

IMPORTANT: Any citizen may orally address the Parks Commission on non-agenda items during the Public Forum. Any citizen may submit written comments to the Commission on any item on the Agenda, unless it is the subject of a public hearing and the record is closed. Time permitting, the Presiding Officer may allow oral testimony. If you wish to speak, please out the Speaker Request Form located near the entrance to the Council Chambers. The chair will recognize you and inform you as to the amount of time allotted to you, if any. The time granted will be dependent to some extent on the nature of the item under discussion, the number of people who wish to speak, and the length of the agenda.



AGENDA FOR SPECIAL REGULAR BUSINESS MEETING

ASHLAND PARKS & RECREATION COMMISSION

August 19, 2019

The Grove, 1195 E. Main Street

5:30 p.m.

I. **CALL TO ORDER**

II. **PUBLIC FORUM**

III. **ADDITIONS OR DELETIONS TO THE AGENDA**

IV. **UNFINISHED BUSINESS**

V. **NEW BUSINESS**

1. Request to Access Parks Property for Wildland Monitoring with Drones (Action)
2. Request to Access Parks Property for Creek Restoration (Action)
3. Recreation Division Advisory Committee Formation (Informational)

VI. **ITEMS FROM COMMISSIONERS/STAFF**

VII. **UPCOMING MEETING DATES**

1. Pool Ad-Hoc Committee – September 4, 2019
 - Ashland Senior Center, 1699 Homes Ave—3:30 p.m.
2. Ashland Senior Advisory Committee – October 14, 2019
 - Ashland Senior Center, 1699 Homes Ave—3:30 p.m.
3. Current Parks, Conservation, and Maintenance Subcommittee—Aug 19, 2019 (Date subject to change)
 - Lithia Cabin, 340 S Pioneer St.—12:00 p.m.
4. APRC Regular Meeting—August 26, 2019
 - Council Chambers, 1175 E. Main St., Ashland—7:00 p.m.

VIII. **EXECUTIVE SESSION (pursuant to ORS 192.660(2)(e))**

IX. **ADJOURNMENT**

ASHLAND PARKS & RECREATION COMMISSION

340 S PIONEER STREET • ASHLAND, OREGON 97520

COMMISSIONERS:

Mike Gardiner
Joel Heller
Rick Landt
Jim Lewis
Julian Bell



Michael A. Black, AICP
Director

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PARKS COMMISSIONER STAFF REPORT

TO: Ashland Parks and Recreation Commissioners

FROM: Michael Black, Director

DATE: August 14, 2019

SUBJECT: Public Lands Monitoring by Aerial Drone (Action)

Summary

With support from the Forest Lands Commission and the Wildfire Safety Commission, Ashland Fire and Rescue is seeking APRC approval to use aerial drones for detection of fires, use of fire, and illegal camping in forested areas on APRC managed land. The drone would use infrared cameras, so there would be no photos of people or private property, just heat signatures that would pinpoint fire and body heat. Law enforcement and/or fire resources would follow up with detected fires and illegal camping.

On May 21, 2019, City Council approved the use of aerial drone detection via infrared camera for the purpose of fire detection and enforcement of the City's camping ordinance and pertinent fire prevention codes and regulations on City-owned lands and adjacent public lands as agreed for a pilot program of one fire season. Temporary approval was granted to monitor APRC managed land after Ashland Fire and Rescue expressed concern about not being able to monitor these lands. Approval by the Commission will allow these activities to continue. Ashland Fire and Rescue will give a presentation on the drone program and will be available to answer questions from the Commission.

This activity relates to Commission Goal #10:

Explore fire vulnerability on all APRC lands and if discovered there is a large volume of different mitigation work – Explore a bond for fire suppression

Possible Motion

I move to approve access to APRC managed forestlands to Ashland Fire and Rescue to launch aerial drones and to monitor APRC managed forestlands with aerial drones to detect fires, use of fire, and illegal camping in accordance with the City of Ashland approved aerial drone detection program.

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PARKS COMMISSIONER STAFF REPORT

TO: Ashland Parks and Recreation Commissioners

FROM: Michael Black

DATE: 8/16/2019

SUBJECT: Request from Public Works for an Exemption from the IPM Plan

The public works department is undergoing a project on City land that is designed as a Water Quality Trading program in compliance with the Clean Water Act. In order to reach the maximum level of Water Quality Trading, public works is requesting the use of some of APRC property adjacent to Bear Creek.

Generally, a request like this would be handled on a staff level; however, since the project requires the use of "limited herbicides... to successfully achieve the multi-faceted benefits of a Water Quality Trading Program," the project requires an exemption from the Parks Integrated Pest Management Policy. Working with The Freshwater Trust, public works has proposed a protocol for using herbicides sparingly, that they believe is crucial to the success of the program.

Staff has reviewed the request and we believe that the benefits from the project are crucial to ensure the health of Bear Creek and to accomplish the goal of the public works department's Water Quality Trading Program.

Staff recommends that the Commissioners grant the exemption to the IPM for the properties outlined in the attached report to accomplish the goals identified in the report.

TO: Ashland Parks & Recreation Commission
FROM: Kaylea Kathol, Public Works
DATE: August 15, 2019
RE: Riparian Restoration and Integrated Pest Management on Parks-Managed Lands

INTRODUCTION

The City of Ashland Public Works Department has partnered with The Freshwater Trust (TFT) to implement a Water Quality Trading (WQT) Program. This Clean Water Act (CWA) compliance program, overseen by the Oregon DEQ, allows the City to generate “thermal credits” by restoring riparian lands with native, shade-producing trees and understory. The shade on instream waters offsets the heat load contributed by the release of effluent from the wastewater treatment plant. Not all projects produce shade benefits equally, so in order for the WQT Program to provide long-term, sustainable compliance with the Clean Water Act, the City and TFT need to target the most effective shade-producing sites within a relatively narrow “trading area” in the Bear Creek watershed.

GEOGRAPHIC SCOPE

Public Works desires to keep the Commissioners informed of upcoming restoration work because some of the riparian sites prioritized for the WQT program are on Parks-managed land. In fact, TFT will soon begin restoring riparian lands on two City parcels known as “The Hardesty Property” and would like to also implement the adjoining Parks-managed “Ashland Ponds Property”, shown in **Attachment A**, so as to capitalize on efficiencies of scale, and to create a large-scale contiguous impact right out of the gates within City limits. Additional Parks-managed lands prioritized for riparian restoration are also shown in Attachment A. Initial noxious weed removal on these lands will adhere to the provisions of the Commission’s Integrated Pest Management (IPM) Policy.

INTEGRATED PEST MANAGEMENT

Compliance-grade restoration projects in the WQT Program are highly regulated and must meet very specific ecological performance standards over time in order for the City to keep using credits for compliance. As discussed and displayed on the tour TFT provided to Parks staff and two Parks Commissioners in late June of the year, one of the most detrimental factors to program success is insufficient management of noxious weeds during the early establishment phase of riparian restoration. To achieve water quality compliance objectives, it is necessary to effectively and permanently eliminate noxious weeds, so they do not crowd-out and suppress growth of the new native plantings necessary to transform degraded riparian areas into sustainable, functional habitat. As a 36-year old conservation organization, TFT has extensive experience implementing and managing many similar compliance programs, including a WQT program for the City of Medford. Based on this experience, TFT has found that currently, the only successful method for eliminating weeds on large-scale restoration programs is to utilize integrated pest management, including limited and targeted use of herbicide. Consistent with feedback provided on the Parks tour, the City’s Public Works department is already experimenting with non-chemical approaches on non-compliance sites, and hopes that this experimentation may eventually yield a scalable non-chemical approach that can be incorporated into the WQT program.

POLICY

The Ashland Municipal Code §9.28 (Pesticide Policy) notes that mechanical and cultural methods are to be used to control noxious vegetation and pests “whenever practical.” The Commission’s IPM Policy goes a step further and identifies herbicide use as a “last resort” for managing noxious weeds. To help the City work within the confines of these two documents, TFT developed an herbicide application plan, which explains why limited herbicide use is needed in to successfully achieve the multi-faceted benefits of a WQT Program and establishes protocol for ensuring herbicide is applied sparingly and safely (**Attachment B**). Furthermore, TFT tailored its herbicide use and restriction guidelines to confirm with “Ashland-specific” needs, which were incorporated into the existing Goods and Services Contract (**Attachment C**).

FEEDBACK REQUESTED FROM THE COMMISSION

While both attached documents provided by TFT primarily reference AMC §9.28, they are also sufficiently robust to address the provisions and spirit of the IPM Policy, especially given the important outcomes associated with the City’s WQT program (e.g., compliance, restoring the Bear Creek watershed in City limits, using funds that have to be spent on compliance anyway in a way that improves watershed resiliency in the face of climate change and is consistent with the City’s climate action goals). Public Works encourages the Commission to study TFT’s plans and guidelines and share any concerns or suggestions about proceeding with implementation of WQT projects on Parks-managed lands, starting with the Ashland Ponds parcel this fall. Because stakeholder involvement is a critical component of the WQT Program, it is important that Public Works receives input to ensure the early stages of the program are implemented as safely as possibly.

ATTACHMENT A

THE FRESHWATER TRUST INITIAL AND FUTURE RESTORATION SITES

Figure 1. Initial Sites: Ashland Ponds Property and Hardesty Property, where restoration will be conducted on Bear Creek (amber parcels)

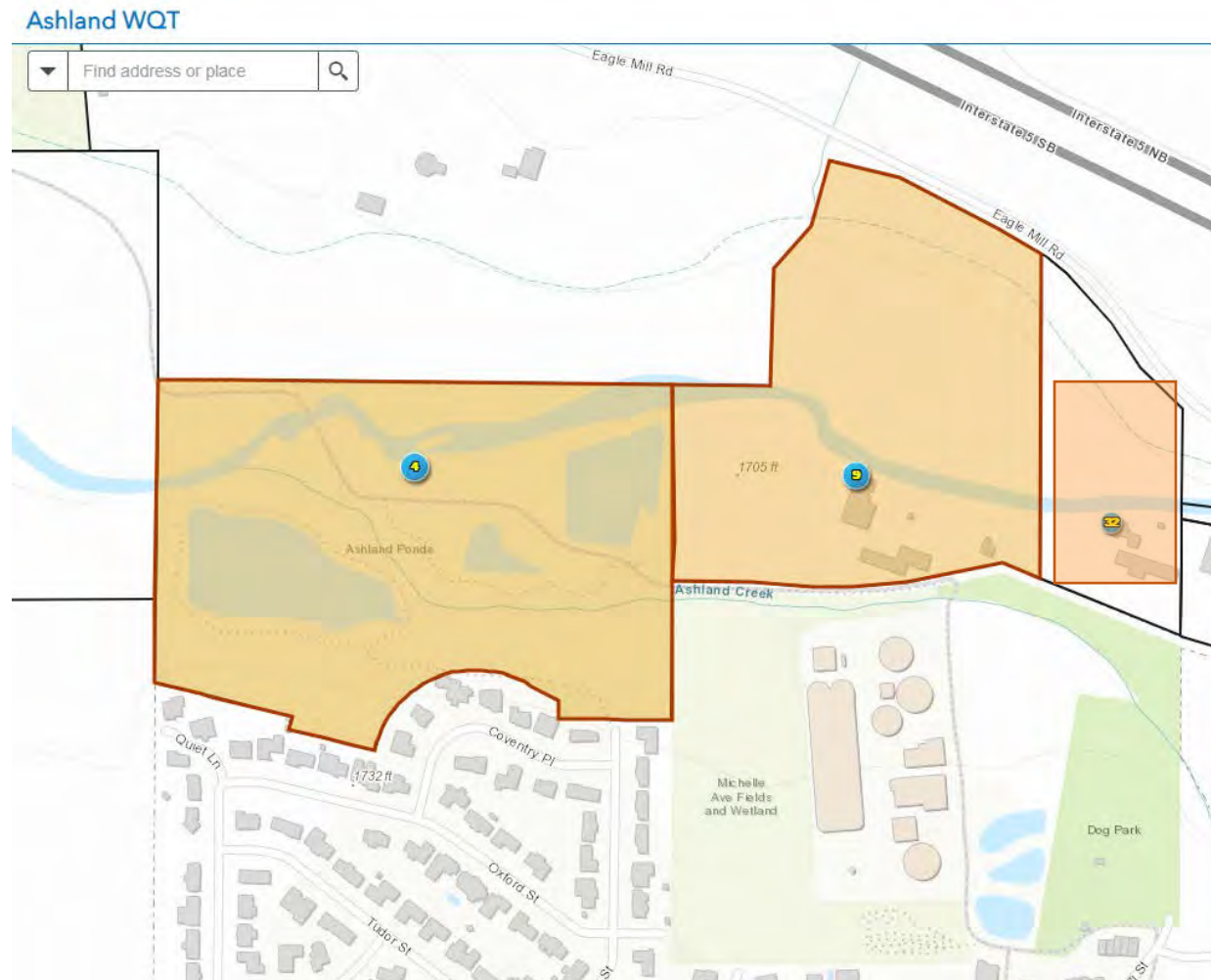
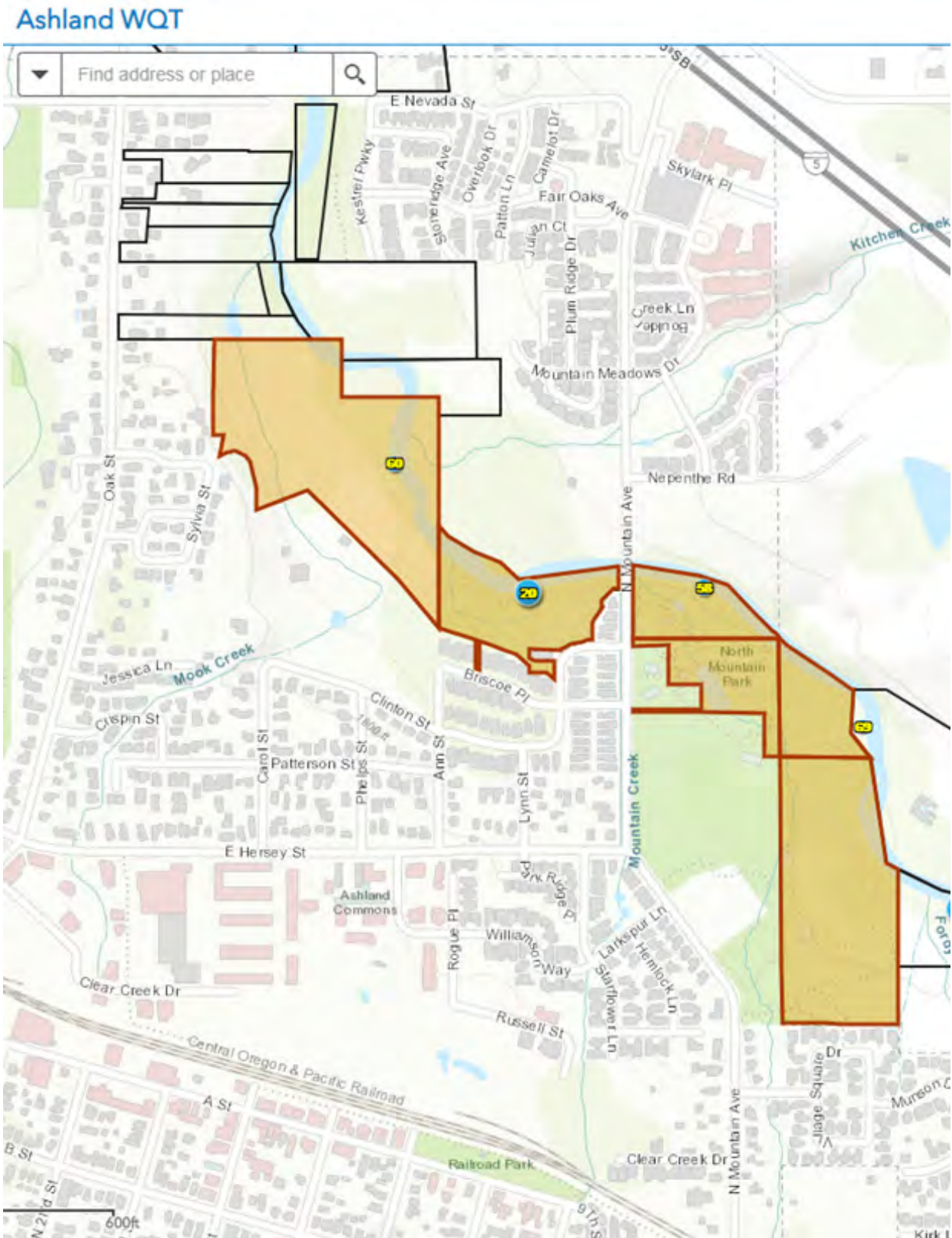


Figure 2. Future restoration sites, where restoration will be conducted on Parks-managed properties (amber parcels)





Limited Application of Herbicide to Manage Invasive Species for the City Of Ashland's Water Quality Trading Program

February 22, 2019

The Freshwater Trust (TFT) was selected by the City of Ashland (the City) this year as its partner to develop and implement a water quality trading (WQT) program for temperature compliance with the Clean Water Act. TFT has drafted the following memorandum to explain how it plans to implement the City's WQT program consistent with the City's Pesticide Policy (Policy) in Chapter 9.28 of the Ashland Municipal Code. In this document and supporting attachments, TFT describes WQT and the performance standards associated with this compliance program—and why the limited use of herbicide is an essential practicality associated with this program. TFT then outlines the comprehensive guidelines it has developed to minimize the amount of chemical used as well as risks to humans, pollinators, birds, water, salmonids, and other cohabitants of the natural systems we work to restore. TFT then demonstrates that this approach has resulted in herbicide application rates in other programs that are often lower than industry average.

I. INTRODUCTION TO CITY OF ASHLAND WATER QUALITY TRADING PROGRAM, THE FRESHWATER TRUST, AND THE BENEFITS OF WQT PROGRAMS

The Freshwater Trust (TFT) is a 501(c)(3) non-profit organization headquartered in Portland, with an office in Ashland, whose mission is to restore impaired rivers and protect threatened and endangered species. With more than 30 years of on-the-ground restoration experience in Oregon, TFT is one of the most seasoned restoration-focused organizations in the Pacific Northwest. In addition to TFT's long history of restoration work, the organization was responsible for listing the first salmonid species in the Northwest under the Endangered Species Act, and started the nation's first water trust.¹ One of TFT's main areas of work is helping cities and municipalities use watershed restoration projects to comply with Clean Water Act,² Endangered Species Act and other environmental regulatory requirements. Constructed compliance solutions like cooling towers and chillers lack the more holistic benefits of a restoration approach and are often considerably more expensive. TFT works on behalf of entities like the City to provide compliance solutions that produce the same robust regulatory result, and also improve the ecosystem health of the surrounding watershed. TFT measures the benefits restoration actions provide to freshwater ecosystems in units that are familiar to regulators and required in permits. In addition to providing the translation between watershed projects and regulatory drivers, TFT also monitors and maintains these restoration projects over the long term, with frequent third-party verification to confirm that the sites are progressing appropriately, to ensure that they persist as compliance grade projects. Unlike many traditional restoration efforts, this rigorous, long-term

¹ A water trust leases or purchases water rights from irrigators and other water uses, and then protects that water instream for the benefit of the environment and aquatic species.

² The Freshwater Trust, Featured Case Study: Medford Water Quality Trading Program, <https://www.thefreshwatertrust.org/case-study/medford-water-quality-trading-program/>.

monitoring, maintenance and tracking of sites over time ensures that the promised benefits not only materialize but also continue to thrive for decades.

In this particular instance, the City's WQT program will entail the restoration of riparian vegetation in the Bear Creek watershed. This vegetation will produce shade, which will block sunlight and minimize the warming of the stream, for the benefit of salmonids and other temperature-sensitive aquatic species. In addition to producing thermal benefits that the City can use to achieve compliance with its Clean Water Act permit, this restoration-based approach generates multiple ancillary benefits, including improvements to habitat for sensitive native plants and animals, increased resiliency to climate change, carbon sequestration, and a buffer against erosion and runoff of other pollutants into the waterway.³ In addition, these natural solutions to compliance also help the City avoid the electricity costs and carbon impacts of having to operate chilling equipment, which align with the City's stated climate mitigation and adaptation goals.⁴ Finally, the City's WQT program will also help stimulate the local economy.⁵ It is because of these multiple benefits, and the long-lasting impacts of WQT that TFT has thrown its conservation legacy behind WQT.

II. REGULATORY REQUIREMENTS FOR COMPLIANCE GRADE WQT RESTORATION SITES

Oregon's water quality trading rules require a Trading Plan to be developed, and that plan must include quality standards with specifications for design, implementation, maintenance, and performance tracking to "ensure the estimated water quality benefits of a trading project are achieved."⁶ In addition, WQT projects have to be verified as "conforming to applicable quality standards."⁷ The City has developed a Trading Plan for shade credits that addresses these issues, which has been endorsed by the Oregon Department of Environmental Quality (DEQ) as consistent with its WQT rules.

Like the trading programs approved by DEQ for The City of Medford, the Port of St. Helens, and the Metropolitan Wastewater Management Commission of Eugene-Springfield (MWWC),⁸ the City's Trading

³ See M.D. Tomer & M.A. Locke, *The Challenge of Documenting Water Quality Benefits of Conservation Practices: A Review of USDA-ARS's Conservation Effects Assessment Project Watershed Studies*, 64 WATER SCIENCE & TECHNOLOGY 300, 303 (2011) (noting nutrient and erosion benefits of buffers); Scott W. Miller et al., *Quantifying Macroinvertebrate Responses to In-Stream Habitat Restoration: Applications of Meta-Analysis to River Restoration*, 18 RESTORATION ECOLOGY 8, 8 (2010) (noting benefits of heterogeneous riparian habitat).

⁴ CITY OF ASHLAND, CLIMATE & ENERGY ACTION PLAN (Jan. 2017). In addition to reducing greenhouse gas emissions, restoration advances the City's goals of becoming carbon neutral and increasing the local ecosystem's resiliency to climate change.

⁵ Riparian plantings require a local workforce (excavators, operators, equipment suppliers, contractors, and restoration professionals), plant stock and supplies are purchased from local nurseries, and project site leases provide an important income stream to local landowners. Typically 80 cents of every dollar spent on restoration stays in the local economy, and every \$1 million spent on restoration creates up to 16–23 jobs. Max Nielsen-Pincus & Cassandra Moseley, *The Economic and Employment Impacts of Forest and Watershed Restoration*, 21(2) RESTORATION ECOLOGY 207, 207-214 (2013). Restoration work also has a multiplier effect: every dollar spent on Oregon restoration creates an additional 1.7 – 2.6x economic output. *Id.*

⁶ OAR 340-039-0025(5)(d). BMP Quality Standards are "Specifications for the design, implementation, maintenance and performance tracking of a particular BMP that ensure the estimated water quality benefits of a trading project are achieved, and that allow for verification that the BMP is performing as described in an approved trading plan." OAR 340-039-0005(2).

⁷ OAR 340-039-0025(5)(h).

⁸ All of TFT's compliance-grade restoration sites can be reviewed on its publicly available credit ledger: <https://mer.markit.com/br->

Plan incorporates robust riparian project quality standards developed by the Oregon nonprofit organization Willamette Partnership, an independent third party that oversees the integrity of and results from natural infrastructure compliance solutions.⁹ These standards were developed through a collaborative process among twenty-five local, federal, and state agencies, including the US EPA, the USDA Forest Service, the USDA Natural Resources Conservation Service, and other stakeholders.¹⁰ Standards meet four criteria: standards are science-based and credible, transparent and replicable, efficient and practical to apply, and applicable to a range of environmental criteria. Among other requirements, riparian revegetation projects must meet a set of performance standards (Table 1) throughout their 20-year life. Performance standards were selected to indicate whether a project remains on track to establish a native riparian forest that is likely to produce modeled shade benefits. Most relevant to this proposal, these quality standards include a cap on the combined cover of a limited list of plants that are considered invasive¹¹, with the intent that these plants are kept below thresholds expected to prevent successful regrowth of native riparian forests. For the shade generated from this solution to count for compliance, invasive plant species cover must remain below regulatory thresholds over a 20-year timeline. This standard is what drives TFT to incorporate limited herbicide application into its site implementation and management approach. Each credit must also be third-party reviewed (including site visits) and certified for accuracy and environmental benefit. Projects that fail to meet these criteria are at risk for de-certification and loss of compliance credits.¹²

reg/public/index.jsp?entity=project&sort=project_name&dir=DESC&start=0&acronym=&limit=15&name=the+freshwater+trust&standardId.

⁹ Willamette Partnership, Performance Standards for Riparian Revegetation (2016), http://willamettepartnership.org/wp-content/uploads/2014/06/Performance-Stds-for-Rip-Reveg_2016-02-16.pdf.

¹⁰ Willamette Partnership, Joint Statement of Agreement for an Ecosystem Credit Accounting System (2009), <http://willamettepartnership.org/joint-agreement-statement-ecosystem-credit-accounting-system/>.

¹¹ Invasive species are those on the Oregon Department of Agriculture's current noxious weeds list, plus known problem species including pennyroyal (*Mentha pulegium*) and Russian olive (*Elaeagnus angustifolia*).

¹² Willamette Partnership, Ecosystem Credit Accounting System, General Crediting Protocol, version 2 (2013, updated 2017), http://willamettepartnership.org/wp-content/uploads/2014/06/General-Crediting-Protocol-v2.0_2013_updated-2017-1.pdf.

Table 1. Quantitative performance standards for Water Quality Trading riparian revegetation projects.¹³

METRIC	PERFORMANCE CRITERIA			
	YEAR 5	YEAR 10	YEAR 15	YEAR 20
<i>EITHER:</i> 1) Live, native woody stems/acre	≥ 1,600 stems/ acre	80% of the stem density required at Year 5	70% of the stem density required at Year 5	70% of the stem density required at Year 5
<i>OR</i> 2) Combined live, native shrub and woody vine cover	≥ 25% cover			
% canopy closure or cover	N/A	N/A	≥ 25%	
Live, native trees/acre	None		(Dry ecoregions) ^a ≥ 50 trees/acre (Wet ecoregions) ≥ 100 trees/acre	
Number of native woody species present	≥ 5 species			
% cover of invasive ^b woody species	≤ 10% cover			
% cover of invasive herbaceous species	≤ 20% cover			
% cover of non-native plants	Take and document actions reasonably necessary to evaluate the risk posed to project site by non-native species where they are problematic (e.g., reed canarygrass [<i>Phalaris arundinacea</i>], English holly [<i>Ilex aquifolium</i>]), taking the steps necessary to control those non-native species such that their presence does not prevent the successful establishment and propagation of native ecosystem characteristics and functions. This includes monitoring and reporting % cover of such species.			

^a For the purposes of this performance standard, EPA Level III ecoregions in Oregon that are considered to be “dry”: Klamath Mountains, Blue Mountains, East Cascades, Columbia Basin, Northern Basin and Range.

^b Invasive species are those indicated by the Oregon Department of Agriculture Noxious Weed list, plus known problem species including pennyroyal (*Mentha pulegium*) and Russian olive (*Elaeagnus angustifolia*). Reed canarygrass (*Phalaris arundinacea*) was included in invasive herbaceous cover 2015 and earlier but is no longer considered invasive; cover of this species is still monitored.

¹³ Willamette Partnership, Performance Standards for Riparian Revegetation (2016), http://willamettepartnership.org/wp-content/uploads/2014/06/Performance-Stds-for-Rip-Reveg_2016-02-16.pdf.

III. CITY OF ASHLAND RIPARIAN WQT PROGRAM AND THE CITY'S PESTICIDE APPLICATION POLICY

Early on in its Riparian WQT program analysis, TFT reviewed Ashland's Pesticide Policy at Chapter 9.28 of the Ashland Municipal Code and began considering how to integrate this policy into its planned WQT restoration work, and conformance with WQT performance standards. The City's policy seeks "to reduce or eliminate the use of, and exposure to, pesticides" on publicly owned property managed by the City,¹⁴ and calls for the use of mechanical and cultural methods "whenever practical" to "control noxious vegetation and pests."¹⁵ "When mechanical and cultural methods are not practical, only the safest, lowest toxicity products available shall be used. No 'restricted use' pesticides shall be used."¹⁶

TFT strongly supports the City's goal of reducing the potential human and ecological risks—including impacts on pollinators and other sensitive species—from exposure to herbicides. However, it has been TFT's experience that complete elimination of herbicide use in a compliance restoration program—where long-term survival, persistence, and resilience of plantings is an essential component—is not practical. The spread of certain invasive species such as Japanese knotweed can even be exacerbated through removal efforts that are exclusively manual or mechanical. TFT's limited and judicious use of carefully selected, non-restricted use herbicides has evolved out of the necessity to complete successful riparian restoration projects for compliance purposes. More broadly, effective vegetation management is necessary for Ashland to achieve compliance in a way that ultimately improves the health of its watershed. Due to both the acreage and site longevity required in these programs,¹⁷ it is simply not practical to use chemical-free approaches and have these projects succeed over the long term. The Rogue Valley has a large number of sites that are examples of herbicide-free restoration. The few that have succeeded in suppressing weeds and growing healthy native vegetation over an extended period of time (more than five years) are singular, small in size (less than one acre), and have special significance for a dedicated group of volunteers.¹⁸ This is an approach that TFT applauds but does not expect to successfully apply to a much larger multi-site compliance program.

TFT has developed and implemented detailed herbicide use and restriction guidelines (see attachment, which includes TFT's Ashland-specific Herbicide Use and Restriction Guidelines contract exhibit, Best Management Practices for Bird Conservation, and an Invasive Species Spread Prevention Policy). TFT's guidelines have been developed based on expertise in the field, subject matter knowledge, and product evaluations conducted by the

¹⁴ Ashland Municipal Code § 9.28.020 (purpose); § 9.28.010 (describing scope).

¹⁵ Ashland Municipal Code § 9.28.030(A). "Practicality shall be determined by an Oregon Certified Pesticide Applicator and the respective department head or the department head's designee. Worker safety and terrain shall be among the factors considered in this judgment."

¹⁶ Ashland Municipal Code § 9.28.030(B). "As provided in ORS 634.316, restricted use pesticides shall be: (1) Any pesticide active ingredient, formulation, product or usage classified restricted use by the United States Environmental Protection Agency, through administration of the Federal Insecticide, Fungicide and Rodenticide Act, and identified in current Title 40, Chapter 1, Sub-Chapter E, Part 152 of the Code of Federal Regulations [40 C.F.R. § 152.175]; or (2) Any pesticide product having labeling which specifies the product as being restricted use and has been accepted by the department for the purpose of registration as provided in ORS 634.016." OAR 603-057-0205. "Restricted use pesticides" are generally understood to be "a category of products that pose a higher risk to people, animals, or the environment. [RUPs] can only be purchased by a person with a pesticide license; use requires supervision by a licensed applicator." ODA, Oregon Pesticide Licensing Guide (2017).

¹⁷ TFT anticipates 20 to 30 acres of riparian plantings on about 15 to 25 sites will be needed to achieve compliance for City of Ashland when they receive their new NPDES permit. Sites must meet interim performance standards over a 20 year period, and achieve final performance standards at the end of the 20-year credit life period.

¹⁸ For example, sites including Wagner Creek Park, Talent on Wagner Creek, Blue Heron Park in Phoenix, and Ashland Pond are smaller restoration sites in the Rogue Basin where ongoing citizen efforts to manage weeds have resulted in some degree of success with plant establishment. However, even these sites have invasive species cover that would not meet WQT performance standards.

National Marine Fisheries Service (NMFS). Attached is the exhibit that TFT includes in all of its subcontracts, and which requires contractors to take the City’s Pesticide Policy into account in conducting their pre-treatment, site preparation, and maintenance activities; these requirements go above and beyond the industry standards for licensed applicators and exceed the minimum requirements set forth in City Code. TFT also has a licensed applicator on staff who oversees contractor herbicide application and strategy. In addition, TFT follows a set of best management practices (described further below), to ensure effective and environmentally sensitive approaches to addressing problematic and invasive vegetation through the use of herbicides. For example, mechanical and biological weed control methods are applied to the extent feasible to minimize the use of herbicides. By following its policies, records show that TFT and its contractors apply at per-acre rates that are considerably lower than is standard in the natural resource industry (see Section V).

IV. TFT’S INVASIVE SPECIES BEST MANAGEMENT PRACTICES

TFT’s focus is on restoring native plant communities at scale using the tactics that are most effective and that pose the least human and ecological risk. In TFT’s experience, successful restoration projects over the long term require good control of invasive weeds, particularly in the first few years of project implementation while native vegetation communities are establishing. To ensure this result, TFT’s best management practices include:

1. Application of an “Integrated Pest Management” (IPM) approach to every site (for an example, see Box 1). Mechanical and biological methods of weed control are always applied to the extent feasible to minimize chemical methods of weed control. Project planning includes pre-implementation surveys to identify weeds present on site and their abundance. Project managers use this information to research weed biology, and use knowledge of the plants’ life history to determine the most effective types, timing, and strategies for treatment approaches. Treatment is designed to avoid impacts to non-target species; for example, see TFT’s Best Management Practices for Bird Conservation (included in attachment).¹⁹ During implementation and maintenance, TFT’s Invasive Species Spread Prevention

Box 1. Integrated Pest Management of Himalayan blackberry.

An example of TFT’s integrated pest management is its approach to treating Himalayan blackberry (Rubus bifrons). TFT first uses mechanical treatment to reduce the amount of plant material to be treated. However, mechanical removal is timed so that it does not impact nesting birds (following TFT’s Best Management Practices for Bird Conservation, TFT clears in late winter/early spring). TFT then allows the blackberry to regrow, flower and fruit through summer, thereby avoiding herbicide applications when pollinators may be present (although Aquatic POEA-free Glyphosate is not known to pose any risk to pollinators). Himalayan blackberry is then spot-treated with herbicide approved for use near water in late fall. This timing is most effective because the plants are pulling energy down to the roots, and so the chemical is translocated throughout the plant and need for future treatment is reduced. At this time of year, native plants have mostly lost their leaves which also reduces the chance that herbicide, which works on photosynthetic surfaces, will injure them. An understanding of the weed’s life history, herbicide products actions and pathways, and coexisting natural resources and their sensitivity periods results in far less product being applied and with much greater efficacy and low risk to non-target resources.

¹⁹ TFT’s Best Management Practices for Bird Conservation have been developed to ensure that appropriate and reasonable measures are taken to comply with the Migratory Bird Treaty Act (MBTA) and avoid impacts to birds and other animals that may use invasive plant species as habitat.

Policy (included in attachment) helps prevent weed introduction and proliferation during restoration activities to reduce the need for ongoing control. Mulch between plants and pollinator-friendly seed mixes also help suppress weeds and reduce maintenance needs.

2. TFT limits weed control to a selected list of highly aggressive plant species identified by the State of Oregon as having the most deleterious ecological impacts, as well as a small number of additional species identified by restoration experts to be particularly harmful to healthy riparian forest establishment. TFT recognizes that many non-native plants contribute important functions, including providing pollinator and other wildlife habitat. Therefore, TFT does not target the majority of plants on site with any control treatment.
3. TFT works in locations that have significant habitat value for endangered and threatened salmonid species. Because of this, it is imperative that strict precautionary measures are taken to ensure that only chemicals that have no or low toxicity for sensitive fish species²⁰ are applied at restoration sites. Where herbicides are required to control selected invasive species and meet project objectives, TFT follows practices in its Herbicide Use and Restriction Guidelines to select and apply least-harm herbicides. This document provides a short list of herbicide products and adjuvants that TFT may use on its sites. Consistent with Ashland's Pesticide Policy, TFT does not use any "restricted use pesticides" as identified in ODA and federal EPA regulations. For TFT, allowable herbicides are restricted to products that have been evaluated and reported as posing no jeopardy to endangered fish species by the National Marine Fisheries Service (NMFS).²¹ TFT reviews this document annually to integrate the best available science, management practices and emerging solutions, as well as approaches for handling new weed species. TFT considers effects on human health as well.²² TFT also participates in local practitioner groups to stay aware of new weeds and the latest approaches to dealing with them in our region.
4. Once we have identified the safest, most targeted herbicide approach for a site, TFT follows all of the attached guidelines when it or its contractor applies herbicides, including implementing requirements for safe transport; herbicide preparation (e.g., dilution of a concentrated product, addition of adjuvants to the diluted product—different pesticides will not be mixed); avoiding application when environmental conditions could cause drift, volatilization, or runoff; correct buffer distances; and other measures. TFT uses minimum application rates and maximum dilutions. Because TFT is most often

²⁰ No or low toxicity for sensitive fish species is defined by: (1) having "no jeopardy" to endangered and threatened salmonid species, as designated in a National Marine Fisheries Service Biological Opinion, or (2) having a hazard quotient of less than 0.1 as described in a United States Forest Service issued Human Health and Ecological Risk Assessment Report.

²¹ National Oceanic and Atmospheric Administration National Marine Fisheries Service (NMFS). 2009. Programmatic Biological and Conference Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation for Restoration Actions Funded or Carried Out by the U.S. Fish and Wildlife Service in Oregon and Southwest Washington Using the Partners for Fish and Wildlife, Coastal, and Recovery Programs. October 21, 2009. NMFS Document No.: 2008/03791. Seattle, WA.

³ Based on maximum application rates for projects on Federal Conservation Reserve Program land.

²² For example, TFT has carefully reviewed the conflicting determinations concerning potential carcinogenicity of glyphosate that have been published in the last several years. To date, TFT concurs with statements published by Oregon State University Extension (<https://extension.oregonstate.edu/pests-diseases/pesticides/glyphosate-questions-answers>) and the California Invasive Plant Council (<https://www.cal-ipc.org/wp-content/uploads/2017/11/Cal-IPC-glyphosate-policy.pdf>) that careful use of glyphosate within an IPM program, according to the label, is low risk for wildlife, applicators, and the public.

managing against weeds within a complex matrix of a newly establishing native plant community and other desirable species, we apply all of these weed control methods and guidelines in a highly accurate and targeted manner. Management of invasive species on TFT restoration sites generally occurs as spot treatment, targeting only the problematic vegetation, and minimizing the risk of negative outcomes such as pesticide drift and non-target species damage.²³ Selective weed control has been found to be effective at maintaining butterfly habitat.²⁴ As necessary, TFT will provide signage and notification to neighbors for pesticide application within fifty feet of the property line of a residence and abide by other requirements as described in Ashland City Code 9.28.040.

5. TFT collects real-time data from applicators via maintenance and reporting apps to ensure that requirements are being followed, and uses regular project inspections to assess the success of the treatments. This adaptive management approach ensures that we are learning from each application to continue to improve our management of specific target weeds.
6. In TFT's experience, early years of site establishment are often most critical to long-term project success. Herbicide is most utilized as a restoration tool at the project outset, to reduce the impact of widespread invasive species cover that is most often suppressing native forest regrowth. Projects are then designed and managed to maximize the ability of native trees and shrubs to compete weeds as much as possible. Weed management after planting is informed by rigorous qualitative and quantitative monitoring. As needed, herbicides are applied discretely (spot-sprayed) on re-sprouting weeds that cannot efficiently or effectively be controlled by mechanical means alone. Once native plantings are established, and for the remainder of the project, herbicides are only applied to new or persisting outbreaks of particularly aggressive weeds that threaten overall performance and project health.

Combined, TFT's best management practices outlined above have ultimately allowed TFT to apply less herbicide than industry average (see section V). TFT is proud of its clean track record with regards to compliance with all federal, state and local laws related to all aspects of herbicide application and record keeping. TFT understands the public's concerns related to chemical use near streams and takes seriously its responsibility to use those products safely and judiciously in a way that aligns with our non-profit mission to restore the health of our rivers and streams.

V. TFT HERBICIDE USAGE RATES V. INDUSTRY PRACTICE

TFT and its contractors use herbicide at a rate that is typically lower than average application rates recommended for vegetation management. For example, the Pacific Northwest Weed Management Handbook

²³ See Roger E. Sheley et al., *Managing Riparian Weeds*, 17 *Rangelands* 5 (1995), available at <https://journals.uair.arizona.edu/index.php/rangelands/article/viewFile/11260/10533>.

²⁴ The Xerces Society for Invertebrate Conservation. *Pollinators in Natural Areas, A Primer on Habitat Management*. http://www.xerces.org/wp-content/uploads/2014/09/PollinatorsNaturalAreas_June2014_web.pdf.

recommends application of glyphosate at a rate of 24-120 fl oz/acre.^{25,26} For the years 2017-2018, TFT used an average glyphosate application rate of 17.6 fl oz/acre in 2017 and 28.7 fl oz/acre in 2018 at the 10 compliance-grade WQT riparian restoration sites that have been implemented in the Rogue River Basin to date. However, management is tailored to the specific risks identified at each site, which sometimes include highly aggressive invasive species for which chemical control is the most effective option. Specifically, Japanese knotweed is a vigorous invasive species that is rapidly expanding in the Rogue basin, and is often detected at TFT's sites during pre-implementation surveys. Allelopathic (toxic) compounds produced by this weed often prevent establishment of native riparian vegetation. While the Oregon State University Extension Service recommends a glyphosate application rate of 120 fl oz/acre for treatment of knotweed species,²⁷ TFT's highest application rate, which occurs on a site where Japanese knotweed is pervasive, is about half of that recommended amount (highest average application rate was 62.5 fl oz/acre in 2017, the site's first growing season after planting). When we remove this site from the analysis, average glyphosate application rates drop to 11.2 fl oz/acre in 2017, and 24.4 fl oz/ac in 2018.

VI. CONCLUSION:

As the City begins implementing WQT projects on City-owned sites, TFT will judiciously apply herbicide so as to conform to Ashland's Pesticide Policy within the Ashland Municipal Code 9.28. TFT has implemented other WQT projects on publicly owned land with success, and so appreciates the importance of maintaining public confidence that the methods used will work to achieve the desired results while protecting sensitive resources. As a conservation organization with deep roots in Oregon, TFT will seek to earn the confidence of Ashland residents so they can trust that they City's program will result in healthy, flourishing riparian areas for threatened and endangered species, native pollinators, and people alike.

Please direct questions and comments to:

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²⁵ This is equivalent to 0.75 to 3.75 lb ae/A, where Ae/A is acid equivalent (the acid portion of the active ingredient) per unit Area. Peachey, E., editor. 2018. Pacific Northwest Weed Management Handbook [online]. Section X. Noncropland and Right-of-Way. Oregon State University, Corvallis, OR. <https://pnwhandbooks.org/sites/pnwhandbooks/files/weed/chapterpdf/weed18-xnoncropland.pdf> (accessed 30 Nov. 2018).

²⁶ The lb ae/A values were converted to fluid ounces per acre using a ratio of lb ae/A to fluid ounces as defined in Emanuel, Hulting, and Koepke-Hill (2011) for Rodeo, a formulation of glyphosate registered for use near water. See <https://catalog.extension.oregonstate.edu/sites/catalog/files/project/pdf/em9031.pdf>

²⁷ Amount of product per acre recommended for Rodeo, a formulation of glyphosate registered for use near water. Emanuel, R., A. Hulting, and R. Koepke-Hill. 2011. Biology and Management of Knotweeds in Oregon: A Guide for Gardeners and Small-Acreage Landowners. EM 3031. Oregon State University Extension. Corvallis, OR.

<https://catalog.extension.oregonstate.edu/sites/catalog/files/project/pdf/em9031.pdf>

A. Contract Exhibit: Herbicide Use and Restrictions for City of Ashland WQT Program

CONTRACTOR and its subcontractors will follow the guidelines set forth in this document and the Invasive and Non-Native Plant Control section of the October 21, 2009 NMFS Document No.: 2008/03791: *Programmatic Biological and Conference Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation for Restoration Actions Funded or Carried Out by the U.S. Fish and Wildlife Service in Oregon and Southwest Washington Using the Partners for Fish and Wildlife, Coastal, and Recovery Programs.*

INTRODUCTION

The Freshwater Trust (TFT) and its partners work together to implement restoration projects that lead to the establishment of ecologically functioning riparian forest communities. TFT works in locations that have significant habitat value for endangered and threatened salmonid species. Because of this, it is imperative that strict precautionary measures are taken to ensure that only chemicals that have no or low toxicity¹ for sensitive fish species are applied at restoration sites.

The City of Ashland's pesticide policy for all city departments and divisions, with the exception of Ashland Parks and Recreation, which sets a similar policy through their elected Commission, seeks "to reduce or eliminate the use of, and exposure to, pesticides"², on publicly owned property managed by the City. Mechanical and manual methods are preferred methods whenever practical. When performing habitat restoration on publicly owned properties, CONTRACTOR shall review the copy of City of Ashland Municipal Code Chapter 9.28, Pesticide Policy, provided by TFT in the implementation of best management practices on site.

This document outlines effective and environmentally sensitive approaches to addressing invasive vegetation through the use of herbicides, while considering best available science, economic restraints, emerging solutions and the introduction of new weed species. Special attention is paid to the impact of vegetation control on endangered and threatened salmonid species and their critical habitats. This document may be revised from time to time by TFT to ensure product lists and protocols are current with emerging best management practices. Revisions will be provided to CONTRACTOR as necessary.

¹ No or low toxicity for sensitive fish species is defined by: (1) having "no jeopardy" to endangered and threatened salmonid species, as designated in a National Marine Fisheries Service Biological Opinion, or (2) having a hazard quotient of less than 0.1 as described in a United States Forest Service issued Human Health and Ecological Risk Assessment Report.

² Ashland Municipal Code § 9.28.020 (purpose); § 9.28.010 (describing scope).

GENERAL CRITERIA

- a. In an effort to minimize the application amounts from chemical methods of weed control, application will be generally preceded by mechanical methods of weed control. Applications will be limited to a selected list of plant species, as directed by TFT staff.
- b. At a minimum, applicators will adhere to all local, state, and federal laws, including all label requirements concerning the safe and effective use of herbicides, in addition to adhering to TFT's Herbicide Use and Restrictions Guidelines.
- c. Application will occur in full compliance with all other regulations, orders and permits as required.
- d. Application will occur according to the best management practices outlined below.

HERBICIDE TRANSPORTATION AND SAFETY PLAN

CONTRACTOR will reduce the likelihood of spills or misapplication, take remedial actions in the event of spills, and fully report any spill or misapplication event to TFT and the appropriate regulatory agency. CONTRACTOR will:

- a. Limit the quantity of herbicides to be transported to treatment sites to the amount used on a daily basis;
- b. Place impervious material beneath herbicide preparation areas in such a manner as to contain small spills associated with dilution/adjuvant addition/refilling;
- c. Make a spill cleanup kit readily available in each vehicle during herbicide transport, storage and application;
- d. Be familiar with reporting procedures, including reporting spills to the appropriate regulatory agency as defined by state and federal laws;
- e. Ensure that applicators are trained in safe handling and transportation procedures and spill cleanup;
- f. Maintain equipment used in herbicide storage, transportation and handling in a leak proof condition;
- g. Plan transportation routes so that hazardous conditions are avoided to the extent possible;
- h. Prepare and load herbicides at least 150 feet away from water bodies so that accidental spills do not contaminate surface waters;
- i. Wash spray tanks at least 150 feet away from water bodies; and
- j. Dispose of herbicide containers safely.

HERBICIDE PRODUCT LIST

Except in special circumstances that result from prior consultation and written approval by TFT staff, herbicide use will be restricted to products that have been evaluated and reported as posing no jeopardy to endangered fish species by the National Marine Fisheries Service (NMFS).³ The products listed below are acceptable for use as long as specified application methods and prescribed buffer zones are followed. As described by NMFS, herbicides will be applied at the lowest effective label rates, and must fall within the typical and maximum rates given below. Herbicide labels will be used to determine species-specific and application method appropriate application rates. In addition to selecting the products that pose the least risk to the environment and non-

³ As described in the "Pesticide and Consultations Summary and Schedule," available at http://www.nmfs.noaa.gov/pr/consultation/pesticide_schedule.htm.

target weed species, and using them at the minimum application rates, herbicides must be applied by trained and licensed applicators who can identify target weeds and apply the products with precision, accuracy, and care. Pursuant to Ashland Municipal Code 9.28.030(B), no “restricted use” pesticides shall be used.⁴

Table 1. Accepted herbicides, application buffer distances, and typical and maximum application rates for use on TFT riparian restoration projects. Adapted from National Marine Fisheries Service Bi-Op No: 2007/09078.

Herbicide	Common trade names	Buffer distance from water (ft)* based on application method			Typical application rate***	Maximum application rate***
		Broadcast Spray**	Spot Spray**	Hand Selective**		
Aquatic glyphosate ⁵	<i>AquaMaster, AquaPro, Rodeo</i>	100	no closer than 5 ft to waterline	no closer than 5 ft to waterline	Broadcast: 1 1/2 pints per acre Spot spray: 0.75% solution by volume	Broadcast: 7 1/2 pints per acre Spot spray: 2% solution by volume
Aquatic imazapyr ⁴	<i>Habitat</i>	100	15	no closer than 5 ft to waterline	2 pints per acre	6 pints per acre
Aquatic triclopyr-TEA ⁴	<i>Renovate 3, Garlon3A, Tahoe3A</i>	Not allowed	15	no closer than 5 ft to waterline	2.5% solution by volume	50% solution by volume
Imazapic	<i>Plateau</i>	100	15	bankfull elev.	0.1 lbs of active ingredient per acre	0.1875 lbs of active ingredient per acre
Clopyralid	<i>Transline</i>	100	15	bankfull elev.	0.35 lbs of active ingredient per acre	0.5 lbs of active ingredient per acre
Metsulfuron-methyl	<i>Escort</i>	100	15	bankfull elev.	0.03 lbs of active ingredient per acre	0.15 lbs of active ingredient per acre
Aminopyralid	<i>Milestone</i>	100	15	15	4 fl oz formulation ⁶ /acre	7 fl oz formulation/acre

***Herbicide buffer distances from water.** No-application buffer widths are in feet, measured as map distance perpendicular to the bankfull elevation. Herbicide applications will use the most conservative buffer for any herbicide being applied included. As an added precaution, no product shall be applied within five (5) feet of open water regardless of product labeling. Instead, within this narrow zone, use hand or mechanical methods to attempt management of target weeds occurring at the water’s edge.

****Herbicide application methods.** Liquid or granular forms of herbicides will be applied as follows:

- a. Broadcast spraying – Herbicide is uniformly sprayed onto large patches of target vegetation using hand held nozzles attached to back pack tanks or vehicles, or vehicle mounted boom sprayers; this approach should only be utilized with prior permission from TFT and the City.
- b. Spot spraying – Herbicide is sprayed directly onto small patches or individual plants using hand held nozzles attached to back pack tanks or vehicles, hand-pumped sprayers, or squirt bottles.
- c. Hand selective – Herbicide is sprayed directly onto small patches or individual plants using one of the following methods: wick-and-wipes, basal bark, fill (“hack and squirt”), stem injection, or cut-stump.

*****Typical and maximum application rate.** These rates will vary significantly depending on the target species. Applicators are responsible for referencing manufacturer's label to ensure that proper rates are administered and the treatment is made using the minimum dilution rate recommended for a given target.

⁴ Ashland Municipal Code § 9.28.030(B). As provided in ORS 634.316, restricted use pesticides shall be:(1) Any pesticide active ingredient, formulation, product or usage classified restricted use by the United States Environmental Protection Agency, through administration of the Federal Insecticide, Fungicide and Rodenticide Act, and identified in current Title 40, Chapter 1, Sub-Chapter E, Part 152 of the Code of Federal Regulations [40 C.F.R. § 152.175]; or (2) Any pesticide product having labeling which specifies the product as being restricted use and has been accepted by the department for the purpose of registration as provided in ORS 634.016.” OAR 603-057-0205.

⁵ Typical rates are taken from manufacture’s labels.

⁶ Formulation is defined as 80% active ingredient at between 0.25% - 0.5% by volume.

HERBICIDE ADJUVANT PRODUCT LIST

Adjuvants are non-pesticides that can be added to pesticides to make an herbicide product more effective and thus reduce the amount of herbicide applied and number of applications needed. When an adjuvant has been deemed acceptable by NMFS and TFT, it will be added to our accepted products list and used in accordance with its label and the specific herbicides product labels. As per the NMFS recommendations cited above, the only adjuvants acceptable for use are as follows (Table 2). Polyethoxylated tallow amine (POEA) surfactant and herbicides that contain POEA (e.g., Roundup) will not be used.

Table 2. Accepted adjuvants, surfactants and drift retardants for use on TFT riparian restoration projects. Adapted from National Marine Fisheries Service Bi-Op No: 2007/09078 (NMFS, 2009).

Adjuvant Type	Trade Name	Mixing Rate (per gallon)	Application Areas
Surfactants	Activator 90	0.16-0.64 fl oz	Upland ⁷
	Agri-Dee	0.16-0.48 fl oz	Riparian ⁸
	Hasten	0.16-0.48 fl oz	Riparian
	LI 700	0.16-0.48 fl oz	Riparian
	R 11	0.16-1.28 fl oz	Riparian
	Super Spread MSO	0.16-0.32 fl oz	Riparian
	Syl-Tac	0.16-0.48 fl oz	Upland
Drift Retardants	41-A	0.03-0.06 fl oz	Riparian
	Vale	0.16 fl oz	Upland

HERBICIDE CARRIERS

Herbicide carriers (solvents) are limited to water or vegetable oil specifically labeled for this use.

HERBICIDE PREPARATION

Herbicides will be prepared (e.g., produce concentration will be diluted or adjuvants added to the diluted product) more than 150 feet from any natural waterbody to minimize the risk of an accidental discharge. Pursuant to Ashland Municipal Code 9.28.040(D), different pesticides shall not be mixed.

MINIMIZATION OF HERBICIDE DRIFT, VOLATILIZATION, RUNOFF, AND LEACHING

Consistent with Ashland Municipal Code 9.28.040(E), herbicide drift, volatilization, runoff, and leaching will be minimized as follows:

- a. Spraying will not occur when wind speeds exceed 10 miles per hour;

⁷ "Upland area" means land that is not wetland or riparian.

⁸ For the purpose of this document, "riparian area" means land: (1) within a distance equal to the height of one "site potential tree" (SPTH) of any natural waterbody occupied by ESA-listed salmon or steelhead during any part of the year, or designated as critical habitat; or (2) within 100 feet of any "natural waterbody" that is within ¼ mile upstream of areas occupied by ESA-listed salmon or steelhead, or designated as critical habitat, and that is physically connected by an aboveground channel system such that water, sediment, or woody material delivered to such waters will eventually be delivered to water occupied by ESA-listed salmon or steelhead or designated as critical habitat; or (3) within 50 feet of any "natural water" more than a ¼ mile upstream of areas occupied by ESA-listed salmon or steelhead, or designated as critical habitat, and that is physically connected by an above-ground channel system such that water, sediment, or woody material delivered to such waters will eventually be delivered to water occupied by listed salmon or designated as critical habitat. "SPTH" means the average height, at age 100, of the tallest, mature, native conifer species that is capable of growing in the soils found at that site for which height measurements are noted in the soil survey reports published by the National Resource Conservation Service (NRCS).

- b. Applicator will be aware of wind directions and potential for herbicides to affect aquatic habitat area downwind;
- c. Boom or spray will be kept as low to the ground as possible to reduce wind effects;
- d. Spray droplet size will be increased whenever possible by decreasing spray pressure, using high flow rate nozzles, using water dilutents instead of oil, or adding thickening agents;
- e. Herbicides will not be applied during temperature inversions;
- f. Herbicides will not be applied when ground temperatures exceed 80 degrees Fahrenheit;
- g. Herbicides will not be sprayed when rain, fog, or other precipitation is falling or is imminent. Wind and other weather data will be monitored and reported for all broadcast applications.

HERBICIDE APPLICATION TIMING

Proper timing is critical for effective herbicide treatment and minimal aquatic resource disturbance. Herbicides should be applied at the most appropriate time based on target species biology, as well as impact to co-existing vegetation and targeted plant life cycles. Applicators must also take into account weather forecasts, including temperature and humidity readings, so as to minimize the risk of runoff or volatilization.

HERBICIDE APPLICATION RECORDS

State law requires written records to be kept for certain types of herbicide applications. Licensed applicators must record the details of these applications and keep these on record for no less than three years. These records must be available for review by the Oregon Department of Agriculture. TFT requests that applicators document applications using Exhibit D (“Herbicide Application Record”) and provide such documentation no more than ten (10) days after application occurs. Applicators may also report to TFT in TFT’s digital platform so that records are saved in more than one location and are immediately available for review. As necessary, signage and notification to neighbors will be provided for pesticide application within fifty feet of the property line of a residence and if required by Ashland Municipal Code 9.28.040(A)-(B) (if active ingredients have a greater acute toxicity than table salt).

VECTOR CONTROL

Vectors are any physical means, actions or agents by which a species is moved from one location to another. Equipment, soil, people, clothes and vehicles are all common vectors by which invasive species can be spread. All contractors, employees or others who work in weed or invasive species-infested areas will clean themselves and their equipment before moving to a new site to avoid becoming a vector. The following suggestions should be followed:

- a. Inspect tools, equipment, and vehicles before entering and leaving the worksite.
- b. Clean soils and plant materials from tools, equipment, and vehicles before entering and leaving the worksite.
- c. Wear clothing, boots and gear that do not retain soil and plant material.
- d. Inspect and clean boots, pant legs and clothes from soil, mud, or plant materials before entering and leaving worksite.
- e. When invasive plant materials are removed from a site, always bag and dispose of debris in the landfill (not green waste).

REFERENCES AND RESOURCES

Cal-IPC. 2012. Preventing the Spread of Invasive Plants: Best Management Practices for Land Managers (3rd ed.). Cal-IPC Publication 2012-03. California Invasive Plant Council, Berkeley, CA. Accessed April 7, 2014: <https://www.cal-ipc.org/resources/library/publications/landmanagers/>

Clean Water Services. 2018. Integrated Pest Management Plan. Updated June 2018. Hillsboro, OR. Accessed December 3, 2018: <https://www.cleanwaterservices.org/media/1289/integrated-pest-management-plan.pdf>

Crop Data Management Systems Inc Label and Manufacturer's Safety Data Sheets. Accessed April 7, 2014: <http://www.cdms.net/Label-Database>

National Marine Fisheries Service (NMFS). 2014. Pesticide Consultations Summary and Schedule. Accessed April 7, 2014: <https://www.fisheries.noaa.gov/national/endangered-species-conservation/pesticide-consultations-summary-and-schedule>

NMFS. 2009. Programmatic Biological and Conference Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation for Restoration Actions Funded or Carried Out by the NOAA Restoration Center in the Pacific Northwest Using the Damage Assessment, Remediation and Restoration Program (DARRP) and the Community-based Restoration Program (CRP) (NMFS No. 2007/09078), Silver Spring, Maryland.

Oregon State University Extension. 2014. Pacific Northwest Weed Management Handbook. Accessed April 7, 2014: <http://pnwhandbooks.org/weed/control-problem-weeds>

Appendix: Herbicide Application Record

Applicator Profile

Full name:	
Applicator company name:	
License number:	
Company address:	
License number:	

Event I Application Details

Location:	Date:	Time in:	Time out:
Weather conditions:	Wind speed:	Temperature:	
Equipment used:			
Description of area treated:			
Total area treated:			
Target species:			
Herbicide label names:			
Type of surfactant/adjuvant used:			
Coverage rate (e.g., 6 lbs/100 sq ft):	Mix ratio or percentage (e.g., 3 g/100 g OR 3%):		
Total amount of dilute applied:	Pesticide supplier:		
Comments:			

Event II Application Details

Location:	Date:	Time in:	Time out:
Weather conditions:	Wind speed:	Temperature:	
Equipment used:			
Description of area treated:			
Total area treated:			
Target species:			
Herbicide label names:			
Type of surfactant/adjuvant used:			
Coverage rate (e.g., 6 lbs/100 sq ft):	Mix ratio or percentage (e.g., 3 g/100 g OR 3%):		
Total amount of dilute applied:	Pesticide supplier:		
Comments:			

ASHLAND PARKS & RECREATION COMMISSION

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COMMISSIONERS:

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PARKS COMMISSIONER STAFF REPORT

TO: Ashland Parks and Recreation Commissioners

FROM: Rachel Dials, Recreation Superintendent

DATE: August 13, 2019

SUBJECT: Formation of Recreation Division Advisory Committee (Information)

At the November 2018 study session staff brought forward a proposal for consideration to the Commission to form a Recreation Advisory Committee. The proposal was based on recommendations from the 2016 Performance Audit from MATRIX.

The draft policy to form the Recreation Division Advisory Committee is attached and staff is seeking feedback from the Commission on the draft policy. This policy is similar to the current make up and model for the Ashland Senior Advisory Committee (ASAC).



**Ashland Parks and
Recreation Commission**

**COMMISSION POLICY-
DRAFT**

TITLE FORMATION of the RECREATION DIVISION ADVISORY COMMITTEE	PAGE 1 of 2	POLICY No.
EFFECTIVE DATE	REVISED DATE	N/A

APPROVED BY COMMISSIONER ACTION

The Charter of the City of Ashland, **Article XIX – “Park Commission,”** gives the Ashland Parks and Recreation Commissioners the *“power to formulate and adopt rules and regulations for their government.”* This authority allows Commissioners to adopt rules and policies through the public process in order to provide organization, aide in decision making and to provide regulation for park and facility uses in order to achieve the goals of the APRC and protect people, the environment and assets and to ensure fair and equal use of parks by all users.

PURPOSE

The Recreation Division Advisory Committee (R-DAC) purpose is to advise the Ashland Parks and Recreation Commissioners on matters related to the Recreation Divisions programs and services and to coordinate with the Recreation Superintendent and APRC Director on matters related to the general operations, quality, promotions, diversity, equity and inclusion practices and programming.

The Recreation Division oversees the operations of the Ashland Rotary Centennial Ice Rink, Daniel Meyer Pool, Nature Center, indoor and outdoor facility rentals, volunteer (VIP program) special events and general youth, adult and therapeutic recreation programs.

GENERAL PROVISIONS

Committee Make-up

The total membership of program representatives and community partner representatives should be no more than seven (7) members, total. There should be a diverse combination of program related members (participants, instructors, volunteers), and community partner members (business, non-profit, community advocates) of the R-DAC.

In addition, there should be two (2) APRC Commissioners for a total of nine (9) Members.

TITLE : FORMATION of the RECREATION DIVISION ADVISORY COMMITTEE	Page 2 of 2	POLICY No.
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Meetings

R-DAC will meet every other month or as needed.

Staff Support

The Recreation Superintendent and/or APRC Director will attend and assist in the planning advertising and management of the R-DAC meetings.

Term Limits

The term of each R-DAC member will be three (3) years, with no member serving more than two (2) consecutive terms.

Bylaws and Program Mission

Once the R-DAC Members are appointed by the Commissioners, they will create R-DAC Bylaws in collaboration with APRC staff and approval of the Parks Commissioners at a regular business meeting. The R-DAC may also choose to develop a strategic plan and revise their mission and vision statement concurrent with the adopted goals of the Commissioners.

Approved: _____ Date: _____
Mike Gardiner, APRC Chair

Approved, as to form: _____ Date: _____
Dave Lohman, City Attorney