

To: Osama.a.el-lissy@aphis.usda.gov, AgSec@usda.gov, jrains@cdfa.ca.gov  
CC: EIR@lbamspray.com  
Subject: Public Comments on LBAM Draft EIR

Concerns to address in the Draft EIRs for the USDA/CDFA LBAM pesticide program:

**Human health:**

- Review every health complaint suspected by complainant of having been caused or exacerbated by the LBAM program, to be reviewed by independent medical staff, with direct interaction with complainant, and/or any additional medical staff of complainant's own choosing.
- Actively and thoroughly solicit related health complaints from the public, which may not have been counted due to lack of access to health care from not properly informed medical staff, including a survey of the homeless, non-english speakers, prisoners, and other underrepresented residents of the areas affected by any and all LBAM treatments, including in neighboring communities in which drift was reported. All participation in such reviews and surveys should be kept anonymous and confidential if participants so choose. Visitors to the area during the time LBAM applications were/are present, should also be included in this research.
- Assess the impact on immune system compromised individuals, such as people with cancer, MCS, AIDS, MS, thyroid disorders, arthritis, infants with undeveloped immune systems, elders with vulnerabilities due to aging, and any other immune compromising health or living condition. Solicit complaints from affected community.
- Assess the impact on individuals with existing respiratory conditions, such as asthma, bronchitis, OPD, emphysema, the flu, common cold, or any other temporary or permanent condition that could be exacerbated or brought on by chemical fumes or particulate matter. Solicit complaints from affected community.
- Assess the impact on pregnancy, breastfeeding, fertility, and all reproductive system functioning, including review of reports of recommencement of menstruation after menopause. Solicit complaints from affected community.
- Assess the impact of all LBAM program tools, including aerial and ground applications, spray, paint, or otherwise, including twist ties and traps, on free movement of all members of the public, including workers passing daily by thousands of treated utility poles, and curious, climbing and otherwise playful children. Solicit complaints from affected community.
- Assess all possible short or long term impacts on human health, taking into account the emerging body of research on chemical poisoning, including body burden studies, synergism, bioaccumulation of and sensitization to synthetic chemicals, and the long list of historical claims of safety by the pesticide industry, eventually revealed to be false by an even longer list of associated injuries and deaths.

**Environmental health:**

- Review the deaths of hundreds of birds, washed ashore in the aftermath of the aerial spraying in the Fall of 2007, by independent specialists, taking into account all ingredients of the chemicals used, paying particular attention to surfactants and other chemicals that contribute to red tides, and ingredients that may have contributed to the stripping of waterproofing from birds' feathers.
- Actively and thoroughly solicit reports from residents who witnessed a temporary, but lengthy disappearance of birds, which previously frequented forests, gardens, and bird feeders, in the aftermath of the spraying, or strange behaviors of birds that stayed. Such survey should

also include queries as to disappearance and strange behaviors by other beneficial creatures, such as honeybees, wasps, butterflies and moths other than LBAM, other insects, spiders, wild and farm animals, and pets.

#### **The LBAM emergency:**

- Review actual status of the ecological emergency the LBAM supposedly represents, by independent specialists, taking into account particularly the fact that the LBAM has not done any damage to crops or native habitat in California to date, and is not considered a significant pest in either Hawaii or New Zealand. Especially relevant to this review is the most recent research by Dr. Daniel Harder, a plant expert at the UC Santa Cruz Arboretum, who just returned from New Zealand, where he found that reports of LBAM damage occurred only during pesticide programs such as this one, in which the natural predators of the LBAM were also eliminated, and the LBAM and other pests developed resistance to the pesticides.

- Assess how current agricultural practices, particularly mono-cropping and dependence on chemicals, have contributed to the vulnerability of conventional farms to pests such as the LBAM, and compare how organic, ecological agricultural practices that nurture and mimic natural ecosystems perceive and manage such "pests".

#### **Economic:**

- Aside from ever changing estimates of relatively negligible reduction in profit margin to the conventional agriculture industry, take into account the much larger economic impact on all the other local industries.

- Take into account the economic toll on nurseries and small organic farms, both from USDA/CDFA requirements to spray, quarantine, and overhandle crops in search of LBAM, and from organics consumers' shift away from locally grown crops no longer considered organic by them.

- Take into account the economic losses of the Bay Area and Peninsula's thriving tourism industry, due to visitors' concerns over exposure to pesticides being sprayed on them, and persisting in their vacation environment, and wafting from vegetation, and from utility poles for miles around. Include those traveling here for business, who may begin to conduct their business elsewhere instead, and athletes concerned with their health, who may refuse to compete here, like some olympians are doing in Beijing because of air quality concerns.

- Take into account real estate losses from potential new residents, not to mention previous residents now fleeing the area, because they are not willing to be exposed to persistent pesticides year round.

- Take into account cost of loss of productivity by workers and students increasingly made ill by chemical exposure. Take into account the medical costs.

- Assess how trade policies impact agricultural practices, how farming policies are increasingly based on international trade policies, rather than on the health of local farmers, their neighbors, and their ecosystems.

#### **The Precautionary Principle:**

Rather than a risk assessment approach which determines how much risk is acceptable to those theorizing about potential impact, take a precautionary approach, based on the precautionary principle, which in a nut shell states "better safe than sorry".

Theoretical risk assessment is meaningless in a situation where a lot of risk has already been taken with the lives of the public and our common environment.

Isis Feral

**Disabled Access Advocate**  
**Don't Spray California**  
[www.DontSprayCalifornia.org](http://www.DontSprayCalifornia.org)