

January 19, 2017

Members of the Contra Costa County IPM Advisory Committee,

My name is Priscilla Witt and I am here as a new member of Parents for a Safer Environment's Steering Committee. I am also a member of a national organization, Holistic Moms Network – the Mt Diablo chapter. I live in Lafayette with my family that includes 3 children who inspire me to work to make our environment healthier so they have a chance to grow up to be healthy adults.

I am very interested in seeing our county adopt an IPM Ordinance (a law that holds the staff more accountable) like that of Marin, San Francisco and Santa Clara Counties so that our staff know that the people of this county take pesticide usage very seriously.

I am also interested in seeing this county adopt an Approved, Limited, and Restricted list of pesticide toxicity categories, not pesticide products. This would help ensure that staff do not introduce pesticides without consulting the IPM Manager and refrain from using the highest risk pesticides in areas of potential exposure to children and other users. The Moraga Unified School District has such a list that I am submitting to you today. It is not a list of banned pesticide products but categories of toxicity that would be restricted such as known and probable human cancer causing chemicals. This list would require staff to show that safer alternatives were attempted prior to using the Limited categories and restrict them from using the most dangerous and unnecessary ones where children and other users can be exposed. It also provides an approved category like self-containerized insect bait stations, (never rodenticides), and other methods that impose little to no risk to users and the environment.

Thank you for your consideration of my public comment and request for our county to create safer public buildings, parks, trails, open space, and water that meet the standards of our neighboring counties at minimum.

With Optimism,

Priscilla Witt  
Lafayette Resident

### **Approved, Limited Use and Banned Products List**

1. Approved Products List shall include but not be limited to: insecticides, baits and traps; caulking agents and crack sealants; borates, silicates, and diatomaceous earth; soap-based products; Natural products on the Federal Insecticide Fungicide and Rodenticide Act (FIFRA) 25(b) list [40 C.F.R Section 152.25(g)(1)] or the California Certified Organic Farmers organic list; cryogenics, electronic products, heat, and lights; biological controls such as parasites and predators; pheromones and attractants for traps and physical barriers.

#### 2. Limited Use Products

A pesticide applicator or district staff may submit a written request to the IPM Committee that a particular pesticide not on the Approved List be approved for use for a specific and limited purpose. Limited Use Products may not be pesticides on the Banned Use List. The request must be reviewed by the IPM Committee, signed by the IPM Coordinator, and approved by the Board. The IPM Committee may grant a limited use exemption, not to exceed three months, upon finding that the pesticide applicator has: identified a compelling need to use the pesticide; made a good-faith effort to find alternatives to the particular pesticide; demonstrated that effective, economic alternatives to the particular pesticide do not exist for the particular use; and developed a reasonable plan for investigating alternatives to the pesticide in question during the exemption period.

#### 3. Banned Use Products List

The following high health risk pest management products will not be allowed on the Approved List: rodenticides, pesticides linked to cancer, (US EPA Class A, B and C carcinogens; World Health Organizations listed carcinogens, and chemicals known to the state of California to cause cancer under Proposition 65); pesticides that cause birth defects or reproductive or developmental harm (identified by the US EPA or known to the State of California under Proposition 65 as reproductive or developmental toxins); Pesticides that interfere with human hormones; Pesticides classified as Acute Toxicity Categories I and II by US EPA: Carbamate or organophosphate pesticides; and foggers, bombs, fumigants or sprays that contain pesticides identified by the state of California as potentially hazardous to human health (CFR 6198.5).