

CHEMICAL WEED CONTROL

Description

Herbicide applications only target specific noxious weeds or non-native and invasive species of special concern in our area that have been identified by the Clallam County Noxious Weed Board, state, or federal agencies. Applications are made with herbicides selected for their effectiveness on the weed being targeted and may be applied using backpack sprayers or other handheld equipment as determined appropriate by the site conditions and/or the target weed.

General Use Considerations

Herbicide applications are a less physically labor-intensive means of controlling large weed infestations. Herbicides are the most effective way to control deeply rooted, persistent weeds. Properly applied herbicides can suppress weed germination and allow desirable vegetation to flourish with minimal effort. However, herbicides may not be appropriate under certain site or weather conditions and require more complex decision making and staff training than most other control measures. In Washington all herbicides must undergo a registration process in addition to that required by the Environmental Protection Agency before they can be legally applied. Washington's pesticide laws may require an applicator to be licensed.

Choosing an herbicide application requires carefully considering the level of weed infestation, economic impacts, and human and ecologic consequences. When a chemical measure is chosen, optimal effect is achieved through proper herbicide selection, timely application, proper application method, and the use of the effective rate of herbicide.

Herbicide use may differ depending on the setting. Targeted roadside application, as included in this plan, is fundamentally different than that of many other types of applications where herbicides are the mainstay of weed control. Spot applications of herbicides in a noxious weed control program are often used to control individual plants, while in agricultural settings broadcast applications to entire fields are common. A limited number of chemicals are typically used for noxious weed management compared to those used in agriculture. In a successful weed management program, the amount of herbicide used on a particular site will decrease over time as the invasive plant population declines and sustainable, desirable plant replacement is supported. The potential for developing herbicide resistance is also significantly decreased by this approach.

An herbicide's potential risk is assessed by the Environmental Protection Agency before the product is registered for use. A clear understanding of the risk of using a particular herbicide requires knowledge of the toxicity of the herbicide as well as the likelihood of exposure. Toxicity is a measure of how harmful any chemical compound is. It can be measured in many ways and evaluated for many different biological systems. However, a chemical cannot have any effects on an organism without exposure. Because noxious weed management with herbicides necessarily introduces chemicals into the environment, the challenge is to estimate the amount of exposure (the dose) for humans and different types of animals, as well as non-target plants. The presence of an herbicide in the environment poses less risk if the exposure for non-target organisms is sufficiently low that it is unlikely to have a negative impact.

ROADSIDE APPLICATION

It is the explicit goal of this IWM plan to minimize the use of herbicides whenever practicable, while shifting roadside vegetation to natural, self-sustaining, site-appropriate plant communities. Activities that create bare ground while controlling weeds will be avoided, or be limited in duration, to prevent reinvasion by other weed species. Revegetation of bare ground with desirable plants will be promoted wherever opportunity exists.

Each species will have a Best Management Practice (BMP) specific to that species, developed and provided by the Clallam County Noxious Weed Program. Product label guidelines for timing and rates will be observed for best results. Herbicides may be used in conjunction with other practices, including biological and physical.

Most of the herbicides used in noxious weed control are of low toxicity; however, not all herbicides have equal impacts. For example, some may pose greater risks to aquatic life and are not approved for use in aquatic settings. Others have long-lasting pre-emergent herbicidal activity that may restrict plant emergence or growth for several months after treatment. In areas that are to be re-vegetated soon after treatment, these herbicides may not be the best choice if their residues remain biologically active in the soil after desirable plant species are seeded or transplanted.

Herbicide products chosen for this program are ones that maximize effectiveness, selectivity, and safety. Appendix B provides herbicide toxicity and possible exposure scenarios for wildlife. The analysis presented in the Cal-IPC document from which this information was reproduced, was based on the best available scientific data. Herbicide users are reminded of the need to keep in mind that risk analysis is a dynamic, ongoing process, as new data is generated on exposure potential and toxicity. Future studies or refined analyses may reveal risks that were previously unknown; alternatively, they may provide assurance that risks are lower than previously understood. Invasive weed managers must stay informed about the latest technical developments about the chemical and non-chemical strategies they use.

The way in which herbicides are applied can enhance efficiency and safety goals. Spot treatments with backpack sprayers or selective handheld equipment will be the most used application method. Spot treatments protect habitat for wildlife such as pollinators, songbirds, and small mammals. Spot treatments reduce potential for offsite chemical drift. No broadcast treatments with mechanized equipment are being considered.

The general treatment period for noxious weeds will be during the growing season when the weeds are in full leaf. Treating before bloom focuses on preventing seed production, treating after bloom focuses on herbicide translocation to the roots as the plant restores food levels in the roots. Some species respond well to dormant treatments, extending the treatment season through the winter and early spring. Fall applications are effective for controlling germinating winter annuals, biennials in the rosette stage, and moving herbicide to the roots of established perennials.

All herbicides used by Clallam County are currently registered by the U.S. Environmental Protection Agency (EPA) and the Washington State Department of Agriculture (WSDA). Application of herbicides is in accordance with WSDA standards and chemical labels. County

employees who apply the herbicides are licensed by WSDA or under the direct supervision of licensed personnel. In addition, these employees undergo continuous training to upgrade their expertise in the selection and safe application of herbicides. Herbicide labels, Safety Data Sheets (SDS), WSDA sensitive person list, a safety plan, and this document are kept in the office and in the weed control truck.

Record Keeping

Thorough record keeping is maintained on a WSDA approved form (Appendix C), per State requirement for all herbicide applications. The record includes information about the treatment including location, chemical used, weather conditions, and applicator comments. Citizen inquiries pertaining to herbicide applications are recorded and addressed.

Limitation

Herbicides should not be used:

- When heavy rainfall is imminent, winds exceed 10 mph or during other inclement weather conditions, such as heavy rainfall that is expected soon after an application.
- Where landowners have a current "Landowner Will Control" agreement
- Special management areas may have specific control practices or limitations.

Application Guidelines/Standard Operating Procedures

- Use only EPA and WSDA approved herbicides.
- All applications are conducted under direct supervision of licensed applicators.
- Observe strict compliance with product labels and with State and local regulations.
- Use personal protective equipment as directed on the herbicide product label.
- Carefully select products, rates, timing of application, and equipment to be used.
- Include marker dye to aid identification of treated areas.
- Follow all applicable notification protocols.
- Follow product label for use and storage.
- Apply only aquatically approved formulations within 25 feet of water.
- Treat only the noxious weeds or invasive plant species on the site.
- Minimize drift injury by not spraying when wind exceeds 10 mph.
- Use drift reduction agents or techniques as appropriate.
- Don't spray when drifting cannot be controlled.
- Avoid foliar application when measurable rainfall is imminent.
- Conduct mixing and loading operations in an area where a spill would not contaminate an aquatic site or well head.
- Do not rinse spray equipment near bodies of water or sources of potable water.
- Be aware and protective of people, working equipment, sensitive crops and gardens, apiaries, endangered species, water, and wells.

- Avoid direct applications to pollinators.
- Secure containers during transportation.
- Contain and clean up spills and request help as needed.
- Keep copy of product labels and SDSs in truck.
- Promptly respond to any public inquiries or direct them to the supervisor.
- Post treated areas and specify the duration of exclusion, if appropriate.
- Provide public educational information on the need for weed treatments.
- Coordinate weed management activities where joint use of a right-of-way exists.

Herbicide Notification Process

Our intent is to provide notice as far in advance as possible balanced with the ability to predict weather and scheduling. General notice is provided in early spring through a Press Release (Appendix D) provided to the local news media and Public Notice posted on the County website. Both include general vicinity of areas to be treated, reference to the IWM plan and how to obtain a copy, and information for entering into an Owner Will Control Agreement with Clallam County. Additionally, an Herbicide Notice (Appendix E) is posted at intersections or at the discretion of the applicator. The Herbicide Notice includes the herbicides to be used, target weed species, application date, and phone contact. Notices that are pre-posted are re-dated with the actual date of application. Staff are trained and available to explain applications and answer onsite questions.

Staff

The IWM program will be staffed with a licensed supervisor and any additional employee will be licensed or operate under the direct supervision of a licensed Noxious Weed Control Board staff.

Training and Licensing

Washington State Department of Agriculture Pesticide License “Public Operator”
 Washington State University IPM Program Certification (Continuing Education)

Equipment

Equipment used: backpack sprayers, hydraulic sprayers with hose and handheld nozzle, handheld spray bottles and loppers, dabbers, wicker wipe applicators, EZ-Ject lance and injection guns for selected noxious weeds. A backpack sprayer is a self-contained unit (tank and pump) and is carried on the back of the applicator. The capacity of these sprayers is usually less than 5 gallons. The entire tank may be pressurized or only a small chamber that draws from the main tank. This equipment is useful for selective applications and spot treatments. Backpack sprayers are very adaptable to a wide range of nozzle configurations for treating foliage. The backpack sprayer is the major application device for roadside weed control in Clallam County.

Maintenance

- Regular maintenance and calibration of all spray equipment.
- Early detection of targeted weed infestations and ongoing site evaluations.

- Ongoing training of staff including yearly recertification credits.
- Ongoing improvement and updates of equipment and handling protocols.

Performance Measurements

- ◆ Number of projects completed and ratio of spot treatment to whole road treatment.
- ◆ Area of weeds controlled.
- ◆ Number of weed species controlled/encountered/eradicated.
- ◆ Public, interdepartmental, and agency weed control requests – number of requests, area of treatment, miles of road.
- ◆ Public satisfaction -- number of complaints (the lower the number, the better the performance)
- ◆ Survey goals: – area, number of miles inspected, number of roads in a four-year rotational cycle.
- ◆ Documentation, monitoring, evaluation, and reporting

Herbicide Selection Process

Several factors contributed to selecting herbicides to control noxious weeds on Clallam County roadsides.

- **EPA Approved for Roadside Use** -- All the selected herbicides are fully labeled for use on roadsides and are registered for use in the state of Washington. The herbicide label does not have to list all the weeds, but the label does have to list roadsides or rights-of-way as a use site.
- **Effectiveness on Target Species** – AquaNeat and Polaris are very broad spectrum and will control most of the county's noxious weeds. Milestone, Transline, Vastlan, and 2,4-D are selective and very effective only on broadleaf plants. Fusillade II is effective only on grass species. Many of the targeted weeds have a perennial life cycle with persistent root systems. Effective control requires translocated herbicides that kill the roots. All the selected herbicides translocate to the roots.
- **Selectivity** – Several of the herbicides were chosen because they selectively target broadleaf weeds, not grasses. This allows grass to be unaffected and to colonize space previously occupied by broadleaf weeds. The grass herbicide gives the program a selective chemical for controlling weedy grasses, such as reed canarygrass, in a mixed plant community.
- **Human and Environmental Safety** – A carefully selected, limited palette of herbicides rated with low toxicity to humans and wildlife has been chosen for this program. Some of the products are labeled for aquatic use so inadvertent occurrences in water is anticipated to have minimal effects on aquatic organisms. Most are labeled for use on grazed areas such as range and pasture. Most are labeled for use in maintaining wildlife habitat, fence rows, as well as rights-of-way.

Herbicide Product List

Clallam County proposes to use the following products for targeted herbicide applications:

- AquaNeat® (aquatic formulation glyphosate)
- Element 3A® (aquatic formulation triclopyr amine)
- Element 4® (triclopyr ester)
- Fusilade II® (fluazifop-P)
- Garlon 3A® (aquatic formulation triclopyr amine)
- Garlon 4® (triclopyr ester)
- HighNoon® (aquatic formulation aminopyralid and florpyrauxifen)
- Milestone® (aquatic formulation aminopyralid)
- Oust XP® (sulfometuron-methyl)
- Plateau® (imazapic)
- Polaris® (aquatic formulation imazapyr)
- Ranger Pro® (glyphosate)
- Transline® (clopyralid)
- Vastlan® (aquatic formulation triclopyr choline salt)
- WeeDestroy AM-40® (aquatic formulation 2,4-D)

The chosen products are effective on known roadside and pit weeds, offer the greatest weed selectivity, maximize worker and public safety (no wait, access when the spray has dried), and used as proposed, pose low risk for wildlife and the environment. See Appendix B for risk analysis.

The standard, minimum personal protection equipment (PPE) when using herbicides includes:

- Long sleeved shirt, long pants
- Shoes plus socks
- Chemical resistant gloves made of waterproof materials

The required PPE for each herbicide, listed on the label, will be strictly adhered to during treatment.

Table 12. Selected herbicide characteristics.

<u>Chemical Name</u> Product Name	Selective	Aquatic Sites	Target Weeds	Personal Protection Equipment	Comments
<u>2,4-D</u> WeeDestroy AM-40	✓	✓	Broadleaf	Standard; eye protection + apron for mixing	Inexpensive, often used in mix; short residual
<u>Aminopyralid¹</u> Milestone	✓	✓	Broadleaf	Standard	Moderate residual may help suppress seed germination; very low rates
<u>Aminopyralid and florpyrauxifen</u> HighNoon	✓	✓	Broadleaf, some annual grasses	Standard	Moderate residual may help suppress seed germination; very low rates
<u>Clopyralid</u> Transline	✓		Broadleaf	Standard	Very selective; will not affect many native and desirable plants; moderate residual; low rates

Chemical Name Product Name	Selective	Aquatic Sites	Target Weeds	Personal Protection Equipment	Comments
<u>Fluazifop-P</u> Fusilade II	✓		Grasses	Standard + eye protection	For dry sites; reed canary-grass and annual grasses
<u>Glyphosate</u> AquaNeat		✓	All weeds	Standard	Minimal to no residual; protect desirable vegetation
<u>Glyphosate</u> Ranger Pro			All weeds	Standard	For pits and some special sites only
<u>Imazapic</u> Plateau	✓		Annual weeds	Standard	For dry sites, annual weeds, and for prairie restoration, wildflower establishment
<u>Imazapyr</u> Polaris		✓	All weeds	Standard	Long residual; protect desirable vegetation
<u>Sulfometuron-methyl</u> Oust XP			Broadleaf, grasses	Standard	Long residual; early season pre and post-emergent; for use in county pits only
<u>Triclopyr amine</u> Element 3A, Garlon 3A	✓	✓	Broadleaf, shrubs	Standard; Eye protection for mixing, access to eye wash station	Moderate residual
<u>Triclopyr choline</u> Vastlan	✓	✓	Broadleaf, shrubs	Standard	Moderate residual
<u>Triclopyr ester</u> Garlon 4, Element 4	✓		Broadleaf, shrubs	Standard	Moderate residual

¹Registered as a reduced risk pesticide under the EPA reduced risk pesticide program

Adjuvants are compounds added into an herbicide mix to improve efficacy. They perform various functions, including enhanced plant uptake of the herbicide; better mixing of otherwise incompatible herbicides; increased adhesion of the spray to plant surfaces; and reduced spray drift. In many herbicide products, adjuvants are included as part of the pre-mixed formulation as purchased. Applicators can also add adjuvants to spray mixtures prior to application. Adjuvants include marker dyes, which are visible indicators of freshly treated weeds, including Blazon and Highlite (aquatic formulation).

Surfactants, or “surface active agents”, are a type of adjuvant added to a mix to increase the dispersing, spreading, wetting, or other properties of the liquids. Surfactants disperse water droplets and help penetrate a plant’s waxy surface. (Table 13).

Some states require registration of adjuvants as pesticide products, but the US EPA does not, so relatively less is known about adjuvants compared to pesticide active ingredients. Acute toxicity information is often available, with some of these compounds being labeled as strong eye or skin irritants, but information regarding chronic toxicity is sparse. Washington State and European countries require environmental toxicology data on adjuvants.

For many pesticide products containing adjuvants as part of the formulation, the compounds are not explicitly identified on the label or the Safety Data Sheet. Unless they are on one of US

EPA's lists of more toxic chemicals, they do not have to be identified. The identity of these ingredients in a pesticide or adjuvant product is legally protected from full disclosure as "Confidential Business Information."

Without more detailed information, it is not possible to conduct a comprehensive risk assessment on adjuvants, so they are not included in the risk charts shown as part of Appendix B, which focus on herbicidal active ingredients. However, at least one adjuvant is known to pose hazards to wildlife—the surfactant used in the original formulation of RoundUp®, polyoxyethyleneamine (POEA). This surfactant is more toxic to aquatic life than the active ingredient glyphosate—it has been included as a separate entry in the risk charts. Nonylphenol ethoxylates (NPEs), which are used in some adjuvants (and many consumer products), may be linked to endocrine disrupting effects. No products containing polyethoxylated tallowamine (POEA) or nonylphenol ethoxylates (NPEs) will be allowed for use in this program. Adjuvants with low toxicity to wildlife include modified seed oils, alkyl ethoxylates, and silicones. Liberate®, Competitor®, DyneAmic®, Syl-Tac EA® and Agri-Dex® (all aquatic formulations) are brand names of some adjuvants from these low toxicity categories and have been selected for use in this program. Research is developing on this subject and will be regularly added to updates for this program.

Government agencies negotiate for favorable pricing and award a contract to a preferred provider for many goods and services. Herbicides will be purchased under state contract whenever possible to conserve tax dollars. Because the preferred provider may vary from year to year; different brand names than listed in the previous tables, with the same active ingredient may be substituted. New products or different formulations with the same active ingredient that are more user or environmental friendly and cost beneficial will be substituted as they become available.

Table 13. Adjuvants used to enhance herbicide effectiveness.

Adjuvants	Aquatic use	Treatment effects	PPE	Comments
Competitor - vegetable oil Agri-Dex, - crop oil concentrate Dyne-Amic - nonionic surfactant Liberate - fatty acids Hasten- vegetable oil Syl-Tac EA, organosilicone surfactant and modified vegetable oil concentrate	✓	Increases herbicide uptake	Standard	Used at low rates
Blazon Blue - marker dye Hi-Light Blue - marker dye	✓	No active effect	Standard	Highlights recently sprayed weeds; washable

Several studies have shown non-synthetic products (or “natural”) are considerably less effective for controlling weeds, especially biennials or perennials, than synthetic ones. However, three of these products, acetic acid, clove oil, and limonene are the subject of an on-going study for control of the annual weed, herb Robert. Pending study results, one or more of these herbicides may be added to the herbicide product list for control of this or other annual weeds.

Application Methods

Foliar. Applications to the plants' leaves are an easy way to control weeds with maximum amount of herbicide directed to the target plants and optimum up take by the plants for both herbaceous forbs and grasses.

Wiping Applicators. Wiping applicators (also called rope wicks) rub the concentrated herbicide solution on the plant's leaf and stem surfaces. Because only the weeds tall enough to contact the rubbing surface are affected, nonselective herbicides can be used selectively to release low-growing plants or plants below the treatment height. Drift does not occur with wiping applicators so there is no potential exposure for adjacent crops and gardens.

Stem Injection. Some species, such as knotweeds, have stems of sufficient size that herbicide can be injected directly into the stem. While this is an effective treatment, it is a very labor-intensive treatment for treating dense stands. Only some herbicides are labeled for this application method.

Stem Injection/Spaced Cuts/Cut Surface/Cut Stump. Stem injection, spaced cuts, cut surface and cut stump treatments are often used for controlling tall growing woody plants. As the name implies, herbicide is applied to just the cut surface. The herbicide rate and carrier are adjusted according to the part of the woody plant being treated. Unlike foliar treatments done during the growing season, these treatments can be applied year-round. These treatments are particularly effective for large butterfly bush and Scotch broom in excess of 1-2 inches in diameter.

Basal Bark. A concentrated herbicide is applied to the lower 12-18 inches of the woody plant. This treatment can be performed during the dormant season, extending the treatment season and limiting the exposure to humans, wildlife and pollinators.