

Yearly Operational Plan (YOP)

Town of Wellesley

2025

Updated: December 30, 2024



Prepared By:
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Yearly Operational Plan

The purpose of 333 CMR 11.00, Rights of Way Management, is to promote the implementation of integrated pest management techniques and to establish requirements and procedures necessary to minimize the risk of unreasonable adverse effects on human health and the environment associated with the use of herbicides to maintain streets, road, sidewalks, and paths. These regulations establish procedures that guarantee ample opportunity for public and municipal agency review and input on the right-of-way maintenance plans.

A yearly operational plan (YOP) must be submitted to the Department of Agricultural Resources every year with herbicides that are intended for use to maintain Rights-Of-Way. The YOP provides a detailed program for vegetation management for the year. A five-year Vegetation Management Plan (VMP) was approved by the Department and is available for review at the office of the Department of Public Works, Board of Health, Natural Resources Commission, and Select Board.

Upon receipt of this YOP, the Department publishes a notice in the Environmental Monitor. The Town must provide a copy of the proposed YOP and Environmental Monitor notice to the Board of Health, Natural Resources Commission, and the Select Board for the Town of Wellesley in which the herbicide treatment is proposed. The Department allows a 45-day comment period on the proposed YOP beginning with the publication of the notice and receipt of the YOP and Environmental Monitor notice by the Town.

Public notification of herbicide application to the streets (ROW) is made at least 21 days in advance of the treatment by a separate notice. Notice is made to the Department of Agricultural Resources, Board of Health, Select Board, and the Natural Resources Commission in the Town of Wellesley.

Any comments on this YOP should be made to the person designated herein as the person supervising the YOP or the person performing the treatment.

Municipal Yearly Operational Plan

This Yearly Operational Plan, approved by the Massachusetts Department of Agricultural Resources pursuant to Rights-of-Way Management Regulations (333 CMR 11.00), has been adopted by the following roadway vegetation management program in the Town of Wellesley. The undersigned hereby acknowledges that the conditions of the Yearly Operational Plan will be adopted and complied with.

Municipality: Town of Wellesley


Name: Cricket Vlass
Superintendent, Wellesley Park & Tree

Agency: Department of Public Works

Address: 30 Municipal Way, Wellesley MA. 02481

Telephone / Fax: Tel. 781-235-7600, ext.3330 / fax: 781-431-7569

Email: cvlass@wellesleyma.gov

Signature: 

Date: 1/22/25

Individual Supervising YOP

Name and Title: Cricket Vlass
Superintendent, Park & Tree

Department: Department of Public Works

Address: 30 Municipal Way, Wellesley MA. 02481

Telephone: Tel. 781-235-7600, ext.3330 / fax: 781-431-7569
E-mail: cvlass@wellesleyma.gov

Signature:



Municipal Department Performing Herbicide Treatment

The Park & Tree Division will perform the herbicide treatments. The following licensed applicators are employed by the town and certified by the Massachusetts Department of Agricultural Resources in the applicator category listed next to their names:

Certified Applicator & License Number:

Park & Tree Staff:

1. Susy Jordan, Horticultural Technician / License #34654 Category #36
2. Adam Wheeler, Athletic Fields Foreman / License # 28069, Category #37
3. Waldermar Caban, Groundskeeper Foreman / License # 31667 Core
4. Timothy Bania, General Foreman / License # 42021 Core
5. Benjamin Smith, Groundskeeper / License # 0049611 Core
6. Adam Granger, Groundskeeper / License # 0048036 Core
7. Mike Balboni, Groundskeeper / License # 0051450 Core
8. Daniel Smith, Groundskeeper / License # 0051494 Core
9. Michael Chapman, Groundskeeper / License # 0058333 Core

Company or Department: Wellesley Department of Public Works

Address: 30 Municipal Way, Wellesley, MA 02481
Telephone Number: 781-235-7600
Email: dpw@wellesleyma.gov

Yearly Operational Plan

The following information is provided as details of the YOP of the Town of Wellesley in accordance with the requirements of 333 CMR 11.06 (2):

Herbicide Proposed for Use in Calendar Year 2025 are:

Garlon* 4 Ultra / Corteva Agrisciences LLC, EPA Reg. # 62719-527. This product is a post-emergent, systemic herbicide with no soil residual activity. It gives broad-spectrum control of many woody brush, vines, and trees. It is formulated as a water-soluble liquid containing surfactant and no additional surfactant is needed. The application rate will be based on the type of application and targeted vegetation as prescribed by the manufacturer.

Garlon 3A/ Corteva Agrisciences LLC, EPA Reg.#62719-037. This product is a water-soluble liquid, mixes readily with water and nonionic surfactant to be applied as a foliar spray for the control or destruction of herbaceous and woody plants. Application rate will be based on the type of application and targeted vegetation as prescribed by manufacturer. Even though this product is listed as an aquatic herbicide, it will not be used on aquatic plants which are noted as sensitive areas located on the town's right of way vegetation management plan.

The Safety Data Sheet and the herbicide fact sheet for the above-listed herbicide is attached to and made part of this YOP. Also, a map of the Sensitive Area Restrictions is included.

Herbicide Application Techniques and Alternative Control Procedures

The herbicide will be applied in accordance with the instructions in the attached manufacturer's information. Alternative mechanical control procedures that are used at the designated "No Spray Zones" and used as a means of control will consist of using hand saws, pruners, weedwhackers, and chain saws to control vegetation. Other alternative controls will include routine street sweeping along with road crack repairs and roadside mowing.

Vegetation that we control by herbicide generally falls into two categories: low-growing herbaceous or vining species and tall-growing woody tree and shrub species. Only when vegetation that is less than twelve feet tall will be foliar treated. This technique has few limitations with the exception being reduced effectiveness on tall, high-density target vegetation, not expected under this YOP.

This product is mainly used by the department for control of invasive and public nuisance vegetation (vines) that are challenging to control manually. The foliar treatments will be applied to low-growing herbaceous or vining species by applying the herbicide using a manual pump sprayer. This equipment has a low pressure/volume below 60 psi. at the nozzle for application. The herbicide solution will be applied to lightly wet the target plant.

On rare occasions, trees and shrubs treatments will consist of cut stump treatments by mechanical cutting of target species using hand saws/ pruners or chain saws and immediately followed by herbicide applied by dauber on the freshly cut surface of the remaining stump. Cut stump treatments will be performed on tree/shrub species that are susceptible to re-sprouting growth.

The Town is responsible for ensuring that vegetation management activities are conducted in a professional, safe, and efficient manner, with special attention directed towards minimal environmental impact. The Town's personnel are qualified, licensed, and certified to apply herbicides and are considered applicators. "Qualified" means those applicators who have been trained to recognize and identify target and non-target vegetation and are knowledgeable in the safe and proper use of both mechanical and chemical vegetation management techniques. All applicators applying herbicides in Massachusetts must be licensed in the Commonwealth and must work under the on-site supervision of a certified applicator. All applicators will also follow all Label instructions regarding Personal Protective Equipment (PPE).

All equipment used for vegetation management programs must be maintained in good working condition and should be of adequate design and ability to produce the professional quality of work that the Town requires. The Town applicators will provide the appropriate application equipment, calibrated to control target vegetation effectively and legally as to the recommended label requirements.

The Town will comply with all applicable federal and state laws and regulations and the listed herbicide will only be applied in a safe and judicious manner. The Town will comply with but are not limited to OSHA, FIFRA, and DOT regulations, 333 CMR 1-15.00, Rights-of-Way Management, Chapter 132B, Chapter 85 of the Acts of 2000 (see Appendix IV), and 321 CMR 10.00 as managed by NHESP.

All Town applicators will at all-time exercise good judgment and common-sense during herbicide treatment activities and will immediately cancel operations if adverse conditions or other circumstances warrant.

Herbicides will NOT be applied during the following adverse weather conditions:

- A. During high wind velocity, per 333 CMR 11.03
- B. Foliar applications during periods of dense fog, or moderate to heavy rainfall
- C. Foliar applications of volatile herbicides during periods of high temperatures (90 plus degrees Fahrenheit) and low humidity
- D. Cut-stump applications when deep snow (i.e. 6" plus or ice frozen on stem or stump) prevents adequate coverage of target plants to facilitate acceptable control

The Town applicators must complete daily vegetation management reports that include:

- A. Name, date, and time of application and applicators license #
- B. Identification of site or work area
- C. Types of equipment and hours used, both mechanical and chemical
- D. Method of application and description of target vegetation
- E. Amount, concentration, product name of herbicide(s), adjuvants, and dilutants (EPA registration numbers must be on file)
- F. Weather conditions
- G. Notation of any unusual conditions or incidents, including public inquiries
- H. Recording and/or verification of sensitive areas on ROW maps

Identification of Target Vegetation

The target vegetation for this YOP will be Poison Ivy (*Toxicodendron radicans*), Black and Pale Swallowwort (*Cynanchum louiseae* and *Cynanchum rossicum*), and Tree of Heaven (*Ailanthus altissima*).

Vegetation management crews will exercise care to ensure that low-growing desirable vegetation and other non-target organisms are not unreasonably affected by the application of herbicides.

Public Nuisance Vegetation

Public nuisance vegetation includes vegetation that grows along public roads and paths that causes allergies or other health problems, which currently is Poison Ivy.

Vegetation Posing a Risk to Safety

The vegetation that hampers visibility or impedes movement along roads and trails is considered to pose a risk to public safety. M.G.L. Chapter 87, Section 5 authorizes tree wardens to have control of “all public shade trees, shrubs, and growths” along public ways. The primary control methods we use are mowing, weed whacking, or pruning plants that interfere with traffic and visibility. However, due to topography, rate of growth, or other physical characteristics certain plant species might be controlled by herbicides or to prevent regrowth. When vegetation is less than 12 feet tall it may be foliar treated.

Description of Methods Used to Identify Sensitive Areas

When mechanical and manual methods become impractical to control weeds, it is the intention of the Town of Wellesley to spray problem vegetation on traffic islands and roadsides.

Potential sites for treatment using Garlon 4 for Poison Ivy, Swallowwort and/or Tree of Heaven: (Items in bold only sprayed every 24 months)

- Sidewalks: Washington Street at Rte. 9 Bridge eastbound, Cedar Street & Rte.9 Bridge (east bound stairs), Perrin Park pine grove on right
- Traffic Islands: Great Plain Avenue perimeter of woods, **Washington & Dover**, Audubon Rd., Ordway Rd.
- Schools: **Fiske along school west side & PL hillside at Hastings Street**, Bates (swallowwort side of building in raised beds)/ Upham upper and lower fields, Sprague-entrance drive, **Paws Preschool fenced in area next to dealership**
- Parking Lots: Tailby, River St.

Potential sites for treatment using Garlon 3A for Poison Ivy and/ or Swallowwort:

- Sidewalks: River Street along sidewalk and guardrail, Great Plain Avenue guardrail (350 ft.), Cedar St at Barton Rd near Rte. 9, Kelly Memorial on Elmwood Avenue, Rice at Paine Street path near house #41, Harris Ave (dead-end)
- Trails: Fuller Brook Path (Cameron Street N to footbridge), Cochituate Aqueduct Trail (near Morses Pond) & Rte.9 westbound next to Dunkin Donuts
- Schools: Bates (Playground and back path)

Treatments will be done with applicators using a backpack sprayer or a dauber to selectively treat problem areas, which will be posted at the time of application. All the town applicators will be issued a map to identify all the town's Sensitive Areas and "No Spray Zones" as defined in 333 CMR 11.04 during the application process. See attached map that has been created by the town's G.I.S. Department.

Procedures and Locations for Handling, Mixing, and Loading of Herbicide Concentrates

The herbicide will be mixed in a controlled environment at the Wellesley Department of Public Works Facility, 30 Municipal Way, Wellesley, MA 02481.

Herbicides will be handled and applied only in accordance with the label instructions and with proper use of PPE also. The absorbent product "Speedi-Dri" will be available for use at the locations for any application spills. If there is a leak in the hose, the pump will be immediately shut off. The equipment used will be washed at the Department of Public Works Facility.

Although it is expected that all the mixed herbicide will be used, any remaining will be stored at the Park Garage in accordance with the manufacturer's instructions.

Emergency Contacts

- Herbicide label
- Herbicide MSDS sheet
- Herbicide Manufacturer
 - DOW (800) 992-5994
 - Dupont (800) 441-3637
 - Monsanto (314) 694-1000
 - Nufarm (800) 345-3330
- Massachusetts Pesticide Bureau (617) 626-1781
- Massachusetts Department of Environmental Protection (888)-304-1133
- Chem Trec (800) 424-9300
- Massachusetts Poison Control Center 24-Hour Hotline (800) 222-1222
- Department of Public Health – Environmental Toxicology Program (617) 624-5757
- Wellesley Fire Department (781)-235-1300
- Wellesley Health Department (781)-235-0135
- Wellesley Police Department (781)-235-1212
- National Pesticide Information Center (800)-858-7378
- National Animal Poison Control Center (888)-426-4435

Sensitive Area	No Spray Area	Limited Spray Area	Where Identified
Wetlands and Water Over Wetlands	Within 10 feet (unless provisions of 333 CMR 11.04(4)(c) are followed)	10 – 100 feet; 12 months must elapse between applications; Selective low pressure, using foliar techniques or basal or cut-stump applications	YOP Maps and identify on site
Certified Vernal Pool	Within 10 feet	10 feet to the outer boundary of any Certified Vernal Pool Habitat; 12 months must elapse between applications; Selective low pressure, using foliar techniques or basal or cut-stump applications	YOP Maps and identify on site
Public Ground Water Supply	Within 400 feet (Zone I)	Zone II or IWPA (Primary Recharge Area); 24 months must elapse between applications; Selective low pressure, using foliar techniques or basal or cut-stump applications	YOP Maps
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Sensitive Area	No Spray Area	Limited Spray Area	Where Identified
	Within 10 feet of any tributary or associated surface water body located outside of the Zone A	10 feet to the outer boundary of the Zone A; 24 months must elapse between applications; Selective low pressure, using foliar techniques or basal or cut-stump applications	
	Within 100 feet of any tributary or associated surface water body located within the Zone A of a Class A public surface water source		
	Within a lateral distance of 100 feet for 400 feet upstream of any Class B Drinking Water Intake	Within a lateral distance of between 100 - 200 feet for 400 feet upstream of intake; 24 months must elapse between applications; Selective low pressure, using foliar techniques or basal or cut-stump applications	
Private Water Supply	Within 50 feet	50 – 100 feet; 24 months must elapse between applications; Selective low pressure, using foliar techniques or basal or cut-stump applications	In YOP well list and identify on site
Surface Waters	Within 10 feet from mean annual high-water line	10 feet from the mean annual high water line and the outer boundary of the Riverfront Area; 12 months must elapse between applications; Selective low pressure, using foliar techniques or basal or cut-stump applications	YOP Maps and identify on site
Agricultural and Inhabited Areas	N/A	0 – 100 feet 12 months must elapse between application; Selective low pressure, using foliar techniques or basal or cut-stump applications.	Identify on site
State-listed Species Habitat	No application within habitat area except in accordance with a Yearly Operational Plan approved in writing by the Division of Fisheries and Wildlife		YOP Maps