

Wellesley Natural Resources Commission
Integrated Pest Management (IPM) Policy Waiver Approval for Limited Use of Herbicides for Treatment and Management of Invasive Vegetation in Fuller Brook Park

Approved at NRC February 26, 2013 Meeting

Documents Reviewed/Discussed Regarding IPM Herbicide Use Waiver Request (all documents attached):

- Memorandum from Amy Ball, Horsley Witten Group, to NRC, dated January 15, 2013, revised April 18, 2013, entitled “Invasives Species Management – Herbicide Use Memo for Fuller Brook Park Preservation Project.”
- Memorandum from Janet Hartke Bowser, NRC Director, to Amy Ball, Horsley Witten Group, dated January 28, 2013, entitled “NRC Comments/Revisions to the Herbicide Waiver Request under the NRC’s IPM Policy.”
- Memorandum from Amy Ball, Horsley Witten Group, to the NRC, dated February 6, 2013, entitled “Response to January 28, 2013 Comments from NRC on NRC Waiver Request Memo”
- NRC’s Integrated Pest Management Policy, signed by the NRC, dated 2002.

Background on Waiver Request and NRC Discussion/Deliberations Leading to Waiver Approval

At the NRC’s meetings in December 2012 and January 2013, the board discussed a request from Horsley Witten Group, the Town’s Consultant on the Fuller Brook Park Preservation Project, for a waiver of the NRC’s IPM Policy that prohibits the use of herbicides in order to protect the environment and public health. The NRC’s IPM Policy prohibits the use of any pesticides or herbicides on NRC land unless they determine that there is an environmental or public health emergency situation and viable alternatives consistent with the IPM policy do not exist, in which case the NRC may issue a temporary, one time waiver. Horsley Witten Group presented a series of memorandums and background documents listed above in support of the waiver request outlining the justification and rationale for the limited use of herbicides in Fuller Brook Park for the following invasives species: upland applications only (no herbicide applications in stream bank areas or in the 25 foot ‘No Disturb Zone’ abutting Fuller Brook) for Oriental Bittersweet, Norway Maples, Poison Ivy, Japanese Knotweed and Tree of Heaven. In response to Horsley Witten’s initial waiver request, the NRC formulated twenty-one (21) questions and concerns that were discussed at the NRC’s January 15, 2013 meeting and the board concluded that herbicides should only be applied in the upland areas and at least 25 feet from the brook to the 3 following invasive species: Oriental Bittersweet, Poison Ivy and Japanese Knotweed. The NRC’s questions and concerns were submitted in a memorandum dated January 28, 2013 to Amy Ball, Wetlands Scientist at the Horsley Witten Group. Ms. Ball responded and addressed each of the NRC’s 21 questions and concerns in the memorandum referenced above and dated February 6, 2013, requesting permission and providing justification to use herbicides to treat both upland Norway Maples, because of the extent of this invasive species plant throughout the park, and also treat Tree of Heaven, since this is a very difficult plant to eradicate with any method other than herbicides. After extensive discussion, it was the sense of the NRC that while they strongly oppose the use of herbicides for the treatment and management of invasive vegetation, that the extent of Oriental Bittersweet, Japanese Knotweed, Poison Ivy, Norway Maples, and Tree of Heaven in upland areas of the park constitutes an environmental emergency that warrants the approval of a temporary, one-time waiver for the use herbicides under the NRC’s IPM Policy. Furthermore, the NRC concluded that the Horsley Witten Group conducted a thorough and convincing review of alternatives to herbicide use for these particular invasive species and the NRC voted to approve a temporary, one-year waiver to use herbicides since there are no other viable alternatives that will effectively eradicate and control the five referenced invasive species in the park.

NRC Vote Approving IPM Emergency Waiver Request:

After a motion was made and seconded, the NRC voted 5-0 to allow an emergency waiver of the NRC’s IPM Policy for a one year period for limited use of herbicides to eradicate and manage the invasive species of Oriental Bittersweet, Japanese Knotweed, Poison Ivy, Norway Maples, and Tree of Heaven in upland areas only in Fuller Brook Park based on the documentation and supporting information supplied by Horsley Witten Group as part of the Fuller Brook Preservation Project.

