

**The Importance of Comment Letters on the Draft Marin
County Open Space District Plan's Environmental Report
By Sharon Rushton (July 7, 2015)**



Yesterday, July 8th, was the deadline for submitting comment letters on the DRAFT Tiered Programmatic Environmental Impact Report (Draft TPEIR) for the DRAFT Marin County Open Space District (MCOSD) Vegetation and Biodiversity Management Plan (VBMP).

Please follow the below link to view the Sustainable TamAlmonte et al comment letter on the Draft MCOSD Vegetation and Biodiversity Management Plan and its Draft TPEIR, submitted on behalf of Sustainable TamAlmonte, Watershed Alliance of Marin, Health and Habitat, Inc., Moms Advocating Sustainability, Turning Green, Gallinas Watershed Council, Marin Water Coalition, and Sustainable Homestead Valley.

http://www.tamalmonite.org/letters/Sustainable_TamAlmonte_et_al_Comment_Letter_on_DRAFT_TPEIR_of_DRAFT_MCOSD_VBMP_7-6-15.pdf

Also, please follow the below link to read another comment letter on the Draft Plan and its Draft TPEIR submitted on behalf of Community Venture Partners and Sustainable TamAmonte by Environmental Attorney Michael Graf.

<https://s3-us-west-1.amazonaws.com/themarinpost/doc/126/MGraf-FinalCommentLetter-070815-with-Exhibit-A.pdf>

Both comment letters are very comprehensive and focus on the inadequacy of the Draft TPEIR to address potentially significant adverse impacts related to herbicides that could result from implementation of the Draft MCOSD Vegetation and Biodiversity Management Plan.

Background Information

The Marin County Open Space District (MCOSD) currently owns and manages 34 open space preserves across Marin County. These preserves encompass nearly 16,000 acres. Visitors and community members access the preserves through a system of more than 249 miles of unpaved roads and trails from more than 280 trailheads.

Although, the Marin Municipal Water District (MMWD) has had a moratorium on herbicide use since 2005 and has recently decided to continue this moratorium, this is NOT the case with the Marin County Open Space District (MCOSD). The MCOSD has been using a variety of herbicides for years. Moreover, the DRAFT MCOSD Vegetation and Biodiversity Management Plan proposes to continue a wide use of many herbicide products, including Glyphosate (the main ingredient in Roundup), to control weeds and clear vegetation for fire safety in the open space preserves, where beneficial plants, wildlife, pets, and people (including children) could be exposed to the toxic substances.

Concerns About Using Glyphosate:

Respected scientific studies show that there is a strong correlation between Glyphosate and serious health and environmental hazards, including disruption of hormonal systems and beneficial gut bacteria, damage to DNA, developmental and reproductive toxicity, birth defects, cancer and neurotoxicity. Glyphosate use could also kill beneficial vegetation and foster herbicide-resistant super weeds. In addition, Glyphosate is a patented desiccant (a drying agent) and could greatly increase the risk of fire.

The two basic purposes of the Draft TPEIR are: 1) To inform decision makers and the public about the potential, significant environmental effects of the plan;

and 2) To avoid or reduce environmental damage when possible by requiring alternatives or mitigation measures.

If the Draft TPEIR is deficient, then the environment, wildlife, pets and the public could end up being at tremendous risk of harm! This is why comprehensive comment letters on the Draft TPEIR backed by substantive evidence are so important. Such comment letters help ensure that the environmental report is adequate and fulfills the above referenced purposes.

The aforementioned comment letters disclose a number of major flaws in the Draft TPEIR, which, if left unchecked, would allow the implementation of the MCOSD Vegetation and Biodiversity Management Plan to result in significant adverse environmental impacts. For example, the Draft Vegetation and Biodiversity Management Plan and the Draft TPEIR both assume that removing Notices of Herbicide Application four days after application is a Best Management Practice and sufficient to warn the public. However, herbicides persist for many months and sometimes years after being applied. When toxic herbicides potentially persist in the environment for months/ years, removing notices in just four days does little to nothing to protect the public from exposure to the toxic substances. This is just one of MANY deficiencies in the Draft Plan and its Draft TPEIR.

Please take a few minutes to read these informative letters.