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The East Bay Regional Park District (EBRPD) Draft Environmental Impact Report for Wildfire Hazard Reduction and Resource Management is based entirely on faulty premises.

First, evaluating health or environmental issues by a Risk Assessment model necessarily allows that a segment of the population of the evaluated species, including humans, is disposable.

Second, the assumption is that pesticides must be part of the EBRPD wildfire response and/or prevention strategy, and that pesticides can be used safely.

Third, it is assumed that native vegetation is superior to non-native vegetation. Acclimation and naturalization are not acknowledged for their role in an ever-evolving habitat.

Fourth, the very premise of wildfire prevention as an ecological approach is faulty, is in fact being challenged within many institutions, not the least significant of which would be the National Park Service. Wildfire prevention is responsible for significant environmental impacts in wildfire areas, where fire-dependent species, such as Alameda County's endangered Pallid Manzanita, evolved and are now being driven to extinction by the aggressive behavior of attempting to prevent necessary wildfires, rather than suppressing them in specific situations.

PESTICIDE TOXICITY:

Overall park district mismanagement has resulted in increased use of pesticides over many years' time, even taking into account added acreage, all under what is called Integrated Pest Management (IPM), a methodology supposedly set up to "reduce" pesticide use over time, but which more often than not has actually increased use wherever IPM programs have been implemented, because IPM language is legally vague and meaningless.

An alliance between the University of California and EBRPD violates any possibility of neutral, rational decision-making about pesticide use in the hills, since much pesticide research and industry propaganda originates in the UC system. In fact, UC has a longstanding relationship with pesticide companies, such as Novartis, and Tom Klatt, the Manager of the UC Berkeley Office of Emergency Preparedness has steadfastly urged agencies and cities to use pesticides in the East Bay Hills. The latter was widely exposed in 2005 when both Tom Klatt, and Nancy Brownfield, EBRPD IPM Specialist, were urging the City of Oakland to use pesticides on the 1,000+ acres it oversees in the hills (http://dontspraycalifornia.org/wpad.html). Unbeknownst to us, while City of Oakland officials were seemingly backing off their contested plans to add yet another exemption to the city's weak pesticide ordinance, they were quietly preparing to collaborate with UC Berkeley in an extensive "Fire Mitigation Program", contributing financially to a project that clearly violates the city's own pesticide ordinance (http://oep.berkeley.edu/pdf/FireProjects/OtherDocs/ARfire_2005.pdf). At the time Nancy Brownfield, Tom Klatt, and various Oakland city representatives and agencies, as well as Jake Sigg, former president of the California Native Plant Society, and representatives of EBMUD, were all presented with thorough toxicological profiles of RoundUp (http://www.alternatives2toxics.org/catsoldsite/round.htm) and Garlon's triclopyr (http://www.pesticide.org/triclopyr.pdf), the pesticides they proposed for use. Additionally, at least Nancy Brownfield also received the most recent glyphosate (Roundup) toxicological profile (http://www.pesticide.org/glyphosate.pdf) published only a couple of months before.

The evidence is clear: these herbicides are toxic, and have been well known to be for decades, and they translocate. Once pesticides are released, they cannot be reined in. There is no serious debate around these facts. The fact that they are central to EBRPD plans is significant in showing us that the DEIR has been written based on either lack of information (absolute negligence, at best) or specific fraud (criminal). This DEIR should be tossed right now on grounds of propagation of misinformation.

- **How were the technical advisors, mentioned in the DEIR, chosen, and what are their affiliations?**

In this DEIR there is reference to the Marin Municipal Water District (MMWD) claiming that large vegetation management projects can't be successful without the use of pesticides. The EBRPD Board needs to understand this outrageous claim is based on lack of science, lack of acknowledgement of biological processes which have been out of balance for decades, because of EBRPD's and other agencies' mismanagement. MMWD's recent statements are in reference to a faulty study set up to look at decay rates for glyphosate, the so-called "active" ingredient in RoundUp (manufactured by Monsanto). The study couldn't have been set up more perfectly to mimic Monsanto's "informational presentations" for farmers, where they appear to be trying to confuse people.

Hip to more people being wary of pesticides, and specifically RoundUp, at one of these "informational presentations" in 2000 in Santa Rosa, Monsanto representative Martin Lemon said "glyphosate doesn't cause cancer". Well, at that time we already had plenty of information about cancer links, regardless the active ingredient, which was only 41% of the product. First, formaldehyde, a carcinogen, is one of glyphosate's breakdown products. In fact, it is a chemical on California's Proposition 65 list of reproductive or carcinogenic toxins. Then there is a contaminant of glyphosate, N-nitroglyphosate, from a member of a chemical family of which 75% are known carcinogens. A surfactant called polyoxyethylene alkylamine (POEA) added to products with glyphosate is three times more acutely toxic than straight glyphosate and is contaminated by 1,4

dioxane during manufacture. The Office of Health Hazard Assessment lists 1,4 dioxane as a carcinogen under Proposition 65.

Meanwhile, the Department of Pesticide Regulation had already shown by almost 30 years ago possible adverse cancer effects of glyphosate, with rare tumor formation in the kidneys and adrenal cortex of test animals. Other studies found an increase of testicular tumors, thyroid cancer in females, and a rare kidney tumor (U.S. EPA). All that from a mid-1990's toxicological profile using data from the 70's, 80's and 90's, one of the profiles handed to Ms. Brownfield, and Mr. Klatt, and other representatives of EBMUD, as well as PG&E, the California Native Plant Society, Friends of Sausal Creek, Oakland Council member Quan and her aide, Sue Piper, January 26, 2005. In a 2004 toxicological profile we handed Ms. Brownfield in person the same night, right on the front page is the quote, "Studies of farmers and other people exposed to glyphosate herbicides have shown that this exposure is linked with increased risk of the cancer non-Hodgkins Lymphoma." Sodium salt of o-phenylphenol, a so-called "inert", caused cancer in lab tests. In cases of Multiple Myeloma, there is a suggested association with cancer, and both glyphosate alone and RoundUp formulations caused rapid cell division in human breast cancer cells.

Forget about cancer if you want, but recent studies demonstrated that POEA, the surfactant, kills human cells. Doesn't necessarily take cancer to kill, nor does it take an active ingredient being carcinogenic for cancer to be caused by the use of a chemical, or a chemical formulation. In fact, the use of POEA acts synergistically with glyphosate and other so-called "inerts" to dramatically compound the toxicity of a glyphosate product. Glyphosate is mutagenic, hormone-disrupting, causes miscarriages, kills beneficial insects, and is neurotoxic. Seriously, would you want your mother exposed? Your son? Your spouse? Your beloved pets?

So back to the MMWD study in question, since the authors of this Draft EIR insist on the assertion that these chemicals are safe ("no significant impact") and are necessary, and say that MMWD claims that this is the prudent way to proceed. As it turns out, the Marin study was based on the rate of decay for glyphosate alone. Well, isn't that interesting? They were happy to take $50,000 in taxpayer grant monies to prepare and conduct a faulty study and then perpetuate myths about it. We don't know about the people at the MMWD, but regardless whether they know the word "synergism", it isn't rocket science to know that chemicals act differently when they are mixed (http://www.ourstolenfuture.org/NewScience/synergy/mixtures.htm). Hence, all the kids with chemistry kits setting off explosions that delight them and strain their parents' patience while their old neighbors expect to see houses burning down any minute. Come on, testing for glyphosate decay when we know glyphosate is not used straight but as part of a formulation with at least one surfactant and usually a whole list of other so-called "inert" chemicals (http://www.ehponline.org/members/2006/9374/9374.pdf)? Can we say Welfare for the Agencies? Scraping the Pork Barrel, perhaps? People opposing the MMWD, including doctors, exposed the study for the shabby piece of misleading marketing it is. Stop reusing a study which is misleading. It's bad science, unethical to use to support this pesticide program, and what a waste of taxpayer money, which could have gone straight into manual removal of vegetation, were that really necessary.

If RoundUp, which was banned years ago in Denmark, because it was found in ground water as a result of soil mobility (http://www.twnside.org.sg/title/service76.htm), isn't enough of an insult, triclopyr will stand in to finish off the job. In lab tests it has caused an increase in cancers, and causes lethal mutations. Like RoundUp, it contaminates water sources and its major breakdown product is neurotoxic. It also affects the kidneys, the adrenal glands, causes a variety of birth defects and let's just say you don't want to be exposed to it under any circumstances. Yet, EBRPD's

Nancy Brownfield backed by UC's Tom Klatt has no problem whatsoever foisting these poisons on EBRPD's own employees, park visitors, wildlife at the parks, and all the biological life downstream of the parks, and in the San Francisco Bay. And just think: put RoundUp and Triclopyr together and you ought to be able to relieve Bay Area congestion considerably by virtue of death, what the DEIR refers to as "no significant impact".

And as we find that glyphosate and imazapyr (http://www.pesticide.org/imazapyr.pdf) herbicide formulations are being mixed together in the collaborative project between UC Berkeley and the City of Oakland, a health study of residents or workers in the area would likely show a marked increase in health problems. People and animals, insects and vegetation in the area are being used in an unethical chemistry experiment, all funded by taxpayer dollars.

In the EBRPD DEIR is an analysis of what is called an Environmentally Superior Alternative. The Mitigated Alternative is considered the Environmentally Superior Alternative. It is said to "reduce impacts to a less-than-significant level". Sounds great, except if you happen to be on the other end of "less-than-significant". Researchers have long described the cumulative effects of low doses of chemicals, which are considered more dangerous than the occasional major exposure in otherwise-healthy individuals (http://web72345.ntx.net/article/gulfwar.shtml). But there also is the non-monotonic dose response, where the effects of chemical exposure increase as the dose of chemical input is lessened. So in reality the less the individual dose, the more significant the response can be. Endocrine disruptors are one example of chemicals that cause a non-monotonic dose response (http://citybelt.typepad.com/LowDownonLowDoseEDs.PDF). Or as the body is excreting 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 the fermentation of 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. 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 an 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 or "pick them up", for many caffeinated coffee is physically relaxing while decaf coffee, containing much less caffeine, gives them that "pick up".

- **What are the exact chemical ingredients, including so-called "inerts", carriers, surfactants, or other additives, for every part of the EBRPD fire plan?**

- **What are the cummulative and synergistic effects between each chemical, each product, and any previous chemical used in each of the locations of this plan?**

- **Are any of the ingredients in any of the products to be used in this plan, including so-called "inerts", carriers, surfactants, and other additives, endocrine disruptors or other chemicals which provoke a nonmonotonic dose response, where damage increases as the chemical exposure decreases?**

- **Which products contain chemicals that have not been fully tested for whether they cause cancer, endocrine disruption, or other health concerns?**

- **On precisely what evidence do you base your predictions of "no significant impact" from products of which not all ingredients are being disclosed, nor have been tested for all health concerns?**

We read "There are no significant impacts to Air Quality and Climate Change" and we see that what is addressed is the noise of machinery which is acknowledged to be a short-term consequence. There is no acknowledgement of pesticides affecting air quality and climate change. So we ask again, do your homework:

- **How does pesticide use affect air quality?**
- **How does pesticide use affect climate change?**
- **How does pesticide use affect the ecosystem at large?**
- **What is the impact on beneficial insects which are in peril today?**
- **What is the impact on non-native, naturalized, or acclimated species?**

We read "There are no significant impacts to hazards and hazardous materials" with nothing written below that.

- **What does that statement mean?**
- **What hazards and hazardous materials are present in the East Bay Regional Park District, why are they there, and how did they get there?**
- **Are you referring to the very pesticides you're already using?**

The only specific general management practices mentioned in the DEIR refer to an inadequate requirement for notification signs, and the size and smoothness of cut tree stumps. EBRPD appears to be more concerned about the potential for splinters from logged trees, than about chemical poisoning from contact, drift, and other mobility of the pesticides applied to and around the stumps and other vegetation.

RISK ASSESSMENT:

We read, "Both the proposed project and the Mitigated alternatives would provide the least amount of potentially-significant impacts resulting from the fuel treatment and vegetation management activities with the Study Area. Both the proposed project and the Mitigated alternative would also provide sufficient guidelines, recommendations, and mitigation measures necessary to reduce potential impacts."

Obviously based on the above summary of dangers of pesticides, no chemical use is what provides the least amount of potentially-significant impacts resulting from the fuel treatment and vegetation management activities. As for the "Mitigated alternative" providing sufficient guidelines, recommendations, and mitigation measures necessary to reduce potential impacts, we surely do wish the DEIR authors would do some more sharing of their plans. Specific sharing that is. We have plenty of the "believe us" variety. We want facts and figures. For instance:

- **Who pays for the health care necessary as a result of exposure to EBRPD's pesticide use?**

- **Who pays for environmental damage done by pesticide use as part of the plan?**

- **Who pays for environmental damage done by tree felling as part of the plan?**

- **How does one quantify the loss of endangered species in the EBRPD, if pesticides or loss of habitat cause their demise?**

- **Who determines the worth of an endangered species?**

- **Who determines the worth of a naturalized species?**

Under the alternatives section of the EIR goals are stated as "Maintain and enhance ecological values for plant and wildlife habitat" and "Provide a vegetation management plan which is cost-effective and both financially and environmentally sustainable to EBRPD on an ongoing basis". Releasing toxins, which can irreversibly damage humans, wildlife, pets, insects, vegetation, and soil health, is not ecologically sound and does not achieve these goals.

Risk Assessment, the methodology used by industry and authors of Environmental Impact Reports, 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 medical doctors and healthcare workers everywhere, recognizes that it is not ethical to call anyone an Acceptable Risk, nor is it ethical, from a standpoint of environmental sustainability, to apply Risk Assessment to wildlife, pets, insects, vegetation, and soil. Biology is clear: neither humans nor wildlife, pets, insects, vegetation, nor soil exist in a vacuum. Each is part of an intricate biological web from which one cannot be spot-removed without endangering the others. In fact, the USDA's Light Brown Apple Moth debacle has in part been exposed for the danger eradication attempts represent to biological habitats, meaning any habitat. Trying to eradicate something naturalized can create a hole of unknown consequences which we cannot predict so could not possibly know how such potential damage might be mitigated.

Environmental reviews should be based on the precautionary principle, which in a nut shell states "better safe than sorry", with a particular view towards protecting vulnerable species and populations, and not on a theoretical risk assessment approach, which determines how much risk to the lives of others is acceptable to those who theorize about the potential impact of an action.

- **In your risk assessment process, where do you draw the line between "acceptable" and "significant" risk?**

- **Specifically, how do you quantify the value of a person's health?**

- **Is it an acceptable risk if 15% of the population is at risk of negative health impact?** (According to the National Academy of Sciences 15% of the population is chemically sensitive to varying degrees.)

- **How about 1 in 8 children? Is that an acceptable risk?** (That's how many kids are vulnerable to chemical exposure because they have asthma.)

ALTERNATIVES:

While the DEIR mentions mowing, burning and hand removal, they say these options wouldn't be most cost effective, but do not elaborate with clear calculations. Readers and stakeholders are expected to take the authors of the DEIR by their word. In fact, they do not include the many options we brought up in 2005 as standard alternatives to pesticide use, regardless of whether or not trees are being cut down.

Solarization, covering stumps in plastic, is as basic, economical, and efficient as would be coming in yearly for a few years to snip soft new eucalyptus sprouts. Letting them shoot up 20 or 30 feet as the City of Oakland did in Montclair in 2005, while expending a great deal of time, energy, and money on panic mongering with scary resprouting stories and photos, and writing proposals, demanding pesticide use, instead of simply keeping the eucalyptus shoots trimmed, is not useful. Other alternatives could include a high-pressure hot water system which shows great promise, radiant heat weeder (http://www.pesticide.org/radiant.html), or a simple flaming machine (backpack and wand system) used in many municipalities could be a great alternative for paths. What about good, old-fashioned discing, or using a weed wrench? Maybe controlled burns, which native peoples used successfully without burning down their much more quickly-flammable homes? Mowing is an old fave, and cherry pickers to avoid creating erosion on sensitive hillsides could work in some settings.

Jobs are desperately needed. The unemployment rate hovers around 10% or more. In 2005 we calculated extensively, looking at the $125,000+ licensed pesticide applicator's fee an agency would pay, along with chemicals and the related gear, and brought up the longterm healthcare costs and productivity loss as a result of inevitable pesticide poisoning, then calculated how many healthy jobs at reasonable wages with good benefits could be created for hand or mechanical removal of unwanted vegetation. Money needs to go into paying workers living wages and benefits, not paying licensed pesticide applicators who oversee others' applications. Just last year we were told that the EBRPD pays workers who do pesticide applicatons higher wages than their usual wages when they're not applying these chemicals. People know that it's dangerous work and most workers oppose pesticide use in the EBRPD and are resentful that they are put in the position of being told they have to apply poisonous chemicals as part of their jobs, or work in settings where they are exposed to these chemicals. AFSCME Local 2428, the union of the East Bay parks workers, has also expressed concern for park visitors who would be exposed to pesticides applied on EBRPD lands (http://dontspraycalifornia.org/AFSCME%202428%20resolution.pdf). Hand pulling and other non-toxic methods work, and are healthy work for people who need jobs.

Another problem with the pesticide plan is that it eliminates the option to continue using the much beloved goat herds, because, as we learned in 2005, goatherders wait a year plus another rainy season before they let their goats graze on land on which pesticides have been used. EBRPD's wildfire plans would therefore impact the ability and freedom to use goats as much as possible to eat unwanted vegetation, a clear imperative made public by Oakland Hills residents voting for self-assessment via the Wildfire Prevention Assessment District in 2004, voting which was based on photos of goats grazing, which they were shown in the assessment campaign.

This wildfire prevention plan feeds into the notion that pesticides are necessary and unavoidable, when in fact some municipalities have shown that pesticides are completely unnecessary. In California, the City of Arcata has a total pesticide ban, has in fact won the only case known to date against Caltrans' statewide roadside spraying, and helped to forcibly end that practice in several counties. Arcata has won awards for their ballfields, another setting in which people have been mislead to believe that pesticides must be used. The Town of Fairfax also has a pesticide ordinance under which town agencies are not allowed to use pesticides. Eliminating pesticide use altogether is

not only possible, but a viable and necessary alternative, which provides opportunities for a deeper understanding of the surrounding ecosystem.

"INVASIVE" SPECIES:

Another goal of the plan mentioned in the DEIR is to "Preserve aesthetic landscape values for park users and neighboring communities". Again, releasing toxins which can irreversibly damage humans, wildlife, pets, insects, vegetation, and soil health, does not achieve this goal, nor does attacking non-native species of vegetation or other species. 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. Incidentally, the Oakland Office of Parks and Recreation has boasted photos in their marketing materials showcasing eucalyptus, probably because most people agree it is beautiful, and are acclimated to eucalyptus surrounding us in the hills.

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 frequent mudslides in the hills, such as the mudslide being cleaned up at Centennial and Gauss, in Tilden Park, Thursday, October 22, 2009. These mudslides not only do not enhance aesthetic landscape values for park users and neighboring communities, they threaten to devalue the same, and more importantly threaten the health and natural patterns of the established ecosystem. Cars sliding off cliffs not only endanger the occupants, obviously, but create yet more fire danger. What we have seen in the hills as the various agencies collude to try to get rid of eucalyptus (a job works program acting as welfare for the agencies which benefit) is increased landslides and mudslides over the same years. Hillsides are denuded and soil comes washing down. Mismanagement is rampant in the hills, the East Bay Regional Park District being front and center in terms of mismanagement. The slide at Centennial and Gauss was most typical of the recent years' clearcutting philosophy of bulldozing and running. Piles of cut wood and slash have been common sights in Tilden and around the Oakland hills over the past few years. It is a testament to stupidity, frankly.

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 are being 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. These scare tactics could lead, therefore, to more fire danger in the future as threats continue to build due to mismanagement.

We hear ad nauseum from EPRPD in this DEIR about their fixation with 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.

David Theodoropoulos, an Invasion Biologist who is very critical of his field, and points to the historic involvement of the pesticide industry in establishing invasive species councils to do their bidding (http://www.jlhudsonseeds.net/NativesVsExotics.htm), shows photos of eucalyptus in the Oakland hills during the 1991 fire, in areas where the understory had been kept down (http://video.google.com/videoplay?docid=5437585345864241 76). The fire burnt out before igniting the trees in those areas. It is where agencies mismanaged in the 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. That is no excuse for further mismanagement, unleashing potent, or any, toxins upon us.
EBRPD claims that "Invasive plants are harmful, non-native plants" and "Invasive species have no natural enemies in the environment". These are irrational, and just plain inaccurate claims. Species become naturalized. Some native plants can be quite invasive. Many predator species are generalists who'll eat just about anything. The irony of largely European descendents and other pilgrims to this country, vilifying "invasive", "non-native", "exotic" species, and claiming that native species must be defended from them by dumping toxics everywhere and killing living things, is not lost on immigrants and indigenous people alike.

Various plants which have been identified for pesticide applications in the East Bay parks are edible or medicinal plants on which local wildcrafters depend, which includes many first generation Asian residents who forage for certain plants as part of their cultural traditions. The danger from pesticide exposure is exacerbated by the extremely limited notification of applications, which are required to be put up barely a day before the applications, possibly as few as 12 hours before, and it is not clear that the notifications would be posted in any language besides English. Some of the people foraging in the hills as part of their cultural practices may well not speak English well enough to understand the posting, and may be endangered by exposure at the site, and may further endanger family members and friends who eat these pesticided foods. It is also unclear whether such notification remains in place after the applications, and for how long.

Meanwhile fire dependent species are endangered by wildfire prevention practices, which fundamentally violate their most basic survival needs. So much for native species. Among the species endangered by this plan are the Pallid Manzanita, Alameda Whipsnake, Pallid Bat, and the Red-Legged Frog. In fact, a recent lawsuit and settlement specifically aims to protect the Red-Legged Frog from both glyphosate and triclopyr, as well as dozens of other pesticides (http://www.biologicaldiversity.org/swcbd/PRESS/rlf-10-19-2006.html).

WILDFIRE PREVENTION VS. FIRE SUPPRESSION:

Wildfire areas, by definition, are potential habitat of fire-dependent species. Pallid Manzanita is native to our East Bay Hills, has evolved there, is listed as an endangered species, and cannot exist naturally without wildfire. As such, wildfire prevention in and of itself, regardless of the methods, has significant impacts on all fire-dependent species, and represents a threat to their continued existence. Wildfire prevention is not a sustainable or ecologically sound practice.

The National Park Service in its document entitled "National Park Service Fire Management Program for the Pacific West Region" (National Park Service, U.S. Department of the Interior), in its recent edition states, "Without humans, almost all fire is caused by lightning. There is increasing evidence that many ecosystems in the Pacific West have also had human-caused, prescribed fire as an integral process for thousands of years". That certainly is true of local Ohlone practices, which included fires set to keep down the understory in areas where their native, quite flammable housing was clustered. The NPS document includes this big headline: "Small Burns Prevent Big Fires". Mismanagement in the East Bay Hills has included the allowance of easily flammable housing paired with constant fire suppression and prevention across the board, which has resulted in dangerous understory heights. One way or another, fire is inevitable and necessary in wildfire areas.

The East Bay Hills Fire of 1991 was not a wildfire. It was caused by humans, was not fully extinguished, and was exacerbated by people getting disoriented, leaving cars in the middles of

narrow streets, blocking fire and rescue people. The deaths and tragedy were furthered by the allowance of rebuilding with streets just as narrow when there was the opportunity to rectify the extra danger which had resulted in so many needless deaths that hot, windy day, and the needless endangerment of rescue people.

While some people carelessly have their homes built in wildfire areas, attempting to force nature to accommodate their unreasonable expectation of safety from inevitable natural processes, they not only put their own lives at risk, but drag working people in their service down with them. While these home owners jump in their cars to escape the blaze, firefighters are sent in to protect private properties as though they matter more than the lives of these courageous workers, a phenomenon which understandably has caused some resentment among firefighters (http://web.archive.org/web/20060926073159/http://wildfiremag.com/ar/dj_vu_again/index.htm), as well as been the focus of criticism by political historian and scholar Mike Davis (http://web.archive.org/web/20061129163007/http://www.rut.com/mdavis/letmalibuburn.html).

- **Whose responsibility is it to protect misguided people, often the wealthiest with the most choices, who move into wildfire areas and build houses prone to catch fire easily?**

- **With cuts to fire departments across the region, who is responsible for fire suppression, as opposed to fire prevention?**

CONCLUSION:

We struggled against EBRPD's Nancy Brownfield and others pushing the City of Oakland to use pesticides in the hills. And now we're back. We are struck by how it appears that none of the two RoundUp toxicological profiles nor the triclopyr toxicological profile, which Nancy Brownfield has had in her possession since January 26, 2005, seemed to have been even skimmed, let alone read. At the time we attempted to engage her in discussion about the dangers of RoundUp, and she expressed no interest in the topic, saying she thought RoundUp is "fine". Neither the scores of governmental and independent scientific studies on the toxicity of the chemicals nor the synergism between chemicals in the products, seemed to have moved Ms. Brownfield to action. Indeed, between 2005 and the present, she has increased pesticide use in the parks. Our experience in talking with Park Rangers and other park workers is that they are almost uniformly opposed to pesticide use and are concerned for their own safety and for park visitors' safety. Most notable about the DEIR is the complete lack of toxicological information about the pesticides proposed for use. We could not even find the manufacturer's limited and skewed Material Safety Data Sheets of the products proposed anywhere in this document.

Pesticide pushers have relied on misleading and confusing people, by saying they'll use "just a little bit", or "only what's necessary", or "they won't be spraying, they'll only be spritzing", etc. Any pesticide exposure is dangerous in that it can accumulate even if it doesn't cause an obvious reaction in the moment. In fact, exposure to some pesticides causes reactions which become obvious 8 or 12 hours after exposure, or the next day, or the next week, and reactions can last weeks or longer. In the case of exposure to the Light Brown Apple Moth pesticides called "pheromones", people are having what started as acute reactions continuing over 2 years later. One of our collective members has had dramatic, ongoing health problems since exposure in July of 2008. This includes out of control blood sugar and menstrual bleeding of 10 – 11 days monthly. Some people developed tumors on their livers after exposure to that pesticide.

The EBRPD action plan outlined in the DEIR is completely misguided, and if implemented, will likely create more fire hazard, the very hazard supposed to be addressed by this plan, through flammability of the chemicals themselves, as well as by dying, dry vegetation resulting from the chemicals. Additional hazards could also be created by this plan, by creating more mudslide and landslide conditions in the hills, which can lead to harm to the public and the environment.

East Bay Pesticide Alert, also known as Don't Spray California when working on statewide issues, is a collective of individuals, most of whom are disabled by pesticide poisoning, and who are directly and negatively impacted by the continued use of pesticides.

We are opposed to the EBRPD's fire plan, and demand an immediate end to all pesticide applications.

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