

**City of Santa Barbara**  
**Integrated Pest Management Advisory Committee**  
**MATERIAL EXEMPTION REQUEST FOR PESTICIDE APPLICATION**

Name Doug Morgan Department Operations Phone 574-538-8046

Pesticide Applicator (employee or company) Channel Islands Restoration Phone 574-538-8046

Application Site Gould Park Specific Location: **Appx 10' wide on both road shoulders along East Camino Cielo, spot treatment of Fennel (Foeniculum vulgare)**

Date(s) of Application: **2/15/24-3/30/24 as determined by weather and growth of plants** Date of Request: **2/8/24**

Product Name Polaris Active Ingredient Imazapyr

Type: ☒ One-time ☐ Programmatic ☐ Emergency

Number of Applications: ☒ One ☐ Other \_\_\_\_\_

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

Application: ☐ Ornamental ☐ Sports Field ☐ Golf Course ☒ Vector Control ☐ Park Tree ☐ Street Tree  
☐ Airport Runways ☒ Right of Way ☐ City Facility ☐ Other \_\_\_\_\_

Is the pesticide on the *Tiered Materials List*? ☐ No ☒ Yes

If yes, provide the color: **Yellow**

If the pesticide is not on the *Tiered Materials List*, provide the following information. Please use the Material Selection Criteria and work with a Certified Pesticide Applicator to determine the estimated color.

EPA Reg # \_\_\_\_\_ Signal \_\_\_\_\_ Estimated Color \_\_\_\_\_

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

P Waste \_\_\_\_\_ PBT \_\_\_\_\_ WA PBT \_\_\_\_\_ Persistent \_\_\_\_\_ Mobil \_\_\_\_\_

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

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

Please attach product label and MSDS to this form.

**Describe the pest problem.** The fennel is growing along East Camino Cielo on both shoulders creating an unsafe visual barrier to traffic, increasing the fuel load, and creating an introduction vector into LPNF where the current fennel populations are a manageable size. We are planning to treat the same issue on the shoulders bordered by LPNF lands to the east of the park boundaries, and being able to treat on the road shoulders in Gould Park would eliminate this point of entry into LPNF for this highly invasive weed.

**Describe the overall management goals and objectives for this site.** The goal is to drastically reduce or eliminate this mature fennel population and reduce the number of seeds that can potentially enter LPNF from this source.

**What is the damage or action threshold for this pest at this site? (The action threshold is the number of pests or level of damage beyond which management action should be taken.)** We are currently beyond the action threshold since the Fennel is currently growing into the road way, blocking sight lines for traffic, creating a non native fuel load, and spreading east to LPNF property.

**Describe the monitoring of the pest and potential predators that was conducted and the control methods previously used at the site.** Channel Islands Restoration, (CIR) has been working around and travelling on this section road for over ten years. During this time, we have observed the fennel problem increasing in both number of plants and size of mature plants growing into the public right of way.

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

Depending on the growth stage of the plants we propose a spot foliar treatment of 3-5% Polaris with 1-2% surfactant and blue tracker dye. This will be applied by Field Technicians using backpack style sprayers who have been Licensed, trained in native plants and invasive weeds, and experienced in working in sensitive environments around threatened and endangered native species. The application will be to only the newly emerging fennel foliage we expect no collateral damage to native plants near by or drift kill away from the target plants.

**What non-target impacts are anticipated?** None, we are very precise in our application techniques and all applicators will have daily refresher training including site specific species of note and possible presence.

**How does the use of this product help achieve the site management goals? Note if this is curative or preventative.** This proposed treatment can be viewed as both curative and preventive. By reducing the mature population, we cure the issue of fuel load build up and sight line impairment. This process will also prevent the future years contribution to the seed bank that is being transported by various methods east on the road and into LPNF lands.

**How will the effectiveness of this product be monitored? Include expected results and indicators of success.** This will be a one-time application, but just to the east of the Gould Park boundary we treated similar populations of Fennel in 2023 and have a better than 95% mortality rate. We expect the same results inside the park boundaries. We will visually monitor this area during our normal travels along East Camino Cielo and seek future funding if the problem reoccurs.

**Describe what precautions would be used for application. For example consider restricting access, distance from a creek or body of water, degree of runoff, weather conditions, etc.** We treat every foliar application of herbicide very seriously considering all those mentioned variables. There is no water near the application sites, and using the absolute minimum of mixture applied only to the new foliage of the emerging fennel eliminates the potential for runoff. The biggest site-specific challenge is wind on the high ridge. We have years of experience in foliar spray treatments on East Camino Cielo and know the conditions that may stop us due to wind. Generally, we start in the early morning as the winds are calmer then and we never spray when the wind speed is over 10 MPH as measured at 6' above ground level using a handheld anemometer. Traffic will be alerted to our presence by warning signs in both road directions and our company trucks will follow along with the work crews to provide a physical barrier to any traffic.

**List alternatives considered, alternatives implemented and why they were eliminated.** In similar cases we have used a Cut and Paint method on Fennel. This is highly effective on sparse populations scattered across large areas. It is also very labor intensive with our in-house time studies showing that process takes 20 times as long. Timing the treatment to the emerging growth stage early in the season means we get optimal herbicide uptake through the rapidly growing foliage and the small size of the plant reduces the amount of herbicide required. We can also use a lower concentration of active ingredients. Since the plants will not have flowered at this growth stage we eliminate the potential post application, (we always look for insects before treating a plant), exposure of the many pollinators likely in the area including Native Bees.

**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.** Channel Islands Restoration has tested all the commercially available organic herbicides and have found none to be effective on established Fennel populations. Manual removal would not be efficient or effective on the perennial mature plants we will treat. Mechanical methods, mowing, for example will not be fatal to the plants and will not remove the problem of future seed production.

**Was outside expertise utilized? ☒ No ☐ Yes / Describe:**

CIR has been treating invasive weeds in sensitive habitats around threatened and endangered species for 22 years. We currently have 4 staff holding Qualified Applicator Licenses, (QAL) issued by the Department of Pesticide Regulations, (DPR). All of our crews are trained annually in pesticide usage and before beginning each treatment on proper

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application techniques, site specific variables, maintenance and use of the backpacks and safe practices BMP's. Because of this attention to safety and BMP's we have gained a reputation as the herbicide applicator of choice for many local organizations including a recent application in Parma Park and Honda Valley for the Parks Department. Other government organizations, (LPNF, COSCA, NFWF) consider CIR to be the foremost experts in surgical use of herbicides in sensitive environments.

**Describe future plans to prevent using the chemical again. :** We only have funding for a single treatment currently and do not expect the problem to return to action status soon.

**Signatures** \_\_\_\_\_

Department IPM Coordinator

City IPM Coordinator

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

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

If approved, follow the attached best management practices.

Comments:





CIR - NFWF Fennel Removal  
East Camino Cielo  
February 2024

- Los Padres National Forest Land
- Previous Fennel Treatment
- Santa Barbara City Parks

