

October 12, 2017

Public Comment for  
CCC Decision Making Subcommittee of the IPM Advisory Committee

RE: **Draft Public Works Decision Making Document for Flood Control Channels: (boldened were read during the comment period).**

**Please respond to my questions and suggestions to the draft FCD Decision Making Document** prior to the next Decision Making Committee meeting and approving it. You can send your response to Susan@pfse.net:

**1) Management Goals:** Draft has no mention of using the least toxic method for weed control in order to decrease pesticide contamination to the water, aquatic organisms, wildlife, and to human health. Risks are from hi-line pesticide treatment as well as from leaching from the treated areas into the water upon rainstorms. How about risk to applicator's long-term health conditions? One published study found that applicators even donned with personal protective equipment had 2,400% higher 2,4-D herbicides in their bodies after application as compared to before treatment.

**2) Is this a sensitive site?**

3<sup>rd</sup> box states, "is THIS part of any of the court-ordered injunction?" The more accurate question would be, "Are any of the listed pesticides in the Injunctions used by the county at this site?"

**5<sup>th</sup> box asks, "Is it on or near an area where people walk or children play?"**

***Currently it states that "The Division does not manage pests on or near established trails. In cases where established trails exist along flood control channels (The walking trails on areas of Walnut Creek, Marsh Creek, and Wildcat Creek) they are situated above the creek slopes, and the Division does not use pesticides on or near the trails. In general, the public is not allowed on access to the slopes or waterway within these environments in the water."***

When we conducted the pilot trial of grazing goats along the Flood Control District portion in Pinole Creek adjacent to Collins Elementary School, we saw children walking along what they would see as the wide dirt trail that leads from the neighborhoods and sidewalks to the schools. Contrary to what the Decision Making Document states, most of the naturally occurring creeks that encompass about 70 miles of the Flood Control District system have no fencing nor posting to keep people out. They are in fact welcoming, being connected directly to neighborhood sidewalks with often bridges for pedestrians. I saw people with strollers, walking dogs, and will bring photos of children walking along those trails so that you can see how misleading the statement in the Decision Making Document is that needs to

be deleted that the Flood Control District is off-limits, fenced, and illegal for people to utilize as walking trails. The fenced areas are the man-made structures that have steep & slippery slopes made of cement where people and animals have been known to drown. Pesticides are seldom utilized in these man-made structures since weeds cannot grow on slabs of cement. Any reference to treatments implies treatment on naturally occurring creek banks and this needs to be reflected in the document. I will bring and submit photos to the next meeting.

\* Please provide a map showing all the treated flood control district locations with herbicides, grazing, and/or other alternatives.

**8<sup>th</sup> Box:** “Is it near desirable trees or landscaping? Yes. There are some flood control access roads that are near residences.”

**Being near residences is a more crucial issue to address. How about, “Are there residential areas, schools, and other areas nearby with sensitive receptors?”**

3) Which cultural controls were considered? (3<sup>rd</sup> to last paragraph before conclusion):

I would question the assertion that herbicides are required to maintain the restoration planted areas, *“Native grasses and sedges can potentially out-compete non-native broadleaf weeds and annual grasses, but they do require maintenance assistance from herbicides. The Division, at the request of The Restoration Trust, spot treats the area with broadleaf herbicides to reduce competition and provide the native plants with an advantage. The Division also provides hand and mechanical mowing, as requested.”*

*“The Restoration Trust will monitor these plots until 2018 to assess native plant survival, the degree to which they compete with the non-native annual species, and the relative success of seeding versus planting plugs.”*

Weeds can be flagged and later pulled out by alternative labor or spot-treated with steam or electro-thermal weeding techniques.

Steamweeding (Weedtechnics):

It is our understanding from Weedtechnic's Director, Jeremy, that seedbanks actually become diminished using the steaming, working systemically and treatment needs diminish over time. There is a video online with the University of Colorado making this statement. Steaming method is ubiquitously used by public agencies in Australia where the system was developed, and now New Zealand is also using this. [Jeremy@weedtechnics.com](mailto:Jeremy@weedtechnics.com) or 1-888-783-2655.

Please consider investigating this method as a potential tool.

UC Boulder video interview: [www.weedtechnics.com](http://www.weedtechnics.com) David Lawson (contact : 303 265 1215) found reduction of seed bank and less follow up work after treatments.

The university has 3 machines that are on a trailer, small truck, and ATV mounted. SW700, SW800 and SW900. They use them for hand held applications mainly.

Weedtechnics recently added 4'boom applicators that will be suitable for weed abatement along trails. Large organic farms are utilizing the 4' long booms.

Cheryl Wilen, extension officer from University of California, Agriculture & Natural Resources Program (UCANR) Statewide IPM Program, piloted Weedtechnics for Long Beach United Schools District (LBUSD) and recommended its usage. They are in the process of working with LBUSD and a couple of other school districts.

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#### Electrothermal weeding (Rootwave of Ubiquetec):

We contacted Ubiquetec to confirm that the county's conclusion on its limitations are accurate. Andrew Diprose, the Managing Director, advised some corrections to the Decision Making Document as follows:

“ There are some incorrect facts here (3,4,5kV, not 30kV), and I believe incorrect assessments (we are also quicker than manual weeding). There have also been plenty of (positive) independent evaluations of the methods, but nothing published. We are a start-up, and have no public agencies using at the moment, only private companies. Like a chainsaw or a flame weeder, used incorrectly, the technology can be lethal, used as designed, and it is safe. We insist that everyone has operator training. “

Goat Grazing: A study that was funded over a million dollars (per SFEI staff) was conducted by the SF Estuary Institute, Blankinship Associates and Contra Costa County Public Works Dept in 2004 concluded that goat grazing was 20% less expensive than chemical control of weeds along the flood control district in our county. Perhaps the county's more recent cost analysis did not consider permits and licenses and training required for spraying? How about Equipment, repairs and not just pesticide purchase? I am submitting the cover and pages 78-83, where this expensive study concluded that grazing is a more economical method.

This does not even include the health risk and costs to staff who apply pesticides.

**4) I ask that corrections are made in the document in order for both staff and Committee members to make better decisions on least toxic and feasible options. Please provide a written response to the information that was provided to us by the Weedtechnics and Ubiquetec and the Ventura County Dept of Agriculture who calculated that goat grazing cost only 50% more, not over 2000% more as CCC Dept of Ag calculated**

In the methods used to treat with herbicides, Hi-line pesticide application is not mentioned, although this is the most common method from my understanding.

**Table 1: What is the breakdown for total cost for all acres treated?**

This table also indicated 152 acres of FCD ACCESS ROADS are chemically treated. I will bring photos showing how these "access roads" are used as trails and are connected to sidewalks and welcoming to pedestrians. The decision making document must be corrected.

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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."*