

*This marked-up draft is for indicating, at an early stage of the policy making process, what the nature of changes are being advocated by the Herbicide Sub-Committee of the CNPS Invasive Plant Committee (ad hoc committee). This draft will be subject to review and revision if this policy process request is green-lighted to proceed by the Chapter Council.*

## **CNPS Policy - THE USE OF HERBICIDE IN SITUATIONS WHERE NATIVE VEGETATION MAY BE AFFECTED (3-08-08)**

### **Policy Statement**

1. CNPS recognizes that herbicide ~~can be~~ is an effective and sometimes essential tool for controlling invasive ~~or~~ non-native plants (weeds) that negatively impact native plant biodiversity ~~vegetation. However, herbicide, like other vegetation treatments, has potential adverse effects.~~ The decision of whether or not to use herbicide in a specific weed management project is site-specific, and should be based on an evaluation of herbicide and alternative treatments, especially from an environmental standpoint. Project plans should address the conservation of native plants and their habitat.
2. CNPS ~~is concerned~~ recommends that when herbicide is used for controlling roadside vegetation, its use should be conducted under a plan that addresses the conservation of native plants and their habitat and gives consideration to all potential adverse effects.
3. CNPS opposes the use of herbicide in forest management, to maximize timber production by targeting non-timber native species.

### **Background**

~~The tradeoff between the benefits and costs of using herbicide—either proven or alleged—has made it difficult for the public at large, CNPS members, other organizations, and public agencies to evaluate whether or not to use herbicide. The use of herbicide as part of Integrated Weed Management is essential to CNPS’ mission to protect California's native plants and their natural habitats, today and into the future, through science, education, stewardship, gardening, and advocacy.~~

### **Goal/purpose**

~~The goal of this policy is to distinguish appropriate use of herbicide in the context of protecting native plant biodiversity ~~vegetation, from inappropriate uses of herbicides that are harmful to native plant biodiversity. CNPS distinguishes between the types of herbicide use that it considers appropriate, and those it considers inappropriate. Where the use of herbicide is appropriate, CNPS offers suggestions that will help ensure that herbicide is used properly.~~~~

### **Recommendations**

#### **1. Appropriate Use – Weed management**

Herbicide is ~~an~~ potentially useful effective and sometimes essential tool for controlling ~~weedy or~~ invasive plants and restoring native habitat. However, the following precautions and considerations should be made before herbicide is selected and applied as a treatment in locations where native vegetation may be affected:

- A. Compare herbicide and alternative treatments for effectiveness, and for potential impacts, both on the environment and on human beings. Monetary cost should not be the only

consideration. Herbicide may be appropriate ~~if-when~~ it is among the most biologically effective or among the least harmful of the alternatives for the task at hand. The most effective treatment may be a combination of methods.

- B. As with all vegetation treatments, herbicide treatment should have clear and achievable objectives, preferably including a gradual reduction or phase-out of the need for continued intervention.
- C. Ensure that herbicide is used in accordance with label instructions and applicable laws and regulations, and that it is applied by trained personnel, or with sufficient supervision by licensed personnel to ~~insure~~ensure that it is applied in the manner and locations intended.
- D. Application personnel must be able to distinguish between the target weeds and native plants, particularly any native plants of concern, and should avoid herbicide drift.
- E. Adverse impacts to natural resources, such as pollinators, wildlife, and water, and to people, their property, and cultural resources must be avoided or mitigated.
- F. Public notification and posting of herbicide application sites should be required on public lands, and on private lands where the public may be affected, such as near public roads.

## 2. Use of Concern – Controlling ~~roadside~~ vegetation along roadsides and fuel modification zones

In ~~those~~ areas where ~~roadside~~ herbicide use is permissible under public law and policy for controlling vegetation along roadsides or fuel modification zones, it should be done within the context of an approved, long-term and comprehensive management plan that addresses not only maintenance and public safety, but also the conservation of native plants and their habitat. This means not directly damaging native vegetation where possible, and not spreading invasive plants. Where feasible, the plan should encourage the establishment of native vegetation of a type that would ultimately reduce the need to continue to use herbicide. The Integrated Roadside Vegetation Management Plan of the state of Iowa is an example of this type of management ~~—~~(1). Because disturbed areas like roadsides and fuel modification zones are major vectors for spreading invasive plants, these areas are important placers to control invasive plants. As with other sites, herbicides are a useful and sometimes essential tool for controlling invasive plants on roadsides and in fuel modification zones.

## 3. Inappropriate Use – Post-logging, post-fire treatment to maximize timber-production

CNPS opposes the use of herbicide or any other method of post-fire or post-logging treatment where the main objective is to suppress the natural re-growth of native plants in order to maximize timber production. This practice is likely to have severe and long--lasting impacts to forest plant diversity. ~~Among our concerns are the following:~~

~~A. Extent~~—Herbicide is currently being used for this purpose on hundreds of thousands of acres of private and public forest lands in California.

~~B. Cumulative impact unknown~~—If this practice continues, each harvest rotation will likely reduce the presence of non-timber native plants. ~~The specific and cumulative impacts to native seed banks and to biological diversity have not been quantified, nor are they currently being monitored or mitigated by any public or private agency or entity.~~

~~C. **May contribute to the risk of wildfire**—It has been observed that herbicide use can contribute to the establishment of a dense understory of non native grasses likely to increase fire hazard (2). When wildfires occur in plantations (a frequent occurrence (3)), the management response usually includes re-application of herbicide, which may exacerbate the problem.~~

~~D. **Poor protections**—The regulatory system currently governing private timberland operations in California does not provide for the protection of threatened, rare or endangered plant species after logging operations have been completed.~~

~~Furthermore, CNPS believes the use of herbicides in commercial forestry is resulting in cumulative impacts that violate California Forest Practice Rules, Subch.2, Art. 1, § 897 (b) (1)-(2) which require the goal of forest management to be forests that are “healthy and naturally diverse, with a mixture of trees and understory plants”.~~

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