



CHEYENNE MOUNTAIN ZOO

4250 Cheyenne Mtn. Zoo Rd.
Colorado Springs, CO 80906
Tel. (719) 633-9925
Fax (719) 633-2254
Email: info@cmzoo.org
Website: www.cmzoo.org

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December 10, 2015

To Whom It May Concern;

As the Associate Veterinarian at the Cheyenne Mountain Zoo, I was asked to comment on behalf of our zoo in regard to the aerial spraying in 2016 of the product Foray® 48B Biological Insecticide (active ingredient *Bacillus thuringiensis subsp. kurstaki*, Strain ABTS-351; fermentation solids, spores and insecticidal toxins) as a management tool for zoo grounds and nearby forest due to the severe infestation of coniferous trees by tussock and budworm moth larvae.

In reviewing the SDS provided, if the product is mixed and applied as labeled, Cheyenne Mountain Zoo animals should be unaffected by ingestion or contact with the product post-application. As there is enough concern to warrant the use of PPE by individuals applying and for those individuals to avoid being in the direct spray, I would advise that as many of the collection animals as possible be kept inside during spraying and for two hours after, to account for spray drift. Based upon information provided at the below website, I feel there should be no issue for our trout, koi, or alligators in their aquatic pools if incidentally sprayed. Residue in drinking/bathing water, on food, or in enclosures should not be an issue for collection animals.

<http://pmep.cce.cornell.edu/profiles/extoxnet/24d-captan/bt-ext.html> . Accessed 12-10-15

Ideally, application at night would minimize exposure of our honeybee colony, guests, employees, and many of our animals normally brought inside at zoo closing. We recognize that native wildlife on zoo grounds would be directly sprayed, including non-targeted butterflies and moths (Lepidopterans). Studies indicate that targeted application does not affect Lepidoptera species population numbers, and there are no listed threatened or endangered Lepidopteran species on Cheyenne Mountain Zoo grounds.

Sincerely,

Eric Klaphake, DVM, DACZM, DABVP (Avian Practice), DABVP (Reptile/Amphibian Practice)

Associate Veterinarian, Cheyenne Mountain Zoo

