

Priorities for both Public Works and Dept of Agriculture:

- 1. Posting before pesticide treatment at parks, along hiking trails, major intersections of roads, and creek banks where children and pets frequent.** Posting online and at locations that are accessible by children and pets. **Post at least 72 hours prior to treatment on the IPM website homepage and each departmental homepage; and simultaneously as applications occur on-site.** Posting to include: **when, where, target pest, product, amount, expected active period, toxicity properties,** link to PANNA database on the toxicity info for laypersons, **and contact** phone # & e-mail address.
- 2. Demonstrate that for each pest control problem, least toxic alternatives were evaluated and shown to be infeasible first prior to choosing a pesticide.** And show that the least toxic pesticide is chosen for the job required.
- 3. Tracking and Documenting acreage of treatment for each pest control method for each given program and include info on the pesticide use reports in order to adequately track the effectiveness of each strategy and be transparent with data to the community.** A summary should be provided in the annual report tracking trends for each program from year to year for 6-7 years. Good example is the Santa Clara County Annual Report.
- 4. Investigate trapping of burrowing rodents in open space and parks with an expert trapper** and have an expert provide training to staff and/or work together with staff to capture burrowing rodents. We are the only county among S.F., Marin, and Santa Clara counties still using rodenticides in open space.
- 5. Post onto the IPM website, *Pesticide Use Reports* for each separate Program upon Reports being submitted to the county/state monthly.** Providing Reports online for public and staff review would help save time for both staff and community members who review and conduct calculations on the data every year. Community members have often received Reports far beyond the required 10 working days limit and have received the incorrect set of records.

Priority for the Dept of Agriculture and the IPM Advisory Committee:

- 1. Comment on the landmark Kestrel feed study and PfSE's Draft LD50 document** submitted in January 9th, 2013 and earlier, showing that a bird of prey, Kestrel, can die from secondary poisoning from eating a small mouse having consumed diphacinone poisoned bait.

Priorities for the Public Works Dept:

1. **Special District Division should solicit contractors to bid for maintaining the county parks with the highest rating given to those with a track record of demonstrating IPM implementation** that includes monitoring pests, tracking the progress of the program, which naturally results in the reduction of unnecessary pesticide usage. The current contractor using rodenticides in numerous county parks has had no such requirement.
2. **Special District should require any contractor to demonstrate that pesticides such as rodenticides being used in parks is the only option.** There are traps/euthanizing and CO2 asphyxiation methods that are cost effective and do not impose the higher risk of using rodenticides in parks.
3. **Maintenance Division should notate in their pesticide use reports whether treatments are for roadsides or for the flood control district in order to increase transparency and enable tracking of pest control methods' effectiveness.**
4. **Maintenance Division should demonstrate that half-lives of pesticides are considered prior to treatment.** If half-life time surpasses the time before a forecasted rainstorm, adjustment of the treatment plan is necessary to decrease risk of significant run-off and harm to the ecosystem, particularly in the Flood Control Channels.
5. **Maintenance Division's Decision Making tree that compares the use of herbicides vs. goats need to include many missing costs of herbicide treatments** including permitting requirements among other missing costs.
6. Public Works Dept co-authored a study with the 2004 SFEI study that concluded on page 36 that goat grazing costs 20% less than herbicide treatments for terrestrial weed control. **Maintenance Division needs to explain why the 2004 study concludes that grazing is cheaper than herbicide treatments but its 2013 Decision making tree says it's multiple times more expensive to graze.**

Priorities for the IPM Advisory Committee:

1. **Recommend that the by-laws require a 5-year moratorium or cooling-off period before members can receive payments of any type from the departments with whom they have served** in order to decrease conflict of interest while serving on the Committee. This includes payments from the Public Works Dept, Dept of Ag, and the Health Services Dept.
2. **Evaluate the 2009 and 2013 IPM Ordinance issue documents written by the IPM Coordinator and County Counsel and request the Counsel to provide specific responses to PfSE's document of 2013** that referenced the two errors

in citations of the county and state statutes/laws, leading to false conclusions that an IPM Ordinance is both illegal and not implementable.

3. **Develop an Approved Pesticide List such as those developed by the SF Dept of the Environment and other counties** and include the Bad Actors and many of the Bay Area Pesticide Injunction listed pesticides as priority to phase out. This would help the departments choose amongst least toxic alternatives for a given program and prioritize the phasing out of the more risky treatments.
4. **Recommend that all IPM Advisory Committee, Subcommittee, and IPM presentations at TWIC meetings are recorded by camcorder and uploaded onto the IPM website** in order to provide quick references to meeting minutes, increase civility, and track concerns of the community and follow up by the county.
5. **Recommend reporting of TRI developmental toxins as Bad Actor pesticides, as provided in the PANNA database. These are not being properly identified thus not being included in the county's report as Bad Actors.** In addition, include the list of the 5 categories of these highly toxic pesticides in the county's "Summary of CCC Pesticide Usage" spreadsheet that highlights "bad actors" without a definition.

Priorities for the IPM Coordinator:

1. **Conduct outreach and education to staff and the community per the IPM Policy at minimum by promoting least toxic alternatives** such as the anti-rodenticide campaign being done by neighboring counties. Work with pre-existing programs like Our Water Our World, County's Clean Water Program and Parents for a Safer Environment by supporting outreach and education to the community and staff.
2. **Participate in a conflict resolution mediation program with Parents for a Safer Environment Steering Committee members to help increase cooperation, collaboration, and productivity.**
3. **Focus on assisting departments investigate successful pest control programs of neighboring counties who have eliminated the pesticide intensive programs and have turned to least toxic alternatives.**
4. **Determine whether our PWD and Ag Dept apply more pesticides and Bad Actors than that of neighboring counties of Marin, S.F., and Santa Clara Counties *combined* for addressing the same pest programs.** E.g. burrowing ground squirrels over specific acreage, right of way weed control acres/miles, public parks numbers/acres for burrowing rodent and weed control; Invasive aquatic and terrestrial weed control in acres of land/water.

5. **Provide an annual report that provides comprehensive tracking of each pest control program's progress**, including the quantity and the toxicity category of each pesticide used, the area treated and exposure risk for human and wildlife, and show the breakdown cost of each program.