

**City of Santa Barbara**  
**MATERIAL EXEMPTION REQUEST FOR PESTICIDE APPLICATION**

Dept Public Works IPM Coordinator Beth Anna Cornett Phone (805) 564-5537

Pesticide Applicator (employee or company) Name Channel Islands Restoration Phone (805) 448-4175

Application Site City of Santa Barbara Veterans' Memorial Walkway and Oak Grove Mitigation Sites at Elings Park

Specific Location See attached figures

Date(s) of Application February 2022 Date of Request February 2022

Product Name BurnOut Active Ingredient Clove oil

Number of Applications:  One-time  Other as needed, depending on weed growth over the 7-year maintenance and monitoring period

Type:  Emergency  Trial  Programmatic  Other \_\_\_\_\_

Product type:  Herbicide  Insecticide  Fungicide  Other \_\_\_\_\_

Application:  Ornamental  Turf  Golf  Vector Control  Park Tree  Street Tree  
 Right of Way  Vertebrate pest  Other habitat restoration

Is the pesticide on the *Tiered Materials List*?  No  Yes If yes, provide the Tier Green

If the pesticide is not on the *Tiered Materials List*, provide the following screening information. See the IPM Strategy and the *Tiered Materials List* for instructions on screening the pesticide.

EPA Reg # \_\_\_\_\_ Signal \_\_\_\_\_ Estimated Tier \_\_\_\_\_

Restricted  No  Yes/Describe \_\_\_\_\_

P Waste \_\_\_\_\_ PBT \_\_\_\_\_ WA PBT \_\_\_\_\_ Persistant \_\_\_\_\_ Mobil \_\_\_\_\_

Cancer \_\_\_\_\_ Repro \_\_\_\_\_ Neuro \_\_\_\_\_ Endocrine \_\_\_\_\_

Bird \_\_\_\_\_ Fish \_\_\_\_\_ Bees \_\_\_\_\_ Wildlife \_\_\_\_\_

Attach product label and MSDS to this form.

**Describe the pest problem.**

The two City of Santa Barbara mitigation sites at Elings Park (Veterans' Memorial Walkway and Oak Grove) are dominated by non-native plant species (weeds) including ripgut brome (*Bromus diandrus*), sweet alyssum (*Lobularia maritima*), and fountaingrass (*Pennisetum setaceum*). These non-native species are invasive and outcompete native plants for water, sunlight, and space and need to be removed for mitigation purposes per the Mitigation Plan associated with the Las Positas and Modoc Roads Multi-Use Pathway Project.

**Describe the management goals and objectives for this site.**

As part of the mitigation for impacts to natural areas caused by the construction of the Las Positas and Modoc Roads Multi-Use Pathway Project, two sites in Elings Park have been planted with native herbs, shrubs, and trees. These mitigation sites (Veterans' Memorial Walkway and Oak Grove) will be maintained for 7 years to encourage the survival of native plant species via irrigation and removal of non-native plant species. These sites were dominated by non-native species prior to site preparation and planting. Without regular weed removal visits, these non-native plants will outcompete and overwhelm the newly installed native plants. Success criteria for the mitigation sites include requirements for the survival of native plant species and minimal presence of non-native species.

**What is the damage threshold for this pest at this site?** N/A since the pests in this instance are plants.

**Describe the monitoring of the pest and potential predators that was conducted and the control methods previously used at the site.**

Thus far, removal of non-native species has been restricted to mechanical methods, such as hand removal. Hand removal will continue to be the primary method of non-native species removal, and BurnOut would be used in specific circumstances, as described below.

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**Describe how the product would be applied including frequency, concentration, and method of application.**

Channel Islands Restoration will conduct non-native plant removal at the mitigation site for seven years, for five visits per year. It is anticipated that the weed removal visits will occur twice in March and April, and once each in May and June. BurnOut would be used during these weed removal visits as needed to target non-native species during the first two weeks after germination.

Herbicide application will be limited to the smallest extent possible while maintaining effectiveness, at a 20-30% solution. Only individual plants will be treated; no blanket spraying efforts will be allowed. If herbicide is applied, it will be applied during dry and low wind conditions to prevent conveyance of herbicide into non-targeted areas. Herbicide application would be performed by a licensed applicator that can identify the species to be treated and is experienced in the handling and application of herbicides.

**What non-target impacts are anticipated?**

None. BurnOut would be applied in a controlled manner to prevent overspray onto non-target species, and the herbicide applicator will be trained in the identification of target species and will operate under the regulations associated with their pesticide application license.

**How does the use of this product help achieve the site management goals? Note if this is curative or preventative.**

The Burnout would be used as part of the program of non-native plant species removal. The herbicide would be applied during the first two weeks after plant germination, before the plants create seeds. Therefore, repeated applications of BurnOut will deplete the seedbank and result in fewer non-native plant species germinating in later years. In addition, as the newly installed native plants grow and become established, they will be able to compete with the non-native species. More native cover will result in less opportunity for the non-native plants to grow.

**How will the effectiveness of this product be monitored? Include expected results and indicators of success.**

Regularly monitoring of the site, including the infestation of non-native plants and the effectiveness of maintenance efforts, will be conducted on a monthly basis.

Success criteria relating to the presence of non-native plants on the mitigation sites are as follows:

- Herbaceous invasive plant species, as defined by the California Invasive Plant Council Inventory for the southwest region, shall not exceed 5% cover, excluding non-native annual grasses.
- No woody invasive species shall be present, except for the existing mature non-native trees.

**Describe site conditions, for example consider the following: restricted access, distance from a creek or body of water, degree of runoff, site is a pesticide-free zone, etc.**

Both mitigation sites are located within Elings Park; there are no fences preventing site access. The mitigation sites are not near any bodies of water, and no runoff is expected due to the small amounts of BurnOut that would be used. This location is not in a pesticide-free zone.

**List alternatives considered, alternatives implemented and why they were eliminated.**

Non-native plants will be removed primarily using hand removal methods, e.g., hand-held weed whips, loppers, and hoes. However, hand removal methods are not effective for some species, due to their ability to resprout from roots or rhizomes. If hand removal is not feasible due to the characteristics of the species, such as resistance to hand removal methods, the size of the plants, or the number of plants, these non-native species may be treated with herbicide.

**Justification: describe why is applying this pesticide is the best solution and why a less-hazardous chemical, non-chemical option or taking no action is not feasible.**

Mechanical removal of non-native species will be the primary method utilized on the mitigation sites. However, using BurnOut would allow for more efficient and effective removal of certain species. If non-native species are not removed during the 7-year maintenance period, the native plants would not be able to flourish and the mitigation sites would not meet the success criteria outlined above.

**Was outside expertise utilized?  No  Yes / Describe**

The approach of using limited amounts of herbicide as needed was proposed by Rincon Consultants, the author of the Mitigation Plan for the Las Positas and Modoc Roads Multi-Use Pathway Project, and agreed upon by the City of Santa Barbara Public Works Department.

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**Describe future plans to prevent using the chemical again.**

The maintenance program is expected to end after 7 years, when the success criteria described above have been met. At that point, native plants should dominate the sites and outcompete the non-native plant species for water, sunlight, and space. No further mechanical or chemical removal of non-native plants would be necessary.

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**Signatures** \_\_\_\_\_  
Department IPM Coordinator City IPM Coordinator

**Completed by the City of Santa Barbara Staff IPM Committee**

Vote Tally \_\_\_\_\_ Disposition:  Approved  Denied/Reason \_\_\_\_\_

If approved, follow the attached best management practices.

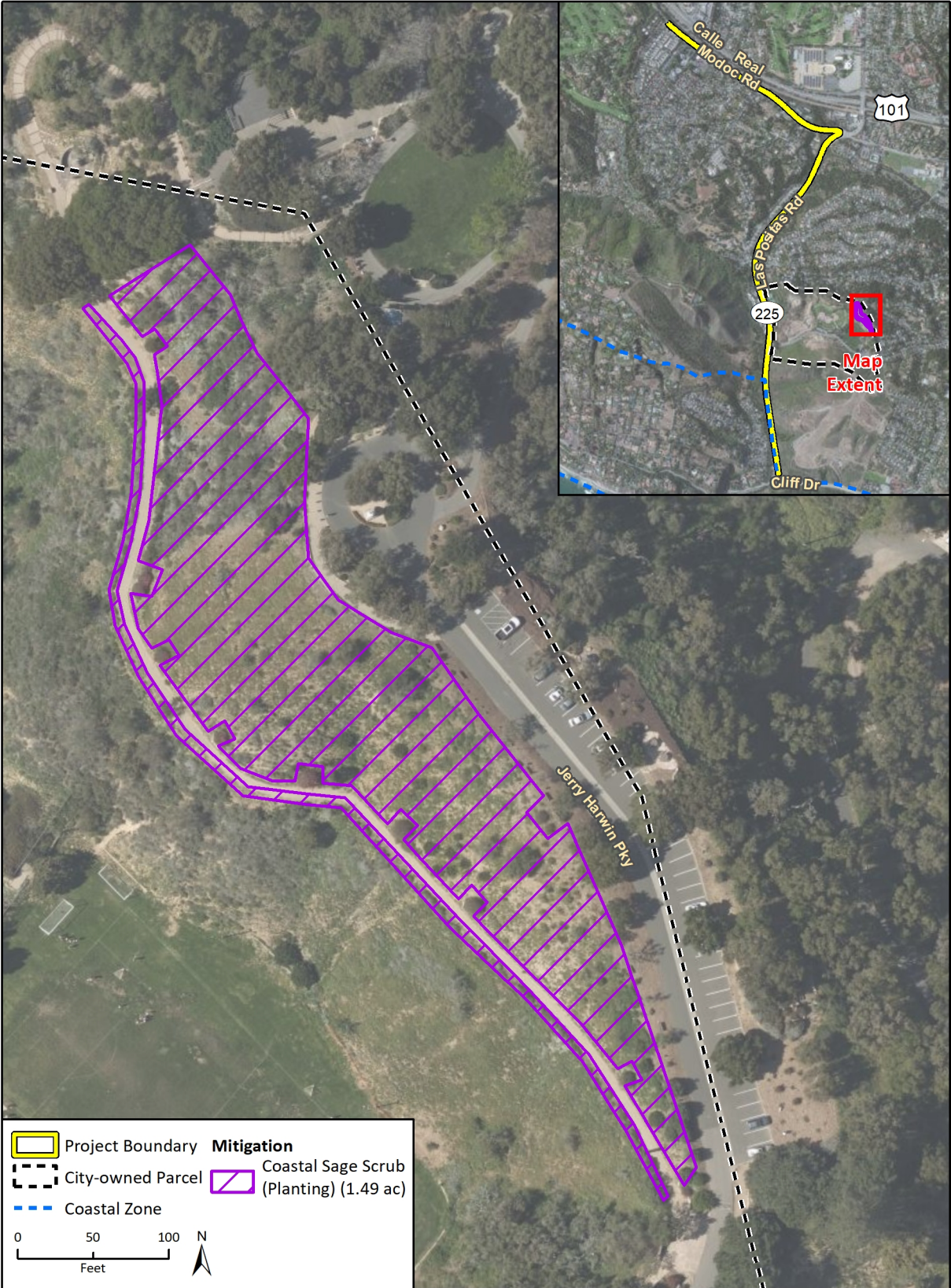
Comments:





**Completed by the IPM Advisory Committee**

Vote Tally \_\_\_\_\_ Disposition:  Approved  Denied/Reason \_\_\_\_\_

If approved, follow the attached best management practices.

Comments:



	Project Boundary	<b>Mitigation</b>	
	City-owned Parcel		Coastal Sage Scrub (Planting) (1.49 ac)
	Coastal Zone		

