

Pesticide Use Justification Form: Public Works Utilities & Operations, WWTP & Wetlands, 2026

Department/Division: Public Works U&O / Wastewater Treatment Plant

Name/Title: Cory Eden/Lead Maintenance Technician

Community Contact: (530) 757-5686/PWWEB@cityofdavis.org

Proposed Date(s) of Use: January 1st 2026 – December 31st, 2026

Use Location Street Address/Site Name: 45400 Country Road 28h –Wastewater Treatment plant & Wetlands.

Location of Application: Fence lines, levees road tops, road sides, and fenced in areas.

Posting and Notification: Site notifications will be posted at least 48 hours before application via the pesticide application electronic notification system and at site entrances, remaining 24 hours after.

Pesticide

Product(s):

1) Method of application/Common name(s): Products will be applied using a trailer mount sprayer and backpack sprayer./ AquaMaster (Roundup), Cleantraxx

Active chemical ingredient(s):

Glyphosate 53.8%, Penoxsulam 0.85% & Oxyfluorfen 40.31%

EPA Reg #: 524-343, 62719-702

Pesticide type (*Herbicide, Insecticide, Fungicide, etc.*): Herbicide

Tier: 1 – Most Hazardous/Restrictive

2 – Less Hazardous/Restrictive

3 – Least Hazardous/Restrictive

2) Method of application/Common name(s): Products will be applied using a trailer mount sprayer and backpack sprayer / Capstone, Scythe, Activator90

Active chemical ingredient(s):

Aminopyralid 2.22% & Triclopyr 16.22%, Pelargonic Acid 57%, Alkylphenol ethoxylate & alcohol ethoxylate 90%

EPA Reg #: 62719-572, 10162-325 , CA Reg# 34704-50034

Pesticide type (*Herbicide, Insecticide, Fungicide, etc.*): Herbicide

- Tier:** 1 – Most Hazardous/Restrictive
2 – Less Hazardous/Restrictive
3 – Least Hazardous/Restrictive

3) Method of application/Common name(s): Products will be applied using a trailer mount sprayer and backpack sprayer./ Cheetah Pro, Lifeline, Homeplate

Active chemical ingredient(s): Glufosinate Ammonium 24.5%,
Glufosinate Ammonium 24.5%, Caprylic acid 44% & Capric acid 36%

EPA Reg #: 228-743, 70506-310, 67702-54-70051

Pesticide type (*Herbicide, Insecticide, Fungicide, etc.*): Herbicide

- Tier:** 1 – Most Hazardous/Restrictive
2 – Less Hazardous/Restrictive
3 – Least Hazardous/Restrictive

Justification Narrative

Target Pests: Various perennial broadleaf & annual weeds; including pepper-weed, short-pod mustard, black mustard, Italian thistle, yellow star thistle, milk thistle, fluellin

Justification for Use: The use of herbicides is justified due to staff's requirement to maintain safe access to the various critical infrastructure facilities on site and the Treatment Plant's regulatory requirement to keep levees free of vegetation for state inspectors year-round. The material used for the road tops and leaves are not conducive for typical mechanical landscaping maintenance equipment. Heavy use of mechanical tools may leave the road tops unleveled and increase safety risk to staff and critical infrastructure. Herbicides help staff manage the vast acreage of the WWTP and Wetlands in a cost-effective manner.

Strategies to Reduce Future Pesticide Applications: The primary strategy to reduce the need for future herbicide applications is to manage the emerging vegetation and preventing seed-set. Effective products and strategically timed applications will decrease the overall reproductive material present in the soil. Division staff have incorporated the use a new power rake to reduce emerging weeds and reduce the amount of herbicide used. However, depending on conditions such as precipitation levels, ground temperature, operational priorities, the need for site access or public safety may affect this trend. Additionally, Staff are exploring the feasibility of prescribed grazing & burning for these sites.

IPM History Utilized at Location(s): Staff primarily employ non-chemical control measures throughout the majority of the non-hardscaped areas within the sites. The sites receive a variety of mechanical methods where/when feasible including mowing, hand pulling, dragging/scraping, and weed eating to help control the weeds. The use of a power rake was explored in 2024 and has shown proven results around the wetlands and road tops. Previous use of herbicides has proven effective when applied strategically.

Tier 1 Remarks:

Areas where Tier 1 products are applied will be closed to the public during application and remain closed until the product has dried. Additionally, appropriate personal protective equipment will be used. Primary use of this Tier 1 product will be on critical infrastructure such as levees, pond road tops and edges to ensure site meets state regulatory compliance. Glyphosate is useful here as some of the targeted weeds reproduce from segmented material scattered from mechanical landscaping equipment, which in turn increase the vegetative pest infestation around these sites.

ERD Approval:

*John T.
McNerney*

Digitally signed by John T. McNerney
DN: cn=John T. McNerney, o=US,
ou=City of Davis, ou=Public Works U&O,
email=jmcnerney@cityofdavis.org
Reason: I am approving this document
Date: 2026.03.03 14:49:51 -08'00'

Date: 3/3/2026

City Manager Approval: Approval on File