Pesticide Use Justification Form – City Pools 4.25.2022

## Applicant Information:

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## Pesticide:

**Proposed Dates of Use: May 2022**

**Products (W/ active ingredients):** Ortho Weed-B-Gone plus Crabgrass Control: 2,4-D, dimethylamine salt 6.42%, Dicamba, dimethylamine salt 0.6%, Quinclorac 2.13%

**EPA Reg #**: No. 2217-896-239

**Pesticide Type:** Herbicide

**City Use Type**: Tier 1: Most hazardous, most use restrictive

## Use Location:

**Street Address/Site Name**: 2000 Shasta Drive; 1525 Tulip Lane

**Detailed Location of Application Site**: Turf areas within the interior fencing.

**Posting and Notification**: A notice of 72 hours will be given before the application. No applications will be in the vicinity of playgrounds, schools or picnic areas. Additionally, this area can be locked down restricting the use of pedestrian traffic.

## Justification:

**Target Pests**: Various broadleaf weeds including crabgrass, dandelion, poa annua and clover.

**Justification for Use**: The justification for use of this product is based on previous IPM methods utilized that have proven not to be successful and also for the vast area that needs to be covered. The conditions of the turf is fair to poor. Invasive weeds such as clover, poa annua, crabgrass and dandelion have spread throughout the turf and now make up over 50% of the vegetation. Clover attracts honey bees which in turn create an elevated occurrence of bee strings on the bare feet of visitors. The facility is gated and can be locked to prevent any pedestrians from entering during and after the treatment has been completed. If this treatment is not completed, invasive weeds will continue to spread creating

poor and unsafe conditions. If this area goes untreated then the potential to re-sod the area becomes increasingly high, which could cost hundreds of thousands of dollars in materials and man hours to complete. Additionally, these are facilities that generate continuous revenue for the City that could be reduced if patrons choose to leave and utilize facilities elsewhere that have more favorable conditions with little to no potential for bee stings. The herbicide application process would include a lock down of the facility, an operator would apply the liquid chemical treatment to the turf via a spray boom, the application would be dry within a couple of hours and begin eradicating invasive weeds almost immediately, thus allowing healthy turf to reclaim areas occupied by weeds. As this product is a "weed and feed", the turf with have a boost of nutrients to aid in its regrowth.

**Explanation of IPM Methods Used**: Previous IPM methods utilized by Parks staff have included mechanical, cultural and chemical weed abatement. The turf areas were previously treated with nitrogen in an effort to suppress clover growth. The nitrogen application was not successful. No other methods can be utilized in this facility as this area generates revenue for the City and the cost to sod the area is far greater than what our budget allows. Furthermore, methods such as solarization or steaming are not feasible as they would have damaged the turf grass species. Hand pulling is not a cost effective option and we do not have personnel available to complete this task.

**Strategies to Prevent Future Applications**: Unfortunately, there are no other methods that can be utilized in these specific areas to mitigate invasive weeds at this time; however, staff will continue to research new developments in order to provide the safest and least environmentally invasive solutions.

**Additional comments**:

Parks staff is aware that City policy limits the use of Tier 1 hazard herbicides in high use public spaces such as City pools. As such they investigated the possible use of lower hazard tier herbicides to avoid having to justify the variance in policy. Cheetah Pro (Tier 3) was used to treat clover at Playfields with no success. Staff are concerned that other Tier 2 or 3 products currently listed on the Reduced Risk Pesticide List would present an issue with off-target drift. Additionally, those products would require spot treatment in a turf grass environment to avoid damaging desirable turf grass species. Even with this precaution, some damage would result. Staff are unaware of alternative Tier 2 or 3 herbicides that can achieve the desired results. Finally, staff believe that by utilizing this dual purpose "weed and feed" chemical, they can both eradicate the weeds while fertilizing and strengthening the turf, which will reduce associated maintenance costs and better prepare the turf to successfully compete with future weed growth.

ERD Approval: Richard Tsai Date: 4/26/2022

City Manager Approval: [signature] Date: 4/28/22