



March 28, 2016

WSDA Pest Program
3939 Cleveland Ave. SE
Olympia, WA 98501

RE: Gypsy Moth Spray proposal

Washington Friends of Farms & Forests represents agricultural and timber producers across the state of Washington. We are writing in support of the Washington State Department of Agriculture's proposed gypsy moth control program.

The Washington State Department of Agriculture caught more gypsy moths in Western Washington in 2015 than ever before. Gypsy moths pose a tremendous threat to agriculture, forestry and our quality of life in Washington. They have the potential to not only devastate our crops, timber and nursery products, but if they were to become established it would also mean costly quarantines for these industries.

Asian gypsy moths have the capacity to spread rapidly. Large infestations can completely defoliate trees, leaving them weak and more susceptible to disease or attack by other insects. Washington is the Evergreen State. Sick and dying trees would harm not only our agricultural and timber industries, but also tourism and the quality of life of all Washingtonians. Damaged and dead trees in western Washington could lead to increased wildfire pressure just as compromised forest health has increased wildfire damage in eastern Washington.

Defoliation of trees in riparian habitats could lead to increased water temperatures harming threatened and endangered salmon and other aquatic life.

Several of the infestations are near state treasures that must be protected from gypsy moths including the University of Washington Arboretum and Volunteer Park in Seattle, Dash Point State Park in Tacoma and Tolmie State Park and the Nisqually National Wildlife Refuge near Lacey.

Btk is a naturally occurring soil bacterium that is widely used in organic farming. It also has a long history of use in similar areawide eradication programs. Because of this history, a huge amount of toxicity data exists. Btk has an excellent safety record for humans, pets, birds, fish and bees. The benefit of protecting our trees from gypsy moths far out weights any concerns about the use of Btk.

No action is not an option for Washington. The potential for catastrophic damage is far too high.

Sincerely,

Heather Hansen
Executive Director

March 30, 2016

Comments on the State of Washington Gypsy Moth project.

I am a professional forester with over 41 years of field experience in Washington State.

Invasive and destructive insects such as the European Gypsy Moth and the Asian Gypsy Moth pose a serious threat to our Evergreen State. As invasive species, they have no natural predators to keep their populations under control and I support the use of Btk insecticide to do so. Btk is a natural product, OMRI (organic) approved and poses very little to no hazard to other insects, birds, animals, people, fish, and the like.

The State has done an excellent job reviewing the problem, looking at various control options, and making thorough plans to carry out a safe and effective control program using Btk.

Btk has been used successfully before to control Gypsy Moth larvae with an excellent record of safety. The trees and shrubs of Washington State are too precious to risk to these invasive insects. Please approve the treatment of Btk to control the moths.

Sincerely,

Bruce P. Alber, Certified Forester
2607 NW 116th Street
Vancouver, WA 98685

Western Timberlands • 16821 SE McGillivray Blvd, Suite 210 • Vancouver, WA 98683-0402

March 30, 2016

WSDA Pest Program
3939 Cleveland Ave. SE
Olympia, WA 98501

RE: WSDA Gypsy Moth Spray Program

To whom it may concern:

Thank you for the opportunity to comment on the proposed gypsy moth treatment planned for this spring. Weyerhaeuser supports the Washington State Department of Agriculture's (WSDA) proposed gypsy moth control program.

Weyerhaeuser Company owns and manages approximately 1.3 million acres in Washington State and another 1.8 million acres in Oregon. Due to our large ownership of timberland holdings in both Washington and Oregon we are concerned about the potential impacts an infestation of Asian and/or European gypsy moths would have on the forests in the Pacific Northwest. As such, we are very supportive of the efforts by WSDA to eradicate the gypsy moth.

As stated above, the ecological and economic impact of the gypsy moth is a serious concern to Weyerhaeuser. If the gypsy moth is able to make establishments in Pacific Northwest forests, costly quarantines will be imposed on Washington's nursery and forest industries. Moreover, if the gypsy moth is not eradicated and allowed to spread, the state will incur significant costs to manage the gypsy moth. It is well documented that the effects of defoliation from the gypsy moth threatens wildlife habitat, increases the risk of wildfire and impacts water quality. Finally, because gypsy moths are non-native, there are few natural enemies to help control them.

For the aforementioned reasons, we support the proposed gypsy moth treatments planned for this spring by WSDA.

Sincerely,



Dan Newton
Chief Forester



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

March 30, 2016

Ms. Kelly McLain
WA Department of Agriculture
PO Box 42560
Olympia, WA 98504-2560

Dear Ms. McLain:

Thank you for the opportunity to comment on the determination of nonsignificance for the 2016 Gypsy Moth Eradication Project located in King, Pierce, Thurston and Clark Counties. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

HAZARDOUS WASTE & TOXICS REDUCTION: Tara Davis (360) 407-6275

The applicant must ensure that all waste generated from operations at this site are designated and managed in accordance with the Dangerous Waste Regulations, Chapter 173-303 WAC.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(SM:16-1378)

cc: Tara Davis, HWTR