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May 16, 2019

Public Comments to the IPM Advisory Committee

Good Morning Chair and Committee members:

My name is Susan JunFish and I direct Parents for a Safer Environment. We have worked to support the implementation of a robust county IPM program for over 14 years. I will provide you with how PASE ended up becoming so committed to the county's IPM program when the new IPM Coordinator is hired.

Today, I would like to summarize those items we ask that this Committee implement as promised in past meetings in order to provide accountability, transparency, and collaboration of the county's IPM program.

1. The Committee agreed in 2018 that a subcommittee would be created to receive recommendations and select 4 to 5 expert speakers selected to present each year. There is still no transparency on how the speakers are being selected to date and it's May, 2019. Chair, when will this subcommittee be created as promised and when will we get transparency? Allowing two individuals, even if it's the IPM Coordinator and the Chair, who do not disclose the process in which speakers are invited or rejected is not acceptable. This would not be an issue except that there have been speakers who provide disengenous data like the LD50 acute toxicity charts without explaining that this does not address chronic toxicity like cancer and telling the Committee that caffeine, aspirin and salt are more "toxic" than pesticides. Also, having a speaker who has no expertise in toxicology and funded handsomly by the pesticide industry invited to convince the Committee that glyphosate being categorized as a carcinogen by the WHO IARC was political and not due to the weight of the scientific evidence was not only irresponsible but unethical. Selection of the presentation committee needs to get on the agenda asap.
2. Currently, the county's IPM website is far behind in being current. Specifically, there is no annual report, whether the 2018 report that was recently approved, or any of the older reports. As Shirley Shelangoski has presented several times in the past years, the website is far from being transparent and informative. Please place this item on the agenda so that there could be clear delineation of the timing and what documents should be on the IPM website for the benefit of the new IPM Coordinator. Second, the most recent pesticide usage by county depts. is dated as FY 14-15. We need to upload the FY 17-18 usage spreadsheet. It's sad that even PASE's website has that document uploaded. It took only 5 minutes and there's no reason to not have these documents on the website as agreed in past IPM Advisory Committee meetings. Third, all the pesticide use reports can easily be uploaded as one pdf file. They should be available for the community to see.

Finally, it's clear that pesticide treatments that can expose people are not all being posted online as the policy instructs. This Committee can also include this topic on the agenda and work with the county programs to see how to streamline the posting online by staff since there are hundreds of treatments annually, with a significant fraction occurring where people recreate or have foot access per the county's policy to post.

To summarize, to support the next IPM Coordinator to fulfill her/his job duties, please place agenda items on the presenter selection process and members of a subcommittee to do so and updating the website with the most important documents including the annual reports, the pesticide usage spreadsheets, the agenda and minutes from the IPM meetings, and the posting prior to treatments for starters.

Thank you for your work on this committee,
Susan JunFish
Director
Parents for a Safer Environment

PASE's Priorities for Improving the CCC IPM Program in 2019

A	B	C	D	E
Reduce Pesticide Risk in Highest Use Programs	Accurate and Prompt Information Access	Track & Report Least Toxic Alternative Trials for each Program	Accountability & Collaboration With Public	Conduct Outreach and Education to Staff and Community per Policy
<p>1) Phase out or Reduce pesticide usage in areas where people, pets, wildlife, and environment are likely be exposed:</p> <p>a) Rodenticide usage outdoors for ground squirrels - Ag & PWD.</p> <p>b) Herbicides in Grounds & Right of Ways (near county buildings, Flood Control District, Roadsides, vacant lots where kids play, and trails).</p> <p>2) Prioritize phase out of the Highest Toxicity Pesticides, which includes Bad Actors, Hormone Disruptors, and Injunction listed pesticides (endangered/protected species listed pesticides).</p> <p>3) Develop an Approved/Allowed Pesticide List such as those developed by the counties of Marin, San Francisco, and Santa Clara counties. Staff can</p>	<p>1) Posting online of pesticide applications 72 hours prior to application of pesticides as well as onsite at every major entry point before application.</p> <p>County has posted 3/6,000+ applications from 2012 - 2015 <i>online</i> and few <i>at sites</i>, Posted less than a dozen in each 2016 & 2017, although committed to posting since 2009.</p> <p>2) Posting online of pesticide use reports from <u>each program</u> simultaneously as they are generated as required on a monthly basis for county/state.</p> <p>3) Include in annual report, site specific comprehensive tracking of <u>each</u> pest control program's progress through consecutive years, including all methods used. Post progress of pesticide usage by each program</p>	<p>1) Compare the method used by neighboring counties of Marin, S.F., and Santa Clara for the same pest problems. (E.g. burrowing rodents over specific acreage, right of ways weed control acres/miles, public parks numbers/acres for burrowing rodent and weed control; Invasive aquatic and terrestrial weed control.</p> <p>2) Decision Making Flow Chart Docs contain cost info that justify not using safer alternatives. PASE written requests for staff to provide supportable data on cost calculations have not been answered. Costs for Right of Ways weed and Burrowing Rodent control need evidence.</p> <p>3) Investigate and correct county programs such as some Head Start pre-schools not being protected by the County's IPM Policy</p>	<p>1) Each program should have a representative consistently attending IPM meetings. Currently the landscape program is mostly absent.</p> <p>2) Community members on the IPM Advisory Committee should be ones making final choices for the 5 speakers presenting annually. This would be done in a transparent way as to why someone was chosen or declined.</p> <p>3) Chairing the IPM Advisory Committee should be rotated among members who wish to chair. A Scribe should be independent of staff involved with the IPM Program to reduce conflict of interest.</p> <p>4) Provide transparency of IPM meetings. Video record all IPM Advisory Committee & IPM related meetings. Upload to IPM website for prompt & easy access to meetings, track community concerns, increase civility, and</p>	<p>1) Budget and encourage staff to participate in local, low-cost or free conferences on our county's most challenging pest problems sponsored by neighboring counties and municipalities who have eliminated or seldom use Bad Actor and Injunction listed pesticides. Encourage staff and community participation by forwarding announcements to the list-serve. Include community members who sign in at IPM related meetings on the list-serve.</p> <p>2) Provide IPM conferences/workshops for staff and community for those pests that are the most difficult to control and incite the highest usage of pesticides and risk exposure to public health, wildlife, water bodies, and other environmental mediums. Most outreach</p>

