

March 2, 2015

To: TWIC co-chairs Supervisor Mary Piepho and Candace Andersen

From: Shirley Shelangoski, Parents for a Safer Environment

TRANSPARENCY ISSUES REMAINING

- 1) The Community requested to have IPM related meetings recorded to achieve accurate meeting minutes that reflect what actually happened at the meetings and to encourage professional behavior. Even the former Agriculture Commissioner, Vince Guise, stated that he would be amenable for the meetings to be audio taped. Audiotaping is not very difficult and it could simply be uploaded to the existing county's website as links to each meeting without any editing.
- 2) Posting is still not done in most treated areas where people have foot access and where they recreate per the CC County's Posting policy. Right of ways used as pedestrian trails and trails in open space areas where people recreate are not posted despite photos showing use by school children on a daily basis.

Also, posting on the website has been promised several times in the past year, the latest date being August 24, 2014. The community has not received any updates on why posting is not being done on the website.

- 3) The county continues to omit tracking of certain "Bad Actors" and still is underreporting usage of the most toxic pesticides, which Susan will cover in more detail.
- 4) The county is not tracking pesticide usage separately for each distinct program, a key feature of any IPM program. The Public Works Department programs, Flood Control District and Roadside weed control, are being combined and reported as Right-of-Ways. These are distinct programs and effectiveness of these pesticide-dependent programs cannot be evaluated without pesticide tracking, a key component of IPM. Mainstar technicians have said that data from two programs combined into one spreadsheet would be simple to separate since Mainstar like all databases, are designed to sort and query data. All the county has to do is ask. So why does our county not ask? We do not see any good reason why pesticide usage is not being provided to the community for each roadside and flood control programs.
- 5) The decision-making documents are a good start and the community would like to see the data that was used to calculate costs for programs that rely on pesticides. This includes weed control in the right of ways and for ground squirrel control program in open space and their alternatives. I believe that the TWIC co-chairs as well as the

community have been asking for this data or matrix for years. We need transparency on how final dollar figures were calculated to conclude in the county's flow chart that goat grazing is multiple times more expensive than herbicides spraying when other researchers have calculated that grazing is less expensive than herbicides.

March 2, 2015

To: TWIC Co-Chairs, Supervisors Piepho and Andersen
From: Susan JunFish, PfSE

Re: UnResolved Issues of Accountability in the CC County's IPM Program (as Requested by Supervisor Piepho on December 4, 2014)

1. First, we are very grateful that Supervisor Andersen clearly stated at the December TWIC meeting that she believes that reducing the use of pesticides should be a goal of the county's IPM program. We would like to know if Supervisor Piepho also feels the same. We believe it's past due that the IPM Advisory Committee is provided clarity on this question. And if reduction of pesticides is a goal, then a clarification is due to rectify misunderstandings by members of the IPM Advisory Committee who have been hearing otherwise by staff since 2009.

2. Second, it is very disconcerting to the community that reports going to the Board of Supervisors dismiss the wide body of community expressing concerns and reports also downplay unresolved issues.

a) Examples include reporting in Section VIII of the Triennial Report of the IPM Advisory Board that all issues are "resolved" except for two. The full Committee voted that the Triennial Report Section VII should state that issues were actually "unresolved" when the community believed it to be so. The IPM Coordinator made much effort to convince the full Committee that "resolution" is in the perspective of the Committee and not of the community members who may be intending to stir up conflict. Only a portion of the staff agreed and her N/A answer was over-ruled. In addition, the final Report showed a change from "community members" to Susan JunFish and Shirley Shelangoski although there have been over 25 individuals since 2009 who have presented unresolved issues and over 10 different individuals in the past 3 years who expressed a variety of issues that were unresolved.

b) Dr Susan Kegley provided a special presentation on March 25, 2013 explaining the PANNA database and how to use it to identify Bad Actor pesticides. The staff learned that they have been missing many of the acutely hazard pesticides and reproductive and developmental pesticides as Bad Actors for over a decade. The question of whether to go back and report all the years of missed Bad Actors or just report accurately in the future was debated. Committee members agreed that they would need to begin reporting Bad Actors from that point and forward.

We have not seen any acknowledgement in any of the IPM Coordinator's reports to address the correction, whether reporting to the full Advisory Committee, report to TWIC, or the Annual Progress Report. Instead, county reports state, "Parents for a Safer Environment has requested that additional pesticides be reported as "Bad Actors", but *after studying this request and*

consulting Dr. Susan Kegley, who was instrumental in developing the PAN pesticide database, the IPM Advisory Committee decided that the County will report as "Bad Actor" pesticides only those that are designated as such in the PAN database." The implication here is that the county has not been under reporting and missing Bad Actors in the past. This misleading statement takes no accountability for the serious error made for years and further degenerates the trust between the public and the county.

The county continues to miss Bad Actor pesticides for the reasons that numerous PfSE members and Dr Reeves, a senior scientist representing PANNA have submitted in writing and the developer of the database, Dr Kegley explained at the meeting, including salt forms of Bad Actor parent chemicals and known human reproductive or developmental toxins that are on the US EPA Toxic Release Inventory List that are not being tracked as Bad Actors.

3. Third, In the Fall of 2013, the County decided to use an Administrative Bulletin in lieu of an IPM Ordinance. PfSE has found errors in the County Counsel's documents and provided specifically two questions to the the County Counsel's first 2009 document that was produced with the advice of the IPM Coordinator. To date, the county has refused to answer why for one, only half of a sentence from the county statute was cited, when if cited in its entirety, would have provided the support for exactly the opposite conclusion. Two, how have other counties adopted an Ordinance when our county counsel's 2011 document states that an Ordinance is illegal per the pre=eminent authority of the CDFA.

Numerous PfSE members including myself have requested at least 5 times in public comments and submitted in writing for the county to provide answers to our specific questions about errors we have found in the county's "legal analysis" that refers to an IPM Ordinance as " irrelevant" and "illegal." These county documents were used by the staff to convince the IPM Advisory Committee to not even consider an Ordinance. In addition, a presentation from the Santa Clara County IPM Manager who stated and submitted a written testimony saying that IPM programs are difficult to implement unless an Ordinance is in place was omitted by staff from the meeting minutes entirely. The SF IPM Manager also stated to PfSE that without an Ordinance he would not have the leverage to do get cooperation from staff to cooperate; however for some reason the IPM Coordinator did not pursue inviting him to speak to the Committee after hearing the Santa Clara County's IPM Coordinator. The Marin County Coordinator lost his position after violating the IPM Ordinance, something that will not happen in our county although our county's IPM policy and the Public Records Act have been violated at least on a quarterly basis by staff since 2009. To date, no genuine replies have been provided to PfSE's analysis in response to the county's conclusions. We have only received, "we are staying with our earlier analysis," which the community cannot accept as very transparent nor accountable.

4. Fourth, Reducing Conflicts of Monetary Interest on the IPM Advisory Committee. PfSE has requested a 5 year moratorium on financial benefit to individuals via county contracts or employment after being on the IPM Advisory Committee, which has yet to be addressed. The IPM Coordinator stated in the Response Table that the decision is up to the Board of Supervisors to make. We ask you then, would you support a 5-year moratorium of financial gains for anyone serving on the IPM Advisory Committee in order to deter those vying for seats for monetary incentives? Second, would you be willing to support a prohibition of pesticide salesperson soliciting to county staff? The IPM Coordinator states that staff do not receive and have not been offered gifts from pesticide salespersons. We would like to know how the IPM Coordinator can assume this as stated in the Response Table.

In the Table, the staff states that Michael Baefsky was not a member of the IPM Advisory Committee. Staff omitted that in 2009 he was talking with General Services staff about work while actively participating in the IPM Committee at the time that previously only engaged county staff. The Committee was informed by the Board of Supervisors that community stakeholders would be joining the committee that year. Mr Baefsky although an expert in many aspects, also recommended the use of neonicotinoids, linked to the demise of the Bee Colony Collapse Disorder and adamantly supported its usage and advising the Committee that it was 20x more expensive than the use of biological controls that PfSE recommended. At the urging of Elisa Wilfong of the Clean Water Program, the IPM Coordinator was urged to provide the data that revealed that using the biological control at the contracted site would have cost only \$100 more, far less than what the IPM Coordinator and Mr Baefsky, her former instructor/mentor at the junior college, suggested. The county applied another insecticide with the approval of the IPM Coordinator and did not use the least toxic and effective nematodes that other counties use for grub control on lawns. Other public agencies including neighboring counties report that nematodes are much more effective with one application for the entire season whereas insecticides are not even as effective besides the higher risk to public health, bees, pets, and our creeks.

In a swift decision over 7 years ago, Dr. Walker, Director of the Department of Health Services Director prohibited his staff from inviting and meeting with pharmaceutical salesperson on county grounds and time. Even highly productive and good workers were approving the purchase of unnecessary pharmaceutical products and receiving gifts in exchange such as tickets for sporting events and theater and vacation accommodations. Would you expect staff who purchase pesticides to be any less susceptible than staff working in the Health Services Dept? It's common to hear of Monsanto providing free fishing trips to exotic places to those in charge of large contracts. Reps from pesticide distribution companies are constantly providing incentives for loyal customers. Apparently this is a very expected ritual to receive perk gifts for purchasing

pesticides. Will TWIC be willing to recommend changes to those who purchase pesticides so that they are not allowed to meet with salesmen and also provide a questionnaire asking if they have received any gifts from anyone who is affiliated with companies that have sold them pesticides or pesticide related products and services?

5. Fifth, PfSE member have requested that a non-voting and non-county staff member facilitate the county meetings. After witnessing numerous occasions of the meeting minutes being transcribed inaccurately and in a biased manner, I would also ask that a staff person not responsible in pest control issues be responsible in transcribing and working on the meeting minutes. PfSE members objected to the re-writing of comments, omissions, and other manipulative behavior, and asked for at minimum tape recording of the meeting minutes that can be accessed online so that the staff and anyone else at the meetings can be held accountable for statements and agreements made at the meetings for starters.

PfSE members also feel a lack of good-will and collaboration when the IPM Coordinator references statements by members that were never made. For example, in the Response Table, it states that a PfSE member stated at the February 12, 2015 TWIC meeting that "The IPM Committee is planning to include only 70% of PfSE's priorities as the Committee's priorities for 2014." We would actually be thrilled if this was the case.. however it is not the case (see the 3 public comments made at the meeting and attached as TWIC minutes) since less than 25% of our recommendations for priorities were addressed and almost no tangible recommendations for alternatives were produced from the subcommittees. We would like the county to be accountable and make this correction and list as erratum on all meeting minutes where this Response Table has been provided. It is also difficult for the Committee to make decisions when the county is not providing helpful documents prior to a meeting when decisions need to be on data and not on just staff's recommendations that come with no supportable evidence.

There is more unresolved issues that were covered by Shirley Shelangoski and we will submit additional collaboration unresolved issues as well in the near future. We ask the TWIC co-chairs to convene a meeting with a facilitator who is not county staff, to help resolve these issues that continue to be unresolved.

Sincerely,

Susan JunFish,
Parents for a Safer Environment
Moraga resident
junfish@gmail.com

Jan 9, 2013

From: Susan JunFish, Parents for a Safer Environment, Steering Committee

To: IPM Advisory Committee

Rodenticide usage by the Department of Agriculture in open space and by the Public Works Dept contractors in school yards and other landscaped areas near civilians is not practiced by other counties with IPM Ordinances like Marin, S.F. and Santa Clara Counties.

Our county is endangering pets and wildlife with the use of diphacinone, according to the literature.

Kestrels were shown to be 20-35x more sensitive than non-predatory birds. As low as 35 mg/kg diphacinone showed internal bleeding in Kestrels. Hemorrhaging included liver, kidney, lung, intestine, and skeletal muscles. Authors conclude that Raptors may be at higher risk from diphacinone than understood previously. Please see full study as provided, and also electronically.

~ Rattner et al, Environmental Toxicology, May 2011

All Bobcats that died from a common mite that causes mange were biopsied and found to have rodenticides in their livers. Authors state that the animals may have a lowered immune system from the exposure and thus a natural parasite such as the mite may have been able to overcome the bobcat.

~ Laurel Serieys et al, Journal of Wildlife Management, 2007

The following are the LD 50 for the following animals upon exposure to diphacinone. E.g. the amount (in mg) of diphacinone per kg of animal's weight, to be lethal to at least 50% of a given animal:

- LD 50 in ground squirrels is .5 to 1 mg/kg
- LD 50 in rats is .3 to 7mg/kg
- LD50 in mice is 50 to 300 mg/kg
- LD50 in cats is 15 mg/kg
- LD50 in dogs is 3 to 8 mg/kg
- LD 50 in kestrels is 35 mg/kg

LD₅₀ data from the Cornell University IPM Cooperative Extension Program.

	Oral LD 50	Average weight	Diphacinone needed to kill individual animal	
Ground Squirrels	.5 to 1 mg/kg	.28-.74kg	High as .74 mg	
Wood rat	.3 to 7 mg/kg	.2 - .5 kg	High as 3.5 mg	
mice	50 to 300 mg/kg	.01 - .04kg	High as 12 mg	
Cats	15 mg/kg	3 -7 kg	As low as 45mg	Takes less than 4 mice or 13 rats
Dogs	3.0 - 7.5 mg/kg	> 20 kg eat ground squirrel	As low as 60 mg	Takes 5 mice or 17 rats
Mallard ducks	3158 mg/kg	1-1.4 kg	As low as 3,158 mg	—
Northern Bobwhite	2,014 mg/kg	.15 kg	As low as mg 302 mg	—
Kestrels	97 mg/kg	.08 - .12 kg	As low as 7.8 mg	Takes <1 mouse
Red Tailed Hawk	Predatory birds likely similar	.69 – 1.3 kg	? 67 mg ?	Takes 5 mice or 17 rats or 90 g.s.
Bobcat	indirect death via lowered immune system and inability to overcome stress from mites.	6 – 18 kg		

The endangered San Joaquin kit fox (*Vulpes macrotis mutica*), several endangered species of kangaroo rats, the riparian brush rabbit (*Sylvilagus bachmani riparius*), the riparian wood rat (*Neotoma fuscipes riparia*), and some endangered amphibians and reptiles also are within the California ground squirrels' range, so some squirrel control techniques could impact them as well.

~ UC IPM Cooperative Extension

March 2, 2015

Public Comment regarding item not on the agenda

To: TWIC co-chairs, Supervisor Mary Piepho and Supervisor Candace Andersen
From: Shirley Shelangoski, Parents for a Safer Environment

From: Submitted by Shirley Shelangoski and read by Michael Sullivan during Public Comments.

Re: Why is county staff advising to prioritize weed control this year again when last year staff said it had little herbicide usage problems?

I attended the first Weed Subcommittee of the IPM Advisory Committee on February 17th where the same four staff members from last year's Cost Accounting Subcommittee were present along with two Community members of the Committee.

I was stunned earlier this month when everyone agreed that the Weed Subcommittee should address the Grounds program pesticide spraying. This was after Tanya confirmed that the largest amount of pesticides was applied to Roadside and Flood Control District Programs. PfSE has provided photos of children walking along the Flood Control Channel pedestrian trails close to schools and homes where pesticides are broadcast sprayed and expressing concern for years about exposure to the community in these areas. I am confused as to why staff agreed that that there were no significant herbicides used in the Ground program last year and now want to prioritize Grounds program weed problems this year.

Last year, I attended all the Cost Accounting subcommittee meetings that chose the Grounds Program for evaluation. When members of that Cost subcommittee asked the IPM Coordinator about accessing information on the costs of herbicide usage and the costs to replace with alternatives, Ms Drlik stated that "There are so little herbicides used by the Grounds Program, that it would be a waste of time to address costs of using them." I remember clearly that county staff, Michael Kent, asked the question, ""But isn't that what this Committee is suppose to do, address cost issues of pesticides?" Ms Drlik again insisted that it would be a waste of time to address costs on herbicides since almost none is used and that it would serve the program better to focus on other best practices like water conservation. No one challenged this further and the Subcommittee produced no recommendations regarding any pesticide application program nor mentioned pesticide costs nor that of alternative methods in its final report to TWIC. I am attaching a copy of the report to my public comments.

Now forward to this year's Weed Subcommittee. Several members, both staff

and community volunteers, asked which programs were most likely to expose the public and perhaps the environment to pesticides. It was very apparent that the Subcommittee members did not have the information needed to determine which programs used the most pesticides, the Bad Actors or the most dangerous pesticides where exposure may occur. These questions came up repeatedly and finally it was agreed that the staff should present the information at the next meeting in March. However, the Ms Drlik advised that a decision of what to address should be done that day since waiting for information regarding the pesticide usage in each program would stall the process. So everyone followed the suggestion to evaluate the Grounds Program's weed problems without questioning why it was not worthy to address last year due to insignificant use of pesticides. My hand was raised repeatedly and so were other community members but we were told that they had to move on and I was not able to speak. I sent my concerns in writing to the four staff members present at the Weed Subcommittee meeting and have not received any explanation on this change of perspective of priorities from either Ms Drlik, Ms Cellgren, Mr. Kent nor Mr Godoy.

I would ask that in the future, that the IPM Coordinator provide the information of how much pesticides are being applied for each program, how much of the Bad Actors are also being used and how, so that with the feedback from staff, the Subcommittee can decide which program to choose to evaluate innovative technologies, posting and transparency issues, cost issues, and a decision making process as agreed upon at the January 14th IPM Advisory Committee meeting. This information is **needed by the Subcommittee in advance or at least in time for these important decision making meetings that are time critical.**

Further documentation states the lack of herbicides used in the Ground Program according to the IPM Coordinator, as evidenced by the attachments in the TWIC packet provided to you today dated Feb 17, 2015, a memo to TWIC on the Progress Report of IPM Activities from May to Sept, 2014. It states under item 2. "The Committee...learned that the Grounds Division does not use any insecticides, or fungicides and does not use a large amount of herbicides on county landscapes." Has there been a significant shift since September 2014 that has yet to be reported? I have attended all the meetings and no changes in the Grounds program have been reported to my recollection.

We need to be cautious that we not only focus on least controversial topics but remember that the community depends on staff to tackle those issues that are the most difficult due to having to advise staff of programs on alternatives and which may gather some resistance from staff. **Both staff and community members reluctantly agreed to working on the Grounds Weed Program, expressing that they did not want to repeat what happened last year at the Cost Subcommittee that addressed the Grounds Program. We believe that something is amiss and would like an explanation and/or at least an opportunity for the Weed Subcommittee members to make a decision with data available.**

January 14, 2015

To: Tanya Drlik & CCC IPM Advisory Committee

From: Susan JunFish, Parents for a Safer Environment

Re: Request to address items in documents submitted to the Committee that appears to be erroneous or statements where supportive evidence is not available,

"Background on some of the issues proposed as 2015 priorities for the Committee,"
Jan 6, 2015 :

1. Item #3 states that no former IPM Committee member has contracted w/ the County. In 2009, Michael Baefsky, a community representative of the IPM Advisory Committee received a contract with the former General Services Department according to a document from Terry Mann, former Deputy Director of the General Services Dept . After receiving that contract, Mr. Baefsky's behavior on the Committee changed significantly.

In order to reduce bias and conflict of interest on the Committee, we ask for your support to amend the ByLaws to restrict former voting members of the Committee representing the community from doing business with the departments of the county that use pesticides, namely Public works and Agriculture Departments (General Services has been folded into Public Works Dept).

2. Item #6 states that the county would incur a charge of \$16,720 per linear mile for ground squirrel control if we paid a contractor who charges \$25/squirrel trapped. This is very speculative and we would like to see the county take bids from trappers and share the proposals with the Committee.

3. Item # 8. The document states that the Santa Clara County's use of trapping for their ground squirrel problem is very limited in park areas and not for roadsides. This statement can be misleading. I interviewed the Santa Clara County's IPM Manager to get clarification. He stated the following:

Santa Clara County uses only traps in 47,000 acres of open space that includes 29 county parks. Their parks are both natural resource areas (open space, not managed park lands.. only managing invasive weeds) and recreational areas. They also use only trapping at all correctional facilities, all buildings, and their 2 airports comprising of 700 acres. They also use only trapping in the right of ways (this includes park trails, infrastructure next to roads, bridges).

Please make corrections on the background document so that it more accurately reflects the facts. Thank you in advance.

Public Comment to the County Pesticide Committee
January 9, 2013 meeting

Good Morning, my name is Renee Adams and I'm a resident of Orinda and an active grandmother of many children. I would like to see all children have the best chance to grow without being in harm's way of unnecessary pesticide spraying and that's why I'm here.

We are the only county among Marin, San Francisco, and Santa Clara Counties that continue to broadcast spray pesticides along 70 miles of creek banks in the flood control district for weed control. When will this practice stop? I hope this year because I do not want to worry about my grandkids getting exposed to pesticides by playing along creeks.

Parents for a Safer Environment has documented the toxicity of the herbicides being used by the Public Works Department. We are damaging the ecosystem by the broadcast spraying.

Can't we at least stop this type of practice that is guaranteed to contaminate the water, drift into the nearby businesses, residential neighborhoods, and schools that are lined alongside the flood control districts by only a few yards of distance from the spraying?

We can at least spot spray and provide a larger buffer zone from the waters like other counties do when they spray at all which is rare compared to our county. At least until we move away from pesticides.

We are thankful to the Flood Control District that at least they have worked with Parents for a Safer Environment on our 400 goat grazing field project along Pinole Creek that resulted in showing that goat feces do not contaminate water downstream unlike cattle feces. We wish to see that goats are utilized right along flood control districts as a least toxic alternative to herbicides as soon as possible as it is being done in Cheyenne, Wyoming throughout the year.

Better yet, let's think long-term, and pilot restoration projects along the flood control district creek and channel banks with native grasses that compete out unwanted vegetation so we can get off the un-ending need to use up county's resources on expensive maintenance for weed control. If other counties like Yolo and Santa Clara can conduct sensible restoration projects, so can we! My understanding is that community groups are doing this in Walnut Creek. If volunteers can do this, why can't the county work with volunteers to do more restoration projects for a more sustainable and permanent fix?

Bearing witness to the risk being imposed upon our county's community, wildlife and the environment is not very pleasant. I much rather enjoy spending more time with my grand kids but until the county makes significant changes in the pest control programs, I will continue to express my concerns to the county and to help my community become aware of these serious county pesticide dependency problems.

January 9, 2013

To: IPM Advisory Committee

From: Shirley Shelangoski, resident of Contra Costa County, Parents for a Safer Environment Steering Committee member.

Good morning members of the Committee and Happy New Year! My name is Shirley Shelangoski and I am a Pleasant Hill Resident and on the Steering Committee of Parents for a Safer Environment as well as on the Board of various organizations and state political campaigns. I'd like to provide a summary of priorities that Parents for a Safer Environment would like to see receive immediate attention in 2013.

First, please accept a copy of this letter from Pesticide Action Network's (PAN) senior scientist, Dr. Margaret Reeves. In summary, it states she has reviewed the Contra Costa County's Pesticide Use Summary Table and concludes that our county is misidentifying and under reporting Bad Actor pesticides. The county is omitting highly acute toxins and salts of bad actors because the PAN database is not being read correctly. Please accept this letter and immediately address the errors that are currently reported on the Contra Costa County's Annual Progress Report for fiscal year 2011-2012.

Parents for a Safer Environment has calculated in 2011 that over 30% of Bad Actors are not being reported. Under reporting the application of Bad Actor pesticides provides a false sense of security and is misleading. This should be a high priority, to make these corrections and resubmit to the IPM Advisory Committee for review before updating the Annual Progress Report.

Two, phase out Bad Actor pesticides by the end of 2013 and eliminate the use of all rodenticides immediately. We ask that rodenticide usage be immediately replaced with trapping as practiced in other counties. This should be a top priority to stop practices that both endanger and kill our wildlife. We are shooting ourselves in the foot by killing off the very predators that would control ground squirrels as nature intended.

Three, we ask that Pestec cease the use of all glue traps for rodents. Parents for a Safer Environment interviewed each pest control operator that bid for the structural pest control contract in 2009 and convinced the county staff to not choose the lowest bidder but instead choose Pestec since they assured us that rodenticides and glue boards would never be used. We are pleased with Pestec's performance overall and ask that any use of the glue boards be immediately eliminated and that Pestec provides a written statement by e-mail stating when this practice has ceased.

Four, demonstrate that for each pest control problem, least toxic alternatives were evaluated first prior to choosing pesticides. We want to see the matrix of non-chemical alternatives that are working in other counties and documentation showing sincere attempts by our staff to implement them. Any program claiming to practice IPM would provide this information particularly when pesticides are selected to be the solution.

Five, require all contracts for pest control operators to include IPM language and requirements and award contracts to only those vendors with a strong IPM track record and references. The Public Works Department's Special District has hired contractors who have been using rodenticides in landscaping in the past two years at least. Currently, their contracts include no IPM requirements. We ask that the Committee

recommend immediate cessation of rodenticide usage by the Public Works Dept contractors.

Six, provide posting requirements that are at least as protective as neighboring counties who implement IPM programs, including the identification of products applied at the site. We thank Dan Jordan of the Public Works Program who worked to set up notification of sprayings on the county's website. I am submitting a copy of the posting requirements of three other counties besides ours that the staff have drafted. Instead of being the least transparent and accountable, our posting policy can be a leading example.

Seven, please support a permanent public health expert seat on the IPM Advisory Committee by converting this current substitute seat into a permanent seat. A Public Health expert such as Dr Myrto Petreas should not be a substitute but be an equal member of a fully participating and voting IPM Advisory committee. This expert would be able to assess health risk issues, be able to interpret scientific papers in this area, be familiar with biochemistry and toxicological terms, be able to interpret the PAN's and other pesticide toxicity databases accurately, and will be able to provide support to the Committee in these areas that requires years of training in this field.

I have closely followed the county's IPM program for the past 18 months and attended nearly every subcommittee and IPM Advisory Committee meetings while reviewing the relevant documents. The existing IPM program needs a lot of work and addressing the priorities I have just listed here would help Contra Costa County come up to speed with award winning IPM county programs in the Bay Area.

I thank you in advance on behalf of the community and ask you for your wisdom and thoughts on these issues.

Respectfully,

Shirley Shelangoski

Feb 11, 2014

To: TWIC Co-Chairs, Supervisors Mary Piepho and Candace Anderson

From: Shirley Shelangoski, PfSE

I would like to start out by thanking the Co-Chairs for asking county staff at the December 5th TWIC meeting to provide responses to Parents for a Safer Environment's list of Unresolved issues from 2013 and 2012.

Three items I am asking you to address this morning involves inaccurate statements in the Triennial Report, key change in reporting by staff that was left out in the Annual Report and concerns about PfSE community members' public comments that were never mentioned in the Dec, 2013 and in the Dec 2012 TWIC meetings as promised.

1. The IPM Advisory Committee voted whether or not to list "unresolved issues" in the Triennial report because staff did not want to acknowledge there were on-going problems raised by the community and felt that they were resolved. The majority of the IPM Advisory Committee appeared not to agree, and voted that "unresolved issues" should be listed in the Triennial Report, as submitted by Parents for a Safer Environment. Additional justifications listed in the Triennial Report were added by staff after the meeting and were not discussed nor approved by the IPM Advisory Committee. Staff stated in the report that all 6 items had been resolved except for the civility issue towards the public. This is *not* the consensus by the Committee and no vote was taken to conclude such. The statement is an opinion of the IPM coordinator and that should be made clear in the Triennial Report. I ask that the IPM Coordinator retract her personal statement made in the Triennial Report.

2. The IPM Advisory Committee listened to a presentation by Dr. Susan Kegley of the Pesticide Research Institute who developed the EPA award winning PANNA database. She clarified some of the Bad Actor pesticides the county had misidentified. I think some positive resolution occurred and that the county began including at least the acutely toxic pesticides that were omitted as Bad Actors in the past. However, the county is still missing the Known Reproductive/Developmental toxins listed under the EPA's TRI. I ask that you instruct staff to include the TRI toxins AND to correct in the Annual Report that they acknowledge that they have misidentified and not reported all the Bad Actors in the past decade, including the Acutely Hazardous and the TRI known human reproductive/developmental pesticides. Currently, the text in the Annual Report is not transparent of this significant correction.

3. At the Dec, 2012 TWIC meeting, eleven Parents for a Safer Environment, Audubon Society, a rodenticide poisoning witness at Kaiser Hospital, and Cagwin & Darwood staff all testified with public comments that were also provided in writing. These were not referenced nor posted in the meeting minutes. In a subsequent TWIC meeting, we asked for your attention to this matter, and we were told that administrative staff John Greitzer would work with us. This did not happen and we ask that all public comments that we submitted by hard copy be posted online for tracking purposes. I can help by providing you electronic copies if these public comments he promised would be provided as copies to anyone asking for them, have been lost. We would also appreciate the 2013 public comments posted and linked to all meeting minutes.

Thank you for your follow-up on the three items of concern.

Shirley Shelangoski

Report of the Cost Accounting Subcommittee to the Contra Costa County IPM Committee.

Prepared by Tanya Drlik, IPM Coordinator September 2014

Members

Vince Guise/Matt Slattengren/Chad Godoy
Susan Heckly
Michael Kent
Allison Knapp/Joe Yee
Marj Leeds—Chair
Cece Sellgren

The Cost Accounting Subcommittee met five times in 2014: February 20, March 18, April 15, June 17, and August 19.

After considerable discussion during the first two meetings about the areas on which to focus the committee's attention, the committee agreed to investigate the cost of a long-term transition to more sustainable landscaping around County buildings that would require less maintenance, energy and water, and minimal or no pesticide use. The committee researched the costs of turf vs. ornamentals and the cost of artificial turf. Over the 5 meetings, the committee learned the following:

- The Grounds Division uses most of its herbicide on the Marsh Creek Firing Range where they must maintain bare ground because of fire and other safety regulations.
- The Grounds Division has quite a diverse portfolio of landscapes around County buildings as well as other sites to maintain—over 100 sites. It is extremely difficult to make generalizations about County landscapes because they are so varied, and the amount of funding is so different from one site to another.
- When Kevin Lachapelle took the position as Grounds Manager, he made the decision to stop using insecticides, miticides, or fungicides. The Grounds Crew tries to keep the landscapes healthy enough that these pests are not a problem, but if plants succumb to damage from insects, mites or fungus, they are removed.
- The Grounds Division uses only herbicides, and the majority of the herbicide is Roundup® (glyphosate) that is used in spot treatments around County buildings. These spot treatments are primarily in cracks and crevices in pavement. Cracks can be sealed in pavement, but this is expensive, has environmental consequences, and will always provide spaces for soil to collect and allow weeds to germinate. Pre-emergent herbicides are no longer used around buildings, so the amount of pre-emergent used is small.
- The Grounds Division has been de-landscaping buildings and medians (and covering the soil with mulch where feasible) over the last few years because of lack of funds for maintenance. Summit Center on Arnold Drive in Martinez is one site where this has been used extensively.
- Artificial turf is costly to install (around \$25K for 1000 sq ft). Conversion to artificial turf would entail the substantial use of herbicide to kill any vegetation at the site. Artificial turf is a petroleum product, it still uses some water (for cleaning), it must be vacuumed and raked, weeds can grow on top of it when enough soil accumulates, in the summer it can increase the heat in the immediate vicinity, and it could pose environmental problems at the end of its life. In the best case, the return on investment is 20 years.
- Artificial turf might be appropriate at sites with tiny, odd-shaped pieces of turf that are difficult and expensive to maintain, if there is some pressing reason the turf is needed.

Artificial turf has been used at some Head Start sites where they like to use it for play areas.

- The costs of maintaining different kinds of landscapes is complicated:
 - So much depends on the site, how it is planted, and with what.
 - Formal ornamental plantings with high water needs and fast-growing plants can take just as much or more water and maintenance as a similar area of turf.
 - Informal plantings with moderate water-use plants need less maintenance and water.
 - Informal plantings with drought-tolerant plants use much less water and need less maintenance.
 - If plants are chosen properly (right plant/right place) and are planted properly (enough room for each plant to reach its natural size), they can be left alone and require maintenance perhaps only 2 times per year.
 - Drought tolerant plants will need water for around 3 years to get established, but then should be able to make it on their own (although in severe drought, they may need supplemental water)
 - Other factors contribute to the cost of maintenance:
 - Deferring plant maintenance (which the County started doing during the recession) can greatly increase maintenance time when the decision is made to resume maintenance. Often plants have grown into a jungle that can take a huge amount of work to tame, and the site looks unattractive once the work is done.
 - Overplanted sites take much more maintenance and water because there are more plants to maintain, and often more kinds of plants that must be treated differently.
 - Plants in the wrong place increase maintenance—for example, if plants are too close together or too close to the building or the sidewalk, they will need constant pruning.
 - No-mow turf that is allowed to go dormant during the summer can use much less water and need much less maintenance, but people will have to accept brown grass in summer.
 - Old irrigation systems need much more maintenance because there are so many more problems as they age.
 - Drip irrigation can require much more attention than traditional sprinklers because the lines are delicate and vulnerable to vandalism, chewing from animals, clogging, or being accidentally cut by shovels or other tools.
- Determining the maintenance costs and herbicide use on any particular County site would be time consuming and would have to be done by hand. The Public Works accounting system would be unable to produce such a report electronically, and the data available in current reports are not suited to understanding the cost of maintenance, water, and equipment.
- People's expectations for the kind of landscapes around County buildings, and the way those landscapes will look, need to change.
- There are many County sites with dead and dying plant material. These are prime sites to examine for re-landscaping with drought-tolerant plants. The irrigation systems at those sites are designed for the old plant material, and the cost of fixing the irrigation would have to be factored in.

Suggestions from the committee

- The County could look for opportunities to change people's expectations regarding landscaping:
 - People cannot expect perfect turf, or any turf.
 - People cannot expect County landscapes to be weed-free.
 - During the dry season, and especially during times of drought, people cannot expect lush, green landscapes.
- The Grounds Division could find opportunities to educate building occupants and citizens, for instance, by using a sign at de-landscaped sites or areas with brown turf explaining that the County is saving water in time of severe drought.
- The County could consider developing a strategic plan for sustainable landscapes around County buildings.
- The County could adopt a policy specifying that any new landscapes that are created or any landscapes that are renewed should be planted with drought-tolerant plants that are appropriate to the site and planted with minimizing water use and lowering maintenance in mind. The policy would have to be general enough to accommodate the diverse uses of County landscapes.
- Since we are in the midst of a several year drought and the prospect for ample rain this winter is poor, this is not the time to begin extensive renovation projects.