David J. Sasek, P.E.

Director

GENERAL SERVICES AGENCY

800 South Victoria Avenue, L#1000 Ventura, CA 93009 (805) 654-3700

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Board of Supervisors County of Ventura 800 South Victoria Avenue Ventura, CA 93009

Board of Directors Ventura County Fire Protection District 800 South Victoria Avenue Ventura, CA 93009

SUBJECT:

Report Back Regarding the Potential Use of Non-Glyphosate-Based Products for Vegetation Management in the County of Ventura on Properties Owned by the General Services Agency Parks Department, Department of Airports, and Ventura County Fire Protection District; Direction Regarding Use of Such Products on GSA-Maintained Parks and Facilities; and Authorization for Use of Glyphosate-Based Products in Limited Situations.

RECOMMENDATIONS:

- Receive and file a report regarding the potential use of non-glyphosate-based products for vegetation management in the County of Ventura on properties owned by the General Services Agency Parks Department (GSA Parks), Department of Airports, and Ventura County Fire Protection District;
- 2. Provide Direction to GSA Parks regarding use of such non-glyphosate-based products on GSA-maintained parks and facilities; and

3. Authorize GSA Parks and Ventura County Fire Protection District to use glyphosate-based herbicides on Arundo (and other vegetation) as required by granting agencies.

FISCAL/MANDATES IMPACT:

There are no County costs associated with this Board item.

BACKGROUND:

On October 22, 2019, your Board received a report on the use of glyphosate for vegetation management in the County of Ventura by the Agricultural Commissioner, Department of Airports, Ventura County Fire Protection District, General Services Agency (GSA), Harbor Department and Public Works Agency. As part of this report, your Board was informed that GSA Parks used 48 gallons of glyphosate-based herbicide over 230 acres of parks and trails for a total annual labor and material cost of \$32,000. These 230 acres consist of eight regional parks (Camp Comfort, Dennison, Foster, Santa Rosa, Steckel, Toland, Oak, and Tapo Canyon), one local facility (the Casitas Springs Community Center), one historical site (the Mission Aqueduct), and the Piru trail. These 230 acres do not include the Ojai Valley Trail (OVT), an additional 59 acres. In addition, your Board was informed that GSA Parks leasehold facilities use 15 gallons of glyphosate-based herbicide over 280 acres of golf courses and that the GSA Grounds Department maintains 134 acres and has not used glyphosate since 2015.

The Ventura County Fire Protection District manages approximately 50 acres of landscaped area throughout Ventura County. Only a few gallons of glyphosate per year is used for weed control in these areas.

The Department of Airports uses 292 gallons of glyphosate over approximately 208 acres primarily around runways, taxiways, and restricted roadways, in addition to minor usage on approximately 2 acres of public areas in its business park area.

DISCUSSION:

GSA Parks uses Rodeo, which is manufactured by Dow and contains glyphosate, in and around aquatic sites, wildlife habitat, and other park areas for weed abatement. The estimated cost of switching from Rodeo to a non-glyphosate based herbicide is approximately \$6,000 per year, an amount that can be absorbed within GSA Parks' existing budget. Several factors are considered in managing GSA Parks' weed abatement program, including public health and safety, environmental impacts, product effectiveness and cost. Considerable time has gone into researching and investigating ways to minimize herbicide use while achieving the mandated weed-free defensible space around structures; as a result, very little herbicide is currently used in GSA Parks facilities.

In 2014, GSA Parks discontinued the use of all chemical herbicides, including glyphosate, on the OVT in response to public concerns, and has been using more costly manual methods to control weeds, primarily the use of weed-whackers. In an effort to minimize the fiscal impact of manual weed control, GSA Parks has been using work furlough crews from the Probation Agency to manage the weeds on the OVT. The effort to maintain the OVT has skyrocketed to an estimated annual cost of over \$180,000 in labor for weed management. In addition, GSA Parks has experienced an uptick in tort claims since beginning manual weed abatement on the trail, and there are concerns about traffic safety along the trail. Even with an increased level of effort, adequately maintaining the trail without the use of herbicides has remained a challenge, as the weed growth is difficult to keep pace with. GSA costs will continue to increase because manual weed abatement does not remove the weeds' roots and the weeds reseed along the trail. This method of weed abatement has now become a year-round process and GSA Parks anticipates this same trend carrying over to other facilities such as campgrounds, golf courses, parks and other trails and walkways if systemic herbicide spraying is discontinued.

GSA Parks fully expects the impacts listed above related to the OVT will be encountered throughout the rest of the park system if all spraying is discontinued. The estimated labor costs that would be realized would exceed \$659,000 per year for all parks except the OVT or 20 times more than spraying. If GSA Parks is unable to continue using work furlough labor on the OVT, the total cost of mechanical weed abatement would be an estimated \$839,000 for the entire parks system. This level of effort would exceed the full-time capacity of GSA Parks' maintenance staff on weed abatement alone, leaving no time for other required maintenance activities.

GSA Parks has five leaseholds that use glyphosate to manage vegetation: Soule Park Golf Course, Rustic Canyon Golf Course, Saticoy Regional Golf Course, the Archery Club at Tapo Canyon Park, and the Simi Valley Fliers at Oak Park. If the three golf course lessees were required to cease the use of glyphosate, the costs impacts would include additional staff hours for manual removal or the increased cost of alternative herbicides, costs that could be passed on to their customers or that might have to be absorbed by the County (and thus by GSA Parks). The other two lessees – the archery club and the model plane club – both use volunteers to maintain their facilities in compliance with the Fire Code; if they were required to cease the use of glyphosate, the man-hour increase necessitated by manual weed abatement or the increased cost of alternative herbicides may make it more difficult for the clubs to comply, given their limited budgets. It is likely that amendments to the leases would have to be negotiated to require the lessees to cease the use of glyphosate or to cease the use of herbicide spraying altogether. Depending on your Board's direction, GSA Parks will pursue negotiations with the lessees.

Weed growth along pavement edges, campsites, sidewalks, Class 1 trails, and parking lots contributes to pavement failure from root growth and seed germination. Certain weeds generate large quantities of tough thorns (puncturevine) that are a frequent source of complaints. GSA Parks also complies with the Ventura County Fire Protection District

defensible space program throughout the parks system. In addition, due to the proximity of traffic, manual removal of weeds introduces unintended public safety issues.

The following alternatives to glyphosate have been explored by GSA Parks with varying results at an increased cost. Manual weed abatement, mowing and trimming are labor intensive; contact chemicals such as vinegar and clove oil, tarps, and heated foam are expensive and only minimally effective and, in the case of vinegar, more hazardous. A comparative cost analysis of the alternatives is included as Exhibit 1.

Considerations and requirements related to weed abatement are outlined below:

- Safety Considerations In many areas safety considerations demand vegetation control. As an example, vegetation must be controlled in order to preserve park infrastructure, thus ensuring safe use of the facilities. It is necessary to control poisonous and/or thorny plants, avoiding contact injury by the public or by maintenance personnel. Lastly, large-scale vegetation control is necessary for fire prevention and control.
- Habitat Restoration/Non-Native Species Removal Large-scale environmental projects often require the removal of non-native species. Some granting agencies require the use of glyphosate for vegetation control as they feel that its use for that purpose is the most cost-effective use of their grant funds.
- Complaints/Aesthetics/Good Neighbor Systemic herbicide is used in response
 to public complaints and/or requests for vegetation control. Systemic herbicide is
 used around facilities (buildings/grounds) to control undesirable vegetation to
 achieve a desirable aesthetic. In many cases, systemic herbicide is used to control
 vegetation on the periphery of properties to avoid its spread to neighboring
 properties.
- Regulatory Requirements Many mitigation planting sites require long-term (5 years or more) maintenance of installed mitigation measures (predominantly native plants). A large part of the maintenance is the eradication of non-native invasive species. Systemic herbicide use allows an efficient and selective eradication of unwanted plant species.

GSA Parks needs to continue the use of systemic herbicides in those scenarios where it is already in use, with a broad-spectrum systemic herbicide to control the growth explosion of weeds, or GSA Parks will face significant operational challenges if required to implement other costlier methods. All alternative products, including Rodeo where applied to eliminate Arundo, require the area to be clear until the product is dry. GSA Parks requests approval from your Board to continue to use systemic herbicides that do not contain glyphosate at all GSA Parks' parks and facilities, restricting park access during treatment until the product is dry. GSA Parks further requests direction from your Board to pursue amendments to the leases described above to prohibit the use of glyphosate but allow the use of alternative systemic herbicides.

The Ventura County Fire Protection District intends to discontinue the use of glyphosate-based herbicides on landscaped areas around its 35 fire stations, the Regional Training Center in Camarillo, the Fire Support Complex/Wildland Division in Oxnard, and other district-owned parcels. The district intends to use other non-glyphosate-containing herbicides for weed control in the future.

The Department of Airports intends to discontinue the use of glyphosate-based herbicides in publicly accessible areas, including on landscaped areas in their business park. The cost of switching to non-glyphosate-based herbicides for this purpose is nominal and can be absorbed within the department's current budget. The Department of Airports intends to continue to use glyphosate-based herbicides in and around the airfield, including runways and taxiways.

This item has been reviewed by the County Executive Office, Auditor Controller's Office, Ventura County Fire Protection District, Department of Airports and County Counsel. If you have any questions regarding this item, please contact Ron Van Dyck at (805) 654-3945.

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Exhibit 1 – Personnel-Time-Labor Metrics

Exhibit 2 – PowerPoint Presentation

ec: Kip Turner, Director of Airports

Byron Hamilton, Maintenance Supervisor, Department of Airports Chad Cook, Assistant Chief, Ventura County Fire Protection District

Ron Van Dyck, Deputy Director, GSA Parks

Mike Kumazawa, CEO Analyst