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August 31, 2019

Board of Supervisors
County of Ventura
625 West Hillcrest Drive
Thousand Oaks, CA 91360

Dear Supervisors,

I am writing on behalf of the California Invasive Plant Council to comment on the importance of herbicides as a tool for controlling invasive plants in natural areas. This is in response to the County of Ventura and other jurisdictions reevaluating their use of glyphosate, the active ingredient in Roundup herbicide, due to concerns over environmental impact, public health and liability. Cal-IPC would like to share our view from the perspective of land management.

Invasive plants have significant impact on California, as they do across the globe. The state's *Biodiversity Initiative* and *Wildlife Action Plan* both spell out the impacts of invasive plants to our unique natural heritage and urge action to reduce these impacts. Recent catastrophic wildfires highlight the role of invasive plants as fuels that increase risk. Damage to agriculture (including grazing and timber lands), recreation, and water resources is also of major concern. Interactions with climate change are making matters worse.

Cal-IPC is a science-based nonprofit organization formed by land managers and research ecologists in 1992 to protect the state's environment and economy from invasive plants. We maintain a statewide list of invasive plants and the online CalWeedMapper database. We have produced reference volumes including *Invasive Plants of California's Wildlands* (2000, UC Press) and the *Wildland Weed Worker's Handbook* (2004) and we distribute more recent publications such as *Weed Control in Natural Areas in the Western United States* (2013, UC Dept. of Agriculture and Natural Resources). Our work is funded by public agencies including the California Wildlife Conservation Board, the National Fish & Wildlife Foundation, the US Fish & Wildlife Service and the US Forest Service as well as by private conservation foundations.

Cal-IPC promotes Integrated Pest Management (IPM) as a holistic approach to controlling invasive plants. (The California Dept. of Pesticide Regulation presented Cal-IPC with an "IPM Achievement" Award in 2015.) An IPM approach uses a range of strategies, including prevention (preventing pests from being introduced in the first place) and early detection (so that management actions can be taken before a pest is widespread). An IPM approach also uses a range of tools for managing pests, including physical tools (like mowing), biological tools (like grazing), cultural tools (like fire), and chemical tools (herbicides). For any given

management situation, these tools are used in combination as determined to be most effective and safe. Herbicides are an essential tool in the IPM toolbox.

We are currently working with the University of California to develop best practices for controlling invasive plants using non-chemical methods. This aims to help land managers and decision makers assess all management options, choosing appropriate non-chemical approaches where they will be effective and safe (and affordable), while recognizing that not all invasive plant management can be implemented effectively with a fully non-chemical approach.

Each tool used to control invasive plants has advantages and disadvantages. Herbicides have unique advantages in many situations and are used responsibly as part of an IPM approach by many land management agencies. The preponderance of agencies and land managers—knowledgeable professionals dedicating their careers to environmental protection—employ herbicides for restoration as an effective and low-risk tool. In many instances, herbicides are determined to be the approach that is least harmful to the environment and those doing the work.

Applications of herbicides to control invasive plants in natural areas are (1) very small in scale relative to applications for agricultural crops and landscaping, (2) performed by trained applicators under direction of supervisors who are professionally licensed by the state's Dept. of Pesticide Regulation, part of the California Environmental Protection Agency, and (3) chiefly conducted away from areas frequented by the public.

Regarding glyphosate, regulatory agencies continue to register it for use because extensive research has not shown significant health risk. Though the World Health Organization has classified it as a probable carcinogen, WHO has also stated that dietary exposure is unlikely to pose a public health concern. The American Cancer Society's website describes how to interpret classifications of carcinogenicity, which is important given that many aspects of everyday life – sunlight, alcoholic beverages, processed meat, pumping gas –are listed as having the potential for increasing our risk for cancer. This is valuable knowledge, but of course actual exposure is a major part of the equation. Under real-world conditions, exposure can be limited to levels that are extremely low risk. This is the case with glyphosate used for invasive plant management in natural areas.

The current climate of public concern and institutional liability regarding glyphosate makes it important for entities like county Boards of Supervisors to consider potential actions. These entities are responsible for protecting natural areas and communities under their jurisdiction from the impacts of invasive plants. This is an opportunity for decision-makers and the public to engage in discussions around local land management.

Given the importance of addressing invasive plants and the unique role that herbicides play in this effort, we recommend that all jurisdictions retain the option of using registered herbicides—including glyphosate—for sites and situations where professional land managers determine them to be an appropriate part of an integrated management strategy.

Please contact me if you have any questions or comments. Thank you for your consideration of our perspective on this important topic.

Sincerely,



Doug Johnson
Executive Director
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