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To Whom It May Concern:

East Bay Pesticide Alert, also known as Don't Spray California, is taking this opportunity to respond jointly to FEMA grant requests from the University of California (UC); the East Bay Regional Park District (EBRPD); and the city of Oakland for what the agencies refer to as 'wildfire prevention projects' in the East Bay Hills. For nearly 6 years we actively have opposed these entities' attempts to continue various and related wildfire projects which often include the use of pesticides, and in the case of tree fellings which for these agencies is paired with pesticide use, cause increased fire danger to people, wildlife, structures. These plans violate at least two out of three parameters of FEMA's Wildfire Mitigation Policy, MRR-2-08-1, "Wildfire Mitigation Policy for the HMGP and PDM Program".

PESTICIDES, TOXICITY, and FIRE DANGER DUE TO MISMANAGEMENT

UC, EBRPD, and the city of Oakland amply have demonstrated their wildfire prevention protocols in the past and have, in the EIR process of EBRPD quite recently, shown their intentions to continue what has caused fire danger in the hills. Each of these entities' practices, irregardless whether people support more tree fellings or pesticide use, routinely have included spraying pesticides and leaving dead vegetation throughout the hills, a clear fire danger adding to grossly mismanaged understories throughout the hills. These agencies each have acted in negligence, continuing practices which abetted the '91 fire. For this reason alone, they should not be granted FEMA wildfire prevention monies. They have demonstrated incompetence in the past and their future plans would jeopardize the health and wellbeing of people, pets, wildlife, insects, soil, and vegetation, as well as structures, a misuse of public funds. For a flammability study conducted in the East Bay, near Claremont Canyon, please see <http://pesticides.intown.biz/Cheriel%20Response.html> .

Perhaps an example of intention would be enlightening. The only specific general management practices mentioned in the EBRPD's Draft EIR were an inadequate requirement for notification signs, and reference to the size and smoothness of cut tree stumps. EBRPD appears to have no interest in serious notification which might allow people plans to avoid treated areas or better yet make arrangements to stay away from nearby homes for a time period, and seems to be more concerned about the potential for splinters from logged trees than about chemical poisoning from contact, drift, and other mobility of pesticides applied to and around the stumps and other vegetation, a subject they avoid. Please see <http://twinside.org.sg/title/service76.htm> on Denmark's ban on RoundUp because it was found in groundwater.

ALTERNATIVES to PESTICIDES

These agencies' plans are to cut trees and use pesticides. There is no safe use of pesticides. By nature they kill, cause genetic mutations, neurological problems, hormonal disruption and disfunction. They translocate and endanger water supplies. We offered them alternatives, most absolutely standard practices, focusing on fuel reduction by employing people who need jobs to do manual labor of understory removal without the use of chemicals. And in the case of any tree fellings, solarization of tree stumps, a standard practice relying on elementary school and backyard bulb gardeners' basic principles of starving plant life of the photosynthesis process. No photosynthesis, no sugars to feed the plant (read: re-sprouts). A sheet of plastic stapled down is a

standard practice, but it is possible to use a natural tar (as opposed to a petrochemically-derived product) instead. Alternatives to pesticides abound, as we made clear in 2005; yet, just days after our presentation, Tom Klatt of UC put out his 10 year plan for Strawberry Canyon and Claremont Canyon, which is enlightening. It says labor and chemicals are about \$100 per acre each of two times per year, expecting it to take 1-1/2 hours per acre. That's probably a crew of several working to apply pesticides (it's only the Licensed Pesticide Applicators overseeing spray projects who make huge salaries; people doing the dangerous work rarely make much above minimum wage). The \$4000 management for \$6716 in labor and \$1125 in chemicals for 45 acres for Claremont Canyon for 10 years may well be part of the Licensed Pesticide Applicator salary of \$125,000 common in 2005. So in the event of tree fellings, a crew going in with weed wrenches for baby trees or weed whackers for re-sprouts should be able to be paid if instead applying most or all of that "management" \$4000 for their wages, an assertion we have made all these years. Additionally, what is not outlined in Klatt's plan, nor in any of the agencies' project plans or grant requests is who covers the costs of lost productivity for those sickened by pesticide exposures, whether workers applying pesticides or otherwise working in the hills, residents, or visitors to the hills. Without such plans specified it appears that the burden is shifted to individuals, cities, or counties.

SCARE TACTICS

The issue we brought up in 2005 remains today; mismanagement. Even in the few cases of diseased trees which legitimately should be felled if they would be likely to fall in an area where people or homes would be damaged, after fellings these agencies could be cutting back re-sprouts, solarizing, or employing one of the many other alternatives we offered as examples. But the city of Oakland is a prime example of mismanagement creating fire danger. Eucalypts cut down in Montclair were left to resprout and in 2005, after this resprout museum had grown tall once more, but with multiple sprouts creating fire ladders everywhere, the city council woman who wanted to join in the hills pesticide use pushed by UC and EBRPD used these re-sprouts as an example to scare people. What scared us was the city's irresponsible behavior in cutting the trees in the first place if they didn't plan to cut them back after, or dig out the stumps. City representatives kept talking about the massive danger of that stand of re-sprouts but never bothered in that time period to have the sprouts cut back down.

TOXICOLOGICAL PROFILES OF PESTICIDES

In January of 2005, EBPA/ DSC handed representatives of each of these entities toxicology of the pesticides UC and EBRPD already were using, and pushing Oakland to use in the hills. We offered many quite standard alternatives to pesticide use while pointing out the danger to other species of removing Eucalyptus from the hills (Eucalyptus was the only tree being discussed at public hearings at that time). Please see <http://dontspraycalifornia.org/wpadmin/html> for more info on our opposition in that time period. Also, please see the toxicology of Monsanto's RoundUp (<http://www.alternatives2toxics.org/catsoldsite/round.htm>), the toxicology of glyphosate, the "active" ingredient of the product called RoundUp (<http://www.pesticide.org/get-the-facts/pesticide-factsheets/factsheets/glyphosate>), and that of Garlon's triclopyr (<http://www.pesticide.org/get-the-facts/pesticide-factsheets/factsheets/triclopyr>), at least the formulation used at that time. Formulations are changed routinely due to pesticide resistance. In fact, part of the danger of a pesticide approach is that when a pesticide stops performing as expected, use of a new formulation is planned.

What about environmental oversight of new formulations? Is that part of FEMA's oversight when granting monies for wildfire prevention projects? Does FEMA plan to leave oversight around product and formulation use to these agencies if FEMA should grant them public monies to fund their requests? Please see <http://www.eastbaypesticidealert.org/wildfire.html> for details of the other pesticides UC uses in the hills.

LOW DOSE and the NON-MONOTONIC DOSE RESPONSE

New formulations cannot be expected to be "less toxic", though that phrase also has absolutely no legal meaning, which may be why we have seen these agencies use such language trying to assuage the public throughout time as people have opposed pesticide use. In fact, pesticides can hit hardest in small, repeated,

cumulative doses which build up in the body, and by the ‘non-monotonic dose response’. The NMDR results in a larger response with less of a dose. This is the theory and basis of the practice of the healthcare modality, Homeopathy, practiced around the world; less can be more. Researchers long have described the cumulative effects of low doses of chemicals, which they consider more dangerous than the occasional major exposure in otherwise-healthy individuals. For more detail on low-dose chemical responses, please see <http://web72345.ntx.net/article/gulfwar.shtml> or <http://toxsci.oxfordjournals.org/content/68/1/1.full>. Endocrine disruptors are one example of chemicals that cause a non-monotonic dose response. Or, as the body is secreting what it can of the toxin, toxic effects can increase as well. An example dating back to 1888 is that of fungicidal chemicals such as mercuric chloride increasing fermentation in yeast (<http://toxsci.oxfordjournals.org/cgi/content/full/77/1/151>). This kind of process was demonstrated in Sonoma and Napa Wine Country, where health surveying revealed common, overwhelming, systemic yeast overgrowth in people (animal testing was not done to ascertain statistics on farm or domestic animals). Fungicides such as Copper Hydroxide, and Sulfur scraped from industrial smokestacks, are used everywhere in the vineyards and inversion layers in the valleys trap people and animals in a chemical soup. Another fairly common example shows itself around varied responses to coffee. While the general expectation is that a cup of caffeinated coffee will give people energy and a “pick up”, for many caffeinated coffee has a physically relaxing effect while decaffeinated coffee, containing much less caffeine, gives them alertness and a burst of energy.

RESPONSE TIME AFTER EXPOSURE

In the case of pesticide applications, people might not have their primary reactions at the time of highest exposure but as the exposure tapers off, they can have even fatal responses. In the case of carbamate and organophosphate pesticides, commonly people don’t experience any significant response until 8-12 hours after exposure, and responses to pesticides can last weeks to years, in the case of a response taking someone past a point of her/his body’s ability to metabolize the toxins in question. Just as one person can metabolize a 6-pack of beer quickly, another can be asleep, or otherwise affected, after a sip or two. We, and wildlife and pets, are individual biological beings which variously are damaged by pesticides, as is soil and vegetation. The medical establishment has not been taught to recognize even the most common symptoms of exposure to even the most commonly-found pesticides, and typically is not familiar with appropriate tests such as the cholinesterase test which looks for depressed levels of this enzyme, seen with carbamate and organophosphate poisoning, but must be checked within a few hours of exposure to provide an accurate assessment. Thus, when people die of heart attacks or asthma attacks due to pesticide exposures, their death certificates give no indication of the part pesticides have played. This results in any epidemiological or other health studies and data kept by the Department of Pesticide Regulation (DPR) and other agencies being skewed. It doesn’t help statistical understanding that undocumented workers, many who do the dirty work of applying chemicals which can kill them, are not going to be showing up in OSHA (Occupational Safety and Health Administration) files, DPR’s source for records on work-related pesticide poisonings, as DPR’s staff scientist, Louise Mehler, acknowledged to us in the latter 90’s.

UNETHICAL ASPECTS of RISK ASSESSMENT

Risk Assessment is the game played by the pesticide industry, busily trying to keep people from thinking critically about pesticide use. Risk Assessment, the methodology used by the chemical industry and authors of Environmental Impact Reports and Statements and seekers of any number of grants for projects including pesticide use, or the downing of trees, for instance, theorizes which risks are “significant” or “acceptable” to those who are paid to evaluate the financial cost-effectiveness of a plan. First, do no harm, Hippocrates’ motto, and that of healthcare workers and medical doctors everywhere, recognizes that it is not ethical to call anyone an Acceptable Risk, nor is it ethical, from a standpoint of environmental sustainability, to apply Risk Assessment to wildlife, pets, insects, vegetation, and soil. Biology is clear: neither humans nor wildlife, pets, insects, vegetation, nor soil exist in a vacuum. Each is part of an intricate web from which one cannot be spot-removed without endangering the others. In fact, the USDA’s Light Brown Apple Moth debacle has been

exposed for the danger eradication attempts represent to biological habitats, meaning any habitat. Trying to eradicate something naturalized can create a hole of unknown consequences which we cannot predict so could not possibly know how such potential damage might be mitigated.

Environmental reviews should be based on the Precautionary Principle, which in a nutshell states “better safe than sorry”, with a particular view toward protecting vulnerable species and populations, and not on a theoretical risk assessment approach, which determines how much risk to the lives of others is acceptable to those who theorize about the potential impact of an action.

INFORMATION and FACTS IGNORED

Shocking to many is how much information these agencies have been given for years about the dangers of the use of pesticides, and abundant alternatives, but also that their plans for, and execution already, of tree felling is actually a “native plant restoration” project, masked as a wildfire prevention project. Almost 6 years ago we were challenging the city of Oakland over what was very publicly being touted as a “native plant restoration” project alongside the more formal ‘wildfire prevention project’ titling, pointing out the irony that, using pesticides in Sausal Creek or other hills areas would in fact serve to kill off the web of mycorrhizal fungi which nourish native plants and are an essential part of healthy soil which supports healthy vegetation. Pesticides damage immune systems of all biological beings. In spite of this fact, the city councilwoman, Jean Quan, and Friends of Sausal Creek, continued to push for pesticide use in the creek and on the 1,023 acres the city oversees in the hills, being actively pushed by UC’s Tom Klatt and EBRPD’s Nancy Brownfield, under whose tenure EBRPD has increased use of pesticides, even taking into consideration acreage added over the years.

ENDANGERED SPECIES in the HILLS

We countered that in fact there are endangered species in the hills, both animal and vegetation and that, pesticides would endanger them. Finally, the city attorney said to us, “Okay, you got us. This does fall under CEQA (the California Environmental Quality Act).” As we continued to attempt to follow up, to make sure plans were not continuing without formal environmental review, including more public, advertised hearings, we were stonewalled. No one contacted at city offices would talk. Later we discovered that apparently to do an end-run around our expose, the city quietly made an alliance with UC and has plowed ahead with plans to cut down healthy trees and use pesticides, in spite of the fact of endangered species in the hills. While the endangered Pallid Manzanita, Alameda Whipsnake, Pallid Bat, and the Red-legged Frog all reside in the East Bay Hills we see no significant plans to protect them nor the raptors who depend on tall trees for their survival. Findings of ‘no significant impact’ abound in the EBRPD’s EIR; yet it is scientifically-impossible for their plans to have ‘no significant impact’ when they plan to down between 500,000 and 1.2 million trees, then apply pesticides for the next 10 years. By virtue of the fact of this agency’s arrogance in its statement that there would be ‘no significant impact’, we feel any assertion they make must be questioned and researched for facts. In light of this, their request for FEMA wildfire prevention grant funding should not be provided so that it is available for true emergency wildfire prevention work.

OAKLAND MISLEADS

Look at the city’s website and you see talk of sustainability and environmental health, and the old pesticide industry line, “best management practices”. The words ‘pesticides’ and ‘herbicides’ are nowhere to be seen. It would appear the city continues to try to pull the wool over people’s eyes as in spite of having what the city attorney likes to call a ‘ban’ on pesticide use by the city, it uses herbicides citywide on medians, and in some parks, such as on the paths within a few feet of Children’s Fairyland, and along narrow roads in the hills on Joaquin Miller Road, among others. In addition, subcontractors use pesticides without oversight by the city, as acknowledged to us by Noel Gallo early in 2005. This results in people not being able easily or accurately to track pesticide use in the city associated with city use as county agricultural records for the city’s use do not reflect the subcontractors’ use, and records for subcontractors do not have to specify as clearly what products they are using where and when, or in what amounts.

The Oakland city people behind plans to remove eucalyptus seem to miss the irony of the city Office of Parks and Recreation boasting photos in their marketing materials showcasing eucalyptus, probably because most people agree it is beautiful, and are acclimated to eucalyptus surrounding us in the hills and creek areas and all around the Bay Area.

UC ACQUIRES MONEY FROM PESTICIDE COMPANIES

People would like to believe that a public university system will be devoted to seeking truth in science. UC has contracts with pesticide companies such as Novartis and Syngenta, Dow, Bayer, and Monsanto. Suffice it to say, UC is not objective; it receives masses of money directly and indirectly from pesticide companies so of course it will push pesticides. At the same time, UC has been clearcutting areas of the East Bay Hills and we have pointed out that the reason UC may have set its sights so aggressively on Claremont Canyon's trees is that to get rid of them now clears the way more easily for their Lawrence Berkeley Lab extensions to proceed without getting bogged down later in the EIR process around: trees. UC seems to have a stronghold over the city of Berkeley but it also is apparent that, that stronghold is acquiring breadth with passing time. Oakland has latched on, and a series of agencies with oversight of one area or another in the hills (eg. EBMUD and PG&E) seem to tag along fairly quietly with whatever UC asserts.

EBRPD DISAPPOINTS, CONFUSES, and IGNORES

EBRPD is expected to be acting in the public and environment's best interest in work it does in the regional park system and, indeed, its union employees sometimes have taken public stands in support of worker and visitor park safety, such as their strong resolution opposing the Light Brown Apple Moth pesticides program. See resolution: <http://www.dontspraycalifornia.org/AFSCME%202428%20resolution.pdf>. Our experience with the union and park rangers throughout the park system is frustration, almost uniformly, with Nancy Brownfield, at the center of controversy, who has a misleading title of "Integrated Pest Management Specialist". Ms. Brownfield has pushed pesticide use, to the chagrin of many of the workers who understand that visitors, wildlife, vegetation, soil, and they, are being endangered. They want money put into hiring more workers, not paying for chemicals.

To make matters worse, EBRPD has jumped headlong into the Spartina Project which uses pesticides in efforts to eradicate cordgrass in the Bay (brought in originally by the military). As would be expected, the state and federally-listed California Clapper Rail population has significantly decreased. When reading minutes of the EBRPD's Board's September 7, 2010 meeting, one might want to assume that this is due simply to the removal of habitat. But for more insight into the chemicals the Rails are ingesting, inhaling, and absorbing, please see <http://www.eastbaypesticidealert.org/spartina.html>. You might note that Imazapyr is being used by UC in the hills and RoundUp is being used by EBRPD and Oakland. Still, the plan is to continue this pesticide use around the Bay.

WHAT IS NATIVE? WHO IS BEHIND 'INVASIVE SPECIES COUNCILS'?

We have seen repeatedly that 'native plant restoration' projects are being masqueraded as wildfire prevention projects and more insidiously, taxpayer self-assessments along with tax-supplied grants such as the FEMA grants requested by these agencies, are sold to taxpayers as necessary for wildfire safety. These scare tactics are unethical and, worse, will lead to an unwillingness in the future to supply money readily, when it might actually be needed, to fund manual removal of excess understory or grasslands vegetation, some of it ironically native and quite flammable as wildfire historically blazed through these hills bursting seedpods and covering them in what amounted to rich compost. These scare tactics could lead, therefore, to more fire danger in the future as threats continue to build due to mismanagement.

UC, EBRPD, and the city of Oakland have seemed fixated on getting rid of what they refer to as non-native plants. Invasion Biologists have differing scientific opinions on when species have reached acclimation, at which point even trying to remove them can pose biological danger.

Acclimation and naturalization are normal evolutionary processes and have resulted in monarch butterflies overwintering in the East Bay Hills, where they might not if most or all of the eucalyptus were cut down.

David Theodoropoulos, an Invasion Biologist who is deeply critical of his field, and points to the historic involvement of the pesticide industry in establishing invasive species councils to do their bidding (<http://www.jlHUDSONSEEDS.net/NativesVsExotics.htm>), shows photos of eucalyptus in the Oakland Hills during the 1991 fire, in areas where the understory had been kept down (<http://video.google.com/videoplay?docid=543758534586424176>). The fire burnt out before igniting the trees in those areas. Just as we see with many trees in the neighborhood of the San Bruno PG&E gas pipeline explosion and resulting inferno. Many living trees surround burnt homes.

Where agencies mismanaged in the East Bay Hills and failed to cut back the understory since it hadn't been properly attended as an Urban-Wildlands interface or a Residential-Wildlands interface, the hills inferno flourished. But many eucalyptus trees acted as windbreaks that hot, windy day, and the moist, cool forest floor around these trees reduced the potential for ignition in some areas. What we see in photos of the 2003 Scripps Ranch fire in Southern California is classic; homes full of gas lines and gas appliances, and cars, exploded, completely surrounded by massive, unaffected eucalyptus trees. See photos: <http://graphics7.nytimes.com/images/2003/10/27/national/28fire.1.jpg> and: <http://www.scrippsrancho.org/special/Fire2003/Ward/MVC-002F.jpg>. The first shows a whole cul-de-sac of houses and cars exploded, completely surrounded by healthy eucalyptus, the second shows exploded cars and only a chimney of a house left (much like Broadway Terrace in '91), many healthy eucalyptus trees right there, unscathed.

WHO PROFITS IN THIS ATTACK ON “NON-NATIVES”?

The question is, who profits by manufacturing an emergency around getting rid of anything non-native? Pesticide companies, for one, and in the case of felling trees, there are many contracts to be written, much money changing hands already as consultants are sent in to do their studies and estimates, and years of work and money are assured if final decisions reflect taking down a million or more trees, some of the lungs of the earth.

A history of mismanagement is no excuse for allowing further mismanagement, unleashing potent toxins upon us.

Landscape aesthetics are in the eye of the beholder and forcing nature into the aesthetic preferences of a few comes at the expense of ecological health. Continued widespread removal of trees is leading to mudslides in the hills, removing whole sections of habitat. As important, pesticides used on and around the stumps remain in the area and translocate. Innocent pedestrians or bicycle riders in some areas walk or ride through pesticide residues while inhaling residual drift (indoors, insecticides can take two weeks to stop floating around and begin to settle down onto furniture and floors, stuffed animals and dishes—source: Designer Poisons, Marion Moses, MD). People track them and spray them around further as they walk, jog, or bike. Wildlife in the area is exposed through inhalation, absorption and ingestion. One of our considerable concerns is that in the Bay Area we have immigrant populations from Asia who use plants found in the hills medicinally as well as for food (blackberry shoots being popular in some cuisines), and people practicing Western Herbalism frequently gather herbs in the hills. They can unwittingly be sickened ironically as they are gathering Horsetail to aid respiratory distress, or other herbs for other medicinal purposes.

This plan brings to mind the county of Alameda's plan to remove all the century-old Eucalypts along San Leandro Creek, in fact the only wild corridor for miles which links the flatlands and hills. As another story of deception has been revealed, tree by tree, parcel by parcel, we find that the purpose of the county's removal

plans is, once again, according to the county's chief arborist, Jim Brown, a "native restoration project". The grand plan was to quickly clearcut three areas to provide the easiest access/removal areas and spend the next few years chopping down one tree after another, dragging them up the creek further to ruin remaining habitat, then nicely (maybe) replanting some trees. Among those considered by the county is willow, a fine choice if you want to end up with no water at all in the creek. Oh, yes, and pesticide use on the banks of the creek, too, though no one has yet revealed which products after months of requests. And when you read the fine print on their documents, you see that a primary "Reason for Action" to remove the trees again and again is listed as: Tree will require substantial on-going resources to evaluate and maintain.

Money, time, the hassle factor. Not that they don't have money. In fact, the county hired a "very expensive" (according to a county person) p.r. firm, the same one the state hired to push their Light Brown Apple Moth pesticides program, and an arborist who has created her own ranking system for tree danger, at odds with that used by many certified arborists. One has to wonder why the county would want to rely on a new system while the arborists with her company keep saying they can't guarantee anything. Not that we are expecting many guarantees when dealing with nature. But there are some guarantees in this situation in the hills and the SL creek: down trees and you lose oxygen and gain carbon, increasing the numbers of people who will be sickened. Change the environment so drastically by removing these trees and you will have a hotter environment, not able to support life which has acclimated over a century. Use pesticides and you will ruin soil and water health and endanger people, wildlife, pets and insects.

WHAT WOULD AN HONEST LOGGER SAY ABOUT THESE PLANS?

As the author of this writing was at work assembling notes for this response she contacted a gentleman who comes from a logging family from the Central Coast area to hear his response to the general plans by these agencies. His response was swift and clear. He pointed out that in spite of herbicides which might be used, stumps are open wounds, attractive to insects and more so as they degrade. They are prone to disease which then endangers the trees nearby left standing. He put it this way, thinking of clearcutting and replants he's seen in the logging world, "In the infant stage replants are attacked by insects gathering at the open wounds of cut stumps. They are still weak in their infant stages, and more so if exposed to herbicides. Disease can spread easily in that environment, building on the stronghold on a stump. The secondary militia creates infection on many standing trees, a disease ward for any trees in the area." He went on to give more perspective. "If there's 300 tree stumps in one area and 500 are nearby, if there are infantile trees nearby many are likely to become diseased. What can happen to the rest of the forest of 2000 surrounding that area? What are the chances of survival?"

CARBON SEQUESTRATION; WHY SHOULD PEOPLE OPPOSED TO PESTICIDE USE CARE?

The East Bay is home to a population considered to have 16.3% already somewhere on the continuum of chemically-sensitive. Those of us with Multiple Chemical Sensitivity (MCS), or concerned about becoming victims of this debilitating chronic disease which can bring with it myriad life-threatening problems such as high blood sugar, high blood pressure, high cholesterol, heart problems, kidney disease, asthma, and hormonal disruption and dysfunction, are concerned about the massive carbon releases which come with felling trees such as old eucalyptus. These trees are lungs for us. They have taken in carbon and given us oxygen. We cannot lose this oxygen and on top of it face yet more carbon.

It is ironic to know that UCSF, home of an acclaimed medical school, is behind plans to remove all the eucalyptus from Mt. Sutro in San Francisco. We were busy assembling our response to UCSF's requests for a FEMA grant for what was being called a 'wildfire prevention project' but was actually another 'native plant restoration' project. Happily, before we could send in our response, we got the good news that FEMA had realized the grant request was not legitimate and refused to grant it this money to UCSF without an EIR. It is ironic that the home of a medical school is not willing to go through that health and environmental process, and

instead intends to march ahead, funding the felling of trees itself. A foggy mountain in the city, providing so much needed oxygen, to be decimated by UCSF.

OUR RECOMMENDATIONS

We want FEMA to be clear that these agencies have had information in their hands for many years clarifying dangers of pesticides and offering multiple standard alternatives, easily applied with the funds available through various pools of tax monies in addition to the regular streams of funding for maintenance. They have failed in their most basic maintenance duties.

Too, we want FEMA to remember that there is no emergency here other than the lack of proper maintenance over decades by agencies with lack of competence or interest. That is no reason to grant emergency monies which need to be available for emergencies that arise unexpectedly. What's going on here is entirely predictable and reversible with common sense oversight. FEMA's wildfire prevention project granting stream should not be used to make up for incompetence if it will result in that incompetence being allowed to remain, and continue, resulting in future wildfire dangers being created.

These agencies have been expected by people living in the hills to do reasonable understory management, a standard expectation in an Urban-Wildland interface. They have failed to act reasonably, and sensibly, to safeguard people and now are ready to release massive amounts of carbon into the environment, completely change habitats in the hills, and try to create native plant nurseries in pesticide-laden soils. The irony is that they seem completely unaware that many native plants which used to thrive in the East Bay Hills are highly flammable. Perhaps it's time to stop assuming that if something is called native it's preferable, and if it's called non-native it's bad. Time to move beyond that severely limited thinking.

Our climate has changed drastically, quickly, and we cannot assume that pulling down a million eucalyptus, acacia, and monterey pine, and planting native plants, or waiting for vegetation to fill in, will mean we will end up with anything actually resembling the East Bay Hills of a century ago. And as one man said some time ago about 'native plant restoration' projects, "Looks a lot like gardening to me." An ongoing maintenance project, exactly what these agencies all seem to want to avoid: maintenance.

What do you teach a toddler if you give her sweets? Don't fill up on healthy foods; leave room for the sugar.

What do you teach these agencies if you give them these FEMA grants? Don't bother with the regular maintenance with which you are charged; let it go and you'll get the spoils.

These agencies' histories of action have violated at least two of the three parameters of FEMA's Wildfire Mitigation Policy, MRR-2-08-1, in their not doing reasonable maintenance to create defensible space around homes, and their not limiting hazardous fuels, in fact increasing fuels by pesticing and leaving behind dried out vegetation, as described above.

East Bay Pesticide Alert asks that you deny UC; UCRPD; and Oakland the FEMA 'wildfire prevention project' grants they have requested based on the above points, and on the fact that these are 'native plant restoration' projects being masqueraded as 'wildfire prevention projects', an old game it seems we must keep exposing.

Thank you for your attention to this matter.

Sincerely,

Maxina Ventura
Chronic Effects Researcher
East Bay Pesticide Alert