

Date:

Dear \_\_\_\_\_

I am writing in regard to Forests Lands Natural Resource Operations and Rural Development's (FLNRORD) proposed plan to ground spray with (Btk) Foray 48B for treatment of the Gypsy Moth in the Rockland Area of Campbell River, BC.

A Health Canada Impact report registered illnesses (See Health Canada Website) in 2008-2015 from aerial spraying of (Btk) Foray 48B. The BC Gov. website re Ground Spraying: "Both residents near the spraying area and the person applying the spray are more exposed to the insecticide than with aerial spraying, though Btk formulations do pose minimal health risks." Minimal risk is still risk!

A playground is located in the spray area and a school is located on the border of the spray area. Children walk to and from school in the spray area.

A 2003 BC government study titled, "Non-target Lepidoptera on Southern Vancouver Island" identifies impacts to non-targeted butterflies and moths from the spraying of (Btk) Foray 48B.

Simms Creek, with 30 years of volunteer stream keeper salmon enhancement, borders the proposed spray area with all storm drains and detention ponds draining to Simms Creek. The (Btk) Foray 48B label found on the BC Government website, identifies: "DO NOT contaminate irrigation or drinking water supplies or aquatic habitats by cleaning of equipment or disposal of wastes. As this pesticide is not registered for control of pests in aquatic systems, DO NOT use to control aquatic pests."

I am concerned that the dilution rate for this proposed ground spraying is decided by the manufacturer and unknown to us. What protocol is used to confirm what it is FLNRORD is receiving and applying? Is testing done to confirm the stated concentration of the product?

In 2016 no egg masses and 2 Gypsy Moths were found in the Rockland area. In 2017 no egg masses and 8 Gypsy Moths were found in the Rockland area. See BC Government Website-Gypsy Moth Detection History.

<https://www2.gov.bc.ca/gov/content/industry/forestry/managing-our-forest-resources/forest-health/forest-pests/invasive-forest-pests/gypsy-moth/detection-history>

The Sidney, Gabriola and S. Duncan trials are considered successful examples of mass trapping, where the moth populations were eliminated over two years of treatment. See BC Government Website-Gypsy Moth Detection History <https://www2.gov.bc.ca/gov/content/industry/forestry/managing-our-forest-resources/forest-health/forest-pests/invasive-forest-pests/gypsy-moth/alternative-treatments#masstrapping>

As a resident of the Rockland area in Campbell River, BC, I respectfully request to be allowed to use mass trapping and other non-pesticide methods, that have been successful in 3 other BC communities, for the treatment of the Gypsy Moth, instead of FLNRORD entering our private property uninvited with an order in council to ground spray as proposed or aerial spraying for the treatment of the Gypsy Moth.

Sincerely,