

Protecting Marin Since 1934

April 7, 2016

Marin County Board of Supervisors Judy Arnold , Damon Connolly, Steve Kinsey, Katie Rice, Kate Sears 3501 Civic Center Drive, Suite 329 San Rafael, CA 94903

Re: Campaign to Reduce Herbicide Use in Marin County

Dear Supervisors Arnold, Connolly, Kinsey, Rice and Sears:

We write to urge the Board to continue to support limited and regulated herbicide use on County properties under the IPM ordinance, and, at the same time, refocus its concerns and undertake a campaign that will comprehensively address the full scope of herbicide use throughout the county.

At your upcoming meeting on April 12, you will again consider the use of herbicides in county parks and other areas administered under the county's Integrated Pest Management (IPM) program. You will again be assailed by citizens calling for a total ban on herbicides. The temptation to respond to the loudest voices and support the total ban will be strong, and the adverse consequences of doing so may appear to be slight.

We therefore ask you to consider the following:

- 1) The glyphosate used under the IPM program is less than one half of one percent (0.5%) of all the reported glyphosate used in the county, and it is even less than that if unreported use by home and business owners is included. The current campaign to ban glyphosate use under the IPM program is focused entirely on this small fraction while ignoring the 99.5% of other uses in the county. The politicization of this issue risks blinding the county to the reality that a total ban on glyphosate use will strip the Parks staff of one of the tools they need to protect the parks and surrounding properties from wildfire and to protect native biodiversity when other tools can't do the job. At the same time, it achieves nothing to comprehensively reduce herbicide use in the county.
- 2) The Supervisors have a responsibility to look past the narrow focus of the current debate on herbicide use and to instead consider solutions that address the full scope and complexity of the issue. Accordingly, we recommend that the Board initiate a countywide education campaign that will address the widespread herbicide use in the county, and to devote the resources necessary to develop a plan that will set forth goals, poli-

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cies and implementing actions to reduce overall herbicide use. The campaign should engage, educate and mobilize citizens, businesses and public agencies at all levels of government. At the same time, it should acknowledge the complexities of managing invasive plants on public lands and differentiate the hazards of large scale industrial application of herbicides on food crops from the carefully targeted use of some of those herbicides to control invasive plants.

- 3) We already have models for such a campaign. One is the water conservation program of the Marin Municipal Water District to reduce water use in homes and offices, foster water-wise landscaping, and encourage the replacement of lawns and water-intensive gardens in favor of Mediterranean landscapes. MMWD is partnering with local nurseries, landscape contractors, construction material suppliers and the Marin Master Gardeners to carry this program forward. Another example is the county's and local fire departments' Fire Safe Marin program to create fuel breaks in open spaces, reduce flammable vegetation along roadsides, urge property owners to increase defensible space around homes and other buildings, and update fire safety requirements for new construction and remodeling. A third example is the MCSTOPPP (Marin County Stormwater Pollution Prevention Program) and the associated Our Water Our World, which educates nurseries and retailers to direct consumers away from invasive plants and conventional herbicides to better alternatives. These models and others could be used to develop an educational campaign to voluntarily reduce the sale and use of landscape herbicides in Marin County.
- 4) The hazard posed by any herbicide is a function of its toxicity, the quantity and concentration applied, and peoples' exposure to it. Advocates of a total ban on glyphosate purposefully exaggerate the potential for park users' exposure to it. In fact, protecting park users from exposure is not difficult or complicated, is already being done, and the current protocols could easily be augmented as necessary to address particular situations or concerns.
- 5) Glyphosate is one of several herbicides available for use under the IPM program. In considering uses of glyphosate, a distinction must be made between critical uses, such as for wildfire protection and species preservation (or in the case of road medians, worker safety), and non-critical uses, particularly cosmetic landscaping, for which other options are possible. Scores of invasive plants exist in Marin now, and more are arriving each year as a result of increased global trade. Park staff need the tools necessary to combat not only current threats, but those that will continue to arrive in coming years. Eliminating the use of glyphosate entirely for such critical uses would require staff to consider less effective herbicides or techniques, some of which may be more dangerous to the applicator.
- 6) Given the considerations above, we ask the Board to shift its focus to the much greater

issue of widespread personal and commercial use of herbicides countywide. We also support park staff in their efforts to minimize and reduce herbicide use, but urge the Board not to eliminate this tool entirely from the management of county facilities under the IPM program.

In light of the above, we urge the Board to consider placing on a future agenda a study session to receive suggestions for developing a written plan and initiating and executing a county-wide campaign to voluntarily reduce the sale and use of herbicides by households, business owners, public agencies and landscape contractors in Marin County.

We look forward to presenting this proposal at your April 12 meeting.

Sincerely yours,

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Gandra Guldman

Sandra Guldman, Friends of Corte Madera Creek Watershed

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