

**For Facts, Photos, and Analysis of  
Wildfire, Tree Decimation, Pesticides Issues,  
and Who's Pulling the Strings of the  
"Native Plant Restoration" Movement,  
visit these websites:**

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**[www.MillionTrees.me](http://www.MillionTrees.me)**

**[www.SutroForest.com](http://www.SutroForest.com)**

**[www.HillsConservationNetwork.org](http://www.HillsConservationNetwork.org)**

**[www.facebook.com/SaveOurDimondParkTrees](https://www.facebook.com/SaveOurDimondParkTrees)**

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# East Bay Pesticide Alert / Don't Spray California's 2013 Submitted OPPOSITION TO FEMA GRANT for UC; EBRPD; Oakland, dEIS response submitted 6/16/13

To Whom It May Concern:

East Bay Pesticide Alert, also known as Don't Spray California, is taking this opportunity to respond to any 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 over 8 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.

The toxicity of the various pesticides in the plans was handed to representatives of the various agencies involved; Jean Quan; Jake Sigg of the CA Native Plant Society; the two Friends of Sausal Creek "leaders" at the January 26, 2005, hearing whom Jean Quan identified as having come to her asking her help to get another exemption to the city "ban" on pesticide use so that they could use pesticides around Sausal Creek. We have various toxicological profiles looking at Triclopyr-based pesticides; Glyphosate-based pesticides; and Imazapyr-based pesticides on our site's wildfire pages, what was handed to these people in 2005 (<http://www.eastbaypesticidealert.org/wildfire.html>), along with some other toxicological profiles of other pesticides used by EBRPD, for instance Surflan. An excellent essay follows those toxicological profiles, describing synergistic effects of pesticide products which are combinations of chemicals thrown together to make a pesticide product such as Garlon; RounUp; Stalker.

## **SYNERGISM**

From the dEIS:

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### 5.1.1.3 Cumulative Effects

Frequently herbicides are applied as a mixture. For example it is common practice to mix Garlon 4 (triclopyr) with Stalker (imazapyr). It is not possible to calculate the hazard for a mixture but hazards were calculated for each herbicide in the mixture and then combined if appropriate.

### 5.1.1.4 Adjuvants

Adjuvants are solution additives that are mixed with an herbicide solution to improve performance of the mixture. Adjuvants can enhance activity of an herbicide's active ingredient (activator adjuvant) or offset any problems associated with spray application. Activator adjuvants include surfactants, wetting agents, sticker-spreaders, and penetrants. Surfactants, or surface-acting agents, facilitate and enhance the absorbing, emulsifying, dispersing, spreading, sticking, wetting, or penetrating properties of herbicides. Adjuvants are not under the same registration guidelines as pesticides. US EPA does not register or approve the labeling of adjuvants. California Department of Pesticide Regulation does require the registration of those adjuvants that are considered to increase the action of the pesticide/herbicide it is used with.

Based on the analysis of possible adjuvants that may be used in the proposed and connected actions (see Section 2.1.2), including the design features, the risk of adjuvants (at the application rates provided in proposed and connected actions) would be low.

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Again, conflictual statements in the dEIS. Above in 5.1.1.3 we read, "It is not possible to calculate the hazard for a mixture." Whether it is possible or not is a separate issue but they just have stated they cannot. Next they say, "but hazards were calculated for each herbicide in the mixture and then combined if appropriate." In fact, this statement does not make sense. When chemicals are mixed synergism, potentiation, can occur. This is the effect of two chemicals combined creating what is considered a higher level of toxicity than the sum effects of two chemicals.

What do they mean? Hazards were combined? Do they mean that hazards were added up in sums, like 2 + 2 on a chalkboard? That is not useful to us if we want to know the real effects on living organisms. In fact, they have given the very reason that pesticide use must not be allowed at all, because even for those who feel fine about risking their own families' lives by having pesticides used around them, this document clarifies that the combined chemicals according to them cannot be understood in terms of their effects, and therefore their statement in 5.1.1.4, "the risk of adjuvants (at the application rates provided in proposed and connected actions) would be low," cannot truthfully be made. It is illegal to call pesticides safe. Is this an attempt to do an end run around this law? In fact, we have known since at least 1988 (Sawada) about POEA, a surfactant used in RounUp in some formulations, being linked with cancer, that its inclusion activated and potentiated the "work" of the "active ingredient", Glyphosate. This is no new news. As it says in the dEIS, "Adjuvants can enhance activity of an herbicide's active ingredient." This fact is not being disputed so it is unconscionable that the dEIS authors conclude that, "the risk of adjuvants (at the application rates provided in proposed and connected actions) would be low".

## **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 dysfunction. They translocate and endanger water supplies. We offered them alternatives in 2005, 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 gardeners' basic principles of starving plant life of the photosynthesis process was offered. No photosynthesis, no sugars to feed the plant (read: resprouts). A dark tarp 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 resprouts 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 very few cases of diseased trees which legitimately should be felled if they would be likely to collapse in an area where people or homes would be damaged, after fellings these agencies could be cutting back resprouts, 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, Jean Quan, who wanted to join in the hills pesticide use pushed by UC and EBRPD, used these resprouts 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 resprouts but never bothered in that time period to have the sprouts cut back down. Further, Jean Quan, City Council member then, Mayor now, recently was cited for creating fire danger in her neighborhood by negligence around her home (September 2011: <http://www.ktvu.com/news/news/irate-neighbor-calls-oakland-mayor-juan-queen-of-b/nD5P5/>). These requests for FEMA grants were in many ways fueled by Jean Quan who has proven herself to be irresponsible around her own neighborhood in the most basic of ways. FEMA should take no lead from someone apparently having no interest in universally-agreed upon fire safety methods of keeping areas around homes clear of brush.

## **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/wpad.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. Look at our wildfire page to see a group of toxicological profiles partway down the page: <http://www.eastbaypesticidealert.org/wildfire.html>

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.

## **DOES THE DECEIT NEVER END?**

From the dEIS:

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None of the herbicides proposed for use in this project were identified as carcinogens; therefore, only non-cancer hazards were evaluated. Adverse ecological effects were evaluated by comparing exposure concentrations to reference doses or toxicity values. The ration of exposure to toxicity is referred to as a hazard quotient (HQ). An HQ assumes that some level of exposure exists below which even sensitive populations are unlikely to experience significant adverse effects. HQs below 1 suggest acceptable risk, while HQs equal to or exceeding 1 may suggest unacceptable risk.

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Once again, we must consider synergism. Possible carcinogenicity of pesticide products is based on so-called "active ingredients", what are called 'inerts' (can be 99.99% of a product) not evaluated for carcinogenicity, and as they are proprietary, we have no ability to try to evaluate carcinogenicity by identifying separate chemicals and checking for whether any of them are carcinogens. We are left in the dark.

## **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.

## **RISK ASSESSMENT: THE UNETHICAL PRACTICE OF DECIDING SOME PEOPLE AND OTHER BIOLOGICAL ORGANISMS ARE AN "ACCEPTABLE RISK"**

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 exists 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.

Repeatedly in the dEIS, what are called "Best Management Practices" are based in vagueries and sometimes conflicting numbers such as reference to "windless nights", "apply on windless days to reduce drift", "when wind speed is low" or "less than 2 mph" winds, or "wind must be less than 3-5 mph".

Who determines wind speed? A quick internet search of 'wildfire abatement wind speed predictor tool' and 'wind speed predictor tool' show no item which, on the spot, would provide such information as the wind speed and directions change; indeed, it appears that the methods a Sonoma County Deputy Ag. Commissioner, Jim Sallee, told Sonoma Pesticide Alert in the mid-90's were the ways that growers were using to determine whether it was a "good" time to apply pesticides in vineyards or on oats and hay, looking at a wind sock, or burning old tires, seems to be approximately what is being suggested in this dEIS. Based on 5 months of photography of pesticide applications in the Sonoma Valley primarily in 1998 and 2000, every time of day and night, photos demonstrate why there is not going to be a "windless" situation and that, there is no way to be able to assume that even if specific wind speed could be stated in one moment, it would remain so.

From the introduction to the Screening Level Human Health and Ecological Risk Assessment section of the dEIS:

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.... herbicides would not be applied to foliage outside the buffer when wind speed is greater than 10 mph or less than 2 mph. Very low wind speeds are conducive to drift because very light winds are highly variable and are associated with inversion conditions, in which mists and vapors tend to stay near the ground rather than dispersing upward.

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Photos on our website (photos of changing winds taken by author literally a few seconds between photos) show a typical "low wind" night in the Sonoma Valley where, like in the East Bay, inversion layers are common: <http://www.dontspraycalifornia.org/pixwc.htm>. Here in the dEIS direction for applying only between 2.01 mph and 9.99 mph is given, while in the "Best Management Practices" sections 3-5 mph is one directive. What will determine the difference between 2.01 and 2.99 mph for the pesticide applicators applying toxics? Wind speeds change continuously; this is inexact and conflictual direction posing as science. Perhaps we should collect old tires and haul them to the hills for disposal.

From the dEIS:

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Surface water could be impacted by herbicides being directly sprayed on the water, by windblown spray reaching the water, or by precipitation and runoff carrying herbicides from the application site to surface water. Visitors participating in recreational activities such as swimming or boating could then be exposed through skin contact to contaminants in surface water or through incidental ingestion of the water. Further, anglers may, in theory, be exposed to chemicals taken up into fish through consumption of fish taken from nearby surface water bodies.

Groundwater could also be impacted if precipitation percolating through soil transports herbicides to groundwater. Surface water or groundwater affected by herbicides could in theory be used for drinking water or irrigation of home grown vegetables; therefore, risks to residents should be considered for these possible exposure pathways. However, most residents use public water supplies. In addition, surface water or groundwater in the area may be used for irrigation of agricultural crops. Uptake of chemicals into crops and subsequent consumption by people in the area is a possible exposure pathway.

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There is no reference for the meaning of 'most', or for which residents the dEIS authors include. Many residents of Alameda and Contra Costa Counties, including the author of these comments, are on well water, without potential protections of municipal water supplies. That is many hundreds of people in the development in which my family lives, probably 400 or more people. One reasonably may conclude that they consider all people on well water, in two counties, an acceptable risk.

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, and other organisms, is acceptable to those who theorize about the potential impacts 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 fellings 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 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 cutting down healthy trees and using 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 around 500,000 trees, then apply pesticides for the next 13 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.

## **TIMBER HARVEST PLANS ROUTINELY ARE DENIED**

It is routine practice to deny timber harvest plans which will lead to clearcutting or deforestation, as UC already has demonstrated by its clearcutting in the Berkeley Hills. The erosion that has been created by UC's actions clearcutting in the Berkeley hills already has caused landslides, and danger to residents and visitors to the hills, while damaging the habitat of many species. Tree removals commonly can lead to erosion of stream banks.

Creek bank stability is the very reason that eucalyptus was planted over 100 years ago in San Leandro Creek, to stop erosion, which it has accomplished handsomely, while providing generous raptor habitat and the only safe crossing between the hills and flatlands for terrestrial creatures since Highways 580 and 13 were created. Yet, the county has the intention of removing these glorious trees, wrecking the habitat, again with Jean Quan seeming to be behind it. She has met with a creeks group, Friends of San Leandro Creek, making plans for yet another "native plant restoration" project, as she had met behind closed doors with some self-appointed leaders of Friends of Sausal Creek in 2004 to plan to get an exemption to what was called a city "ban" on pesticide use, and as she did in 2012 to plan the removal of nearly 100 year-old redwoods from Sausal Creek, which runs through Dimond Park. Neighbors of Dimond Park had not even been notified of the plan, as most members of FOSC had not been, until 2 days before the felling was to occur. This plan was based on lies and deceit by some people from FOSC who were leading the charge, and confused many of the hundreds of people they refer to as FOSC members.

<https://www.facebook.com/SaveOurDimondParkTrees?>

## **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 contractors' or subcontractors' use, and records for contractors and 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 (and Redwoods) seem to miss the irony of the city Office of Parks and Recreation boasting photos in their marketing materials showcasing eucalyptus (and Redwoods), 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 had a misleading title of "Integrated Pest Management Specialist". Ms. Brownfield, now deceased of cancer, as we were told by a former EBRPD worker, 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. In fact, under her tenure pesticide use increased, as we had noted in 2005, and as is noted in this dEIS.

To make matters worse, EBRPD 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.jludsonseeds.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.l.jpg> and:

<http://www.scrippsranh.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 had 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 effects of any quickly shifting climate changes on either global levels or local levels, shifts which can completely change the ecology of an area and put our bodies, already physiologically-challenged, at increased risk for health problems. We have co-evolved over the past few



generations in the Bay Area with hills covered in oxygen-producing, carbon-sequestering trees. To wholesale remove, and to use pesticides in addition, killing off most living things in their midst, creates dramatic imbalance in an already rapidly-changing world. 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, made even more stark in these plans which in addition to felling trees, and killing many species of vegetation, includes chemical toxins which also would kill off many kinds of wildlife, directly and indirectly.

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 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. EBPA points out that, in this case FEMA should choose the No Action Alternative.

Thank you for your attention to this matter.

Sincerely,

Maxina Ventura  
Chronic Effects Researcher  
East Bay Pesticide Alert

additional quotes regarding UC:

<http://www.dontspraycalifornia.org/gwss/031901santabarbara.htm>

SANTA BARBARA COUNTY 3/19/01  
805-681-5600 fax: 805-661-5603  
263 Camino Del Remedio, Santa Barbara 93110

I spoke with Ag. Commissioner, William Gillette

<<M: I brought up Sudden Oak Death Syndrome and how by following media in the Bay Area and a San Jose Mercury News spread of a couple month ago, it is apparent that the State's approach is the same: yell emergency and push chemicals.

W: That's coming out of UC, much to my dismay. I'm perfectly OK taking the rap for the county or state when we make a mistake. I've been vocal about that... it's carefully written. They say materials to use but say they don't know if they are effective or how to use them! It's just wrong. It's a classic... we have a problem...people want answers now. We jump the gun to take the pressure off but can't put out info that way. Yeah, the pattern is pretty similar. That one's coming from the UC.

If you want to be really cynical, this fight (around the GWSS) involves a lot of job security.

The key is buying enough time.>>

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<http://www.dontspraycalifornia.org/gwss/everettdietrich3-19.htm>

Everett Dietrich of Rincon Vitova Insectiary. Mentor of Kate Burroughs, 80 yrs old, going strong, 50 years in the biocontrol business. He worked 15 years for UC in the Department of Biological Controls. On aphids.\*\*\* He said, laughing, You can quote me on this, I don't work for the University anymore!: But with all the money going into this, they're gonna have to justify what they have done."

He said there are a number of contracts out to grow these parasites, but he hasn't found any successful way of doing it. It is not cost-effective unless you have a steady market.

\*\*\* If I grow gwss parasites, it will go away by itself and I will have no market.

The other insectiaries [?that are growing the wasps??] have a subsidiary company that has Pesticide Control Advisors, the find a spot where every insect they grow can be sold. As long as you have a place to put every insect.

The University needs money, so their policy is "Make as big a deal of it as you can"

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**Comments on the East Bay Hills Draft Environmental Impact Statement  
for the Federal Emergency Management Agency (FEMA)  
Wildfire Pre-Disaster and Hazard Mitigation funding requested by  
the University of California, City of Oakland, and East Bay Regional Park District**

Isis Feral - June 17, 2013

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The University of California (UC), the City of Oakland, and the East Bay Regional Park District (EBRPD) have applied for FEMA funding for four fire mitigation projects in the East Bay Hills, spanning 1,000 acres of a total of over 2,000 acres of connected projects, in Alameda and Contra Costa Counties.

FEMA funding for these projects should be denied, because the planned actions do not accomplish the purpose of the Pre-Disaster and Hazard Mitigation Grant programs. They do not protect life, but instead increase fire danger and contribute to ecological devastation.

The Draft Environmental Impact Study should be rejected, as it does not adequately address the health and environmental hazards of logging tens of thousands of trees from the environment, and spreading toxic chemicals.

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**INCREASED FIRE DANGER**

The projects' stated intent is to reduce fire danger, but the proposed actions are more likely to increase fire danger. In addition to clearcutting moisture-rich forests and turning them into dry, flammable grasslands, as well as removing windbreaks, giving Diablo

winds free rein to drive fires into our communities, large piles of chipped, dead vegetation are to be spread over large areas, and herbicides planned for use increase the flammability of vegetation, and may themselves have flammable components.

One of the herbicides to be used in these projects, Garlon 4, for example, contains kerosene, which is highly flammable, and produces toxic fumes when it does burn.

The manufacturer's Material Safety Data Sheet for Stalker, another herbicide to be used, warns that if the product is involved in a fire, toxic vapors will be released. This is not an unusual warning for pesticide products, and shows that chemical use in fire prone areas is particularly irresponsible.

Experiments by community activists also showed that herbicides in general make vegetation more flammable than vegetation that was not exposed to herbicides ([http://www.dontspraycalifornia.org/Cheriel\\_Response.html](http://www.dontspraycalifornia.org/Cheriel_Response.html)).

Meanwhile the Draft EIS makes allowances for hills residents violating existing fire safety regulations, stating that one of the alternatives proposed in public comments, to focus on ensuring there is defensible space around homes, has "major limitations as a wildfire mitigation program. First, it depends on active and continuing participation by thousands of people. Many property owners do not comply with the existing defensible space requirements, and enforcement of the requirements may not be a top priority of state and local government." (DEIS 3.3.3.1 <http://ebheis.cdmims.com/>)

A particularly poignant example of this is Oakland's Mayor Jean Quan who was not long ago called the 'Queen of Blight' for failing to secure the space around her own home in the hills (<http://www.ktvu.com/news/news/irate-neighbor-calls-oakland-mayor-quan-queen-of-b/nD5P5/>).

However, the answer to irresponsible neighbors, or lax enforcement of safety laws, is not to chop down and poison ecosystems to excuse and accommodate more of the same irresponsible behavior. That is not what federal emergency funding is for. One would think that residents of an area considered for emergency funding might make it a priority to take safety precautions themselves. It seems that perhaps it's not such a big emergency after all.

The DEIS continues on to say that "[t]he second major limitation of defensible space as a wildfire mitigation program is that it does not address the large amounts of vegetative fuel in undeveloped areas." (3.3.3.1) The implication here is that the problem is not human development, but the undeveloped wilderness which the development itself is encroaching upon.

But as one retired Oakland firefighter recalls, who was appointed to the 1991 Oakland-Berkeley Mayors' Task Force on Emergency Preparedness & Community Restoration, it was not trees, but human structures that were primarily to blame for the spread of the 1991 fire. The task force explicitly advised against targeting specific tree species for eradication: [http://www.contracostatimes.com/montclarion/ci\\_12946185](http://www.contracostatimes.com/montclarion/ci_12946185)

"The Task Force Report concluded that the spread of the fire was mostly due to the radiant heat generated by burning houses. A burning house has a sustained radiant heat transmission of 2,500-3,000 degrees. The spread of the fire was not due primarily to burning trees — eucalyptus or any other species."

FEMA's own analysis of the 1991 fire came to the same conclusion that homes and native chaparral were the main source of fuel for the fire (both reports are linked from and summarized here <http://milliontrees.me/fire-the-cover-story/>).

Firefighters have long complained about the exploitation of their labor, and the expectation that they risk their lives to protect property that was knowingly placed in the path of inevitable destruction, so for example said one: <http://firechief.com/wf-public-education/dj-vu-all-over-again>

"I strongly support the concept of individual freedom except when it costs me, and other taxpayers, unreasonable amounts of our tax dollars to indulge the foolishness of those who chose to build and live in those areas like Hurricane Alley and the interface. More importantly, I can't support that choice when those folks expect me and my fellow firefighters to place ourselves in unnecessary risk to save the property that they did not take the basic precautions to protect from wildfire. "

In fact, national wildfire policy in general has come under attack in recent years, and in a lawsuit by the Forest Service Employees for Environmental Ethics (FSEEE), the father of a firefighter killed on the job said: <http://community.seattletimes.nwsources.com/archive/?date=20031015&slug=wildfires15>

"It's one thing to die in the service of your country for a justifiable proper cause,' said Weaver. 'The problem is we've got these kids out there dying for something that is scientifically bankrupt. We are subverting nature, causing more damage than good, and we are taking kids' lives. That is just so wrong.'

The lawsuit argues that wildfire is a natural phenomenon in forests throughout North America, but the Forest Service policy of trying to put out nearly all wildfires has created conditions that have produced huge wildfires in recent years."

The East Bay Hills projects follow a similar trajectory, as they attempt to impose unreasonable controls on these natural phenomena, and in the process do more harm than good, increasing fire danger instead of reducing it, and destroying ecosystems instead of protecting lives.

The East Bay Hills projects are at their core about development. While I understand and sympathize with the desire to live in a natural environment, and I certainly don't want anyone to get hurt in a fire, I strongly oppose any further destruction of precious forests so that people can feel more comfortable building (and perpetually rebuilding) their flammable wooden houses in a wildfire zone.

Another public comment that was dismissed by the DEIS was the suggestion to focus on replacing roofs with fire resistant materials. But in addition to safer roofs, it is absurd that timber construction of exquisitely flammable tinderboxes continues to be permitted in wildfire zones. Any fire mitigation project should first focus on what provided the primary fuel for the 1991 fire: the human-built structures.

A few years ago, when Oakland firefighters saved the building I live in, they told us that the entire six unit residential structure would have been gone within another 2-3 minutes. Compare that with the couple of hours it can take to burn through a strawbale wall, or the clay-firing effect of fire on an earthen wall. Even thick layers of earthen plaster would increase the fire resistance of existing timber structure, and should be undertaken by all residents in the hills. In traditional societies plastering homes at regular intervals is an activity that brings communities together.

For some of the fire tests performed on strawbale structures, please see:

\* [http://www.one-world-design.com/straw\\_bale\\_fire\\_safety.asp](http://www.one-world-design.com/straw_bale_fire_safety.asp)

\* [http://www.earthgarden.com.au/strawbale/fire\\_test.html](http://www.earthgarden.com.au/strawbale/fire_test.html)

\* <http://www.potkettleblack.com/natbild/fire.html>

Cob or rammed earth, natural building methods similar to adobe, but seamless and monolithic, instead of bricks mortared together, essentially turn to ceramic in fires. In fact, Nader Khalili, founder of the California Institute of Earth Art and Architecture (Cal-Earth) in Hesperia, experimented with the Geltaftan building method, where he turned earthen structures into their own kiln, burning them from the inside to create ceramic houses ([http://archnet.org/library/sites/one-site.jsp?site\\_id=260](http://archnet.org/library/sites/one-site.jsp?site_id=260)).

Both strawbale and cob structures have also done very well in seismic tests, and thus are suitable for building in the Bay Area:

Strawbale shake tests: <http://naturalhomes.org/earthquakestraw.htm>

Cob shake tests:

\* <http://www.builtinbliss.com/wp-content/uploads/2013/01/01a.-The-Stanley-Park-Earthen-Architecture-Project-Shake-Te.pdf>

\* <http://www.builtinbliss.com/wp-content/uploads/2013/01/01b.-The-Stanley-Park-Earthen-Architecture-Project-Shake-Te.pdf>

The Draft EIS prefers methods which would devastate ecosystems and increase fire danger over alternatives that would actually address the problem at the root, at human development and its practices. A better use of FEMA emergency funds would be to fund earthen building practices in the hills, help residents create defensible space around their homes, address access issues that hinder firefighters, and bolster the fire department with additional firefighters and tools to aid their work.

It was shortly after budget cuts that crippled an already underfunded fire department, that the City of Oakland, specifically then Councilwoman Jean Quan, previously mentioned as the 'Queen of Blight', first began promoting this toxic project in the hills, and switched from firefighters to herbicides and chainsaws.

## **ADDITIONAL ENVIRONMENTAL HAZARDS**

The DEIS admits that these projects may result in an increased potential for soil erosion and landslides; reduction of soil productivity caused by the wood chips; potential for sedimentation and herbicide contamination of watersheds; carbon dioxide and air pollution during burning of cut vegetation, including carbon monoxide emissions exceeding the California Air Resources Board de minimis threshold for general conformity (though no mention of herbicides or machinery impacting air quality); shorter growing season in areas where trees are cut due to decreased fog-drip in summer; increased ground-level wind speed downwind of ridgelines; potential health effects of herbicide on workers, residents, park users; temporary restrictions on recreational use of trails (considering herbicide persistence, this is not a temporary restriction, but a long term access barrier); significant noise in project areas; as well as a long list of creatures present in the project area that would be impacted.

Thousands of trees represent habitat for millions of organisms. So much damage has already been done to the natural environment in the East Bay Hills, that at the time of the scoping comments, the Berkeley Police was caught unprepared by a

mountain lion driven into the city, where it posed a substantial threat to a neighborhood a few blocks away from downtown (<http://www.sfgate.com/cgi-bin/article.cgi?f=/c/a/2010/08/31/MNV41F6FIP.DTL>). With ever larger areas of habitat disturbed by vegetation removal and poisoning of the environment, communities surrounding the hills will likely see more such desperate, disoriented, and quite possibly poisoned, wildlife wandering into our urban neighborhoods.

The potential problems listed for the no action alternative are all connected to potential wildfires, whereas the actions proposed have far more varied and far reaching impacts beyond the community in the fire zone. A significant oversight is the claim that the only socioeconomic impact is reduced potential for fire, but no mention of the medical bills for those who will get sick from these actions.

## The Herbicides

Pesticides are hazardous to both human and ecological health. As is usually the case with pesticides, more health hazards have been identified since the following toxicological profiles were assembled from the research available at that time. Summarized are some of the specific dangers of the herbicides planned for use in these projects:

**Garlon** <http://www.pesticide.org/get-the-facts/pesticide-factsheets/factsheets/triclopyr>

The active chemical ingredient in Garlon is triclopyr. Acute exposure symptoms include, but are not limited to, difficulty breathing, lethargy, incoordination, weakness, and tremors, as well as skin sensitization, increasing subsequent exposure symptoms. In lab animals an increased incidence of breast cancer, kidney damage, various reproductive problems, and genetic damage, was observed. Triclopyr's breakdown product 3,5,6-trichloro-2-pyridinol (TCP) disrupts nervous system development, and in lab tests, it accumulated in fetal brains when exposed during pregnancy.

Triclopyr also causes complex ecological impacts, including, but not limited to, interfering with nitrogen cycling, and inhibiting the growth of beneficial mycorrhizal fungi that aid nutrient uptake in plants. It has been observed to reduce the diversity of mosses and lichens. The breakdown product TCP is toxic to soil bacteria. Triclopyr is mobile and persistent in soil, has contaminated wells, streams, and rivers, and has the potential to contaminate ground water. Increased growth of algae has been observed after triclopyr applications. It is highly toxic to fish, affects oyster larvae, and disturbs frog behaviors that help them avoid predators. It also decreases the survival of bird nestlings, is toxic to spider mites, and affects other beneficial insects and spiders by killing plants they depend on for food and shelter.

**Roundup** <http://www.pesticide.org/get-the-facts/pesticide-factsheets/factsheets/glyphosate>

The active chemical ingredient in Roundup is glyphosate. Roundup also contains the surfactant polyethoxylated tallowamine (POEA), which is even more toxic than glyphosate, and the combination of the two is more toxic than either chemical on its own. Acute exposure symptoms include, but are not limited to, eye and skin irritation, blurred vision, skin rashes and blisters, headache, nausea, dizziness, numbness, elevated blood pressure, heart palpitations, coughing, congestion, and chest pains. Extended exposures have been associated with non-Hodgkin's lymphoma, miscarriages, premature birth, and other reproductive harm. In lab animals there was an increase in testicular, kidney, pancreas and liver tumors, as well as thyroid cancer. Studies have shown glyphosate to be mutagenic, and to cause chromosome and DNA damage.

Glyphosate also causes complex ecological impacts, including, but not limited to, inhibiting the growth of nitrogen-fixing bacteria and mycorrhizal fungi, reducing seed quality, and making plants more susceptible to disease. Glyphosate drifts extensively, and is mobile and persistent in soil. Its persistence in soil varies widely, from days to months, but has been found to persist on some forest sites for as long as 3 years. It has been found in both ground and surface water, has found its way into streams and rivers, and contaminated wells. Both glyphosate and POEA are toxic to fish. Roundup has been shown to kill various beneficial insects, such as species of parasitic wasps, lacewings, ladybugs, predatory mites and beetles. Glyphosate also reduces the growth of earthworms, and affects other beneficial insects, spiders, birds, and wildlife by killing plants they depend on for food and shelter.

**Stalker** <http://www.pesticide.org/get-the-facts/pesticide-factsheets/factsheets/imazapyr>

The active ingredient in Stalker is imazapyr. Acute exposure symptoms include, but are not limited to, eye and skin irritation. It is corrosive and can cause irreversible eye damage. Acute effects on lab animals included bleeding and congested lungs, congestion of kidneys, liver, and the intestine. Chronic exposure in lab animals caused fluid accumulation in the lungs, kidney cysts, abnormal blood formation in the spleen, increase in brain, adrenal gland, and thyroid cancers. Quinolinic acid, a breakdown product of imazapyr, causes eye, skin, and respiratory irritation, and is a neurotoxin which causes nerve lesions and symptoms similar to Huntington's disease.

Imazapyr is very mobile and persistent in soil. It has been shown to persist in soil for well over a year. It can disrupt nutrient cycling by slowing down the decomposition of plant material. Imazapyr has contaminated both surface and ground water. Ozone degradation, to remove pesticides from drinking water, removes only half of the contamination. Imazapyr is highly toxic to fish.

In addition, herbicides listed in EBRPD's fire plan ([http://www.ebparks.org/Assets/files/fireplan/ebprd\\_whrrm\\_plan/5-VegMan.pdf](http://www.ebparks.org/Assets/files/fireplan/ebprd_whrrm_plan/5-VegMan.pdf)) include:

**Clopyralid** <http://www.pesticide.org/get-the-facts/pesticide-factsheets/factsheets/clopyralid>

Clopyralid is an eye irritant. Some products containing clopyralid can cause permanent impairment of vision. In lab animals clopyralid caused substantial reproductive problems, including reduced weight and skeletal abnormalities, as well as excess fluid around the brain, of fetuses. Effects on the stomach, liver, blood, and body weight of animals was also observed.

Clopyralid is persistent in soil, and has been measured in soil for up to 14 months. Residues have also been found in compost and mulches, causing damage to plants where used as soil amendments. Plant damage from clopyralid can be passed on for several generations. Clopyralid is particularly volatile, drifting away from the site of application by evaporating from foliage. It is also very soluble in water and very mobile in soil, and has been found in river basins. It is toxic to several beneficial insects, including species of lacewings, ladybugs, and pirate bugs.

**Dicamba** <http://www.pesticide.org/get-the-facts/pesticide-factsheets/factsheets/dicamba>

Dicamba exposure symptoms include muscle cramps, shortness of breath, nausea, vomiting, loss of voice, swollen glands, skin irritation and sensitization, as well as severe eye irritation, and can result in irreversible eye damage. It is associated with the inhibition of the nervous system enzyme acetylcholinesterase, as well as non-Hodgkin's lymphoma. In lab animals it has caused weight loss, liver damage, and fetal loss. Dicamba has caused chromosome and DNA damage.

Dicamba evaporates easily and has been shown to drift for miles. It is toxic to some nitrogen-fixing bacteria, as well as some algae that contribute to soil fertility, and it impacts soil nutrient cycling by reducing enzyme activity in soil microbes. It is mobile in soil, and has been shown to persist in soil as long as a year. It has contaminated rivers, ponds, groundwater, and drinking water supplies. Tests show wide variations of toxic effects on fish and other aquatic organisms. Researchers have documented that dicamba reduced germination of oak seedlings.

## Undisclosed ingredients and chemical mixtures

In addition to active ingredients and their breakdown products, herbicides contain a large percentage of so-called "inert" ingredients, which are kept undisclosed, protected as "proprietary" by trade secret laws. They are frequently even more toxic than the active ingredients listed on the label, and are specifically designed to interact synergistically to achieve greater toxicity than each chemical by itself (<http://www.ncbi.nlm.nih.gov/pmc/articles/PMC1764160/pdf/ehp0114-001803.pdf>).

Some inert ingredients, such as the surfactant POEA in Roundup, have been identified. POEA causes eye burns, skin redness and swelling, blistering, nausea, and diarrhea. Another ingredient in some Roundup products is isopropylamine, which causes injury to the tissue of the mucous membranes and upper respiratory tract, wheezing, laryngitis, headache, and nausea. The details about most other inert ingredients and their effect is being withheld from the public, including from medical workers. Some of the herbicides to be used in these projects are also to be mixed with a dye.

Contamination during manufacture further adds to the danger of chemical use. POEA is contaminated during manufacturing by 1,4 dioxane, which is recognized as a carcinogen under Proposition 65. Dicamba is contaminated during its manufacture with 2,7-dichlorodibenzo-p-dioxin, which has been shown to cause birth defects and cancer. Dicamba can also be contaminated with dimethylnitrosamine, which causes cancer as well.

Synergistic effects also come into play when herbicide products are being combined, as is planned in these projects. Mixing can also occur when different herbicides are used near each other, and chemicals combine as they drift by air, water, soil, and contact. Because chemical residues can persist in the environment for a long time, subsequent applications of different herbicides can also combine into new mixtures. Synergism can exponentially increase chemical toxicity (<http://www.ourstolenfuture.org/newscience/synergy/mixtures.htm>).

## Dose response

Manufacturers and other proponents of pesticides often downplay the dangers, by claiming that they are using a negligible quantity of chemicals. While this is debatable on many levels, it is also irrelevant. Some effects, specifically endocrine disruption, are subject to a nonmonotonic dose response, where decreasing exposure levels can actually cause greater impacts (<http://www.ourstolenfuture.org/newscience/lowdose/nonmonotonic.htm>). Disruptions to the endocrine systems are far reaching, and can cause a vast number of reproductive problems, various cancers, and can impair immune and neurological functions.

Glyphosate has been shown to be an endocrine disruptor (see: <http://www.ncbi.nlm.nih.gov/pubmed/19539684> and <http://www.greenmedinfo.com/blog/breaking-glyphosate-roundup-carcinogenic-parts-trillion-range>). Endocrine effects of the other pesticides in this program have not been adequately studied, and with a large percentage of the ingredients undisclosed, so are their effects.

Body burden studies (<http://www.ewg.org/sites/bodyburden1/>) have shown that chemicals accumulate and persist in our bodies over time, including chemicals to which we were exposed by drift or extensive cross-contamination. Most alarming are the

increasing findings that chemical injuries are being passed on by various means over generations (<http://www.organicconsumers.org/Politics/toxins060605.cfm>).

Chemical exposures have harmed countless people, causing fatal or disabling illnesses, including, but not limited to, lung diseases, cancers, neurological disorders, reproductive harm, immune deficiencies, and increased sensitization to chemicals. For millions of people already disabled by exposure to toxic chemicals, the herbicide applications by UC, EBRPD, and the City of Oakland present especially severe health risks and direct obstacles to access. They deny access to local public parks, including to historic sites, to those of us who most need refuge from urban pollution. Obstacles to access to public space are a violation of the Americans with Disabilities Act.

I made most of these points in my scoping comments, but none of them have been addressed adequately in the DEIS. The access barriers for people with various disabilities caused by chemical injuries, and the right to access to public space, are not mentioned at all. Among the cooperating entities that are participating in the production of the EIS, where are the environmental health physicians, who have worked with victims of pesticide poisoning and other toxic injuries?

## **Safety claims**

The DEIS compares estimated exposures to a 'safe dose'. But as referenced in the section on the nonmonotonic dose response in my comments, the dose does NOT make the poison. There is no 'safe dose' of pesticides. Pesticides are all by definition toxic. It is in fact illegal to claim that any pesticide is safe.

At a recent forum about the East Bay Hills projects Tom Klatt, the UCB Environmental Projects Manager, who has been advising various local agencies to use herbicides for years, and who has been the driving force behind these projects in the East Bay Hills, claimed that they would be using a "fairly benign herbicide" (<http://www.youtube.com/watch?v=w4Wmlze2xms> 25:45).

## **Risk Assessment vs Precaution**

The approach of estimating 'safe' exposure levels is typical of toxic industries and government agencies to defend their toxic actions. It's based on Risk Assessment methodology, which determines what is an 'acceptable' or 'negligible' risk, as public and environmental health is weighed against 'economic' benefits for some, and life and health of others is sacrificed.

The 'acceptable risk' this methodology refers to are real people like myself, who have been injured by pesticide exposures previously, and others who are particularly vulnerable to the effects of poisoning, and I take personal offense at this approach. Loss or reduction of profits for filthy rich entities like UC is never deemed a 'negligible' or 'acceptable risk'.

The polar opposite approach to Risk Assessment is the Precautionary Principle, which essentially makes decisions on the basis of 'better safe than sorry', and puts the burden of proof that an action is truly safe on those who propose it, instead of on the potential or actual victims of the action.

Being a community means that we don't exclude and abandon the most vulnerable among us. Wrapping 'science' in Risk Assessment terminology is used to divide and conquer, to turn us against each other, and to teach us that it's okay to risk the well-being of others for our own perceived comforts. It has nothing to do with science, and everything to do with the selfish aims of some.

## **Native habitat**

While the stated intent of the agencies requesting FEMA funding is fire mitigation, their plans specifically single out so-called 'non-native' plant species for eradication, something that the experts involved with the 1991 firestorm task force explicitly advised against. It appears UC, EBRPD, and the City of Oakland are attempting to appropriate federal emergency monies for native plant restoration projects.

In fact, in the City of Oakland's 2006 press release, announcing the beginning of this EIS process, the public is being misled into believing that "efforts for conversion to native vegetation are objectives included in the grant" (<http://www.oaklandnet.com/wildfireprevention/docs/PressReleaseOaklandFEMAPDMGrant2006.pdf>).

Every proponent of these projects that I've spoken with consistently talks about native vs. non-native species, and many are referring to them as restoration projects. Someone actually suggested to me that a redwood forest will magically grow out of the denuded ground.

The DEIS describes the goal of these projects as 'eradication' of certain species of trees, specifically limited to so-called 'non-native' ones. But eradication is not a fire mitigation activity. It is a pest control activity, and as such not eligible for this funding.

According to the eligibility requirements (<http://www.fema.gov/library/viewRecord.do?id=3576>), not eligible are "[p]rojects to address ecological or agricultural issues related to land and forest management (i.e., insects, diseases, weather-related damages, and infestations)". Throughout the DEIS the targeted species are characterized as invasive plants, which are included in the

definition of 'infestation' by both government agencies and UC (for example <http://www.fs.usda.gov/goto/centraloregon/invasive-plants-projects> and <http://www.ipm.ucdavis.edu/PMG/PESTNOTES/pn74139.html>).

At the recent forum where Tom Klatt spoke, he also said that "our firestorm window really only occurs 6 to 12 days a year" (<http://www.youtube.com/watch?v=w4Wmlze2xms> 27:00), but with the persistence of these chemicals, the toxic impacts of these projects will be constant. In fact, discussing the timeline of the three year destruction of the trees, plus another 10 years of maintenance using herbicides, he said "I actually don't foresee the maintenance ever really stopping - I mean, you can't stop managing the forest" (31:49). The concept of wilderness is clearly lost on Mr. Klatt, as he considers the forest a garden to be managed, quite literally to death.

Ironically, these projects are actually a threat to already endangered native species in the East Bay Hills. The herbicides threaten the California Red-Legged Frog, as well as the Presidio Clarkia, whose habitats are not adequately protected against the drift these chemicals are known for, regardless of application method. Both the Alameda Whipsnake and Alameda Pallid Manzanita are fire-dependent and threatened by the exclusion of fire from their habitat. The Pallid Manzanita specifically cannot reproduce without fire to sterilize the soil and scar its seeds. These species are also threatened by human development in general.

The DEIS admits that these projects will do potential damage to all these species, then makes contradictory claims that the projects will improve the environment for these same species. The fact is that these native species are threatened with extinction because of human development, chemical vegetation management practices, and aggressive wildfire prevention, the very actions these projects propose more of.

The entire xenophobic framework of native vs. non-native species is full of such contradictions, and conservation biologist David Theodoropoulos has done extensive research and field work that exposes 'Invasion Biology' as a pseudoscience (<http://dtheo.org/InvasionBiology.htm>).

Joining Tom Klatt in the disinformation at the recent forum, one of the most vocal proponents of these projects, Jon Kaufman, a member of the Board of Directors of the Claremont Canyon Conservancy, demonstrated the common lack of logic of this framework quite well: <http://www.youtube.com/watch?v=w4Wmlze2xms>

"Another concern was, aren't you going to be altering the ecosystem? Aren't there plants and wildlife and things on this hillside now that you're going to destroy when you remove the eucalyptus trees. Well guess what, that ecosystem was destroyed when those eucalyptus trees were planted a hundred years ago....What they're going to do in fact is restore it and make this area what it was intended to be in the first place." (58:21)

Aside from the misleading claim yet again that these projects are about restoration, one is left to wonder just precisely who 'intended' this area to be the way he believes it should be: Mr. Kaufman? God? The government?

Neither science nor democracy appear to be involved in this belief system, and it is certainly not something that a federal agency should base its policies on. But that is the ideology much of the analysis in the DEIS is based on. It is not based on sound evolutionary science, as Stephen Jay Gould explained in his article 'An Evolutionary Perspective on Strengths, Fallacies, and Confusions in the Concept of Native Plants' (linked from and summarized here: <http://milliontrees.me/2010/12/01/stephen-jay-gould-examines-the-concept-of-native-plants/>)

Mr. Kaufman's notion that ecocide somehow fixes previous ecocide is more than a little troubling. By this logic, people of European descent should be killed as to magically reverse the genocide of the native people who were here before the European invasion. It is particularly perverse that this hostility toward non-native species is largely promoted by people of European descent, who all the while refer to themselves as natives of the Bay Area (<http://claremontcanyon.org/mission.php>).

Meanwhile the EBRPD kills off non-native plant species, but has zero respect for the local human native community, which has demanded that the sacred site at Brushy Peak be closed off to visitors (<https://www.indybay.org/newsitems/2013/05/29/18737638.php>).

In contrast, the native community has a very different attitude towards so-called non-native plant, as expressed by the defenders of Sogorea Te, the native burial ground in Vallejo, which is also being desecrated: <http://protectglencove.org/about/>

"The Master Plan also calls for an aggressive extermination of non-native plant species. Procedures detailed in the Plan describe cutting down trees and applying herbicide to their exposed trunks and remaining root systems. The Plan also calls for years of ongoing herbicide application. Elders in the local Native community say that *All Life is Sacred*. We oppose extermination of the trees and plants that have taken root on this Sacred Burial Ground, regardless of whether they are endemic species or relative newcomers."

## **PUBLIC PROCESS**

While I appreciate that related projects are taken into consideration, the DEIS does not take into consideration that felling trees is never just a regional issue (<http://www.effects-of-deforestation.com/>), nor is this ongoing trend towards deforestation restricted to



the East Bay Hills. We don't have to look far to find more such programs, such as for example another UC project on Mount Sutro in San Francisco (<http://sutroforest.com/>), as well as other Bay Area projects (compiled here: <http://milliontrees.me/>)

Worse yet, it was too late for many of us to participate by the time we became aware of the Programmatic EIR currently being considered by the California State Board of Forestry and Fire Protection and Cal Fire, which may result in the loss of the public's right to input on the destruction of trees on 38 million acres - 1/3 of the state ([http://www.bof.fire.ca.gov/board\\_committees/resource\\_protection\\_committee/current\\_projects/vegetation\\_treatment\\_program\\_environmental\\_impact\\_report\\_%28vtpeir%29/](http://www.bof.fire.ca.gov/board_committees/resource_protection_committee/current_projects/vegetation_treatment_program_environmental_impact_report_%28vtpeir%29/)): "Generally all non-federal forest, range and grasslands might be treated. "

We certainly weren't notified by any agency that projects like the ones we've already expressed interest in were up for discussion. The California Chaparral Institute opposes this PEIR, and got its comments in (<http://californiachaparral.com/threatstochaparral/helpcalfireeir.html>), but many of us were not alerted in time to represent ourselves.

Many of us who've read enough EIR/EIS documents to last us a lifetime recognize that this process is rigged in many ways, ensuring that most of these projects are approved with little, if any public input. For the most part the approach used to assess projects has little to do with environmental health or democratic discourse, but more with rationalizing and quantifying dangers according to formulas that rely on guesses, budgets, and bias, and not on reality, or the needs of people and ecosystems, to justify actions regardless of public opposition. And apparently, if environmental consultants disagree with the actions proposed, it's okay to switch to more agreeable consultants in the middle of the process (<http://milliontrees.me/2013/05/27/environmental-consultant-evaluates-uc-berkeley-fema-project/>).

Notification is limited to barely noticeable ads, and to have consistent access to this process requires the public to monitor any and all agencies that might potentially be involved in related projects, as notification among fragmented, bureaucratic agencies does not trickle down to previous participants. As such, just keeping track of these projects becomes a full time job, as does reading through the thousands of EIR/EIS pages which a whole group of people were paid to produce, while most of the public must still work on their own jobs to survive. 30 days comment periods are not adequate for most working people to read, research, then write comments on such documents. As such the entire process is quite elitist and exclusionary.

The FEMA EIS process was just as badly publicized by the agency as the Cal Fire PEIR, until people across a wide political spectrum mobilized their neighbors to speak out at the last listening session, with the overwhelming majority opposing the projects, including several who pledged that, if necessary, they would place their bodies in the way of these actions and take direct action to stop these projects from moving forward.

In 2005, when the City of Oakland first resolved to produce environmental impact studies for their projects, several of us spent many hours researching the issue, and requested to be notified of the beginning of the EIR/EIS process. Instead of compiling a contact list of interested parties, city officials rudely insisted that we should simply keep checking the Wildfire Prevention Assessment District (WPAD) website for updates. Some of us have been doing this ever since, for the last 8 years. However, to this day, there is no mention of this process on the WPAD website (<http://www.oaklandnet.com/wildfireprevention/>), effectively excluding public input and opposition.

Oakland's approach to fire mitigation has been less than honest: In 2004 the city convinced East Bay Hills residents with brochures that pictured grazing goats, to pay an assessment for wildfire prevention. When the money was collected in 2005, officials suddenly attempted to exempt the WPAD from the city's pesticide ordinance. After the pesticide proposal was successfully challenged by the public, and the city agreed to conduct environmental impact studies, the city instead quietly entered into a partnership with UC to engage in the exact same actions, in violation of Oakland's pesticide ordinance, as is outlined in Section 4 of the DEIS.

As then Councilwoman Jean Quan was behind the attempt to further weaken our city's pesticide ordinance, which is already woefully inadequate, really a sham of a ban, we now have a mayor who actively violates, and tries to overturn local law, displaying a disturbing lack of ethics, which FEMA should not reward.

As for UC Berkeley, its request for federal emergency monies appears to be a development scheme in the making: The two areas ([http://www.hillsconservationnetwork.org/LBL\\_and\\_UC\\_Link.html](http://www.hillsconservationnetwork.org/LBL_and_UC_Link.html)) for which UC requests FEMA funding are immediately adjacent to Lawrence Berkeley National Laboratory, which is operated by UC, and is slated for massive expansion (<http://www.lbl.gov/LRDP/>). It is not FEMA's responsibility nor prerogative to fund LBL's Long Range Development Plan. The DEIS claims that there is 'no effect' on land use and planning, but considering UC's plans for development in the project area this is clearly not true.

Tom Klatt, has even been heard to say that UC would move forward regardless of FEMA funding. It is obvious from looking at UC coffers that this wealthy private entity is not in need of emergency funding, which should go to communities most in need.

## **CONCLUSION**

FEMA has already recognized that UC mischaracterizes fire danger, and does not have a handle on fire safety, when UCSF

applied for a fire mitigation grant for the same kind of project in a similar environment in San Francisco (<http://milliontrees.wordpress.com/2010/09/24/fema-sees-through-the-smokescreen/>). The FEMA grant applications for the East Bay Hills should be denied for the same reasons FEMA representatives expressed concerns during that application process.

The FEMA grant programs specify that the goal is to protect life. Chopping down forests and poisoning the environment accomplish the opposite. These projects do not create defensible space to safeguard homes. The vegetation removal is not limited, but will result in clear cuts. Plants targeted are being categorized as "invasives", which implicitly makes these projects pest control projects, and not eligible for the grants.

Instead of endorsing these actions, The FEMA East Bay Hills Final Environmental Impact Statement should reflect the real dangers these projects pose to public and environmental health, and put on the environmental record the actions these agencies, under the guidance of UC, are already undertaking, so that they can be held accountable for the environmental devastation they are perpetrating on our ecosystem.

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## **Public Comment Draft Environmental Impact Statement (DEIS) Hazardous Fire Risk Reduction – East Bay Hills**

*This is a summary of the 49-page public comment of Mary & Keith McAllister. The full comment provides scientific references to support every statement. The full comment is available on request from [marymcallister@comcast.net](mailto:marymcallister@comcast.net)*

### **The proposed project will increase the risk of wildfire in the East Bay Hills**

- The project will distribute tons of flammable dead wood on the ground, increasing the risk of fire.
- Prescribed burns will increase risks of wildfire.
- The vegetation that will grow where the trees are destroyed will be more flammable than the existing forest.
  - Oaks are being infected with the Sudden Oak Death pathogen at an epidemic rate. Dead trees will be more flammable than living trees.
  - Native vegetation is not inherently less flammable than non-native vegetation.
  - Native vegetation will not be planted. Native vegetation is unlikely to succeed the non-native vegetation that will be destroyed. Non-native grass and shrubs are the likely successors to the forest.
- Fire science does not predict reduced fire hazards from this project.
  - Grassland and shrubs are more likely to ignite and spread fire more rapidly than any forest.
  - Destroying the tree canopy will reduce fog drip, drying out the forest floor and making ignition more likely.
  - Destroying the tree canopy reduces shade on the forest floor which increases temperatures and facilitates ignition. Less shade also encourages the growth of grassy weeds that ignite more easily.
  - Destroying the tree canopy eliminates the windbreak which will enable a wind driven fire to travel unhindered. Most fires in California are wind-driven fires.
  - Replacing tall trees with native trees that are close to the ground creates fire ladders to the tree canopy that do not exist on tall trees. A fire ladder to the canopy increases the likelihood of a crown fire.

### **The proposed project will damage the environment by significantly increasing the emission of greenhouse gases both immediately and for the long-term.**

- The DEIS grossly underestimates the loss of carbon resulting from the proposed project.
  - The DEIS calculates only the carbon stored in the tree trunks, which is only 15% of the total amount of carbon stored in forests.
  - The carbon released by prescribed burns is not quantified by the DEIS
  - The DEIS calculations of carbon loss are reduced by 75% without any explanation of that reduction.
  - The DEIS calculations of carbon loss are for only the proposed project, but claim to include carbon loss from the connected project of the East Bay Regional Park District which grossly underestimates the cumulative impact of the project on the environment.
- Loss of the ability of the existing forest to sequester carbon in the future is not quantified by the DEIS
- The DEIS misrepresents or misinterprets scientific studies regarding carbon loss resulting from fuel reduction treatments. None of the studies cited by the DEIS support the claim that fuel reduction treatments will not result in carbon loss.
- A recently published study corroborates that thinning the forest does not significantly reduce fire risk nor does it increase carbon storage in the forest.
- The DEIS does not acknowledge California law (AB32) requiring reduction in greenhouse gas emissions. The proposed project violates California law AB32.

**The proposed project will damage the environment by dousing public lands with thousands of gallons of toxic herbicides.**

- The DEIS provides inadequate information regarding the quantity and types of herbicides required to implement the project.
- The DEIS provides inaccurate information regarding the toxicity of herbicides required to implement the project. Toxicity is misrepresented by the DEIS as being less toxic than reported by the EPA.
- The DEIS claims that only 5% of non-native trees will require retreatment with herbicides to kill the roots and prevent resprouting. No evidence is provided for this claim which is not credible or consistent with other sources of information.
- The proposed project claims that existing native vegetation will thrive once non-native vegetation is destroyed. In fact existing native vegetation will be damaged by the herbicides that will be used to eradicate non-native vegetation. Herbicides are mobile in the soil and are indiscriminate killers of native and non-native plants.
- Herbicides kill mycorrhizal fungi in the soil which are required for the health of the vegetation that remains, making regeneration of native vegetation less likely.
- The project will kill pollinators, making the regeneration of native vegetation less likely.
  - Honeybees and hummingbirds require the nectar of eucalypts to survive the winter months when native plants are not blooming.
  - Most native bees nest in the ground. They are unable to penetrate the 4 to 24 inches of wood chips that will be spread on the ground of the project areas.
  - Bees and birds are harmed by the herbicides that will be foliar sprayed on non-native vegetation.
- Herbicides favor the growth of grasses over broadleaf plants and reduce all seed germination, making the regeneration of native vegetation less likely.
- The herbicides required to kill the roots of the trees to prevent resprouting will exceed the legal volume limits of the herbicides.

**Other environmental issues and unsupported assumptions about superiority of native plants**

- The proposed project is a continuation of a project that has already destroyed 18,000 trees on the property of UC Berkeley. The completed project has resulted in serious erosion that has not been repaired. This experience predicts more serious erosion if tens of thousands of trees are destroyed by the proposed project.
- East Bay Regional Park District proposes to “thin” its non-native forest by approximately 90% (based on what little information EBRPD provides in its documents). The few remaining trees will be subjected to more wind than they are adapted to. Catastrophic windthrow (AKA failure of the trees) is likely to destroy the few trees that remain.
- The DEIS makes many assumptions about the superiority of native plants for which it provides no supporting scientific evidence.
  - There is no scientific evidence to support the assumption that all non-native plants are “invasive.” In fact, there is photographic evidence that the non-native forest is not expanding in the San Francisco Bay Area.
  - There is no scientific evidence to support the assumption that non-native plants support fewer insects than native plants. In fact, there is considerable scientific evidence to the contrary.
  - There is no scientific evidence to support the assumption that native plants support more wildlife than non-native plants. In fact, there is considerable scientific evidence that non-native plants and trees support wildlife at least equally.

**The “no project” alternative is the only viable alternative because it will deny FEMA funding for projects that will increase fire hazards in the East Bay Hills.**

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## **A Summary of HCN’s Position**

Friday, June 21, 2013

The Hills Conservation Network has proposed a "species neutral" approach to reduce the risk of hazardous wildfires in the East Bay Hills. The HCN alternative involves preserving large trees and the shade canopy, breaking up fire ladders, and clearing underbrush without the use of pesticides. HCN supports and encourages EBRPD's gradual shift towards more sustainable vegetation management practices to reduce fire risk. HCN does not support pesticide use on public lands. HCN opposes UC Berkeley/Oakland's plan to clear-cut all non-native trees (eucalyptus, Monterey pine, and acacia), deposit cuttings and two-feet of wood chips onsite, and use pesticides in Strawberry Canyon, Frowning Ridge, and Claremont Canyon. This policy would increase fire risk in the East Bay Hills, will inflict unprecedented environmental damage, and would be a waste of precious taxpayer dollars.

<http://www.hillsconservationnetwork.org/>

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# PLEASE SAVE OUR EAST BAY PARKS

Killing hundreds of thousands of healthy, tall, mature, beautiful trees without most residents even knowing what is being planned, and with no way to vote is criminal. Losing these parks will be terrible for a population already dealing with poverty and pollution. Protect our local environment and all the wild animals who also will die if this plan based on greed is allowed to happen.

We truly believe that those asking for money from FEMA are primarily concerned with getting access to that money. The few moneyed people who chose to buy houses near the parks knew the risks, and it's unfair that they now want the parks destroyed. It's also not the responsibility of FEMA to help them more than people who actually need help. Besides, making more grasslands will increase fire risk, while the tall trees, including eucalyptus, help prevent fire by bringing inches of water from the fog each year.

To find out the actual facts and not deliberate misinformation, please see these websites (Read every post at the brilliant Death of a Million Trees):

<http://milliontrees.me/fire-the-cover-story/>

[www.eastbaypesticidealert.org/wildfire.html](http://www.eastbaypesticidealert.org/wildfire.html)

[http://hillsconservationnetwork.org/HillsConservation3/Blog/Entries/2013/5/25\\_Our\\_tax\\_dollars\\_at\\_work.html](http://hillsconservationnetwork.org/HillsConservation3/Blog/Entries/2013/5/25_Our_tax_dollars_at_work.html)

PETITIONS TO SIGN:

1. Hills Conservation Network to FEMA

<http://petitions.moveon.org/sign/stop-the-deforestation-3>

2. Vicki Thomas's petition to FEMA

[http://www.avaaz.org/en/petition/Save\\_the\\_Urban\\_Forest/?tcPoKeb](http://www.avaaz.org/en/petition/Save_the_Urban_Forest/?tcPoKeb)

3. Yolanda Huang's Petition to FEMA

[http://petitions.moveon.org/sign/fema-do-not-fund-clear?source=c.em.mt&r\\_by=7883632](http://petitions.moveon.org/sign/fema-do-not-fund-clear?source=c.em.mt&r_by=7883632)

4. Beth Buczynski's Petition to FEMA

FEMA is accepting letters until June 17 at [EBH-EIS-FEMA-RIX@fema.dhs.gov](mailto:EBH-EIS-FEMA-RIX@fema.dhs.gov).

We are NOT tea party supporters, but that is who made the video showing the last meeting with FEMA. Impressive Jean Stewart is at the 24 minute mark. [http://www.youtube.com/watch?v=AT4Zczx\\_bik](http://www.youtube.com/watch?v=AT4Zczx_bik)

1. **This FEMA project will cause MORE fires, not less.** Fires typically begin in grasslands, which is where the 1991 firestorm started. This project will greatly increase non-native, highly flammable grasslands and non-native poison hemlock, thistles, broom, etc. in the East Bay hills, instead of beautiful trees. Entire sections of our parks will become dry, barren wastelands. And the planned "control burns" will pollute the air with smoke, as well as risk more fire and make the herbicides airborne.

2. After the trees are gone, the erosion and resulting landslides will be catastrophic. It is shameful to use desperately needed tax money for a project which is not needed and will result in ecological disaster. At that point, FEMA money really WILL be needed.

3. **Re-planting is NOT part of the project.**

4. Many native trees are extremely flammable, but eucalyptus are NOT a particular fire hazard, and have been demonstrated to help forests prevent and contain fires. Eucalyptus were seen to actually stop the spread of fire to houses, creating windbreaks during the 1991 firestorm, while redwoods burned. (Of course when a fire is hot enough, everything burns, but the answer to that is clearly not to kill all the trees.) Eucalyptus and our other tall non-natives precipitate inches of water from the fog each year, moistening the earth, filling creeks and adding water to reservoirs, supporting green and fire resistant shrubs.

5. Sudden Oak Death is killing our native trees. Most are infected. We should be grateful for having our fire-resistant, disease-resistant, healthy, beautiful, exotic trees who are well-adapted to our semi-arid climate -- especially with climate changing and impending drought -- and treasure them instead of killing them. We have no idea how quickly and extensively our native trees will die. **We may end up with only non-native forest, so we need more tree diversity, not less.** Many of our best parks have almost all non-native trees (which most people don't realize.) What reasonable person would prefer dry, empty, barren grasslands with no shade or wildlife diversity?

6. Why would anyone kill hundreds of thousands of huge trees, some over a hundred years old, when we desperately need them for cleaner air and to prevent climate change? Those supporting this ill-planned project make no mention of the harm done to the

environment from eliminating so many oxygen-producing trees. The killed trees chipped on site will add to air pollution as well as greatly increase fire risk. Significant amounts of sequestered CO2 will be released, adding not only to global warming, but also to local climate changes: more wind, more dry air, less fog, more air pollution. Big trees are needed to store carbon. No other type of vegetation stores as much carbon as tall hardwood trees. Ongoing carbon sequestration capabilities will be reduced from what they are now, and will never recover.

**7. This project is actually about greed and getting 7 million dollars from FEMA for Monsanto, UC, local cities, and EBRP -- money that is desperately needed elsewhere. There has been no significant fire in the East Bay since 1991. There is now better prevention and quicker response time (the main fire cause is arson or carelessness.) Nothing is needed to be done to make the hills safer, but this project WOULD greatly increase fire risk.**

**8. WHY is something that will affect the quality of life in our East Bay cities forever not being put to a vote,** and is being snuck in with almost no one knowing about it? Most of the people affected have no idea they will be losing their beloved parks. The propaganda campaign of myths and half-truths does not lead to trust. Some of who are participating in promoting this destructive plan while spreading misinformation will likely be benefiting.

9. Where is the concern for the millions of native animals who will be killed, including some who are endangered?

Once the trees are destroyed, the already-burdened wildlife will die from hunger and loss of habitat. Others will be directly killed by the devastating bulldozing, chainsawing and poisoning. Without predators like raptors, rodents and other small animals will overpopulate.

Learn from our native animals which trees they prefer. Bay Nature magazine online has a beautiful photo of the Bald Eagles nesting in a eucalyptus at Lake Chabot -- that tree, like much of the parkland overlooking Lake Chabot will be killed. ([Bald eagles have returned to nest at Anthony Chabot May 08, 2013 http://baynature.org/2013/05/08/bald-eagles-have-returned-to-nest-at-anthony-chabot/](http://baynature.org/2013/05/08/bald-eagles-have-returned-to-nest-at-anthony-chabot/)) Our native raptors -- eagles, hawks, owls, etc. -- PREFER eucalyptus for nesting because they are the tallest trees and have an open canopy, which is good for spotting predators and for the largest birds to be able to safely fly in and out of. (A young Peregrine Falcon died recently because he landed badly when learning to fly.) The largest raptors ignore oaks, bays, etc., because the forest is too dense to safely fly in.

Hummingbirds rely on eucalyptus flower nectar. Monarch butterflies prefer eucalyptus to rest in in the millions during migration. The brilliant website Death of a Million Trees says that a survey of 173 ornithologists reported that 47% of birds eat from non-native plants

**Eucalyptus are now an essential part of our eco-system, as are the beautiful Monterey pines, Monterey cypress, acacias, etc.** The Monterey pine forests have far more bird diversity than native forest. Yet every pine is slated for killing. WHY? Yet another myth is that they have short life spans. They live up to 120 years, and every part of their life cycle nurtures our wildlife and plants. Raptors, woodpeckers, and other birds use the dead trees for their survival to hunt from or to store acorns. Insectivorous birds prey on small animals on the trunks. Many animals live on the nutritious pine nuts and those animals feed many native predators. The young pines grow up from the base of their dead mothers, keeping the hills green with new trees, completing the cycle. These trees need no thinning, pruning, cutting. Monterey pine also greatly enriches the soil, creating thick humus helping our native clay earth nurture oak, bay, etc. seedlings, as well as wildflowers, mushrooms, etc. **MONTEREY PINES ARE AN NOW ESSENTIAL PART OF OUR HEALTHY FOREST/PARKS ECOSYSTEM.**

10. When the Redwoods were cut down in the 1800's, the many species of plants growing under them were destroyed. Not all came back. The logging in Marin was done differently, so they have much more species diversity there. The East Bay has very little Woodwardia/Chain fern left (this classic Redwood companion has an almost identical relative, also a Woodwardia, who grows in Japan with their Japanese close Redwood relative, the Cryptomeria.) And we have none of the beautiful Clintonia and Scolipus lilies and other plants that use to live under the Redwoods.

If there is another massive logging with heavy machinery and then poison, we will lose even more native species.

11. The effects of a planned decade or more of highly toxic herbicide spraying is also being ignored. (Monsanto, DOW, etc. must be thrilled at this project.) **How many cases of birth defects, cancer, neurological, auto-immune and other illnesses will result from the use of these poisons?**

Most people living in the East Bay would object to the plan to continuously apply herbicide to the stumps of the butchered trees for TEN years, if they knew the details.

**Applying herbicides across the hills will result in incalculable deaths of native animals, including endangered species, as well as the toxic sediments ending up in our creeks, reservoirs, lakes, and bay.** When the winds come, which will increase because the tree windbreaks will be gone, the dust full of herbicide will be windborne, damaging the health of everyone in the East Bay. Some of the poison will evaporate into the air, adding to our air pollution problem.

**No herbicide or the other petrochemicals added to it is safe.** Every banned pesticide was once declared safe from studies funded by the pesticide industry and which the FDA approved. The experts who once assured us that DDT, Dieldrin, Chlordane, etc. were safe are saying newer poisons are safe. But the cancer rate continues to rise, as do birth defects, neurological illness, and auto-immune illness, etc. all associated with herbicide use. Meanwhile, how many animals are dying? We've seen California Newts dying horrible deaths after crawling through roadside areas sprayed with "safe" herbicides.

Knowing how toxic chemicals work, we also can't believe that the herbicides will not make the poisoned plants more flammable.

We also believe this plan simply won't work, knowing the amazing regenerative capabilities of these magnificent trees. So the use of poison will be far more continuous than planned. Eucalyptus will take thousands of gallons to stop its attempts to stay alive and resprout. And what about the acacias? You cut one down, and dozens sprout along the ground, yards away from the original tree. They continue to try to live years after their mother tree was killed. (These are not realities that should frighten people, but be reassuring that if our native forests die, we will still have magnificent parks full of beautiful shade trees with all the native animals we love.)

The connection between Monsanto and Dow with the "native plant movement" goes way back... There is an annual "wildland invasive species management" conference in the Bay Area that is sponsored by Dow & Monsanto. This unholy alliance is out in the open for everyone to see if they would just look: <http://nativeplantwildlifegarden.com/nwf-teams-up-with-scotts-miracle-gro/>

12. Every part of this plan makes no environmental sense. Honeybees are dying, so we need our native bee populations more than ever, but the planned 24 inches of chipped mulch will prevent native bees from reaching the soil where they nest.

13. Again, people who live in the East Bay have not been given the opportunity to vote on even the short-term aspects of the project and will be subjected, against our wills, to years of constant noise from chainsaws, bulldozing, woodchipping, road closures, and the ugliness and heartache of seeing favorite parks left treeless, with poisoned stumps. (There are a few places where this travesty was done several years ago which are still ugly wastelands.)

14. How will this devastation actually be done and who will commit it? Those of us who have seen "maintenance" in the parks result in destruction of rare wildflowers on one of the few special little trails in the EBRP know the impact just one individual untrained individual can have. (He weed-wacked everything in sight and now we have to travel two counties away to see some of those flowers.) Endangered Clapper Rail habitat was destroyed at Pt. Reyes in an effort to help the rails. Audubon basically destroyed the Burrowing Owl habitat at Cesar Chavez park in Berkeley. (The last two had "experts" advising.)

15. We ask, why the selective logging? Those few people who demand that the park trees be killed are wanting tax-payer FEMA money after they chose to buy houses near the very trees they now want dead. And they want to eliminate the rest of the East Bay residents from access to those beautiful trees that we support with our taxes. We suggest they trade houses and they live instead in the tree-denuded wasteland that is much of the East Bay urban area.

For those who want our parks and UC Berkeley lands clear-cut, we suggest they start with the multi-million dollar ornamental non-natives that are the majority trees at the UC Botanical Gardens and campus, the landscaping of businesses and federal, state, county, and city buildings, people's private gardens and yards – which, like the hills, would leave almost no vegetation since most of the green we see are from non-natives. (Hypocrite UC even has a book about their many exotic trees on campus.) Why the inconsistency – why are the non native plants in the cities being spared while the wild animals' homes and food will be destroyed?

At the East Bay Regional Park headquarters in the hills where the meeting with FEMA was held, and where tree-killing is planned, there were many non-native ornamentals. Those Olive trees, Liquidamber, Arbutus Unedo, etc, aren't going to be eliminated, so why destroy the trees on trails that many of us know personally and love?

**We ask every human who is against the beautiful exotic trees, what do you have in your own garden?** If you don't want to be a hypocrite, first cut down your olives, roses, magnolias, wisteria, jasmine, apples, peaches, plums, etc. before you deprive wild animals of their homes and food. Most people don't even know which trees are native and which are not. But **99% of the plants in people's yards and gardens are not native.**

Actually, there is a reason that the vast majority of city plantings are done with non-natives. They contribute variety and beauty, and they feed and house an incredible diversity of birds, butterflies, etc. (The only truly problematical invasive is Hedera Canariensis, which completely covers trees and kills them. It can be seen from Highway 13 in Oakland and in many other public places, where it has been growing for decades and can be seen completely covering redwoods. We have called those responsible for decades and have been told that they don't see it or don't have the time. That is another reason why it makes no sense to kill healthy trees, while letting healthy natives be killed by ivy.)

Of course we are not actually suggesting that people kill their non-native plants or cut down street trees and other landscaping, but we object to the double standard of where the wild animals are to be deprived of their homes and food while humans keep their non-native plants. Why should only the native animals suffer? **No non-native human should be giving a death sentence to the native animals who will die as a result of this planned environmental devastation.**

There will be many persuasive arguments for committing this irreparable environmental devastation, but please don't believe them. We've seen terrible harm already done in the name of environmentalism in the Bay Area. A few hours of well-intentioned work can result in permanent ecological damage.

For those who insist on eliminating non-natives, we suggest we start with the humans, and then the introduced non-native animals who kill millions of native animals each year. And why not kill all the honeybees as well since they're from Europe?

The animals trees who will be killed by this plan, are not just "things" in humans' territory. They are living, feeling beings. And they give us so much. When people are often depressed from the dark and rain in winter, the gorgeous acacias bloom brilliant golden for two months. The broom with their yellow, exquisitely fragrant blossoms bloom for months during winter and spring.

**Please learn who this project will actually benefit.** Find out the details before it's too late.

**Please know that if this "project" begins, it will be far more destructive than they have told anyone. Expect the worst.**

Once our beautiful forests are gone, we will be left with bare, ugly hillsides with poisoned stumps, impending erosion and landslides, polluted waterways, the wildlife left homeless, with many animals dead, many native plants also destroyed, the topsoil ruined, and the beauty gone forever. Few urban areas have such amazing wilderness. What a tragedy to mindlessly destroy it. We should all be grateful for what we have here.

The FEMA money is desperately needed elsewhere. Please do not waste this money by making a few people rich at the expense of the people, animals, environment, beauty of our parks. **Please don't create a new environmental disaster under the guise of preventing one.**

Bev Jo

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## Fire Reduction? Humans At Risk!

*Comments to FEMA from CUIDO on the East Bay Hills Hazardous Fire Risk Reduction Environmental Impact Statement, submitted on June 14, 2013*

We are a grassroots community organization of people with disabilities, many of whom became disabled as a result of exposure to pesticides.

The project for which the three applicants—UC Berkeley, East Bay Regional Park District, and the City of Oakland—seek FEMA funding is profoundly disturbing, and the draft EIS is inadequate and deeply flawed.

One of the criteria for funding is net benefit to the community. But the project calls for widespread and prolonged use of herbicides over a vast area of public lands, a plan which will inevitably have negative impacts on humans. The draft EIS fails to adequately assess these impacts.

Herbicides are especially damaging to vulnerable populations. While the report does recognize, in passing, the concerns of "sensitive" groups such as children, pregnant women and the elderly, however, people with chemical sensitivity, compromised immune systems and respiratory complications are not mentioned. Large numbers of people are experiencing adverse health effects from even very low levels of chemical exposure.<sup>1</sup> A substantial body of evidence now demonstrates that the standards currently in place for evaluating the risk to human health posed by pesticides are inadequate.<sup>2</sup> Furthermore, the draft EIS contains no evaluation of the impact on humans of so-called "inert" ingredients in the herbicides intended for use, despite the fact that many compounds which have been classified as "inert" have been shown to be as toxic as the "active" ingredients.

Chemical sensitivity is recognized as a disability in American jurisprudence. All of the acreage which is targeted under this plan is public land, intended for the enjoyment of all the people, not merely those with healthy respiratory systems. The widespread application of pesticides in these public spaces would erect a barrier to use of these spaces by people with disabilities, and would therefore constitute a violation of the Americans with Disabilities Act.

But we in CUIDO are concerned not merely with the well-being of humans, but with the entire multitude of creatures which dwell in the targeted habitats. Because they cannot speak for themselves and are thus powerless to restrain this juggernaut of development and greed, we feel obligated to speak for them by pointing out, as forcefully as possible, the fact that this plan will cause displacement, death, and disability to countless species of animals and plants. This is outrageous.

The justification for this massive destruction of an established ecosystem is "fire hazard mitigation." However, the extent to which this dramatic change in landscape will actually reduce fire is in dispute. Instead of living eucalyptus with limited ground foliage, we will see vast expanses of dry grasslands, deep eucalyptus mulch, brush and dead or dying oak trees. We will have simply

exchanged one type of fire hazard for another, in the process destroying a carefully-balanced ecosystem. The EIS dismisses, with very little consideration, alternative solutions to fire hazard mitigation.

We urge you to reject this funding proposal.

Communities United in Defense of Olmstead (CUIDO)

CUIDO is a Bay Area grassroots disability rights organization committed to defending the human and civil rights of people with disabilities. Olmstead is a 1999 Supreme Court ruling which declared that people with disabilities have a right to live in the community.

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<sup>1</sup> "Chemical Intolerance in Primary Care Settings: Prevalence, Comorbidity, and Outcomes"; The Annals of Family Medicine; July/August 2012; vol. 10 no. 4, 357-365.

<sup>2</sup> To cite one example: "Pesticide Exposure in Children," American Academy of Pediatrics Policy Statement; Pediatrics vol. 130 no. C, December 1, 2012 <http://pediatrics.aappublications.org/content/130/6/e1757>

<http://cuido.org/>

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