

# Memorandum



CITY OF DALLAS

DATE January 31, 2020

TO Honorable Mayor and Members of the City Council

SUBJECT **Follow-up on January 8, 2020 Pesticide Procurement Agenda Item**

This memorandum provides requested follow-up information on Agenda Item 19-1798 from January 8, 2020 that was pulled for discussion, and then remanded to the Environment & Sustainability (ENVS) Committee for briefing. Executives and staff from the Office of Environmental Quality & Sustainability (OEQS), the Office of Procurement Services and the Park and Recreation (PKR) Department met on January 17, 2020 to review the agenda item. The decision was made to re-bid this contract using the information gleaned from implementing the pilot projects described herein to allow a reduction in the volumes of pesticides procured, and to add some of the newer, less toxic chemicals to the bid tabulation.

This memorandum provides information on the materials of concern, current integrated pest management practices, and the next steps.

The original procurement included over 201 bid items for a variety of pesticides and herbicides, application and wetting agents used by several departments, including Park and Recreation, to maintain City property. On this approximate \$4.7 million, three-year contract, there were nineteen (19) items for about \$306,313.64 that represented materials with potential public concern. These materials of concern are:

- **Glyphosate (AKA Roundup™, Rodeo, Killzall, Ranger Pro and others):** is a widely used herbicide that controls broadleaf weeds and grasses that has been registered as a pesticide in the United States since 1974. It is effective at managing invasive and noxious weeds, including some invasive plant species such as privet, that are difficult to manage using less toxic management methods. There is public concern about the potential human health risks associated with the use of this product. However, the EPA has conducted an independent evaluation of available data for this substance and found:
  - No risk to human health from current use of glyphosate when used in accordance with the manufacturer's instructions;
  - No indication that children are more sensitive to glyphosate;
  - No evidence that glyphosate causes cancer;
  - No evidence that glyphosate is an endocrine disruptor (as screened using the EPA Tier 1 screening protocol for assessing human health risk);
  - The EPA's ecological risk assessment identified potential risks to non-target plants, birds, and mammals;
  - The EPA recommends use within an integrated pest management program, with spray-drift protocols to avoid ecological impacts to non-target plants and wildlife;
  - Information source: <https://www.epa.gov/ingredients-used-pesticide-products/glyphosate>
- **Neonicotinoids (AKA Imidacloprid, Clothianidin, Thiamethoxam, Dinotefuran, Acetamiprid and others):** This family of pesticides, whose name literally means "nicotine-like," has been used commercially since the 1980s as a way of protecting commercial crops from insect damage, typically by coating the seeds. While these chemicals were not developed to address bees as a pest, bees that are exposed to neonicotinoids can experience [problems with their central nervous systems](#), often resulting in impaired memory,

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movement, and even death. Any major decline in honeybee numbers could have [severe implications for the human diet](#), since bees pollinate about a third of the world's crops. Concerns about this threat have translated into US action.

In May, 2019, the U.S. Environmental Protection Agency (EPA) announced a [ban on 12 neonicotinoid pesticides](#) from three agro-chemical companies: Syngenta, Valent, and Bayer. Neonicotinoids can [cause bees to become hyperactive](#) in the short term and can impair their motor function in the long term. High doses of thiamethoxam may also [make honeybees less tolerant](#) to a virus called Chronic Bee Paralysis, which can lead to their death. The EPA is in the process of updating the pollinator risk assessment and a proposed interim decision will be issued for public comment in early 2020. More information on this class of pesticides can be found at: <https://www.epa.gov/pollinator-protection/schedule-review-neonicotinoid-pesticides>.

This procurement process occurred prior to completion of several PKR Department pilot projects implemented to assess benefits of using an Integrated Pest Management (IPM) program. The PKR Department has an IPM program that has been in place since 2009 to reduce the risks to human health and the environment from using pesticides in our park and recreation facilities. IPM is an EPA-accepted method of managing pests at acceptable levels rather than complete pest elimination. The process begins by implementing structural methods, or preventative means such as planting pest-resistant plant varieties, using mulching mowers and hand pulling weeds, using appropriate biological controls, and less toxic sprays. Traditional synthetic pesticides such as glyphosate and neonicotinoids are used solely as a last resort. Examples of some of the PKR IPM Pilot projects are:

- **Turf Management Program:** Uses pre-emergent weed prevention and mechanical aeration to reduce weed pressure in parks, thus reducing post-emergent herbicides.
- **Proper Mowing Practices as outlined in PKR IPM and Operation Standards Manual:** Reduces weed pressure and provides organic material to naturally assist in building healthy soils reducing the need for herbicides
- **Organic Pilot Program:** 3-year research pilot at Celebration of Life Park, in the downtown area, for a full organic program. Pilot completed in December 2019 and data is being evaluating for SWOT and cost-analysis.
- **Glyphosate-free District Pilot:** Park Maintenance District 4 researched/used glyphosate alternatives in parks in 2019. PKR is analyzing results and costs for new best practice strategies and opportunities.
- **PKR Pest Management Committee:** Annually evaluates IPM, new products and operational changes for operational standards revisions, scientific and technological advancements, and improvement opportunities for PKR.

The proposed procurement for this Agenda item used the quantities and types of pesticides listed in the previous pesticide contract. In discussions with PKR and the Office of Procurement Services, the decision was made to re-bid this contract using the information gleaned from implementing these pilot projects to allow a reduction in the volumes of pesticides procured, and to add some of the newer, less toxic chemicals to the bid tabulation.

The PKR Department will brief this information to both the Park and Recreation Board and the ENVS Committee prior to re-posting on the City Council agenda later this spring. This group also recommended working together with other stakeholder departments towards expanding the PKR IPM to be used Citywide, and towards developing a Green Procurement Policy to guide this type of procurement in the future.

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Should you have questions or need additional information, please contact John Jenkins (214-670-4073) (IPM), Chhunny Chhean (214-670-3874), (Procurement), or James McGuire (214-670-1642), (pesticides).



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