



MEMO

TO: Utilities Committee

FROM: Paula Vandehey, Director of Public Works
Peter Neuberger, Staff Engineer

DATE: April 1, 2021

SUBJECT: Follow-up to questions raised regarding contractor's use of glyphosate at stormwater sites.

At the March 9, 2021 meeting of the Utilities Committee, several great questions were raised regarding the City of Appleton's use of glyphosate at our stormwater sites. Additional information is provided below, in Question/Answer format.

Question #1: How does Appleton DPW use glyphosate at its stormwater sites?

- Targeted Spraying (from backpack) and Hand Wicking (direct application from sponge/glove)
- Acreage Site Preparation (rig spraying) prior to initial native seeding

Question #2: How does Appleton minimize the risks associated with using chemicals?

- Use non-chemical methods where/when cost-effective
 - Acreage mowing
 - Spot mowing
 - Hand pulling
 - Controlled burns
- Use selective herbicides rather than broad-spectrum herbicides where appropriate
- Avoid spraying on windy days
- Proper training, licensure, and PPE for applicators according to regulations and manufacturer guidelines
- Appleton's approach is very different from the one-size-fits-all approach commonly used in agriculture that accounts for the vast majority of glyphosate usage.
- Appleton and AES do not use Restricted Use Pesticides (RUP's) at stormwater sites, and AES doesn't even bother with licensure to apply such products. Such products may be restricted for a number of reasons, including evidence of groundwater contamination, etc.

Question #3: What are the risks of not using chemicals?

- Sites being overtaken by weeds
 - Critically important to get the upper hand on weeds during initial seeding
 - Failure means starting over from scratch
 - Properly prepped sites require less chemical usage in the long run, as native vegetation crowds out weeds
- Vastly more expensive to use the wrong tool for the job
 - Currently 84 DPW/Facilities sites that require some form of weed control
 - Use of herbicide at newer sites allows less usage in long run
 - Maintaining well-established sites with spot herbicide prevents weeds from regaining the upper hand
 - Some weeds don't see significant long-term setbacks from non-chemical approaches like mowing
- When selected for use in Appleton Stormwater sites, glyphosate generally has lower risks than alternative chemicals
 - Per EPA, determined glyphosate is not a carcinogen and there are no risks of concern to human health when used according to the label (which Appleton does)
 - Glyphosate does not have long lasting activity in the soil/environment like many other chemicals, which are marketed as providing "residual control"

Question #4: Is Appleton Stormwater's approach similar to that used in other responsible communities' Stormwater programs?

- Yes, very similar. We recently spoke to staff at the City of Madison regarding their program and use of chemical pesticides in general, and glyphosate in particular:
 - Like Appleton, glyphosate is a very valuable tool too when used appropriately
 - Madison described their approach as Integrated Pest Management (IPM), which evaluates sites on a case-by-case basis to limit the use of pesticides where appropriate
 - Though Appleton may not use IPM terminology, the decision-tree for how and when to use pesticides, including glyphosate, are essentially the same

Since 2008, DPW's native vegetation maintenance contract budget is essentially unchanged, while our maintenance inventory is now over 2.5 times as large. Appropriate use of pesticides, including glyphosate, has been an essential component in our program. It has allowed DPW to create and manage many beautiful native sites while drastically reducing our per-site costs. Please let us know if you have any additional questions.