

Glyphosate Use in Los Alamos County Operations

Background, Considerations and
Impacts of a Ban of Glyphosate

December 14, 2021

Attachment D



Key points

1. Background
 - Pesticide Regulation
 - Applicator Training
 - PPE
2. Glyphosate
 - Use
 - Impacts
3. Pesticide Notification Requirements
4. Integrated Pesticide Management

Pesticides

Pesticide is any substance used to kill, repel or control certain forms of plant or animal life that are considered a pest. Many folks use this term interchangeably when speaking about a specific type of control agent such as herbicide or insecticide. Examples of specific types that maybe globally noted as pesticides-

- Insecticides controls insects
- Fungicides prevent growth of mold and mildew
- Rodenticides controls rodents
- Herbicides controls or prevents weeds and grasses

Pesticide Regulations

Federal

- Environmental Protection Agency (EPA) approves the use of a pesticide after a registration process with data.
- Each approved product is assigned a registration number and each product is limited to the use as directed on the label.
- Each product has a required Safety Data Sheet.

State

- NM Department of Agriculture (NMDA) approves the use of a pesticide after a registration process with data
- Each approved product is assigned a registration number and each product is limited to the use as directed on the label.
- NMDA also sets license categories for approved products and administers statewide license program



Applicators

NMDA License

- Commercial Applicator
- Commercial Operator/Technicians
- Private Applicators
- Public Applicators
- Noncommercial Applicators (restricted use)
- Pest Management Consultant (restricted use)
- Pesticide Dealers

Note: There are 11 subcategories of licenses and four continuing education credits per year required in order to maintain the license.

Personal Protective Equipment (PPE)

- PPE is required for various task in the community
 - Trench safety
 - Electrical work
 - Chain saw use
 - Painting
 - Chemical application
- PPE requirements included on safety data and is specific to the product used.

County Use of Glyphosate



Isopropylamine Salt of Glyphosate

Glyphosate is an approved for label use by EPA & NMDA.

Horticulture

Around 8 % of market for home-owners use sold at local retailers with no license requirements for applicators. *Product will be voluntarily pulled from market in 2023.*

Around 12% of the market is government agencies or institutions which must be licensed.

Agriculture

80% is used in agricultural settings and a specific program has been created for genetically modified organisms (GMO) so the product can be used to increase crop production and efficient harvesting techniques must be licensed.

Los Alamos County (LAC) Areas of Use

LAC has a measured approach for the application of glyphosate products it is not used on every piece of property in the County.

Primary use areas:

- Community Services Department (CSD)
 - Medians
 - Gravel landscape areas
- Department of Public Utilities (DPU) - Federal requirements for clear areas of flammable materials
 - Electrical switching station
 - Gas PRV
 - Solar panel array
- Public Works Department (PWD)
 - Medians
 - Rights of ways
 - Airport fence line, on paved surfaces and runways







Operational Considerations

- Staff could rely on additional **pre-emergent applications** to minimize vegetative growth Requires 3 applications (2 additional and cost of pre-emergent herbicides is 56% higher)
- **Reduce service level** where appropriate and maintain on a complaint basis-Would not work in all areas
- Request **additional staffing** for mechanical control. Staff expects difficulty in filling positions for this type of work
 - CSD (4 FTE ~\$205,956)
 - DPU (2 FTE ~\$102,978 + \$10,000 contracted service)
 - PWD (2 FTE ~\$102,978)

Case Study

- Alternatives to Glyphosate for Vegetation Management in Los Angeles County (not a typo)
 - Established a 5-person Technical Committee
 - Committee composition made of Integrated Pet Management, Weed Scientist, Ecotoxicologist, Human Toxicologist, Practitioner.
 - All committee members are affiliated with a university and hold doctorates, except the Practitioner position.

Case Study Findings

- Chemical methods are amongst the most effective, safest and least expensive methods available.
- Mechanical methods can be effective, but have their drawbacks.
- Physical methods are generally impractical.
- Biological methods are infeasible at large scales.
- Keeping a well-stocked toolbox of methods as part of the County's vegetation management plan will be important for future success.

Glyphosate Bans

- Las Cruces-Council action August 28, 2019
 - Focused on pre-emergent herbicide applications
 - Provided for additional applications
 - Weed issues remained from pre-emergent misses
- Bernalillo County- County action April, 23 2019
 - Added 15 positions at a cost of \$731,939 to control vegetation

Glyphosate Bans

- Monroe, Michigan- proactive use of alternative products and pre-emergents
 - Product cost increase from 4x to 25X plus additional applications
- Davis, California-Council action Feb 24, 2020
 - Increased contracts by \$400,000 for mechanical eradication of weeds
 - Saw an increase in bee stings for areas with clover around pools

Pesticide Notification and Reporting



Reporting and Notification Requirements

- Reporting requirements are based on actual product as defined by the approved label. Many have no requirements, though some state regulated products have notification requirements.
- Every application of a pesticide by an NMDA applicator is documented and retained under penalty by law.

Reporting Impacts

- Reporting would cut across all county operations and property
 - Building applications
 - Facility applications
 - Emergency applications (wasp, etc)
- Additional staff time for notifications, reporting information, and content updating

Integrated Pest Management Plan



Integrated Pest Management

- LAC uses an integrated pest management philosophy for control.
- LAC uses a measured control for use of pesticides.

Summary of Staff Recommended Options

	Posting of Pesticide Use & Product Information	Use of Herbicides Containing Glyphosate	Pesticide Integrated Management Plan
Option 1	Follow product label requirements, develop an administrative policy, and post on the County's website pesticide use by staff or contractor 72 hours in advance of use when feasible	Encourage staff to continue the reduction in use of glyphosate containing herbicides as part of County's operations and explore alternative/comparable in price and effectiveness products	Continue implementing the County's Pesticide Integrated Management Plan including alternative product use considerations and reduced use of pesticides when feasible
Option 2	Same as Option 1	Discontinue use of glyphosate containing herbicide as part of County operations by the end of CY2022 (including contracted services), and request staff return with budget options to fund alternative methods of weed control	Same as Option 1
Option 3	Same as Option 1	Take no action at this time and ask staff to return with a more specific proposal to meet Council provided policy guidance	Same as Option 1

Questions