

**From:** [REDACTED]  
**To:** [web; Clerk](#)  
**Subject:** Full Board of Directors and District Clerk - Board Contact Form  
**Date:** Friday, September 8, 2017 3:24:49 PM

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Name *	Mike Liebhold
Select a Choice *	Full Board of Directors and District Clerk
Email *	[REDACTED]
Location: (i.e. City, Address or District Ward)	10 durham Road, 94062
Daytime Phone Number (if you wish to be contacted by phone)	[REDACTED]

Comments: \*

To: the Full Board of Directors, MidPeninsula Regional Open Space District  
cc: Coty Sifuentes-Winter, kingsmtn@yahoogroups.com, Kirk Lenington, Patty Mayall, Jennifer Woodworth,

Dear Board Members,

I am writing you today to thank you for launching the Integrated Pest Management Plan (IPM) in 2014, and for the special mitigation effort, in 2014- 2015 cleaning up the improper application of glyphosate (Roundup) herbicides on Open Space on Native Sons Road. Since the district provided water quality tests at that time, I have recently learned that glyphosates are far more persistent in the soil than I understood, and may not be immediately evident in groundwater - so local earlier water tests were inconclusive. Now What?

I am also writing to request several related board level considerations:

1. Please conduct a deeper review of the latest annual IPM report to determine what , if any expert and current biological science review was included for application of herbicides in wild space. (No biological review was listed in the current annual IPM report, although there was a sketchy analysis of cost savings using glyphosates, and a full color picture of the new spray truck )
2. Please approve Incorporation of permanent monitoring of water quality, and especially water and soil biology as part of continuous ecological evaluation of pest treatment practices as committed in the original IPM
3. Please consider ending or a moratorium on herbicide application in the district, pending a complete scientific review, and until an adequate continuous and rigorous scientific review process is incorporated into the open space IPM process as committed in the original IPM
4. Please Create a position and hire a Phd. level ecologist to serve as the full-time ombudsman for the District wilderness,

Many thanks for your kind consideration,

Mike Liebhold  
10 Durham Road  
Woodside, 94062

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# DRAFT RESPONSE FOR BOARD REVIEW



Midpeninsula Regional Open Space District

GENERAL MANAGER  
Stephen E. Abbors

BOARD OF DIRECTORS  
Pete Siemens  
Yoriko Kishimoto  
Jed Cyr  
Curt Riffle  
Nonette Hanko  
Larry Hassett  
Cecily Harris

September 27, 2017

Mike Liebhold  
10 Durham Road  
Woodside, CA 94062

RE: Midpeninsula Regional Open Space District Integrated Pest Management Program

Dear Mr. Liebhold,

Thank you for taking the time to write to the Midpeninsula Regional Open Space District (the District) with your suggestions regarding the District's Integrated Pest Management (IPM) Program. It is clear from both your requests and the accompanying correspondence that you are very concerned over the District's use of pesticides as a tool to manage pest species in open space lands. The crux of your concerns appear to center on the District staff's biological review of sites where pesticides are proposed for use or have been used, as well as the District's understanding of the current scientific knowledge of the environmental impact of pesticides, particularly glyphosate.

The District determined that chemical pesticides are one of the tools that should be available to staff when managing pests on Open Space Lands and included pesticides within the IPM Program when the program was established and reviewed in 2014. The IPM Program's environmental review was through an Environmental Impact Report (EIR) that included a toxicological review of the pesticide products proposed for inclusion in the IPM Program. This toxicological review included an assessment of many aspects of the proposed pesticides by technical experts (PhD toxicologists) who evaluated the current scientific knowledge of the human toxicity, ecotoxicity (effect on the environment), as well as physiochemical characteristics of the pesticides, such as persistence in soil and water and ability for the pesticide to bioaccumulate. Based on this review, pesticides were either excluded from use, or included in the District's IPM Program.

The IPM Program includes many requirements for the evaluation and monitoring of pest treatment sites, regardless of the treatment methodology. In particular, District biologists are required to survey all treatment sites prior to work to determine site conditions and if any site-specific measures are warranted. This work is not summarized in the IPM Annual Report, however the District has partnered with many organizations (such as the National Park Service, US Forest Service, Presidio Trust, and the Marin Municipal Watershed District) to develop a data collection and management tool within CalFlora

for managing this data, monitoring the effectiveness of treatment methods, and sharing data with partners.

Glyphosate (Roundup) continues to be a controversial pesticide and the subject of much research throughout the world to evaluate its toxicity (both human and ecological). Although one of the treatment methods allowed within the District's IPM Program, the use of this chemical is limited, and where used, carefully prescribed and monitored. I understand your concerns that the ongoing research may uncover effects that were previously unrecognized. District staff stays current with laws, regulations, and research of pesticides in wildlands. However, to insure that the District has a comprehensive understanding, the District will contract with toxicologists to perform an impartial review of the current research and recommend any changes to the IPM Program that the Board should consider in light of their findings.

In closing, I wanted to thank you for voicing your concerns. I look forward to sharing the results of our review of the current research related to glyphosate when it becomes available.

Sincerely,

Larry Hassett  
President, Board of Directors

cc: Stephen E. Abbors, General Manager  
Kirk Lenington, Natural Resources Manager  
Coty Sifuentes-Winter, Integrated Pest Management Coordinator