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Waleska Ramirez  
State Plant Health Director  
USDA, APHIS, PPZ  
270 S. 17<sup>th</sup> Street  
Las Cruces, NM 88005

Pamela Mathis  
Field Manager  
BLM Taos Field Office  
1024 Paseo Del Pueblo Sur  
Taos, NM 87571

Re: Proposed USDA Animal and Plant Health Inspection Service  
(APHIS) Aerial Pesticide Spraying on Public Lands in Rio Arriba  
County

Dear State Plant Health Director Ramirez and Field Manager  
Mathis,

The New Mexico Wildlife Federation strongly opposes the plan by the USDA Animal and Plant Health Inspection Service (APHIS) to spray carbaryl on public lands in Rio Arriba County.

The NMWF is the oldest and largest group in New Mexico representing the interests of wildlife, hunters and anglers. Founded over a century ago pioneering conservationist Aldo Leopold, the federation for generations has been an unyielding voice for conservation and preservation of public lands and wildlife.

According to your environmental documents, APHIS intends to spray nearly 800 gallons of the pesticide carbaryl over 25,000 acres of land mainly administered by the U.S. Bureau of Land Management to kill native grasshoppers and crickets to prevent the loss of forage for livestock.

The use of carbaryl on our public lands in New Mexico is unacceptable. The US Environmental Protection Agency has classified it as “likely to cause cancer.” Beyond killing grasshoppers and crickets, its application will kill bees and other pollinators. It will also kill stoneflies and other benthic invertebrates that support fish populations. Its effect on the area’s human population – which includes residents of proud traditional communities – promises to be negative.

In short, the full scope of the environmental effects of proceeding with your preferred alternative method of spraying is unclear and apparently unknown. The generic “Finding of No Significant Impact,” that your agencies are relying on to support this proposed

spraying is insufficient to assess the likely effects of the widespread pesticide application you're proposing in this particular area.

It's also profoundly offensive and disingenuous to see the USDA proposing this ham-handed, insensitive approach to land management in the Rio Chama Watershed while national agency leaders are singing a different tune in public.

Just this month, the USDA proclaimed June 19-25 as "National Pollinator Week," stating that it was committed to pollinator health and research.

"Our world's ecosystem and food supply greatly rely on pollinators – without them, many of our nation's crops wouldn't be able to produce as many fruits, nuts or vegetables resulting in lower supplies and higher prices," USDA Secretary Tom Vilsack stated in a release this month. "This week and every week, it is critically important that we continue to encourage the protection of pollinators and their habitats. Fewer pollinators harm both farm income and nutrition security for many Americans. Healthy pollinator populations are essential to the continued success and well-being of agricultural producers, rural America and the entire U.S. economy."

Despite the fact this proposed action was listed on obscure government websites, it's clear that your agencies have failed in your obligation to alert the public in any meaningful way to your proposed action. The scant public comment you received during the comment period on the EA is proof of that.

The NMWF calls on you to drop this ill-considered spraying proposal. Instead, we maintain it's your obligation to approach rangeland health from a holistic perspective that considers and respects the full spectrum of life – including insects, pollinators, fish and wildlife – that makes up a healthy, productive environment.

As Leopold stated, “(A) system of conservation based solely on economic self-interest is hopelessly lopsided. It tends to ignore and thus essentially to eliminate, many elements in the land community that lack commercial value, but that are – as far as we know – essential to its healthy functioning.”

Please keep me informed about any developments on this proposal.

Sincerely,

Jesse Deubel,

Executive Director, NMWF