

Bringing you HOPE -
Helping Our Peninsula's Environment

Box 1495, Carmel, CA 93921
831/ 624-6500

Info7 at 1hope.org
www.1hope.org

Monterey City Council

August 29, 2007

**Questions for State Bureaucrats on Peninsula Aerial
Chemical Spraying**

Toxicity Questions

- Is the man-made chemical Checkmate "moderately toxic" to aquatic invertebrates? (Yes. EA, (USDA Environmental Assessment) page 8)
- Aren't Checkmate spray chemicals required to be cleaned up according to the Federal Hazardous Waste law (called the Resource Conservation and Recovery Act? (Yes, US-EPA Quarantine Exemption Grant, Jul 24, 07)
- Has Checkmate been specifically tested for its harm to Monarch Butterflies? (EA - no)
- Doesn't Checkmate affect more creatures than just the LBA Moth? (Yes, EA pg 9)
- Why does CDFA falsely claim Checkmate is "specific to LBAM" (CDFA Q & A sheet "What are Checkmate ...") when it affects more insects than just LBAM?
- Has Checkmate been tested specifically for its harm to Smith's Blue Butterflies which are protected by our Federal Endangered Species law? (EA – no biological opinion done yet.)
- What are the secret chemicals in the Spray called "Inerts?" which make up more than half the spray.
Some "Inerts" are known to cause cancer, reproductive harm, harm to the nervous system and damage to our environment. ("Toxic Secrets" NCAP, 1997)
- USDA admits Checkmate is "moderately toxic" to aquatic invertebrates. Other experts consider Checkmate chemicals at least generally "slightly toxic" to animals. While this is less than highly toxic, why is the Dept of Food and Agriculture hiding this toxicity information?
- Did CDFA or USDA consult with EPA's Clean Water Act division? (No. EA page 12)
- Doesn't our Federal Clean Water Act prohibit any man-made chemical pollution in our streams? (Yes, 33 CFR Sec 328)
- Does the EPA required Label forbid putting or allowing Checkmate chemicals in surface water? (EA pg 8)
- Isn't it a crime to allow Checkmate chemicals to pollute surface water? (LBAM Label & "Revised EA" pg 12)
- Can you provide 100 percent assurance the spray will NOT be active during rainy weather? (No. No bonding company would insure that claim.)
- Pacific Grove alone has more than 10 watersheds, and Monterey has at least five. (HOPE's Peninsula Watershed map - www.1hope.org)
Since you intend to spray during rainy season, can you provide 100 percent assurance the spray will NOT concentrate the chemicals in the 15 Monterey Peninsula streams - and deliver the concentrated chemicals to our National Marine Sanctuary - to Sea Otters and aquatic invertebrates? (No. No bonding company would insure that claim.)
- Who will provide a \$100 million bond if harm occurs to our children and wildlife? (CDFA and USDA should attempt to do so and will find out the reality of their empty promises.)

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Forest Ecology

Founded in 1998, and known for helping with hundreds of environmental and democracy successes, H.O.P.E. is a non-profit, tax deductible, public interest group protecting our Monterey Peninsula's natural land, air, and water ecosystems and public participation in government, using science, law, education, news alerts and advocacy.

Moth Questions --

- There are billions of Oak moths hanging from oak trees. Aren't LBA moths a completely different moth species?
- Do the LBA moths pose any direct threat to humans or wildlife?
- Do the LBA moths pose any direct threat to schools or hospitals?
- What exact targets on our Peninsula are threatened by the LBA moth?
- Why aren't CDFA & USDA providing evacuation compensation for those who need to leave - like the US Army did when it burned toxic waste at Ft Ord?

*** Alternatives to Spraying ***

- HOPE is aware of two successful non-spraying alternatives --
 1. Hanging Traps and Twist Ties.
 2. Releasing Sterile Male Moths (as they did and do for Mediterranean Fruit Flies.)
- How many other non-spraying alternatives are there?
- Since Checkmate chemical spray has never been used in the US, how can anyone assert it is more effective than alternatives?

Chemical Testing --

- Has Checkmate gone through the normal testing for pesticides? (No. Quarantine exemption from US-EPA, Jul 24, 07)
- Was Checkmate tested for Cancer causing harm? (No)
- Was Checkmate tested for Endocrine system harm? (No)
- Was Checkmate tested for Immune System harm? (No)
- Was Checkmate tested for Chirality effects? (No)

Areas --

- Since Santa Cruz has a higher number and concentration of LBA Moths, why isn't it being sprayed?

- How did you pick Peninsula boundaries for spraying? PG is not on Canadian Quarantine Maps but it is proposed to be sprayed.
- Why is Carmel excluded?
- Why is Carmel Valley excluded?
- Why is Salinas Valley excluded?

Process --

- Where is the "Plan" described in the EA? (Jly 27, pg 2)
- The proposed project description keeps changing. One Environmental Assessment (July 18) is titled "Revised Environmental Assessment." A LATER Environmental Assessment (July 27) is merely titled "Environmental Assessment." Why isn't this contrary to CEQA which requires a stable project description?
- Doesn't CEQA call this Piece-mealing to approve spraying one area (Monterey), then another (Santa Cruz) and then another (Contra Costa Co.)?
- Why does CDFA have a Firewall between the public and agency officials?
No one at the published phone numbers could answer any but superficial questions.
It was impossible for HOPE to reach a responsible official to find out what, if any, CEQA process was followed for two days.
More than a week later HOPE still has not had our phone calls returned.
- Is the normal range of a moth's entire life within the size of a football field from where they were born? (100 meters)
- What are known impacts on redwoods? Provide photographs.
- What are known impacts on pines? Provide photographs.

For more info see – www/1hope.org/pest

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