of even small quantities of these chemicals though most are known to damage nerves and the brain is a collection point of nerves in the body (both for humans and for other creatures).

Studies of the creation of Chemical Sensitivity by the proposed chemicals are deficient in the scientific literature, though several of these chemicals, the solvents listed and the pesticides in particular are acknowledged to cause chemical sensitivity and increase its severity where already present. Thus a Draft PEIR, proposing broad scale use of these same chemicals is by its very nature incomplete and deficient and cannot be completed. Thus the application of the proposed chemicals on the public is a huge experiment, done without a complete EIR, and thus is illegal at this time.

Any manufacturer who fails to permit disclosure of all ingredients and their knowledge about the impacts of those ingredients separately and together in their formulation automatically disqualifies that supplier source. It must be remembered that the activity proposed is not private but large-scale, wide-spread contamination of the public that is at issue. WHERE THIS DRAFT PEIR CONTINUES TO WITHHOLD INFORMATION FROM THE PUBLIC WHO WILL BE EXPOSED TO TOXIC CHEMICALS AND IS THUS INSUFFICIENT, INCOMPLETE AND UNACCEPTABLE.

California Code of Regulations requires that no non-target be exposed to pesticides. Here the whole general public, presumably non-target, will be exposed and this program including all its alternatives is thus against California Regulations.

Ch. 8 HUMAN HEALTH

THE NO PROJECT ALTERNATIVE LISTS CHLORPYRIFOS, PERMETHRIN, LAMBDA-CYHALOTHRIN, SPINOSAD, BACILLUS THURINGIENSIS KURSTAKI (BTK), ethylbenzene, and 1,2,4-trimethylbenzene. Both 1,2,4-trimethylbenzene and ethylbenzene are components of the permethrin formulations. Additionally, three LBAM-specific pheromones are evaluated as potentially hazardous materials: Hercon Disrupt Bio-Flake® (Hercon), SPLAT LBAMTM (SPLAT), and Isomate. (Tables and discussion are internally inconsistent concerning the items on the list.)

THE ABSURDITY OF A DRAFT PEIR TERMING A NO-PROJECT ALTERNATIVE THAT INCLUDES THIS WHOLE LIST OF VERY TOXIC CHEMICALS IS BEYOND BELIEF.

Ch 8.1.5: "This Draft PEIR evaluation and the information contained in Appendix D regarding potential human health risks were prepared to evaluate . . . whether any of the Program alternatives present unacceptable risks or hazards to the public, sensitive receptors, or workers." Thus the Draft PEIR admits the plan is to place humans at some degree of risk acceptable (or unacceptable) to CDFA. Who gave CDFA the authority to determine what degree and type of exposure to toxic chemicals presents an acceptable risk to each of the miscellaneous individuals in our communities? Where is it spelled out in our state and federal constitutions and laws that an agency of government can assume the right to poison people just a little bit or a lot depending on what "risks" the AGENCY considers acceptable, not to itself but to us?

The Draft PEIR discussion of Chlorpyrifos (Ch. 8.1.5.1) FAILS to mention that Chlorpyrifos is now prohibited in residential and structural use, taken off the market for those uses due to its adverse effects on people. Why would project officials consider it's use where it is now against the law to use it?

The Draft PEIR lists Lambda-cyhalothrin as a chemical it could use, this chemicals close relative shown to cause mammary tumors in test animals, in a word - breast cancer. While the agencies that should be listing the chemical a carcinogen based on that study continues to fail to act, the study nevertheless stands. CDFA plans to use a chemical close relative to a breast cancer-causing chemical on the general public.

The Draft PEIR lists Permethrin in the medium priority group by the Carcinogen Identification Committee for review for its carcinogen causing proof (rather than the other way around, as it should have to prove it is not a carcinogen BEFORE it could be used in the environment or on food.) Both of these last two chemicals, while derived from Chrysanthemum chemistry, unlike Chrysanthemum chemistry have been redesigned for killing intensity and to PERSIST in the environment.

The Draft PEIR in its discussion of "Straight Chain Lepidopteran Pheromones" fails to account for the huge experiment it conducted on the people and environment of Santa Cruz and Monterey last year wherein well over 600 people became very ill from the application of what CDFA called LBAM pheromones. While academic determinations on small-scale admittedly-limited studies are very useful absent large scale human experiments, once the large scale human experiments have taken place, the failure to acknowledge the result (in humans and in the environmental damages) in this Draft PEIR is simply unacceptable.

PHEROMONES ARE NON-SELECTIVE.

Furthermore it is clear and here finally admitted that these "selective pheromones" are actually not selective enough to protect the native lepidoterans (Tortricid moths). What about other creatures? What about the observed killing of bees?

Ch 1.6.1.1

"WILL CONSULT" with appropriate Federal, State and local agencies is not acceptable in this Draft PEIR. Consultation should have already occurred in DEPTH in this instance where fish, birds and waterfowl have already been killed en-mass, the ocean of Monterey Bay has been poisoned, and the land and air contaminated by the actions of CDFA, such similar actions to be again apparently allowed by this PEIS.

Department of Pesticide Regulation (DPR) consultation, while it was part of CDFA continuing actions (and has given CDFA an excuse for what they did), was ineffectual in protecting people or the environment, as hundreds of people were made ill and animals killed by the chemicals used already and DPR has taken no apparent action to restrict the use of these chemicals. Apparently it is acceptable to DPR to allow CDFA to poison whole communities.

Ch. 8.1.2.1

The Draft PEIR asserts: "However, the potential for bioaccumulation of permethrin in humans is limited by its rapid metabolism to water-soluble metabolites that are eliminated in urine,"

This is only true for certain people with well functioning kidneys. Many people are not so fortunate due to genetics and/or a history of other toxic exposures.

Ch. 8.1.2.1

The Draft PEIR also asserts: "spinosad is not expected to be released into the environment in sufficient quantities to warrant concern for bioaccumulation." By this statement the Draft EIR admits people will receive doses of toxic chemicals.

BUT PROGRAM MANAGERS PROMISED Representative Jackie Speier in a public meeting earlier this year that they would not expose people to poisons.

THE DRAFT PEIR FAILS TO ADDRESS THE EFFECT OF THE PROPOSED CHEMICALS ON SENSITIZED INDIVIDUALS.

For sensitized individuals, due to the loss of efficient kidney function or lack or loss of liver enzymes bioaccumulation, subsequent bioaccumulation from very slight exposures is on-going. Even tiny amounts of unprocessed chemical add to this disability. A study in the late 1990's shows 6% of Californians have sensitivity to many chemicals and 15% show sensitivity to at least one chemical. These reactions do not depend on the amounts encountered but (as in a peanut allergy) any amount encountered.

ANY toxic chemical exposure can set up a sensitized reaction from slight discomfort, hives, loss of control of bladder or bowels, dizziness, migraine headache, to breathing difficulty, asthma, sudden weakness, sudden fatigue and many other disabling symptoms, all the way to anaphylaxis leading to death. Though the program managers assert these effects to be inconsequential, they are not. Many sensitized individuals are housebound. A twist tie, slat, spinosad, or Btk set up or applied nearby would make living impossible for them as they cannot simply relocate while degradation takes place.

IN BROAD SUMMARY:

This Draft PEIR is deficient as a proper No-Project Alternative was not included.

For each pesticide and pheromone with undisclosed ingredients, no environmental evaluation can be made and thus, as the Draft PEIR addresses those chemical formulations, the Draft PEIR is and will continue to be incomplete and thus undisclosed formulations cannot be used.

For each chemical and chemical formulation proposed (and currently improperly in use), the PEIR is incomplete until sensitivity studies and brain impact studies are available for it. Thus the PEIR is incomplete for each and every chemical.

IN CONCLUSION:

CDFA does not have authority to poison people and the environment, even a little bit, even if the LBAM was a threat. The LBAM is not a threat if properly managed to protect the native predators.

Following these comments is the text of my letter in response to the scoping for the PEIR/EIR:

Yours truly,

Cheriel Jensen

The following must be included in the PEIR/EIS for the eradication and/or control program efforts for the Light Brown Apple Moth:

- 1) Define the setting. What is the actual evidence for the Light Brown Apple Moth? Because this insect apparently has similar visual appearance to a native moth, and apparently requires microscopic analysis to tell them apart, who has made these determinations? Who has made these day-to-day determinations and on what basis? Who has certified these determinations? What percentage of entrapped moths have

been tested by microscopic testing? What percentage of entrapped moths are the native moths? Is the native moth embargoed anywhere? For what physical damage is the native moth accountable? For what physical damage is the Light Brown Apple Moth accountable? Who has made these accounts? Set forth any independent assessment of these differences in behavior.

2) Study and set forth LBAM predators in the existing environment (to include, predators, considering such as various wasps and yellow jackets, earwigs, birds, spiders, bats, bacterial predators, fungal predators, etc) and set forth the predators to the native moth. Study and acknowledge how predators control the light brown apple moth in other places with mild climates. Study and set forth the affect on these predators of the various chemicals/particles intended to be applied. Study and set forth any potential damages to these predators on the native moths and the potential loss of control on these native moths and other insects as well as the light brown apple moth due to each action contemplated by CDFA.

3) Study and set forth the actual evidence for plant damage in the geographical areas termed infested, the actual evidence for the type of damage claimed and the actual damage seen in the mainland U.S.A. as compared to Hawaii and the actual damage caused by the native moth.

4) Examine why in New Zealand and Hawaii, at this time, the light brown apple moth is not considered an ecologically important pest.

5) The consensus of California academic scientists, with expertise in these issues, is that the light brown apple moth cannot be eradicated. Efforts have not even been able to eradicate killer bees or, after toxic dosing urban areas with malathion for years, have not been able to eradicate the Mediterranean Fruit Fly. Provide independent scientific expertise equivalent to that of the universities that any program will eradicate the light brown apple moth.

6) No project alternative. CEQA requires that the No Project Alternative address the current actual PHYSICAL environment based on on-ground facts, infestation and the actual flora and fauna damage from infestation. Projected economic damage (scary speculation) based on embargos or lesser export controls is not part of CEQA and does not belong in a CEQA document.

7) An accurate project description is required. An accurate list, full disclosure of the specific chemicals, their mix and proportion and their amount in the proposed spraying or other application of each proposed alternative, along with the actual effect of each of these chemicals on the flora and fauna is required. Effect on fire susceptibility should be tested. Actual effects to be addressed include flora and fauna growth inhibition, effects on root systems, and effects on the health and balance of the live soil complex. CEQA especially requires disclosure of the effect of each alternative on birds, bees, frogs, salamanders, crawdads, crabs, other crustaceans and benthic organisms, blue gill fish, salmon and on the food required by these creatures. Short term and long term effects must be disclosed regarding these creatures and their support systems including reproductive interference and teratogenic effects.

8) CEQA requires disclosure of the effects of materials to be applied on people, including in utero, babies, those with low levels of the various detoxification liver enzymes, those with limited mucus, those with extra thick mucus, those with allergies, those with sensitivities, those wearing contact lenses, and other particular and disabling characteristics based on actual on-ground scientific evidence as well as laboratory testing. Opinion of program officials or non-medical/research experts is completely insufficient to fulfill this requirement. Short term and long term effects on people must be addressed.

9) CEQA requires disclosure of the testing and investigation providing the actual basis for all assertions of effects, low level effects and the actual basis of any assertions of non-effects of each of the chemicals proposed for use, the possible chemical mixes and the actual on-ground, on-creature effects of the particular mix. The effect of each alternative on particularly sensitive and sensitized populations must be addressed.

10) CEQA requires disclosure of the short term and long term fate of the proposed chemicals and their method of application (air spray, ground spray, particulates, twist ties, mud, sticky traps, pheromone coated insects, radiated insects, etc.) on the human food system. For example, can the particulates be washed off lettuce, spinach or strawberries? Can the particulates enter the edible roots of vegetables? Is the local organic food supply destroyed in fact (not as politically determined)? What happens to the

particulates, chemicals and radiation in the soil and environment in the long term? When breathed or ingested, what is the fate of particles and chemicals inside the human body?

11) CEQA requires disclosure of the short term and long term fate of the proposed chemicals, other techniques, and their application methods (spray, particulates, twist ties, mud, sticky traps, radiated insects, etc.) in the environment (drift, travel distances, longevity of chemicals and particulates outside, suspension times and re-suspension times of chemicals and particulates, effect of rain on these fates, longevity of chemicals, particulates and radiated insents as they enter buildings and longevity inside buildings. For example, without UV, can the chemicals and particulates be broken down? By what method? How long does this take and what is the evidence for this?

12) CEQA requires disclosure of scientific test evidence showing if the "pheromones" termed chemicals are specific to the particular moth, or how unspecific are they? What other creatures will be attracted, confused, or what other effects does the "pheromone" have. Likewise, what effects do Bt and other chemicals proposed have on life, health and behavior of creatures throughout all aspects of the environment.

13) CEQA requires the scientific evidence of the fate of the particulates and chemicals in the mix on architectural surfaces including roofs, and automobile paint, method they travel to water, what happens when they enter feeder streams?

14) Arms length required: Disclose all meetings of EIR Consultants with CDFA personnel, the subject of such meetings, any financial transactions or influence between them.

15) At what point do burning throats, metallic taste, lung failure, cancer, chest pains, asthma, eye irritation or erosion, skin rashes following exposure become recognized as effects of the applications and exposures? That is, at what level of exposure (specific amount) are symptoms of this type to be recognized as effects?

16) Project description: What is the plan to train medical doctors, nurses, other hospital personnel, paramedics, or other health councilors to recognize the symptoms of toxic exposure to substances to be used? What is the plan to provide emergency treatment, treatment and future, on-going support and alternative housing and employment for those who have been injured? What compensation will be provided for people whose life and health have already been damaged and those who will be damaged by this program?

Yours truly,

Cheriel Jensen

cc: by mail:

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