

## Public Comment

September 15, 2016

For Decision Making Subcommittee  
of the CCC IPM Advisory Committee

On behalf of Parents for a Safer Environment, I thank Chair Sutherland and each of the Subcommittee members for their diligent research and sharing neighboring counties and methodologies to reduce herbicide dependency on roadsides and flood control districts. We are also glad to see that the Subcommittee is taking a closer look at how the Special District program is managing pests and expecting better transparency from both staff and its contractors.

Upon reviewing the March 1, 2012 letter from Susan Cohen to Jon Jon Katyanagi Landscape & Pest Control, I found the letter requiring the monitoring and evaluating least toxic alternatives for plant diseases consistent with the county's IPM Policy. However, I found three serious **problems with the directive of the letter.**

1. Rodent control, its monitoring, and evaluations of least toxic methods is missing or unclear.
2. Although the contractor is instructed to receive approval prior to any pesticide treatments throughout the letter, the process including to whom the contractor is to receive approval for treatments, is missing altogether.
3. Under the last Header, "Chemicals," the description of the toxicity of pesticides is very limited and misleading, perpetuating the common error of considering only acute toxicity, by mentioning only LD50 values, a measurement that only considers immediate death and not chronic illnesses that is the predominant concern by the community such as cancer, reproductive/developmental toxicity, and hormone disruption to mention a few.

The letter contains bold font headers of Monitoring; Treatment; Methods, and No herbicides, insecticides, fungicides, rodenticides, or other pesticides shall be applied without prior review and approval of the County; Herbicides, Fungicides and Pesticides; and Chemicals. I found the organization of this letter difficult to understand and therefore its directives often confusing. It's a good start however.

The most concerning issue of this letter is that it leaves out monitoring requirements for rodents. I do not know if this was intentional or in error. It is very easy to interpret the letter to NOT require that rodent and its control requiring monitoring and evaluating of least toxic measures prior to choosing rodenticides. The directive and specific instructions provided for plant disease control are clearly delineated under the Monitoring and Treatment sections and rodents left out altogether.

It is also not clear who the contractor would receive approval from when the letter repeatedly states that "No...pesticides shall be applied without prior review and approval from the County."

Rodents are referenced under the "Methods" section with only one line that states, "Moles, squirrels, and gophers shall be controlled by approved methods. Poison baits, if used, must be placed so as not to create a hazard to children or pets." This statement and the section "No herbicides, insecticides, fungicides, rodenticides, or other pesticides shall be applied without prior review and approval of the County" are primarily boiler plate language that states that almost any method that is legal may be used by the contractor.

Under the last "Chemical" header in the letter, there are numerous undefined terms and not established figures that need to be elaborated upon such as directing the Contractor to "only treat with chemicals when pests are greater than control threshold levels" Are thresholds for each pest defined by the county and contractor?

The letter states that "The toxicity of pesticides is expressed as LD50 (lethal dose). The lower the LD50, the more toxic the chemical. Generally, chemicals with an LD50 of 500 and above are preferred. Highly selective pesticides with minimal residual properties shall be used, and broad-spectrum, long residual materials shall be avoided where possible." How was the LD500 recommendation determined? How would the Contractor know what the residual properties are and how to look it up? Even our county staff have expressed that they had no idea how to find this data at our IPM meetings.

On behalf of Parents for a Safer Environment, I request that the county provide Jon Katyanagi Landscaping Company an updated IPM requirement letter that provides more clarity on the 3 issues delineated above.

Yours,  
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