

**MOMS ADVOCATING SUSTAINABILITY (MOMAS)**  
**SUPPLEMENTAL** EIR Scoping Comments regarding Marin Municipal Water  
District's 2012 Draft Vegetation Management Plan for Watershed Lands  
Dec. 3, 2012

MOMS Advocating Sustainability (MOMAS) submits these supplemental scoping comments regarding the Marin Municipal Water District's Vegetation Management Plan for Watersheds Lands (MMWD's Plan):

1. Public approval process triggered if herbicides are recommended for use beyond four year eradication period: In MOMAS' first scoping comments, we recommend an explicit four-year limit in the event herbicides are used on watershed lands. If after the four-year period, the District seeks to use additional herbicides, MMWD's Plan must provide that this triggers a new discretionary public approval process subject to CEQA review, including a public hearing, before any further herbicides may be authorized for use.

2. Best management practices: If herbicides are used pursuant to MMWD's Plan, then best management practices must be utilized to monitor and ensure success. For example:

- If herbicides are used, then for each plot of land, there must be a defined purpose, and clear and measurable goals that are tracked and available on MMWD's website for public review.
- Clear and publicly available success criteria must be defined, on an incremental basis, so that progress may be evaluated through regularly scheduled follow up monitoring.
- MMWD must discontinue herbicide use if incremental success criteria are not met.

3. Yearly independent audit: MMWD's Plan should include an audit by an independent licensed professional with expertise in Integrated Pest Management to determine whether the limitations set forth in MMWD's Plan are followed. In particular, the auditor should evaluate the amount of herbicides used, locations used, and whether best management practices are followed properly including whether MMWD is on track to meet success criteria or whether herbicide use, if any, should be discontinued.

4. Create interagency environmental health position and commission: MOMAS' goal is to reduce toxic exposures in our community. One idea proposed by MOMAS' Advisory Board Member, Dr. Myrto Ashe, is to find a way to reduce herbicide and pesticide use in our County overall, such that the outcome of MMWD's Plan process is a net positive for our community's health. MOMAS is interested in working with MMWD and other County officials to potentially coordinate with a university such as Berkeley School of Public Health or UCSF's Program on Reproductive Health & the Environment (<http://prhe.ucsf.edu/prhe/staff.html>) and/or a science and policy oriented organization such as Collaborative on Health and the Environment

(<http://www.healthandenvironment.org/>), or Center for Environmental Health (<http://www.ceh.org/>) to develop and implement a long term plan to reduce cumulative toxic impacts in our county, whether it is residential use of pesticides and other toxic substances that run into our waterways, commercial use, or public use (by any agency or district operating in our County), with a particular emphasis on pesticide and herbicide use, and to include incentives to businesses that sell conventional pesticides and herbicides to reduce or eliminate these products for sale in our county and replace them with safer products. The goal would be to develop a process and plan that could be replicated in other communities and at higher levels in our government. The process could include high level policy decisions about resource allocation – such as whether monies spent on removing and replacing water pipes in Marin County is a better use of resources in terms of public health improvement outcomes than implementation of a County-wide public education campaign to reduce the use of residential pesticides.

We recognize that this last comment is likely outside the scope of MMWD's EIR; however, there is precedent for such a model. For example, it is common when developers seek to build in or around sensitive habitat or treasured open space to dedicate large parcels of land as a wildlife preserve or other preserved public space, so that the net outcome may be a positive one for the community. While our circumstances are very different, the concept we are seeking is similar.

Respectfully submitted by,

MOMS Advocating Sustainability