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August 3, 2019

Board of Supervisors  
County of Los Angeles  
Kenneth Hahn Hall of Administration  
500 West Temple St. Ste 383  
Los Angeles, CA 90012

Dear Supervisors,

I am writing on behalf of the California Invasive Plant Council to comment on the use of herbicides to control invasive plants in natural areas. This is in response to recent action taken by the County of Los Angeles to suspend use of glyphosate. As some communities reevaluate herbicide use due to concerns over environmental impact, public health and liability given recent court rulings on glyphosate (the active ingredient in Roundup herbicide), Cal-IPC's mission compels us to provide our perspective based on the best available science.

Invasive plants have significant impact on California, as they do across the globe. In the largely urban County of Los Angeles there are important natural areas to be stewarded for current and future generations as a restorative resource for residents. 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. And interactions with climate change are making matters worse.

Cal-IPC is a nonprofit organization formed 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, 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 the full 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. We support herbicides as one of the important tools 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 projects can be implemented effectively with a 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—have determined that the judicious use of herbicides for restoration is low-risk and effective and in fact are the least environmentally harmful method of controlling invasive plants in many situations.

It is important to recognize that applications of herbicides to control invasive plants in natural areas are (1) very small in scale relative to use on 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 the public frequents.

As to glyphosate in particular, regulatory agencies continue to register it for use because extensive research has not shown significant health risk. Given the current climate of public concern and institutional liability, responsible entities such as the Los Angeles Board of Supervisors want to take action. We believe that there can be meaningful action to reduce public exposure to glyphosate while maintaining land managers' access to an important tool for protecting our natural areas and communities from the impacts of invasive plants.

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 manager evaluation determines 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