

PUBLIC COMMENT REGARDING PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT; GRASSHOPPER AND MORMON CRICKET SUPPRESSION PROGRAM

Submitted by: The Xerces Society for Invertebrate Conservation and Undersigned Individuals

Regarding Docket No. APHIS-2026-0628-0001

Date: July 17, 2026

To: Mr. William D. Wesela
APHIS National Grasshopper and Mormon Cricket Policy Manager
William.d.Wesela@usda.gov

We, the undersigned individuals, respectfully request that APHIS incorporate the following provisions into the preferred alternative of the Programmatic Environmental Impact Statement, as described in the [Notice of Intent To Prepare a Programmatic Environmental Impact Statement; Grasshopper and Mormon Cricket Suppression Program](#) (91 FR 36787).

Invertebrates are the heart of a healthy landscape and large scale insecticide applications can interfere with the role of pollinators and natural enemies. Invertebrates also provide food for birds, fish, mammals and reptiles; plant seed dispersal; water filtration; decomposition; and maintenance of soil health.

End spraying on sensitive public lands.

APHIS must end spraying on National Wildlife Refuges, Wilderness and Wilderness Study Areas, Areas of Critical Environmental Concern, National Monuments, Important Bird Areas, habitats of declining species, and other sensitive lands.

As much as possible, APHIS should keep treatment areas small and targeted--only as large as the area where clear justification of economic harm has been demonstrated and disclosed.

Support prevention-based activities that reduce grasshopper severity. Managing for healthy, resilient and diverse native rangelands can help reduce grasshopper problems. Congress instructed APHIS to coordinate with others to protect rangeland, including prevention practices. Congress also authorized funds for the prevention of actual and potential grasshopper or Mormon cricket outbreaks on Department of Interior lands. In the new Environmental Impact Statement, APHIS must better implement this direction by adopting procedures to provide explicit recommendations annually to Department of Interior agencies on where, when, and how to implement non-chemical preventive methods to reduce grasshopper outbreaks.

Impose comprehensive protections for western rivers and streams. For too long, APHIS has only mandated buffers on permanent waters. But western streams that are seasonal or intermittent are also crucial as habitats and sources of drinking water. All streams and wetlands should be

buffered from sprays, not just places that hold water year-round. Aquatic systems are too important in the West to risk their contamination.

Increase transparency, notification, and engagement. Advance public notification of pesticide applications to public land needs to become part of APHIS' standard operating procedures. The public is currently kept in the dark about when, where, and how applications will occur on public lands and that is wrong. The public should be aware of risks such as pesticide exposure that we may encounter when using our public lands. The lack of a consistent notification procedure has caused last minute scrambling in the research community, and confusion and concern among organic producers, recreationists and conservationists. America's public lands belong to all of us. The broad public also deserves to know that applications only occur when justified; therefore survey data and a statement explaining the data and reasoning for each application must be made available to the public in advance of each spray. We also urge APHIS to include a more robust public consultation and engagement strategy for Tribes, conservationists, recreationists, and the general public into its program.