

**STOP THE SPRAY  
EAST BAY**



## **Key Concerns: Draft Light Brown Apple Moth (LBAM) Eradication Programmatic Environmental Impact Report (EIR)**

The state is currently taking comments on the draft LBAM EIR (see instructions for submitting comments at the end of this document). This summary is designed to assist those who wish to comment on the EIR.

What LBAM treatments are planned, according to the EIR?

- 1. Aerial spraying** - of a pheromone pesticide called Disrupt Bio-Flake, which is dispersed in 1/8" square plastic flakes that the LBAM Environmental Impact Report (EIR) says are "very stable and can remain in the environment for many years." This is a new product, and its inert ingredients have not been disclosed. Aerial spraying is planned for "forested" and "agricultural" areas that have not been specifically identified.
- 2. Ground application of the synthetic pheromone or the same plastic flake pesticide as in #1** mixed with a sticky adhesive ("SPLAT") and applied to shrubs in private yards
- 3. Permethrin (carcinogenic pesticide, toxic to bees)** applied to telephone poles and trees in sticky SPLAT
- 4. Pheromone twist ties** hung in trees
- 5. Ground spraying of the pesticides bacillus thuringiensis and spinosad**
- 6. Release of millions of sterile moths**
- 7. Release of millions of predatory wasps**

**The draft EIR is based on flawed assumptions and incomplete, invalid science and does not adequately assess the LBAM program and its impacts.** Specifically, the draft EIR:

- 1. Fails to address any of the flawed assumptions on which the LBAM program has been based.** It does not address substantial evidence that LBAM is well established in California and poses no threat, so no quarantines or treatments are needed. The EIR assumes eradication as the program's goal even though there is substantial evidence that eradication is neither feasible nor achievable. As a result, the EIR dismisses non-toxic control strategies such as integrated pest management.
- 2. Does not assess the impacts of the LBAM program as a whole.** The EIR evaluates each proposed LBAM eradication treatment separately without accounting for the fact that these treatments would be used in combination; thus, the EIR does not adequately assess the actual health and environmental impacts of the program as a whole.
- 3. Draws unsubstantiated, not credible conclusions about the risks of the proposed treatments.** For example, the EIR, astonishingly, finds no negative health or environmental impacts from ground or aerial pesticide spraying even though aerial spraying sickened hundreds of people on the Central Coast in 2007. Ironically, the EIR concludes that the only negative impact of aerial spray would be airplane noise.
- 4. Defines the treatment area too broadly.** The EIR identifies almost the entire state, with its widely variable geographic and ecological zones, as the potential LBAM treatment area

without specifying what treatments would be used where, when, or how or what the environmental impacts in a given area would be.

5. **Misrepresents “no action” alternative.** The EIR defines the “do nothing” alternative (which EIRs are required to include) as a scenario in which private landowners would use large amounts of dangerous pesticides to try to control the moth even though there is no factual evidence to support this assumption. In addition, the EIR includes the state-mandated quarantine spraying for LBAM as a risk of the no action alternative but not of the program alternative even though the quarantine sprays would continue under both scenarios. As a result of these definitions of the no action and program scenarios, the EIR finds that the no action alternative has more severe environmental consequences than the multiple mass chemical and other treatments the state proposes to use for LBAM.

*For more information, contact Stop the Spray East Bay: [eastbayinfo@stopthespray.org](mailto:eastbayinfo@stopthespray.org) or Pesticide Watch Education Fund: [info@pesticidewatch.org](mailto:info@pesticidewatch.org).*

**Written comments on the LBAM EIR must be sent not later than close of business on Monday, September 28, 2009 to:**

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