

Pesticide Free Zone, Inc

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November 11, 2013

To: Department of Agriculture
From: Pesticide Free Zone, Inc.

These are our comments regarding the Department of Agriculture's 10-Year Invasive Weed Management Plan for Marin County.

We wish to congratulate the Department of Agriculture and the people who have worked for several years on the invasive weed management plan. Having this plan parallel the Marin County IPM Ordinance and operate in accordance with Integrated Pest Management is encouraging. These are all good words but we still have some trust issues.

In the Year 1 there is written the minimum of 60 outreach and education events to landowners, other members of the public and various organizations...this is an extremely ambitious undertaking unless some of those would consist of one-on-one encounters or phone calls. We would like to hear an elaboration on these plans.

Our organization endorses the appropriation from the general fund of \$75,000 for these projects with one proviso: **No funds be spent for the aerial application of pesticides**

- Aerial applications are not controllable, they contaminate and expose people and the environment far distant to the intended targets and they are expensive. Though sanctioned by the County, there are often unfortunate and unintended exposures. For example a few years ago a member of our coalition was driving in West Marin when an aerial applicator, still trailing chemical, came over the road and was near a school.
- West Marin is filled with organic growers and pasture lands that could be placed in jeopardy due to uncontrolled drift. Any contamination of organic lands due to such a program could also place the county in a position of responsibility to compensate the injured parties not just presently but for several years due to loss of certification..

In evaluating the alternatives we have further concerns about the use of pesticides.

- Goats, properly herded have proven to be extremely effective at removing unwanted vegetation. However, in conversation with a nationally known herder who takes great care of her animals, she stated she would not place her animals on lands unless there had been no pesticide application for a minimum of three years. She found animals miscarry and die due to pesticide contamination of three years or less.

- How is a farmer to know if his land has been drifted upon and he wished to use goats for vegetation removal?
- Considering much of the problem vegetation is in inaccessible locations, specifically steep ravines, which are also water ways that should not be subject to spray. As we know from other studies in the county, pesticides linger a long time on plants and in soil and rains will carry these chemicals into our watershed. Buffer zones must be honored if chemical sprays are used.

Alternative removal techniques:

- It is our understanding that if taught early and using spring growth, calves will consume some of the weeds of concern that as adults they would not normally eat. By using Rest Rotation Grazing Techniques as Dave Evans, West Marin farmer has used for years the weed problem has been eliminated or at least brought to a manageable level. Why are the other ranchers having problems?
- Some of the invasive weeds have come through landscaping and nursery purchases by urban landowners. Why has the Board of Supervisors either not outlawed the sale of such plants in the county or at least sent strong letters of concern to the businesses selling them? Prevention is always the best answer.
- If truly following an IPM approach, then mechanical means at the appropriate time of most effective use will be done. We trust that, as it is written in the plan, hand weeding, mowing, disking, solarization or burning in all areas where possible is done early enough to prevent continued plant propagation.
- Investigation of organic herbicides, such as those produced by Marrone Bio Innovations of Davis, California is essential. They have some products in development, such as MBI-005 which acts as a broad-spectrum pre-emergent and will act as a post-emergent on broadleaf plants. We have some questions regarding the use of sodium chloride salt or strong acids, which only burn the above ground plant growth.

The funds being requested, as we read the plan, are for one year, though the plan is for a ten year period. It seems to this organization that the first year should climax with a complete evaluation by an outside agency and future plans rewritten to reflect where to best spend efforts for the remainder of the time span. Education takes time and seed banks do not disappear in one year. Whatever actions are taken we know that pesticide applications do not work because they have been used over and over and yet the problems persist.

Thank you for hearing our concerns.

Sincerely,

Ginger Souders-Mason
Director

CC: Marin County Board of Supervisors

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Supervisor Steve Kinsey
C/o Marin County Board of Supervisors
3501 Civic Center Drive
San Rafael, CA 94903

Regarding: Weed Management Plan

Dear Supervisor Kinsey,

Enclosed you will find our organization's comments regarding the 10-Year Invasive Weed Management Plan which will come before your board soon. Though we still have some trust issues regarding the Agricultural Commissioner's ability to follow IPM (integrated pest management) programs we do endorse the need to go forward with funding of this program, given there can be some form of independent audit of its results after the first year.

Pesticides are only a short-term answer and the resulting damage to natural environmental systems should rule their use out. If Marin is to ever achieve the status of an organic community we must learn to work within natural systems. Weeds are only plants which are out of place. Invasiveness is the plant's mechanism of survival. Many in the West Marin community have been successful at invasive weed management. We trust through education, success will come to all land holders with the help of the proposed program.

Sincerely,

Ginger Souders-Mason
Director

Enc: 2