

Subject: Adopting the 2022 Reduced Risk Pesticide list for City properties - public comment
Date: Monday, September 26, 2022 at 2:52:36 PM Pacific Daylight Time
From: SF Forest
To: Wehner, Kyle (ENV)
CC: Jue, Tyrone (ENV), Iyer, Shoba (ENV), Breed, Mayor London (MYR), Peskin, Aaron (BOS), Safai, Ahsha (BOS), Stefani, Catherine (BOS), Ronen, Hillary, MandelmanStaff, [BOS], Walton, Shamann (BOS), Preston, Dean (BOS), Melgar, Myrna (BOS), Board of Supervisors, (BOS), Chan, Connie (BOS), Mar, Gordon (BOS), DorseyStaff (BOS)
Attachments: NAP NRD pesticide application 2008-2021.png

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Commissioners,

As you might, or might not, know the European Commission (EC) [introduced on June 22 new rules](https://beyondpesticides.org/dailynewsblog/2022/07/eu-bans-pesticides-in-parks-playgrounds-and-playing-fields-fails-to-set-organic-transition-goals-in-ag/) that ban all pesticides in "public parks or gardens, playgrounds, recreation or sports grounds, public paths, as well as ecologically sensitive areas." - <https://beyondpesticides.org/dailynewsblog/2022/07/eu-bans-pesticides-in-parks-playgrounds-and-playing-fields-fails-to-set-organic-transition-goals-in-ag/>.

As you should know:

- The Marin Municipal Water District has been **herbicide free since 2005**.
- Most towns in Marin County **don't use herbicides at all**.
- The **City of Richmond had completely banned use of herbicides** in weed abatement activities by the city or its contractors in 2016.
- The **Town of Fairfax prohibits use of all synthetic pesticides in parks**, open space parcels and public rights of way and buildings it owns and maintains, and a neighbor notification is required prior to the use of pesticides on private property.
- In 2000 the **Arcata City Council banned the use of pesticides** on all properties owned or managed by the city, by unanimous vote. (The city hadn't actually used them since 1986.) <http://www.eastbaypesticidealert.org/Arcata.html>
- Non-toxic Irvine, started by parents of kids with cancers, convinced the **city of Irvine** to switch from regular use of herbicides and toxic fertilizers to eliminating all of them under all circumstances and **adopting a completely organic pest-management program**. The new program also costs less (even with initial investments in soil augmentation included), and water use was reduced by 30%. <https://ocweekly.com/how-irvine-became-socals-first-non-toxic-city-7317638/>
- France banned all use of synthetic pesticides in public spaces in 2017, and banned garden use starting in 2019.

Why is San Francisco so far behind and continues to use these completely unneeded, cancer causing, endocrine disrupting, environmentally damaging chemicals?

Once again, San Francisco Forest Alliance is pointing out that high toxicity herbicides are dangerous, unnecessary, and should never be used. Especially by the government agencies, especially by the bodies claiming to be "national leaders in integrated pest management".

From our June 21 2019 post:

"...

- Herbicidal chemicals are more toxic, more persistent, more mobile and **more dangerous than their manufacturers disclose**;
- The aesthetic or ideological “danger” from “weeds” is **not a risk to health** and welfare;
- Scientific **studies associate exposure to herbicides with cancer**, developmental and learning disabilities, nerve and immune system damage, liver or kidney damage, reproductive impairment, birth defects, and disruption of the endocrine system;
- There is no safe dose of exposure to those chemicals because they **persist in soil, water, and animal tissue**, so even low levels of exposure could still accumulate and harm humans, animals, and the environment;
- **Epecially vulnerable individuals** include infants, children, pregnant women, the elderly, people with compromised immune systems and chemical sensitivities;
- **Toxic runoff from herbicides pollute streams and groundwater**, and therefore the drinking water sources;
- Herbicides are **harmful to pets and wildlife** – including threatened and endangered species, plants, and natural ecosystems;
- Herbicides are harmful to soil microbiology and **contaminate soil into the future, reducing biodiversity** in sensitive areas.

People have a right not to be involuntarily exposed to herbicides in the air, water or soil that inevitably result from chemical drift and contaminated runoff. With the many court cases against Monsanto regarding Roundup, land managers have been considering reducing the use of this herbicide at one time considered safe. This is not enough. In many cases, other herbicides are being used instead – and these may be even more harmful than the ones being replaced, albeit with less research available."

We must do better by limiting synthetic herbicide use only to those classified as “minimum risk” by EPA."

No meaningful progress was achieved in reduction of herbicide use in parks and on watersheds since this post was published.

The attached chart (derived from the city records) shows that the Natural Resource Department used more Tier I & II Toxicity herbicides (combined) in 2021 than at any time since the records have been kept.

Sincerely,

San Francisco Forest Alliance

San Francisco Forest Alliance is a 501(c)4 organization working to eliminate toxic herbicides (including Roundup/ Glyphosate) in our parks and watersheds, preserve non-hazardous trees across the city, preserve public access to parks and open spaces, inform the residents about these issues, and to insist on transparency in governmental decisions regarding them.

Subject: Comment on item 8, adopting the 2022 Reduced Risk Pesticide list for City properties.
Date: Monday, September 26, 2022 at 4:59:58 PM Pacific Daylight Time
From: Anastasia Glikshtern
To: Wehner, Kyle (ENV)
CC: Jue, Tyrone (ENV), Iyer, Shoba (ENV), Melgar, Myrna (BOS), Ronen, Hillary, MandelmanStaff, [BOS], Chan, Connie (BOS), Stefani, Catherine (BOS), Preston, Dean (BOS), Peskin, Aaron (BOS), Safai, Ahsha (BOS), DorseyStaff (BOS), Mar, Gordon (BOS), Board of Supervisors, (BOS), Walton, Shamann (BOS), Breed, Mayor London (MYR)
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Commissioners,

As the attached chart (derived from the city records) shows that in 2021 San Francisco Natural Resources Department used more high toxicity herbicides than at any time since the records were kept.

The claim is this is done for "biodiversity" and to help "native"/"sensitive" plants by killing "non-native"/"invasive" plants. Poisoning the land and water cannot possibly help any plants. The U.S. Environmental Protection Agency has recently published the biological evaluation (done thanks to the lawsuit by Center for Biological Diversity and Pesticide Action Network) of effects of glyphosate (used in SF), atrazine, and simazine (not used in SF) on endangered species. **EPA reports that glyphosate is "likely to adversely affect" 93% of legally protected endangered and threatened plants and animals.** It is safe to assume that other high toxicity herbicides (not evaluated by EPA) used by the city also adversely affect "native"/"sensitive" plants.

The San Francisco Forest Alliance has a list of plants against which herbicides have been used. It includes passion flower, sweet pea, potato vine, african daisy, pincushion flowers, coyote brush ("native")... Not on the list but I have seen them in the Pesticide Use Reports - white clover and calla lily.

The unneeded and environmentally damaging use of high toxicity herbicides must stop.

Sincerely,
Anastasia Glikshtern

Herbicide Applications by NAP/NRD
By Active Ingredient (in fl oz)

