



The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.

April 1, 2010

Animal and Plant Health Inspection Service
Plant Protection and Quarantine
5353 Yellowstone Rd.
Suite 208
Cheyenne, WY 82009

Dear Animal and Plant Health Inspection Service:

Following are the comments from the Wyoming Department of Agriculture (WDA) on the draft Environmental Assessment (EA) for Rangeland Grasshopper and Mormon Cricket Suppression Program.

Our comments are specific to our mission within state government: dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposal has major impacts upon our agriculture industry, our natural resources and the welfare of our citizens, we believe it is important you continue to inform us of proposed actions and decisions and provide us the opportunity to express pertinent issues and concerns.

The WDA supports the control of grasshoppers and Mormon crickets when infestations exceed a predetermined threshold to preserve forage and habitat for livestock and wildlife. We support the Animal Plant Health Inspection Service (APHIS) in their efforts to chemically treat the predicted high infestations of grasshoppers and Mormon crickets in the 2010 Wyoming growing season. We encourage APHIS to work cooperatively with private landowners, BLM, Office of State Lands and Investments and other agency staff, county conservation districts and county weed and pest districts throughout the process. We have reviewed the draft EA and just as in 2009, we continue to recommend Alternative C: Reduced Agent Area Treatments (RAATs). We offer the following comments to support Alternative C, to enhance or guide APHIS through the process.

Protect Wyoming Apiaries

The WDA strongly supports Wyoming beekeepers of both honeybees and alfalfa leafcutter bees. APHIS has taken great measures by developing the 2 – 4 mile buffers when spraying for grasshoppers. We continue our efforts to annually inspect hives and encourage the use of Global Positioning System (GPS) for locating colonies. We encourage APHIS to work cooperatively with the WDA to locate the colonies using GPS prior to any aerial spraying. To date there are approximately 70% of all colonies located by GPS points.

APHIS stated "Beekeepers will be advised to move their bees at least two miles from the spray block boundaries." WDA staff has concerns regarding the movement of hives once in place for

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the pollination season, not only for the impact to the colonies, but also to the economic impact of the beekeepers.

Below, APHIS will find WDA's recommendations regarding the notification of beekeepers in areas proposed for chemical treatment for grasshoppers.

- 1) Provide adequate notification of intention to spray within two miles of the hives. We recommend not less than 5 days notice.
- 2) Develop documented contact list regarding notifications and whether apiarists will move hives, have moved hives since notification, or opted to not move hives.
- 3) Provide re-entry times to all apiarists who have moved hives. Notify all apiarists of their ability to replace hives in original location.
- 4) Keep records of registered, non-active hives to avoid not spraying fields where hives are no longer active, simply based on aerial visual location.

The WDA will encourage all registered, non-active hive owners to write a letter to APHIS regarding their inactivity and permission to spray in the immediate area where non-active hives are stored.

Proceed with Alternative C: RAATs

We support Alternative C as it uses less chemical, considers the importance of providing insects for wildlife such as sage-grouse and is likely the most cost effective alternative. We want to thank APHIS for their extended efforts to work with Sage-grouse Local Working Groups, by gathering their concerns and opinions regarding the possible impacts to sage-grouse populations. Insects such as grasshoppers are important to raising sage-grouse broods and while we encourage grasshopper treatments, we also support RAATs, which can suppress grasshopper populations while still providing food for sage-grouse and other wildlife.

We urge APHIS to develop thresholds of grasshopper and Mormon cricket populations for their spray program as well as work closely with weed and pest districts, agricultural producers and other interested parties. The development of a threshold, for example 8 grasshoppers per square yard, will create a more consistent protocol between applicators and treatments of given areas.

Alternative C provides the information regarding rates of application of insecticides. It is without question, we encourage early detection and when possible, chemical treatment with diflubenzuron. Diflubenzuron has the least negative impact to non-target species such as bees and sage-grouse broods. Additionally, we ask APHIS to reduce the possible impacts to other species of wildlife and livestock by aerial spraying. For example, APHIS should analyze the impacts of accidental chemical treatment of water in stock tanks or ponds and the direct skin contact of chemicals by wildlife and livestock. If negative impacts are possible, APHIS must mitigate or alter their program to reduce the ingestion or contact of chemical to non-target species.

The WDA, as the state regulatory authority over pesticide applicators, pesticide products and their use, strongly encourages APHIS to assure the products applied are used in accordance with

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the respective product label and the proper records be kept of those applications under the authority of Wyoming Environmental Pesticide Control Act W.S. 35-7-350 - 3507-375.

The WDA thanks APHIS for receiving our comments. We look forward to reviewing the final EA and to the implementation of this program onto Wyoming lands.

Sincerely,


for Jason Fearneyhough
Director

JF/jw

Cc: Governor's Planning Office
WDA Board of Agriculture
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Rocky Mountain Farmers Union
Wyoming Association of Conservation Districts
Wyoming Farm Bureau Federation
Wyoming State Grazing Board
Wyoming Game and Fish Department
US Fish and Wildlife Service Cheyenne office
Slade Franklin
Weed and Pest Council
Wyoming Beekeepers Association