

INITIAL PROPOSAL FOR POLICY UPDATES:

JUSTIFICATION TO CHANGE TWO CNPS POLICIES:

“THE USE OF HERBICIDES IN SITUATIONS WHERE NATIVE VEGETATION MAY BE AFFECTED” (HERBICIDE POLICY, FROM 2008)

AND “WILDLAND INVASIVE PLANTS, INTEGRATED WEED MANAGEMENT” (IWM POLICY, FROM 2008)

AND

CREATE A NEW POSITION STATEMENT ON KEEPING HERBICIDES IN THE INTEGRATED WEED MANAGEMENT TOOLBOX

Introduction

The herbicide sub-committee of the CNPS Invasive Species Committee proposes making improvements to the existing CNPS Policies on (1) herbicide use and (2) Integrated Weed Management (IWM) and creating a Position Statement based on the revised Policies. The main substantive change proposed is to refer to herbicides as an “effective and sometimes essential tool” for controlling invasive plants rather than existing language that simply recognizes herbicides as “a tool”. Beyond that, we propose additional changes to improve wording to better reflect CNPS’ mission to protect the California flora. The committee also reviewed the existing CNPS policy on “Invasive Exotic Plants” (from 1996) and did not feel that it needs to be revised at this time.

Included in this Initial Proposal document:

- a background providing context for why changes are needed now,
- a general statement of need for improvements to the existing Policies,
- details on the proposed Policy changes (also shown explicitly in companion draft documents),
- and a justification for creating an additional Position Statement (draft position statement included).

Background and Rationale

As described in the 1996 CNPS Invasive Exotic Plants Policy, invasive plants are one of the greatest threats to our state’s remarkable plant biodiversity (CNPS 1996). In line with our mission statement “To protect California’s native plants...” CNPS collaborates with the California Invasive Plant Council (Cal-IPC) and many other organizations across the state to reduce the impacts of invasive plants to native species. This is done strategically using the paradigm of Integrated Weed Management (IWM), as laid out in the CNPS policy on IWM (CNPS 2008a).

Historically, California state and county governments conducted a highly coordinated and effective Early Detection and Rapid Response (EDRR) program to keep new invaders out of California from 1900-1978. Repeated program budget cuts starting in 1978 have resulted in the elimination of the State’s coordinated program, and many county government programs are operating at a much lower level than their 20th century efforts (Schoenig 2018).

Meanwhile, the number of plants listed as invasive in California by Cal-IPC has grown to over 300 species, including those that have been rated as “Watch” species because they score high on a risk assessment designed to determine the potential for future impact. CNPS representatives are actively involved in this risk assessment process.

At the same time that the risk of new weeds invading is increasing and government efforts are faltering, we are also at high risk of losing perhaps the most powerful tool in the IWM toolbox – herbicides – in many areas across California. There is increasing pressure on local council members, supervisors, and delegates to ban herbicides (especially glyphosate, the active ingredient in Roundup herbicide).

Some local municipalities have already implemented significant policies, effectively banning the use of pesticides. For instance, in the urban South Coast region, these areas include: The City of Los Angeles, The City of Irvine, The City of Santa Monica, The City of Carlsbad, The City of San Clemente, The City of San Juan Capistrano, The City of Burbank, The City of Encinitas, The City of Long Beach, and The City of Laguna Beach. These areas have some of the most important coastal habitat that rely on herbicide as a tool to protect their biodiversity. At the county level, glyphosate has already been banned by Los Angeles County. Orange County has banned the use of glyphosate near trails, staging areas, and parking areas, places where invasive plant infestations often begin.

These council members, supervisors, park managers, and HOA delegates need guidance from the largest and most respected native plant organization in California, CNPS. We are advocating to protect California's native plants and their natural habitats, and it is important that decision makers know where we stand on the issue of using herbicides to protect native plant biodiversity.

There are many situations where herbicides, used correctly, have the least amount of habitat disturbance compared to other methods, such as excavating large plants with extensive roots systems like *Arundo donax*. There are some weeds where herbicides are the only method which can achieve control and eradication success (i.e., tree-of heaven, *Ailanthus altissima*, Canada thistle *Cirsium arvense*, skeleton weed *Chondrilla juncea*, and perennial pepper weed, *Lepidium latifolium*).

Do the existing policies do what they are intended to do?

No, the existing herbicide policy does not provide clear support for the need to maintain the use of herbicide as part of the IWM toolbox to protect biodiversity. The existing policy does not characterize herbicide as an “effective and sometimes essential tool” and only recognizes that it as “a tool”.

Do you think the existing policies need to be changed?

Yes, the existing policies need to be changed to:

- Give CNPS Chapters this clear policy to support their work in advocating for local communities to maintain the use of herbicides as an option for controlling invasive plants.
- Provide clearer language supporting appropriate use of herbicide in the IWM toolbox to protect native plant biodiversity.
- Stay current with best available science and advocacy needs.

Are you proposing to make some simple updates and clarifications to the policy, or do you want to make some substantial changes?

For the herbicide policy, we propose a substantive change of describing herbicides as a “effective and sometimes essential tool”. There are many smaller edits including firmer clearer language. Many specific changes have been made to the policies and are displayed in the marked-up drafts included with this proposal.

We propose minor technical changes to the IWM policy which can be seen in the companion marked-up draft document.

What is the nature and purpose of the newly proposed Position Statement?

The newly proposed Position Statement is designed to accompany the amended policies and provides an effective tool for those actively advocating for public policy that aligns with CNPS's mission and policies to protect native biodiversity by keeping herbicides in the Integrated Weed Management Toolbox.

Acknowledgement of the environmental and human health risks of using herbicide.

All forms of weed management have risks associated with them including herbicides. Whether they be prescribed fire, mechanical removal, biological controls, hand removal or chemicals, harm to humans, wildlife, and infrastructure can and sometimes does result. The safe and effective use of any tool requires training in correct usage, regulation and risk management.

The risks associated with herbicides specifically, are assessed and managed by the following agencies, resources and practices:

- US Environmental Protection Agency (approval process and label restrictions)
- CA Environmental Protection Agency (approval process and label restrictions)
- California Department of Pesticide Regulation (registration and safety enforcement)
- Herbicide specific risk assessments to wildlife (US Forest Service, CA Dept. Of Fish and Wildlife)
- County Ag Commissioner enforcement programs
- Written and in-person training (Cal-IPC, UC Coop Extension)
- Best Management Practices (BMPs) (Cal-IPC, UC Coop Extension)
- Personal Protective Equipment PPE

Regarding the well-publicized declaration by the International Agency for Research on Cancer that glyphosate is a probable carcinogen, keep in mind that that same list includes alcoholic beverages, gasoline, bacon, wood smoke, lack of sleep etc.

Obviously, there are important environmental concerns about pesticide use, especially in agriculture and landscaping. Glyphosate has become a lightning rod for anti-herbicide activism. However, the use of herbicides by land stewards working to protect biodiversity does not have much impact on people or the environment when used in accordance with existing regulations. While we support community members working to reduce risk from toxic substances in their communities, we feel that these efforts often misunderstand the potential risk for negative impact from herbicide use and fail to adequately consider the potential loss of biodiversity resulting from removing herbicide from the IWM toolbox.

Who will be involved in the drafting of these documents and who will review drafts before a Chapter Council (CC) vote?

- The initial voicing of a need to revise these CNPS policies arose in the CNPS Invasive Weed Committee in 2023
- The Policy Committee of the Chapter Council leads and guides the policy process and will guide an ad hoc drafting committee if this effort is allowed to proceed
- CNPS Executive Director and policy staff will review drafts and advise ad hoc committee.

- CC delegates will be presented with the draft documents.
- Draft documents will be distributed by the CC delegates within their chapters and are encouraged to send comments to the Ad hoc Committee.

References Cited

CNPS (1996) Policy on Invasive Exotic Plants. Available at:

<https://www.cnps.org/wp-content/uploads/2018/04/exotics.pdf>

CNPS (2008a) CNPS Policy – Wildland Invasive Plants, Integrated Weed Management. Available at:

https://www.cnps.org/wp-content/uploads/2018/04/IWM_policy.pdf

CNPS (2008b) CNPS Policy – The Use of Herbicides in Situations where Native Vegetation May Be

Affected. Available at: https://www.cnps.org/wp-content/uploads/2018/04/Herbicide_policy.pdf

Schoenig (2018) History of the CDFA Noxious Weed Eradication Program. Available by request.