Submission of questions not addressed in the draft EIR for the LBAM Eradication Program.

I live in an area of Santa Cruz county that was aerially sprayed, yet I never received notification of the spraying, apparently because I have opted out of receiving junk mail distributed by the company hired by CDFA to perform the notification. I was also not notified of the existence of the draft-EIR nor of the associated listening sessions, even though I submitted questions both in writing and at two scoping sessions and am on the CDFA email list. What notification systems will be used in conjunction with any "program alternatives" that are undertaken, and how will they be made more thorough than the systems the agency is currently using?

What are the criteria for choosing between proposed treatment alternatives?

Has companion planting, which was extremely successful in New Zealand, been investigated as an option for addressing the LBAM situation? What findings indicate the appropriateness or lack of same for using companion planting in California instead of or in addition to chemical approaches?

What is the most honest, objective assessment available of the likely consequences were no eradication program to be pursued? If no control or eradication program were to be pursued?

What are the effects of microcapsules from the aerial spraying, their contents, or breakdown products of these materials, on humans, animals, plants and the environment in general when these substances are burned in woodstoves, fireplaces, beach bonfires, controlled burns, forest fires, and the like?

What are the effects of forest fires on LBAM population? Given the huge fires in some of the areas where LBAM have been found, has the population decreased to the point that treatment is no longer called for even by CDFA standards?

What percentage of trapped moths that resemble LBAM are actually examined to determine whether they are, in fact, LBAM? How many of the claimed LBAM 'finds' have actually undergone the necessary microscopic analysis and been definitively identified as LBAM?

What areas are in danger of exposure to these chemicals through wind drift, runoff, and ground water contamination? Include

coastal areas, rivers, and populated areas outside the identified treatment zones.

The "testing" of Checkmate that occurred by spraying communities revealed significant health and environmental problems even in the short-term. Given that this is the only "testing" that has been done, what analysis of the results has been conducted, and what does it reveal?

What are the environmental and health effects of possible interaction between products used for "LBAM eradication" and other toxins in the environment? If this cannot be thoroughly assessed, no pesticides nor artificial "pheromones" should be used.

What may be the cumulative effects of multiple spraying sessions? Of residue from the aerial spraying plus other control/eradication methods used for this and other species? Please address cumulative effects on human health, animal health, environmental health including sea life, and concentration through the food chain.

How many bees have been found in the sticky traps? What kinds of bees have been found? What are the possible and expected effects of all aspects of the LBAM program on the bee population? What will be the environmental effects of decreasing the population of other insects, including bees, should any of the proposed "LBAM eradication methods" that affect other insect populations be used?

How will progress and success or failure of the project be assessed, given that high levels of ambient pheromone will likely decrease incidence of moths entering pheromone-baited traps to be caught and counted?

In designating areas for spraying and other so-called eradication methods, was correlation performed between the number of moths found per quadrant grid and the number of traps set per grid? Or were more moths found in some areas because more traps were set?

Does the LBAM respond to synthetic pheromone in the same way it responds to natural pheromone?

Have the potential effects of all ingredients in the proposed "program alternatives" been assessed, rather than just those classified as "active?" Include anything added to the spray or

other formulations (such as surfactant supposedly mixed with Checkmate before spraying). What are the short- and long-term effects, as well as cumulative effects on humans, animals, plants and the environment, of these ingredients?

What are the possible and/or likely effects, both short- and long-term, on the health of the people, animals, plants and environment of the communities where the pesticides slated for use in this program are ***produced,*** including both manufacturing and formulation facilities?

What are the possible and likely effects of the various parts of the eradication program on vulnerable populations including but not limited to the following:
homeless people
children, including toddlers who spend much time on the ground outdoors
incarcerated persons
night-time workers
pregnant women and their fetuses
people with immune system disorders
asthmatics
elderly people
people with cancer
people with post-traumatic stress disorder

What percentage of families include at least one person in one of these high-risk groups?

What rates of acute illness, increased chronic illness, disability and death are considered "acceptable risk" for the purposes of the LBAM eradication program?

Under what circumstances would the project be considered to be a failure and be stopped, given that:

1) the traps used to catch moths would be rendered nearly useless by the amount of ambient pheromone
2) the contract with Suterra is set to continue until two life cycles after the last moth is found, and any future contract with other suppliers might contain similar language?

How will the performance of the contracted suppliers for any of the "program alternatives" be assessed, given that the design of the program creates a massive disincentive for success (success would terminate their contract and failure would prolong)? What

evidence is there that this disincentive will not result in decrease in the quality of the work done by the contracted company or companies? How have the companies being contracted performed on similar contracts in the past, inside or outside of California?

Under what conditions or circumstances would the "LBAM eradication program" be terminated due to either success or failure? What are the quantitative measurements that would be used to determine that these criteria had been reached?

If sterile moth release is undertaken, how will effectiveness of this method be assessed? Can and would trapped moths be tested for infertility? What percentage of moths that go through the irradiation process are successfully sterilized? What number of non-sterilized moths would therefore be introduced into the environment through a "sterile moth release" program, and how does this compare (adjusted for sex) with the number of moths currently believed to be present in the same areas?

If LBAM were to be declared "eradicated," what precautions would be taken to assure that the insect is not reintroduced into the state?

Given that the agency conducting the LBAM program is the same agency that has commissioned the study, and that that agency (CDFA) has announced even before the final EIR is prepared that it *will* be using one or more of the "program alternatives," what actions were taken to assure that the report would be objective and scientific? What criteria were used and what process followed to select the firm contracted to research and write the EIR?

When will the EIRs from other departments responsible for the health response and monitoring of this program or its effects be drafted? At what levels of health effects will the program be interrupted or terminated?

How will health effects of eradication methods be quantified and assessed?

What training will be given to healthcare providers and other responders in recognizing potential health effects? Given that the agencies responsible for such training to not believe health effects exist, who will be contracted to do such training in a meaningful manner?

What were the quantifiable results of the human experimentation conducted by the CDFA and USDA via the aerial spraying of Monterey and Santa Cruz counties and the placement of sticky traps and twist ties in multiple counties?

What assessment of the scientific literature regarding LBAM has taken place as part of the EIR process?

Given that the international trade ban is regularly cited as a chief motivator for eradicating LBAM, has the option of negotiating a lifting of that ban been considered as an alternative? If not, why not?

Originally the CDFA and USDA claimed the LBAM eradication program was an emergency and that if eradication didn't happen right away it would be too late. What calculations were used to arrive at that projection? Do those calculations indicate it is in fact not yet too late? Given that you're now claiming the program must be carried out in nearly every California county, by what criteria are you determining that eradication is still possible?

What findings from your research were excluded from the draft EIR and why?

A spokesperson for the draft EIR stated at the Watsonville listening session on 8/31/09: "There were some potentially significant impacts but they can be mitigated by the measures outline in the document such that the impact is reduced to less than significant." How can the CDFA guarantee that these "potentially significant impacts" in fact *would* be mitigated, particularly given the sloppiness of the program so far, ranging from lack of notification of aerial spraying to so-called GPS errors, with resultant spraying at times and in places where there was no notification?

Emily Levy
Santa Cruz, CA
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