

March 2, 2018

Public Comment to the CCC Posting Policy Task Force

Dear Posting Policy Members:

I wish to highlight Parents for a Safer Environment's findings that the County has posted only three times online in the past three years (per the IPM website) and none onsite, although 6,000 applications were made by the three highest pesticide programs alone: Public Works Rights of Way and Grounds as well as the Ag Departments' Invasives program.

We are glad that "permanent posting" is reportedly being practiced for structural pest control, although we would prefer that crack and crevice treatment should also require posting at the site in order to preclude staff in kitchens and preschools for example, to be able to take precaution in those treated areas as to not contaminate cleaning supplies that can spread the toxic chemicals to other areas and to lower the potential for direct exposure.

Also for structural pest control, since the county has agreed to not use any more rodenticides in the structures, please update the policy so that it states that the county does not use rodenticides.

The community asks that this Committee also address the problem with numerous county programs being housed in rented properties, such as some of the Head Start pre-school programs, which we were told by staff that they are not under the county IPM program and it's too difficult to manage them. PASE members have seen Clark or some other pest control operator at even this building where we meet to discuss IPM, spraying insecticides on a regular basis according to the technician. I have received calls from Head Start employees asking for help that pesticides are being applied where they work and kids play. They won't complain themselves due to fear of jeopardizing their jobs.

For communicating to the public, posting should include chronic toxicity and not just the misleading "signal word" that only refers to acute toxicity, and which is not as much concern for exposure to the public. Chronic toxicity info can be obtained easily from 4 database sources: US EPA, Cal/EPA, WHO and EU. Chronic toxicity data from these peer-reviewed agencies are neurotoxicity, carcinogenicity, reproductive toxicity, developmental toxicity, and hormone disruption. This is a simple task that PASE high school and college interns were trained to do so we trust that our county staff can spend 30 mins of research to assess each product, which has already been done in part due to the Bad Actor Categorization that has been tracked since 2000.

In the case of disagreement from peer-reviewed and published agency databases, it would be up to the community to assess the differences, if any, and the county would only provide the data. An average community member now can access databases that are provided to them using their cell phone and can conduct additional research and can make decisions for themselves only if given the opportunity. One can even create a Quick Response (QR) bar code for scanning by a cell phone that takes them directly to the database.

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"Partnering with Communities to Prevent Exposure to Pesticides and other Toxicants in Order to Protect Children, Pets, Wildlife, and the Environment."