

Resubmitted on Feb. 17, 2016

November 4, 2015

Public Comment

I thank the staff and volunteers who have spent the time to investigate alternatives and worked to reduce pesticide usage in our county.

In the staff document provided titled 2015 IPM Program Accomplishments, I was very surprised to read that staff believes after reviewing programs throughout the "Bay Area and the nation," that "there is nothing unique or innovative in the Bay Area or the nation." I see a very serious innate problem with this type of perspective. For one, carbon dioxide asphyxiation for controlling burrowing rodents is a highly successful alternative to rodenticide usage that is very risky for secondary poisoning of predators. The City of San Jose is working with this innovative method among many other municipalities. Marin, San Francisco, and Santa Clara counties use trapping and innovative and efficient methods to make it efficient. Please delete this sentence and consider the impact of what thinking this way would do for your motivation and others in seeking alternatives that are constantly being developed throughout the region, the U.S. and throughout the world.

Even former Public Works staff, Chuck Jeffries reported to the IPM Advisory Committee years back that the City of Palo Alto was having success using an innovative method in keeping burrowing rodents away from protected areas by using simple fabric screens that provide the illusion of blockages that deter them from burrowing in that direction. After his report, I was surprised that there was no follow-up by staff to discuss this method working elsewhere and pilot it in our county.

Looking at the agenda, it appears that you will be going through the annual practice of prioritizing the topics in which the Subcommittees of this Advisory Committee would address in more detail. Please consider where the largest amount of pesticides are applied and where applications are causing the highest risk to the public, pets, wildlife and the environment. I hope you each continue to stay on point to help decrease the pesticide usage by county programs. I hope that you are interested in investigating yourself and asking questions to staff about what alternatives are being tried and used successfully elsewhere.

I thank you for your work and hope that you keep on point to reduce the usage of pesticides in our county pest control programs.

Susan JunFish

Community's Priorities within 5 Categories for Improving Contra Costa County's IPM Program in 2016

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<p>Reduce Pesticides in Highest Risk Programs</p>	<p>Accurate and Prompt Data Access</p>	<p>Track & Report the investigation of IPM methods for each program being successfully utilized in neighboring counties and justify ours.</p>	<p>Reduce conflict of interests and encourage civil conduct by staff, community members and the Committee.</p>	<p>Conduct outreach and education to staff and the community per the IPM Policy at minimum by promoting least toxic alternatives.</p>
<p>Phase out pesticide usage in areas where people, pets, wildlife, and environment will likely be exposed: 1. <u>Rodenticides in open space & county parks.</u> - Dept of Ag & Special District Programs. 2. <u>Herbicides in Grounds & Right of Ways</u> Programs. (near county buildings, Flood Control District, Roadsides, vacant lots, and trails).</p>	<p><u>Posting online of pesticide applications</u> 72 hours prior to application of pesticides as well as onsite before application.</p>	<p><u>Compare the quantity and the type of pesticides being used by neighboring counties of Marin, S.F., and Santa Clara Counties for the same pest problems.</u> E.g. <u>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.</u></p>	<p>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.</p>	<p>IPM training requirements are mentioned over 4 times in the county's IPM policy. campaigns targeting county staff, businesses and residents by working with successful programs from agencies like Our Water Our World, Stopwaste.org, Bay Friendly Landscaping, San Francisco, Marin, and Santa Clara counties, City of Palo Alto and Berkeley and Parents for a Safer Environment by supporting outreach and education. The 3 counties have free anti-rodenticide campaign materials.</p>
<p>Prioritize the phase out of the Bad Actor and Federal Injunctions related to endangered/protected species listed pesticides as priority when feasible.</p>	<p><u>Posting online of pesticide use reports from each program as they are generated on a monthly basis for County/State.</u></p>	<p><u>Contractors conducting pest control should be evaluated annually by the IPM Advisory Committee and contracts bid upon and assessed for a strong IPM track record.</u> The Public Works Dept's Special District currently has on its payroll, a contractor who did not have to bid with IPM experience as a criteria and uses only rodenticides, including 2nd generation in public parks.</p>	<p>Evaluate the 2009 and 2013 IPM Ordinance issue documents written by the IPM Coordinator and County Counsel and have Counsel provide specific responses to PASE's document of 2013 that referenced two erroneous citations of county and state statutes/laws, leading to false conclusions that IPM Ordinance is both illegal and not efficacious.</p>	<p>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>

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<p><u>Develop an Approved Pesticide List</u> such as those developed by the counties of San Francisco, Marin, and Santa Clara counties. This would help the departments choose amongst least toxic alternatives for a given program and prioritize the phasing out of more risky treatments.</p>	<p><u>Providing public records review requests</u> within the legal 10 business days.</p>	<p><u>Investigate possibility of non-IPM maintained county buildings/sites adopting IPM methods.</u> Currently, pesticides are used outside the auspices of the County IPM program in many buildings, including the Hazardous Materials building and the County Admin building.</p>	<p><u>Recommend that the Committee by-laws require a 5-year moratorium or cooling-off period before members or their affiliate organization(s) can exchange payments and gifts of any type from the departments with whom they have served.</u></p>	<p><u>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.</u> and risk exposure to public health, wildlife, water bodies, and other environmental mediums.</p>
	<p><u>Include in annual report, site specific comprehensive tracking of each pest control program's progress through consecutive years, including all methods used.</u></p>	<p><u>Use of PSP (inmates) or WWP (alternate work program) or Conservation Corps in reducing cost of non-chemical methods.</u> Town of Moraga has been saving tens of thousands of dollars every year utilizing free labor.</p>	<p><u>IPM Coordinator is encouraged to contact community by e-mail rather than by phone if wanting to cross-examine those making public comments and refrain from pressuring community members to retract public comments.</u></p>	
			<p><u>Chairing the IPM Advisory Committee should be rotated among members who wish to chair.</u> <u>A Scribe should be independent of Committee members and staff involved with the IPM Program.</u></p>	