



# City of Albany

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CISAC Strategic Framework  
1220 N St. Rm. 221  
Sacramento CA 95814  
via email: [cisac@iscc.ca.gov](mailto:cisac@iscc.ca.gov)

## **RE: Comments on CISAC Invasive Species Draft Strategic Framework**

The City of Albany appreciates the opportunity to share our concerns about the California Invasive Species Advisory Committee (CISAC) Framework Document.

First, we are extremely concerned about Recommendation DR-2, "Implement a Programmatic Environmental Impact Report (PEIR) for response to new invasive insect species." We strongly oppose this recommendation that a broad Programmatic EIR should be prepared "for response to new invasive insect species" to allow "the rapid response necessary to contain and possibly eradicate new infestations before they have a chance to spread" for two reasons.

The first reason is that the "rapid response" referred to in this recommendation is precisely the strategy that the California Department of Food and Agriculture (CDFA) pursued in 2007 with its "emergency" aerial spraying of Monterey and Santa Cruz counties for the light brown apple moth (LBAM), after which more than 600 people reported adverse health effects and a number of environmental impacts resulted, including pesticide contamination of the Monterey Bay National Marine Sanctuary. Given the significant adverse consequences of the state's "rapid response" to LBAM, to propose that the state should attempt to get the advance CEQA approval for future rapid response actions poses an unacceptable risk to state residents.

One of the primary reasons that Albany residents were not subjected to the same adverse consequences that residents of Monterey and Santa Cruz experienced was that two courts halted the LBAM program until CDFA complied with CEQA and prepared an EIR. For this document to suggest that the response to invasive species has to be so rapid that there is no time for evaluation of the specific health and environmental impacts of the state's control actions undermines the precise protections that CEQA provides Californians.

The second reason we oppose this CISAC recommendation is that a broad Programmatic EIR could not possibly absolve CDFA from the responsibility to prepare a site-specific analysis of the impacts of specific emergency eradication activities, especially given the huge geographic area, the varied potential species involved, and the ecological considerations that would come into play when specific actions are proposed.

The notion that introduced insect species pose such an emergency threat that the state's environmental laws should not apply is dangerous, particularly since the state has demonstrated amply during the past 50 years that its judgment regarding the need for emergency action for pests and the nature of that action is questionable at best.

*The City of Albany is dedicated to maintaining its small town ambience, responding to the needs of a diverse community, and providing a safe, healthy and sustainable environment.*



Second, we oppose the use of tax dollars to create “educational” programs for schoolchildren (Recommendation OPE-2) that promote the notion of invasive species as a threat without addressing the pesticides used to combat these species and the health and environmental consequences of this approach. We find it deeply disturbing that the CISAC document proposes these programs with the explicit goal that children will be messengers to their parents. Historians generally refer to such government activities as propaganda. CISAC and the CDFA have no business creating educational curricula to convey a public relations message to schoolchildren.

Third, we find it profoundly disturbing that the CISAC document barely mentions human health and appears oblivious to the need to protect human health against the risk of pesticide exposure as a primary criterion in assessing invasive species control activities. This document should make unequivocally clear that human health comes first, and that the “public health threat” posed by invasive species must be weighed against the significant public health threat of pesticide treatments for invasive species.

Finally, as a city facing significant financial shortfalls due in part to the state’s budget crisis, we are surprised that CISAC was created in 2009 when most state agencies were required to cut advisory bodies and services. We believe there are far better uses for scarce tax dollars than planning PR and pesticide campaigns for introduced species.

Sincerely,

Joanne Wile  
Mayor

cc: CDFA Secretary A.G. Kawamura - [akawamura@cdfa.ca.gov](mailto:akawamura@cdfa.ca.gov)