Yearly Operational Plan (YOP)
Town of Wellesley
2018

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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 standards, 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 herbicides 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 Board of Selectmen.

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 Board of Selectmen for the Town of Wellesley, in which the proposed 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 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, Board of Selectmen 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:	Paul V. DePhillips, Horticultural Technician Parks & Trees
Agency:	Department of Public Works
Address:	30 Municipal Way, Wellesley MA. 02481
Telephone / Fax:	Tel. 781-235-7600 ext 3335/ fax: 781-431-7569
Email:	pdephillips@wellesleyma.gov
Signature:	
Date:	3/20/18
Wetland Determination Issued by:	Town of Wellesley G.I.S. Department

Individual Supervising YOP

Name and Title:	Paul V DePhillips, Horticultural Technician Parks & Trees
Department:	Department of Public Works
Address:	30 Municipal Way, Wellesley MA. 02481
Telephone:	Tel. 781-235-7600 ext 3335/ fax: 781-431-7569 E-mail: pdephillips@wellesleyma.gov
Signature:	

Municipal Department Performing Herbicide Treatment

A licensed herbicide applicator under contract to the Highway Division will perform the herbicide treatment. Applicators are certified by the Massachusetts Department of Agricultural Resources in the applicator category:

Certified Applicator & License Number:

Park & Tree Staff:

1. Michael T. Quinn, Assistant Superintendent / License # 25890 Category #36 / #37 / #40
2. Cricket Vlass, Landscape Planner / License # 4904, Category #36
3. Kent Warren, General Foreman / License # 23685
4. Susy Jordan, Horticultural Technician / License #34654
5. Adam Wheeler, Athletic Fields Foreman / License # 28069, Category #37
6. Ryan Donahue, Groundskeeper / License # 44630
7. Wally Caban, Groundskeeper Foreman / License # 31667
8. Timothy Bania, Groundskeeper / License # 42021
9. Jeremy Fawe, Lead Tree Climber / License # 32177, Category #36
10. Justin Monta, Tree Climber / License # 37446, Category #36
11. Paul DePhillips, Horticultural Technician, Foreman / License #47969, Category #40

Company or Department:	Wellesley Department of Public Works
Address:	20 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):

Herbicides Proposed

The herbicide(s) proposed for use in calendar year 2017 is:

1. **Aquaneat Aquatic Herbicide / Nu Farms Americas, EPA Reg. # 228-365.** 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 many herbaceous and woody plants. Application rate will be based on the type of application and targeted vegetation as prescribed by manufacture. 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.

2. **Garlon* 4 Ultra / Dow Agro Sciences, 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 or recommended. Application rate will be based on type of application and targeted vegetation as prescribed by manufacture. This product is mainly used by the department for control of cut stumps and applied by hand using a paint brush to apply product.

Complete information on this product is attached, including the Safety Data Sheets for the product. The herbicide fact sheet for the above listed herbicides are attached to and made part of this YOP.

Herbicide Application Techniques and Alternative Control Procedures

The herbicide(s) will be applied in accordance with the instructions in the attached manufacturer's information. Alternative control procedures, applicable at the designated "No Spray Zones" will consist of hand cutting, mowing, or selective trimming. Other alternative controls will include routine street sweeping along with crack and road repairs.

Low volume foliar treatments will be made using the equipment described below. The herbicide solution is applied to lightly wet the target plant. This technique has few limitations with the exception being reduced effectiveness on tall, high-density target vegetation, not expected at all under this YOP.

Cut stump treatments consist of mechanical cutting of target species using chain saws immediately followed by herbicide treatment applied with a squirt bottle, a hand pump sprayer, or painted on the freshly cut surface of the stump. The herbicide is limited to freshly cut surface of the remaining stump. Cut stump treatments will general be performed to tree species that are susceptible to sprouting stump growth.

A foliar treatment using ready to use procedures, squirt bottles or manual pump application equipment. This treatment will use low pressure, below 60 psi. at the nozzle, for application. The herbicide solution is applied to lightly wet the target plant.
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. Because the Town recognizes the vast variety and performance of herbicide application equipment, dictating how that equipment should be calibrated to deliver precise amounts of herbicide to effectively control a host of vegetation conditions is literally impossible. Therefore, the Town insists that the contractor provide the most appropriate application equipment, calibrated to effectively and legally control target vegetation.

Both the Contractor and the Town are responsible to insure that vegetation management activities are conducted in a professional, safe, efficient manner, with special attention directed towards minimal environmental impact. The contractor is qualified, licensed and certified to apply herbicides. "Qualified" means those personnel 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 personnel applying herbicides in Massachusetts must be licensed in the Commonwealth and must work under the on-site supervision of a certified applicator. All contract personnel will also follow all Label instructions regarding Personal Protective Equipment (PPE).

The Town will rely on the independent contractor listed in the YOP for vegetation management applications and requires, in a contractual agreement, that contractors comply with all applicable federal and state laws and regulations. These include, but are not limited to, applicable 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.

Herbicides will only be applied in a safe and judicious manner, in compliance with all-applicable State and Federal pesticide regulations.

Applicators will at all-time exercise good judgment and common sense during herbicide treatment activities, and will immediately cease 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 contractors or a representative of the Town must complete daily vegetation management reports that include:

A. Date, name and address of vegetation management contractor(s)
B. Identification of site or work area
C. List of crew members
D. Type of equipment and hours used, both mechanical and chemical
E. Method of application and description of target vegetation
F. Amount, concentration, product name of herbicide(s), adjuvants, and dilutants (EPA registration numbers must be on file)
G. Weather conditions
H. Notation of any unusual conditions or incidents, including public inquiries
I. Recording and/or verification of sensitive areas on ROW maps

Identification of Target Vegetation

The target vegetation for this YOP will be poison ivy and vegetation growing between curbing and sidewalks throughout the town.

Vegetation management crews will exercise care to insure 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 cause allergic or other problems. The overwhelming majority of plant material to be controlled is poison ivy.

Nuisance Grass

In most instances grass is a desirable plant species. Along the shoulders of roads, grass growth is encouraged and maintained through mechanical mowing. However, in some instances, grasses may grow in areas where control is limited to the use of herbicides. These areas include cracks in asphalt, along guardrails, and between sidewalks and adjacent curbing. In these instances, grass will become target vegetation.

Vegetation Posing a Risk to Safety

The vegetation that hampers visibility or impedes movement along roads and trails is considered posing 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. Mowing and/or hand cutting shall control most plants that interfere with traffic and visibility. However, due to topography, rate of growth, or physical characteristics, certain plant species are best controlled by herbicides.

Vegetation best controlled by herbicides fall into two separate categories: low growing species and tall growing species. Tall growing species include mostly trees. Hardwood and softwood species that are capable of interfering with pedestrian and traffic safety are either selectively pruned, ground cut, occasionally conditions warrant the treatment of the cut stumps with an herbicide to prevent resprouting. When vegetation is less than 12 feet tall it may be foliar treated

Description of Methods Used to Identify Sensitive Areas

When mechanical and hand weeding become impractical to control weeds, it is the intention of the Town Wellesley to spray problem vegetation in traffic islands, roadsides and along the curb lines of sidewalks.

Identified problem traffic islands:

Abbott Rd. @ Forest St.	Abbott Rd. @ Inverness
Benton Rd. @ Ingraham Rd.	Beverly Rd. @ Chesterton Rd.
Fox hill Rd. @ Sagamore Rd.,	Great Plain Avenue
Oakland St. @ Hunnewell St.	Oakland St. @ Brookside Rd.
Standish Rd. @ Priscilla Rd.	

Identified problems areas for Poison Ivy:

Brookside Road	Cartwright Road,	Cochituate Aqueduct Trail,
Glen Road	Harris Avenue	Kenilworth Circle
Oakland Street	River Street.	

Identified problems areas for sidewalk curb lines:

Central Street	Church Street	Crest Road.	Grove Street
Linden Street	Washington Street	Weston Road	

All treatments will be done with applicators using a backpack sprayer to selectively treat problem areas, which will be posted after application. All the town applicators will be issued a map to identifying 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 the controlled environment at the Wellesley Department of Public Works Facility, 30 Municipal Way, Wellesley. Although it is expected that all the mixed herbicide will be used, any remaining will be stored at the Highway Garage in accordance with manufacturer's instructions. The absorbent product "Speedi-Dri" will be available for use at the locations of application. If there is a leak in the hose, the pump

will be immediately shutoff. Equipment used will be washed at the Department of Public Works Facility.

Herbicides will be handled and applied only in accordance with the label instructions. Contractors will strictly adhere to all mandated safety precautions directed towards the public, the applicator and the environment.

Emergency Contacts

- 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
- Massachusetts Poison Control Center 24-Hour Hotline (800) 222-1222
- Department of Public Health
  Bureau of Environmental Health Assessment (617) 624-5757

- Wellesley Public Works (781)-235-7600
- Wellesley Fire Department (781)-235-1300
- Wellesley Health Department (781)-235-0135
- Wellesley Police Department (781)-235-1212
- Chem Trec (800) 424-9300

- National Pesticide Information Center (800)-858-7378
- National Animal Poison Control Center (888)-426-4435
- EPA Pesticide Hotline (800)-858-7378

Sensitive Area Restriction Guide (333 CMR 11.04)

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;	YOP Maps and identify on site

Sensitive Area	No Spray Area	Limited Spray Area	Where Identified
		Selective low pressure, using foliar techniques or basal or cut-stump applications	
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
Public Surface Water Supply	Within 100 feet of any Class A public surface water source	100 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	YOP Maps
	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;	YOP Maps and identify on site

Sensitive Area	No Spray Area	Limited Spray Area	Where Identified
		12 months must elapse between applications; Selective low pressure, using foliar techniques or basal or cut-stump applications	
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