

Pesticide Use Justification Form – City of Davis WWTP 2024

**Applicant Information:**

Wastewater Division

pwweb@cityofdavis.org

530-757-5686

**Pesticide:** Round up Custom

**Proposed Dates of Use:** As weather conditions and operational factors permit from March 1<sup>st</sup> 2024 – December 31<sup>th</sup> 2024

**Product (W/ active ingredients):** Round up Custom – Glyphosate 53.8%

**EPA Reg #:** 524-343

**Pesticide Type:** Herbicides

**City Use Type:** Tier 1 most hazardous, most restrictive. Primary use on levee and pond road tops and edges. Rock area around clarifiers and solids building. All areas are closed to the public during applications.

**Use Location:** City of Davis, Wastewater Treatment Plant

**Street Address/Site Name:** 45400 Country Road 28H, City of Davis WWTP

**Detailed Location of Application Site:** Round up to be used on road tops, edges, rock areas where run off is unlikely to occur.

**Posting and Notification:** Site notifications will be posted at least 48 hours before application via the pesticide application electronic notification system and at site entrances, remaining 24 hours after. Changing weather conditions and operational factors may delay the application. If so, the notice will be re-posted with new proposed dates.

**Target Pests:** Pepper weed, short-pod mustard, black mustard, Italian thistle, yellow star thistle, milk thistle, fluellin, other annual weeds

**Justification for Use:** This herbicide use is justified due to the need for safe access to these critical infrastructure facilities year –round. PW staff require the ability to safely access stations, roads and facilities throughout the year to perform maintenance and

react to changing conditions during the rainy season. Also, the Treatment Plant has a regulatory requirement to keep levees free of vegetation for state inspectors. The product listed will provide effective control of the broad range of weedy vegetation that is found in and around the listed sites. By performing well-timed herbicide applications, PW staff will be able to reduce the amount of unwanted vegetation.

Pepper weed is of particular concern because there is no reliable way to control them without herbicide. Mechanical cultivation or hand hoeing are not viable options of control due to the plant's ability to reproduce from segmented vegetative material. These methods will actually increase the infestation. These plants can cause damage to stations and road tops because of their large, tuberous roots which can undermine pipes, foundations and other facilities.

**Explanation of IPM Methods Used:** Staff will only use herbicide in the areas identified above. All other acreage included in storm water management areas is maintained without pesticides. Areas that can be mowed or trimmed will receive those treatments, as needed to keep access clear and fire risk low. Crews will continue to do hand trimming, and pruning in areas not accessible to mowing equipment.

**Strategies to Prevent Future Applications:** Effective, well-timed control will decrease pesticide usage over time because less seed and reproductive material will be present in the soil. However, the need for access to secure public safety may affect this trend, depending on conditions such as rainfall amounts, timing and ground temperature. We propose to reduce our use in the following ways:


- Keep Oxidation ponds maintained per state recommendations.
- Practice responsible vehicle access during wet months to prevent road damage and the need for repair work that may promote weed growth.
- Clean and maintain all equipment before and after use to prevent the transfer of seeds and plant materials between sites and/or into sensitive areas.
- Continue to use hand and power tools to keep control of the weeds as much as possible.


**Additional comments:** Plant staff have extensive experience with vegetation management and leverage their knowledge to protect the public the off-target risks associated with all Pesticide/Herbicide. This justification will allow staff to continue to meet their mandate for public health and safety, while reducing the overall reliance on conventional pesticides

Submitted By: Cory Eden

Date: 3/1/2024

WWTP Lead Maintenance Technician

 <b>Environmental Resource Division Approval</b>	<p>3/22/2024</p> <p><b>Date</b></p>
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 <b>City Manager Approval</b>	<p>4/2/24</p> <p><b>Date</b></p>
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