

COMMENTS to Minnesota Department of Agriculture

send your comments to: kimberly.tcremers@state.mn.us , your city council person, and your state legislator

Subject: Gypsy Moth Aerial Insecticide Sprays scheduled for May, 2019

We are in the midst of an international crisis. Despite widespread public concern and research, declines continue at alarming rates. Fifty percent of our wild animals have disappeared in the last 40 years. Internationally, the EU and other countries are banning some insecticides to help bring the pollinators back. In 2016, Governor Dayton signed an executive order for pollinator protections, in 2018 the Minnesota Committee on Pollinator Protection (GCPP) issued 39 recommendations including reductions in pesticide use. Washington County implemented an Integrated Pest Management program and a Pollinator Resolution in 2016, and the City of Stillwater enacted a Pollinator Protection Resolution in 2015. Meanwhile, Minnesota Dept. of Ag. Plant Protection has agreed to partner with the USDA on its “slow the spread” campaign which includes aerial insecticide spraying over 622 acres of Stillwater. **We are opposed to aerial spraying with FORAY 48B.**

Foray (Btk) is a biological insecticide designed to kill caterpillars which also affects other animals including humans, and especially people who are immune-compromised. A study (NX Med J 2003) found residents in the spray path reported sleep problems, dizziness, difficulty concentrating, diarrhea and stomach pain. Another study by US National Library of Medicine found Foray associated with respiratory, gastrointestinal and neuropsychiatric symptoms. Based on the inadequate attempts by MDA Plant Protection to inform residents so far, it will be impossible for MDA to inform all residents of the ensuing spray date(s).

At what cost to pollinators—the environment and people—will we be forced to endure? Although MDA Plant Protection states “*foray has a very narrow target of caterpillars so it will not disrupt the balance of nature*”, the fact is foray will destroy both pest AND beneficial *Lepidoptera* caterpillars including pollinating Monarchs, Swallowtail, Fritillaries, Admiral, Skipper, Gossamer-Wing and Sulphur butterflies, plus moth species including Sphinx, Hawkmoths, Tiger and Luna Moth to name a few. The aerial spray is proposed for May which is when birds are returning from migration and hungry for caterpillars. In Canada and Oregon, studies show bird feeding and nesting are affected by foray (*Bacillus thuringiensis* var. *kurstaki* (Btk)). Caterpillars are also an important food source for other animals like beneficial beetles, bats, frogs and wildlife.

The foray label states “*do not apply directly to water, or to areas where surface water is present ...This product must not be applied aerially within 1/4 mile of any habitats of threatened or endangered Lepidoptera.*” The proposed 633 acres for foray spraying include ponds, lakes, streams, and has the potential for drift and runoff. When foray was sprayed in Duluth, a biologist on site was exposed to drift 1/4 mile away from the spray target.

This winter, temperatures dropped below -50°F with NO snow cover. Overwintering gypsy moth, butterflies and other pollinators perish at -20°F below. If given a chance, nature finds a way to keep

in balance. The federal name for the gypsy eradication program is “slow the spread”. We believe the answer to the gypsy moth over-population problem is to return a natural balance in species through biodiversity. This is not a quick solution, but it is a long lasting, sustainable one. Increased biodiversity will help increase populations of gypsy moth predators like parasitic wasps and beetles. Regardless of the approach, it is Minnesota Dept. of Agriculture’s responsibility to provide public education about [non-insecticidal approaches](#).

It is our government’s responsibility to protect citizens from health and environmental threats. The aerial broadcast spray is a 1980’s out of date protocol that needs to be changed to protect and promote the health of people, pollinators and the environment.

The Minnesota gypsy moth eradication program is out of step with current initiatives in the State of Minnesota for clean water, healthy soil and pollinator protections. Land management practices have drastically changed since 2000, but the gypsy moth insecticide program has not. The gypsy moth program contradicts the leadership that the State of MN has shown regarding pollinator protection. State agencies are taking action to learn and implement ecologically sound best practices and Integrated Pest Management (IPM). Foray spraying kills all Lepidoptera including endangered and at-risk Lepidoptera. MDA’s broadcast insecticide spraying is in direct opposition to these updated ecologically sound practices.

Some examples of best practices include:

- Regenerative methods for soil and tree health to naturally boost resistance to disease and pests.
- [Biocontrols including introduction of natural enemies](#) (birds, mice, beneficial insects) (see attached “Predators of Gypsy Moth” and “fungus”).
- Forestry tactics including species selection for resistance and removal of sick trees that offer habitat for gypsy moths.
- Educating residents and businesses on IPM practices and least toxic methods including observation, spot treatments, moth removal into soapy water, etc.

Foray is not healthy for people (see attached), nor safe for water, aquatic insect nymphs, birds, or pollinators. [Citizens are concerned](#) and don’t feel safe, nor do they want their properties sprayed. The MDA’s Public outreach protocol is ineffective and printed materials are incomplete and misleading. Foray is portrayed as a “safe” substance but has health effects. Many residents are not aware the aerial spraying is to occur over their homes. Most Stillwater residents were not aware of the public open house. The mailer did not reach every affected household and the flyer provided information on one tactic to control gypsy moth – aerial spraying. [Citizens should be provided with tactics they can use in their own yards](#). Instead, community leaders are threatened with a “quarantine” and/or financial burden if they don’t participate. This strategy is not fair nor democratic. Note: gypsy moth quarantine has been imposed only once in the U.S. and in practice, there is no enforcement.

2019 budget for the gypsy moth program is estimated at \$720,000 in Minnesota. The budget is in question: \$150,000 (spraying) \$570,000 (printing and staff). This exorbitant amount of tax dollars spent on an aerial spraying program can be better used for programming that boosts biodiversity and promotes local community integrated pest management. If the gypsy moth insecticide spraying

program is halted by the federal government, we support ceasing the program as it exists in Minnesota and replacing it with programming that works with communities to implement a boots-on-the-ground approach for ecologically sound management practices.

It is not clear if MDA sets thresholds for gypsy moths to determine if a community is subject to aerial spraying. Plant Protection staff found a total of 12 moths plus some egg and pupae casings in 2018 in an isolated Stillwater area. Are 12 moths in an isolated area high enough threshold to warrant broadcast insecticide spraying over 622 urban acres and sensitive water areas?



POLLINATOR FRIENDLY ALLIANCE, PO BOX 934, STILLWATER, MN 55082

WWW.POLLINATORFRIENDLY.ORG

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