


**MEMORANDUM**

September 13, 2018

TO: Planning, Housing and Economic Development Committee  
Transportation, Infrastructure, Energy and Environment and Committee

FROM: Josh Hamlin, Legislative Attorney 

SUBJECT: Pesticide regulation and Pesticide Use on County Property and in County Parks

PURPOSE: **Briefing:** Receive information on pesticide use from representatives of the Executive branch and the Parks Department

Expected Attendees:

- Stan Edwards, Chief, Division of Environmental Policy and Compliance, Department of Environmental Protection (DEP)
- Mary Travaglini, Program Manager, Organic Lawn and Landscaping Program, DEP
- Isami C. Ayala-Collazo, Deputy Director/Chief Operating Officer Department of General Services
- Mike Riley, Director of Parks, M-NCPPC Montgomery Parks
- Bill Tyler, Division Chief, Southern Parks, M-NCPPC Montgomery Parks
- Doug Ludwig, Division Chief, Northern Parks, M-NCPPC Montgomery Parks

The focus of this briefing is on pesticide use by County agencies and the Parks Department since the enactment of Bill 52-14, Pesticides – Notice Requirements – Cosmetic Pesticide Use Restrictions. Representatives from the Department of Environmental Protection (DEP), the Department of General Services (DGS), and the Parks Department will be present to discuss their activities since the Bill's enactment.

## Background

County Code Chapter 33B, Pesticides, regulates certain aspects of pesticide<sup>1</sup> use and storage in the County. On October 6, 2015, the Council enacted Bill 52-14, Pesticides – Notice Requirements – Cosmetic Pesticide Use Restrictions. Bill 52-14 amended Chapter 33B to generally restrict the use of certain pesticides on public and private lawns and areas generally frequented by children, such as playgrounds and recreation areas. Bill 52-14 also included several provisions related to pesticide use reduction in County Parks. The provisions affecting County property and Parks took effect July 1, 2016. The provisions affecting private property were scheduled to take effect January 1, 2018.

In November 2016, several plaintiffs brought a legal challenge to the provisions of Bill 52-14 that pertained to pesticide use on private property. In August 2017, The Circuit Court for Montgomery County, in *Complete Lawn Care, Inc., et al. v. Montgomery County*, invalidated the private property pesticide use restrictions of Bill 52-14, finding that County regulation of the use of pesticides on private property is preempted by State law. The County appealed the Circuit Court decision to the Maryland Court of Special Appeals, which heard oral arguments in the appeal on September 11, 2018. While the Court is not required to issue an opinion within a specific period, a ruling may come within 60-90 days.

The decision by the Court of Special Appeals is not likely to be the final resolution of the matter, however. The Maryland Court of Appeals could accept an appeal from the losing party in that case, which would result in another round of legal arguments on the issue. It is also possible that the Maryland General Assembly could resolve the issue, one way or the other, in its 2019 legislative session. Finally, action at the federal level could also make the resolution of the matter at the State level moot: Section 9101 of the 2018 House farm bill<sup>2</sup> would allow the federal government to preempt local governments from setting their own standards for pesticides.

Bill 52-14's general prohibition on pesticide use on County-owned property was not the subject of the ongoing legal challenge and therefore took effect, as is Article 4 of Chapter 33B of Code (see ©1-4), which pertains specifically to County property and parks. Article 4 generally prohibits the use of neonicotinoid pesticides on County property and requires the Department of Environmental Protection to adopt an integrated pest management program for all County-owned property. It also requires the County Parks Department, subject to appropriation, to take steps to limit the use of pesticides in County parks, provide public notice of pesticide usage, and report semi-annually to the Executive and Council on pesticide usage in County parks.

As noted above, the purpose of this briefing is to allow Committee members to hear from the representatives of the Executive branch and the Parks Department on pesticide use on County property and in County Parks. Descriptions of the roles of the involved departments in the

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<sup>1</sup> Under § 33B-2, *Pesticide* means a substance or mixture of substances intended or used to: (1) prevent, destroy, repel, or mitigate any pest; (2) be used as a plant regulator, defoliant, or desiccant; or (3) be used as a spray adjuvant, such as a wetting agent or adhesive. However, pesticide does not include an antimicrobial agent, such as a disinfectant, sanitizer, or deodorizer, used for cleaning that is not considered a pesticide under any federal or state law or regulation.

<sup>2</sup> <https://www.congress.gov/bills/115th-congress/house-bill/2>

implementation and enforcement of the County's pesticide law, with a focus on the provisions added by Bill 52-14, follows.

### **Enforcement, Outreach, and Education (DEP)**

DEP is charged with enforcing the County's pesticide law, and is the Executive branch department that is implementing the outreach and education campaign required under Bill 52-14. Because the private property pesticide use restrictions in Bill 52-14 have not yet taken effect due to the legal challenge, DEP's enforcement activity is largely the same as it was prior to Bill 52-14's enactment. Similarly, because the focus of the outreach and education campaign was anticipated to be related to the implementation of use restrictions on private property, DEP's actions in this regard have been somewhat limited. DEP does offer several resources on its lawn care website.<sup>3</sup> See (©5-7) for sample pages from the website.

County Code §33B-13, added by Bill 52-14, requires DEP to adopt an integrated pest management (IPM)<sup>4</sup> program for County-owned property. The County first instituted IPM practices in 1990, but a new program has not been adopted since Bill 52-14's enactment. DEP has indicated that it is waiting for final resolution of the legal challenge to Bill 52-14 before moving forward on changes to the existing practices.

### **Pesticide use on County property (DGS)**

DGS, through its Division of Facilities Management, oversees the building operations of County-owned and County-leased facilities. Pest control and grounds keeping are among the services provided by the Division and these services are provided by contractors. County contracts incorporate compliance requirements with the current law and regulations regarding pesticide use. DGS has four contracts for grounds keeping services, all based on the same solicitation, differing only in the geographical area serviced by each contractor. An example of the relevant provision of the contracts is at ©8. DGS also has one contract for pest control services, which includes an Integrated Pest Management Plan (see ©9-10).

The County's Department of Transportation (DOT) maintains certain rights-of-way in the County. DOT has indicated to Council staff that the Department ceased the use of pesticides in rights-of-way it maintains in approximately 2011, and has not resumed the use of pesticides since that time.

### **Pesticide use in County Parks (Montgomery Parks)**

The County Parks Department is subject to a number of requirements under Bill 52-14's amendments to Chapter 33B. These new requirements include a "pesticide-free" parks program

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<sup>3</sup> <https://www.montgomerycountymd.gov/lawns/>

<sup>4</sup> Integrated Pest Management is defined by the U.S. Environmental Protection Agency as: "The use of pest and environmental information in conjunction with available pest control technologies to prevent unacceptable levels of pest damage by the most economical means and with the least possible hazard to persons, property and the environment."

in which certain parks are maintained without the use of EPA-registered pesticides, a program for reducing pesticide use on playing fields, pesticide usage protocols restricting pesticide use near waterbodies and providing public notice prior to the application of EPA-registered pesticides, and a semi-annual reporting requirement on pesticide use and the pesticide-free parks program. The most recent semi-annual report, covering the period from January 1 – June 30, 2018, is attached at ©11-19. The Parks Department’s website includes a great deal of information on its pesticide reduction and integrated pest management programs, as well as notice of scheduled pesticide applications.<sup>5</sup>

*General pesticide use reduction:*

In its efforts to reduce pesticide use, the Parks Department has for some time utilized IPM, which includes alternative methods of managing weeds, insects, and other pest issues to minimize the use of pesticides. Some of these alternative weed-management methods include hand-pulling and mechanical removal of weeds, additional string trimming, propane flame weeding and application of less-toxic “listed pesticides” identified in County Code 33B.<sup>6</sup> In addition, all playgrounds in County parks are pesticide-free.

*Pesticide-free parks:*

In accordance with Chapter 33B, Montgomery Parks has implemented its pesticide-free parks program (see ©12), in which it manages certain parks in different regions of the County without the use of pesticides. At the present time, the following parks are pesticide free parks:

- Big Pines Local Park
- Cedar Creek Local Park
- Clarksburg Village Local Park North
- Dickerson Local Park
- General Getty Neighborhood Park
- Kemp Mill Estates Local Park
- Norbeck Meadows Neighborhood Park
- Norwood Local Park
- Spencerville Local Park
- Stonehedge Local Park

*Playing fields pilot:*

The Parks Department is working with an organic turf management expert, Osborne Organics, LLC, to conduct a pilot program on five athletic fields (see ©14). Through the program, the Parks Department is comparing five conventionally managed fields with five fields managed with organic methods and listed pesticides. Some of the criteria being considered in field selection for the pilot program include:

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<sup>5</sup> <https://www.montgomeryparks.org/about/parks/pesticides/>

<sup>6</sup> A “listed pesticide” under Chapter 33B means: (1) a pesticide the active ingredients of which are recommended by the National Organic Standards Board (NOSB) pursuant to 7 U.S.C. § 6518, as amended, and published as the National List at 7 C.F.R. §§ 205.601 and 205.602; or (2) a pesticide designated a “minimum risk pesticide” under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) § 25(b) and listed in 40 C.F.R. § 152.25(f).

- Level of maintenance – local park athletic fields (non-irrigated);
- cool season turf type;
- mowing height required for use of facility and level of play; and
- the number of field use hours based on permitted hours.

The athletic fields pilot program will allow the evaluation of organic methods and certain listed pesticides in turf maintenance, and will help the Parks Department determine the feasibility of managing all athletic fields with only listed pesticides. Information gathered from the pilot program should inform the plan for transitioning all playing fields to maintenance with only listed pesticides by 2020. This plan is due to be submitted to the Council by September 2019.

*Pesticide usage protocols:*

Bill 52-14 required the Parks Department to develop usage protocols which limit the use of registered pesticides other than listed pesticides to the maximum extent possible and generally do not permit the use of registered pesticides other than listed pesticides within 25 feet of a waterbody. The protocols also must, except where immediate application is necessary to protect human health or prevent significant economic damage, include the posting of notice of each planned application of a registered pesticide other than a listed pesticide on the appropriate Parks Department website and in the area where the pesticide is to be applied, from at least 48 hours before application through at least 48 hours after application. Finally, the protocols must provide for pesticide application information required under paragraph (c)(2) to be made available to the public in real-time and in a manner consistent with the Montgomery County Open Data Act. The protocols are discussed in the most recent semi-annual report (see ©15), and notice of scheduled, ongoing, and recent pesticide applications are on the Montgomery Parks Pesticide Reduction and Integrated Pest Management Program webpage (see footnote 5).

*Semi-annual reports:*

Bill 52-14 required the Parks Department to submit semi-annual reports on pesticide use and the implementation of the pesticide-free parks program. These reports are all available on the Montgomery Parks Pesticide Reduction and Integrated Pest Management Program webpage (see footnote 5).

*Attachments:*

- County Code Chapter 33B, Article 4 ©1
- DEP website sample pages ©5
- DGS contract provision re: “Chemical Weed Control” ©8
- DGS contract provision re: Integrated Pest Management ©9
- Montgomery Parks Pesticide Use Report Jan-June, 2018 ©11

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## Montgomery County Code

**ARTICLE 4. COUNTY PROPERTY AND PARKS.**

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**Sec. 33B-12. Neonicotinoid pesticides on County-owned property.**

(a) *Prohibition.* Except as provided in subsection (b), a County employee or County contractor must not use a neonicotinoid pesticide on property owned by the County.

(b) *Exceptions.*

(1) A County employee or County contractor may use a neonicotinoid pesticide on County-owned property to control pests while engaged in agriculture.

(2) This Section does not apply to County-owned property that the Parks Department operates or manages for the County. (2015 L.M.C., ch. 46, § 1.)

**Editor's note**—2015 L.M.C., ch. 46, § 3, states as follows: The prohibitions and requirements related to the use of registered pesticides and neonicotinoids on County-owned property and in County parks contained in Sections 33B-10, 33B-12, 33B-13 and 33B-14 take effect on July 1, 2016.

**Sec. 33B-13. Integrated pest management on County property.**

(a) *Adoption of program.* The Department must adopt an integrated pest management program for all property owned by the County.

(b) *Requirements.* Any program adopted under subsection (a) must require:

- (1) monitoring the turf or landscape as appropriate;
- (2) accurate record-keeping documenting any potential pest problem;
- (3) evaluating the site for any injury caused by a pest and determining the appropriate treatment;
- (4) using a treatment that is the least damaging to the general environment and best preserves the natural ecosystem;
- (5) using a treatment that will be the most likely to produce long-term reductions in pest control requirements and is operationally feasible and cost effective in the short and long term;
- (6) using a treatment that minimizes negative impacts to non-target organisms;
- (7) using a treatment that is the least disruptive of natural controls;
- (8) using a treatment that is the least hazardous to human health; and

(9) exhausting the list of all non-chemical methods and listed pesticides for the targeted pest before using any other treatments.

(c) The Department must provide training in integrated pest management for each employee who is responsible for pest management. (2015 L.M.C., ch. 46, § 1.)

**Editor's note**—2015 L.M.C., ch. 46, § 3, states as follows: The prohibitions and requirements related to the use of registered pesticides and neonicotinoids on County-owned property and in County parks contained in Sections 33B-10, 33B-12, 33B-13 and 33B-14 take effect on July 1, 2016.

### Sec. 33B-14. County parks.

(a) *Policy.* It is the policy of Montgomery County to promote environmentally sensitive landscape pest management in its parks by phasing out the use of the most hazardous pesticides and reducing overall pesticide use while preserving landscape assets, maintaining functionality of playing fields, and protecting the health and safety of the public and County employees. To carry out this policy, the Parks Department must, subject to appropriation, implement the provisions of this Section.

(b) *Pesticide-free parks.* The Parks Department must implement a pesticide-free parks program that, at a minimum, consists of:

(1) the maintenance of certain parks entirely without the use of registered pesticides other than listed pesticides;

(2) a program for reducing the use of registered pesticides other than listed pesticides on playing fields that includes:

(A) a pilot program consisting of at least five playing fields maintained without the use of registered pesticides other than listed pesticides that:

(i) is conducted in consultation with an expert in organic turf management, with experience in successful transitions from conventional to organic turf management; and

(ii) includes a publicly available plan describing the practices and procedures used;

(B) maintenance of all other playing fields using an integrated pest management program; and

(C) a plan submitted to the Council by September 2019 for transitioning to maintenance of all playing fields without the use of registered pesticides other than listed pesticides by 2020; and

(3) a public communication campaign to inform the public of the existence and progress of the pesticide-free parks program.

(c) *Pesticide usage protocols.* The Parks Department must develop usage protocols which limit the use of registered pesticides other than listed pesticides to the maximum extent possible and, subject to the exceptions in subsection (d):

(1) do not permit the use of registered pesticides other than listed pesticides within 25 feet of a waterbody;

(2) except where immediate application is necessary to protect human health or prevent significant economic damage, include the posting of notice of each planned application of a registered pesticide other than a listed pesticide on the appropriate Parks Department website and in the area where the pesticide is to be applied, from at least 48 hours before application through at least 48 hours after application, that includes:

- (A) the common name of the pesticide;
- (B) the location of the application;
- (C) the planned date and time of the application; and
- (D) the reason for the use of the pesticide; and

(3) provide for pesticide application information required under paragraph (c)(2) to be made available to the public in real-time and in a manner consistent with the Montgomery County Open Data Act, Chapter 2, Article XIV of this Code.

(d) *Exceptions.* The pesticide-free parks program and pesticide usage protocols may generally permit the application of a registered pesticide to:

- (1) control weeds as defined in Chapter 58, Weeds;
- (2) control invasive species listed in a regulation adopted under subsection 33B-5(c);
- (3) control disease vectors;
- (4) control biting or stinging insects or stinging plants;
- (5) control organisms that threaten the health of trees or shrubs;
- (6) remove weeds as part of the renovation of a playing field;
- (7) control pests while engaged in agriculture; and
- (8) otherwise protect human health or prevent significant economic damage.

(e) *Reporting requirement.* The Parks Department must submit semi-annual reports to the County Executive and County Council on or before January 15 and July 15 of each year that:

(1) detail registered pesticide usage, other than listed pesticide usage, in County parks during the preceding year, including:

- (A) the common name of each registered pesticide used;
- (B) the location of each application;
- (C) the date and time of each application; and
- (D) the reason for each use of a registered pesticide;

(2) describe the status of the pesticide-free parks program implemented under this Section; and



(3) are available to the public in a manner consistent with the Montgomery County Open Data Act, Chapter 2, Article XIV of this Code. (2015 L.M.C., ch. 46, § 1.)

**Editor's note**—2015 L.M.C., ch. 46, § 3, states as follows: The prohibitions and requirements related to the use of registered pesticides and neonicotinoids on County-owned property and in County parks contained in Sections 33B-10, 33B-12, 33B-13 and 33B-14 take effect on July 1, 2016.

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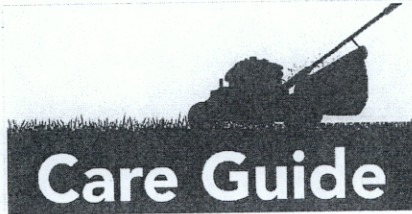
## Notes

[Note] **\*Editor's note**-Chapter 33B, "Pesticides," was held unconstitutional due to conflict with Federal legislation (Federal Insecticide, Fungicide and Rodenticide Act, 'FIFRA,' 7 USC 136 et seq.) which the court ruled preempted local legislation. Maryland Pest Control Ass'n. v. Montgomery County, Maryland, 646 F. Supp. 109 (D.Md., 1986), aff'd on appeal, 822 F.2d 55 (1987). Based on a later Supreme Court decision, Wisconsin Public Intervenor v. Mortier, 115 L.Ed.2d 532, 111 S.Ct. 2476 (1991), the ruling of the District Court in Civil No. JFM-86- 1688 was rescinded on April 3, 1992, and is no longer in effect.

Amendments in 1987 to State law (MD. AGRIC. CODE ANN., § 5-201, et seq.) enacted provisions similar to those in County law. State legislation introduced in 1993 (SB 429) which would have restricted the right of local jurisdictions to regulate application of pesticides did not pass, leaving ch. 33B of the Montgomery County Code still in effect.

We each have our own lawn care style — some are protective (mow, mow, mow!), while others take a more laid back approach. No matter your style, there are ways to reduce the environmental impact of your lawn care practices.

This new website provides the tools for how to make the transition to organic lawn care smooth for all lawn care styles and people. If you have questions or comments about lawn care or this site, please do not hesitate to email the lawn care program at [askdep@montgomerycountymd.gov](mailto:askdep@montgomerycountymd.gov).



## Care Guide

Tips & Best Practices

Making the Switch to Organic

Is your lawn organic? Let us know!



## Intro to Organic Lawns

Why Switch to Organic Lawn Care?

Alternatives to Lawns



## Laws & Regulations

County Pesticide Law

State Fertilizer Law



## Shop Smart

Hiring a Lawn Care Company

Your Organic Shopping List

### Join Our Mailing List

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Contact DEP

Send us an Email

### The Lawn Blog:



Getting rid of your lawn? Follow our plan for a beautiful garden AND happy neighbors

- By Mary Travaglini, July 19, 2018



Meet the Magical Glomalin

- By Mary Travaglini, June 4, 2018

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 Accessibility  
 Language Translations  
 Social Media  
 County Code

### Translation

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## Organic Lawn Care Tips

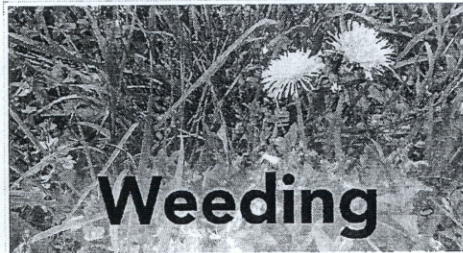
Organic lawn care isn't difficult -- in fact, it can save time and money, while protecting you, your family, your pets and the environment. Search below through our list of tips on the many ways to care for your lawn without chemical fertilizers and weed killers.



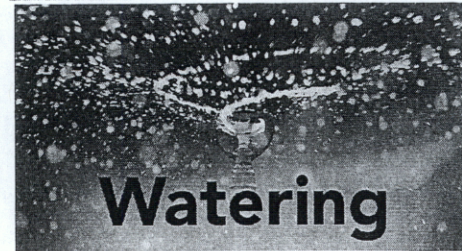
Mowing Tips



Overseeding Tips



Weeding Tips



Watering Tips



Soil Testing Tips



Nutrients + Amendments Tips



Aeration Tips



Pest Control Tips

# Register Your Organic Lawn Program

[www.montgomerycountymd.gov/lawns](http://www.montgomerycountymd.gov/lawns)

## Enroll Your Lawn in the Organic Lawn Program!

Do you have an organic lawn that you are proud of? Enroll your Organic Lawn, and inspire your neighbors!

We're looking for actively maintained lawns that are cared for without the use of synthetic fertilizers or pesticides. Your lawn can help demonstrate to your neighbors that a lush and beautiful green lawn can be achieved organically.

Enrolling in Montgomery County's Organic Lawn program is easy! You must meet the 3 required criteria, as well as, 4 of the 10 additional criteria. If you meet these minimum standards then you'll be enrolled in our program!

As a thank you for going organic, we'll mail you a lawn sign, certificate, and two pairs of gardening gloves - all for free!

Lawns should be primarily turfgrass or other mowable perennial plants, like clover, violets, and even dandelions.



### Organic Lawn Care —

Tips & Best Practices >

Why Switch to Organic? >

Making the Switch >

Hiring a Lawn Care Company >

Alternatives to Lawns >

Your Shopping List >

County Law >

State Fertilizer Law >

### Explore DEP —

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## Criteria to be met

The baseline for enrolling is that your lawn is covered in 75% turf grasses or mowable perennial plants, and that no synthetic fertilizers or pesticides are used. Meet four additional criteria, and your lawn gets our organic stamp of approval!

### Required Criteria (All of these conditions must be met to enroll):

1. You do not use synthetic pesticides on the lawn;
2. You do not use synthetic fertilizers on the lawn; and
3. Grass clippings are left on lawn after mowing.

### Must Complete at least 4 Actions from this List:

- Your lawn is kept more than 3" high. (Lower height acceptable for bluegrass and zoysia)
- You use compost or compost tea that was made within 25 miles of the lawn.
- Your leaves and extra grass clippings from your property are composted on the lawn or property. (They should not be disposed of off-site.)
- You use a solar, electric, or hand powered mower for routine mowing.
- Organic fertilizers used on the lawn are only sourced from plant materials (no animal by-products or man-made products).
- You don't use any man-made/processed fertilizers (with the exception of compost products, mycorrhizae, and other biological inoculants).
- You test your soil at least once every three years.
- You don't water, or you limit watering to between 5am and 9am, and grass is allowed dormancy during dry spells. If present, irrigation systems do not cause runoff from the lawn to other areas.
- Weeds are hand pulled (no pesticides/biocides, with the exception of GMO-free corn gluten).
- Your lawn is maintained by a Montgomery County Certified Green Business .

- branches, epicormic branches, and suckers will be removed. All trimmings generated by the Contractor's work will be removed the same day from the site and disposed of at a legal disposal site by the Contractor.
3. Fitness trails tracks and driving courses will be patrolled to assure they are free of downed trees, and overhanging and obstructing foliage/branches. Any such items will be trimmed and removed.
  4. Perennial beds – Herbaceous perennials will be pruned to remove dead vegetation for appearances by November 30th; some perennials with winter interest should remain unpruned until after March 1. No perennial and clumping grasses shall be pruned below 24 inches until after March 1.

n. Chemical Weed Control

1. Chemical weed control will be subject to prior Contract Administrator's approval and will only be authorized for those situations permitted under Montgomery County Code Chapter 33B and associated regulations. The Contractor will request authorization from the Contract Administrator or its designee to apply chemical weed control at which point the contractor must substantiate the reasons that support the need for the use of this method and will provide specific details as to the pesticide type, quantity to be used and proposed application dates. All work performed must be in compliance with Montgomery County Code Chapter 33B and associated regulations. The Contractor will send the Contract Administrator or its designee a written notification within forty-eight (48) hours of the application including as a minimum the following information: name of the facility, asset number, date of the application, registered and listed pesticide used, quantity applied, name of the technician who performed the application.
2. This service will be quoted on a per unit, per Group basis. A minimum service request of 400 sq. ft. is established per service event. The Contractor will detail on its invoice the area covered at the contract per unit price for the Group being serviced.

o. Irrigation

1. Irrigation will be performed at the direction of the Contract Administrator or his/her designee, on an as needed basis during periods of drought, or when new plants are planted and need to be watered until plants mature. The Contractor will be allowed to use water from the building to water flower beds and building landscaping. Where building water is not feasible for irrigation a water truck is to be used.
2. This service will be quoted on a per unit, per Group basis. A minimum service request of 400 sq. ft. is established per service event. The Contractor will detail on its invoice the area covered at the contract per unit price for the Group being serviced.

p. Mulching

1. Mulching must be performed once a year and/or as directed by the Contract Administrator or his/her designee. Prior to placing mulch, Contractor shall remove all weeds, leaves, trash and debris from areas to be mulched and maintain a clean, crisp distinctive edge along plant beds and around trees or other mulched areas. Areas that were previously mulched will be re-mulched with a minimum of two (2) inches of fresh, undyed, double shredded hardwood bark mulch; total mulch including old and new mulch should never exceed three inches.
2. This service will be quoted on a per unit, per Group basis. A minimum service request of 400 sq. ft. is established per service event. The Contractor will detail on its invoice the area covered at the contract per unit price for the Group being serviced.

q. Lawn Revitalization

To be performed in September, only at facilities designated by the Contract Administrator or his/her designee. The Contract Administrator or his/her designee will provide a list of designated facilities to the Contractor thirty (30) days in advance of performing any revitalization services. Prior to aeration, turf area will be mowed to a height of not less than one and one half inches and no greater than two (2) inches. All clippings will be bagged as cut and disposed of in accordance with Section D.3.b. Turf area will not be mowed for fifteen (15) days following completion of lawn revitalization.

**ATTACHMENT M****Department of General Services****Division of Facilities Management  
Integrated Pest Management Plan to be used on property maintained  
by the Division of Facilities Management**

The Division of Facilities Management (DFM) intends to establish a landscape pest control program that is responsible in relation to the environment and human society. Thus, DFM recognizes that Integrated Pest Management (IPM) provides a safer method of pest management that minimizes the use of pesticides in the landscape.

For this reason, DFM shall adopt IPM as its pest management strategy. DFM will work toward implementing all proper management strategies to deter pest problems from occurring and strive to minimize the use of chemical pesticides whenever a more environmentally sensitive method of control is available.

DFM therefore adopts the principles of landscape IPM as follows:

- I. First DFM will take all reasonable measures to select and maintain healthy plants. This will be accomplished as follows:
  - A. Selecting plants that are pest resistant. Native plants are preferred.
  - B. Choosing plants that will do well in locations they are selected for, considering the site, soil conditions climate, exposure, amount of sun or shade, and other pertinent factors.
  - C. Preparing the site correctly and installing plants properly.
- II. The maintenance program will also be designed so as to limit exposure of the landscape to pest problems. The program will include:
  - A. Practicing appropriate and correct cultural methods of plant maintenance, such as proper pruning, raking, irrigating, mulching, destruction of heavily infected plants, fertilization, composting, etc.
  - B. Removing plants with recurring pest problems and replacing them using Part I as a guide for plant selection.
  - C. Identifying natural enemies of pests and maximizing their use to reduce pests.
- III. DFM will accurately identify pest induced problems in the landscape. Factors associated with this process are as follows:
  - A. Monitoring plants for the presence and/or level of infestation of pests.
  - B. Recognizing that the mere presence of a pest is not a reason in itself to initiate control action, and establishing thresholds below which pests and related aesthetic problems can be tolerated.

- C. Tolerating damage that will not have long term effects on the plant.
- D. Focusing management activities on the parts of the landscape that are most prone to pest problems.
- E. Considering ALL factors associated with damage so as to identify damage that may have occurred after the plant was weakened and not as a result of injury sustained by pest.
- F. Being certain to identify the pest, its host, and the life cycle of both.

IV. DFM will make an educated and environmentally sensitive decision on how to deal with pest induced problems using these principles:

- A. Weighing the benefits of control action against other factors such as potential hazards to the property and the environment, employee and public health and safety, efficacy and economics.
- B. Acquiring all relevant knowledge in regard to the pest life cycle and the host growth cycle in order to determine control method/action.
- C. When control is necessary, considering the options in the following order: 1) physical/mechanical control; 2) biological control; 3) soft chemicals (i.e. pesticidal soaps, oils); and, 4) organic and synthetic pesticides.
- D. In case pesticide application is required, evaluating selection based on a pesticide's environmental fate and ecological impact.
- E. NOT using pesticides on a scheduled or preventative basis.
- F. Applying materials at the time they will be most efficacious against the target pest and have minimal impact on beneficials.
- G. Targeted spraying for confirmed pest problems and NOT cover spraying.
- H. Reading and following the labels of all pesticides and taking every precaution in their use.

V. To implement, DFM shall:

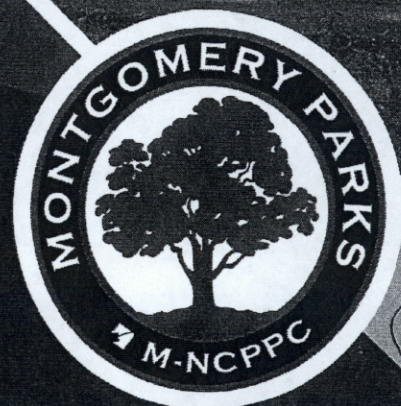
- A. Provide landscape Integrated Pest Management training to all property managers and inspectors.
- B. Select Contractors for landscape/grounds work that are experienced in IPM and assure that they are familiar with key pests, key plants, and key locations within the DFM inventory of plants.
- C. Insist that all DFM property services employees and the landscape contractor, whenever in doubt, seek help or assistance in dealing with a pest problem.
- D. Maintain a written record, indicating the names and quantities of pesticides used in the previous year.

# Montgomery Parks Pesticide Use Report

January 1 – June 30, 2018



[MontgomeryParks.org](http://MontgomeryParks.org)





## Overview:

Bill 52-14 Pesticides-Notice Requirements-Cosmetic Pesticide Use Restrictions was enacted by Montgomery County Council October 2015 and adopted into County Code Sec. 33B Pesticide Use. Montgomery Parks began implementing sections of the pesticide use law July 1, 2016. This report provides updates, assessments and future direction for the following programs:

1. Pesticide-free pilot parks
2. Pesticide-free playgrounds
3. Integrated Pest Management (IPM) of athletic fields
4. Pesticide-free pilot athletic fields
5. Use of organic & listed products and alternatives
6. Pesticide use protocols
7. Informing the public and staff training
8. Summary and future steps
9. Pesticide data summary and alternative use

## Pesticide-Free Pilot Parks

Ten parks, located in different areas of the county, are part of the pesticide-free park pilot program that began in July 2016. Due to unique environments and different amenities at each park, management without pesticides has presented varying levels of challenges.

This spring, the managers of each pesticide-free park met to share their insights. Challenges identified across all parks included: management of weeds in tree mulch rings, additional cost of materials, equipment and staff time associated with extra string trimming, and weed removal on fence lines, curbs, courts, parking lots and walkways.

While many sites faced similar challenges, weed management solutions that proved most successful at each site were different. Strategies for weeding tree rings included: reducing the size of mulch areas or removing entire mulch tree rings so crews do not need to mow and can string trim only; designating additional staff time to hand-pull weeds in the mulch rings; or applying organic / listed weed control products.

All park managers identified the need to reduce the number of signposts because it takes staff time and resources to trim around each post. Fewer signposts can be achieved by combining multiple signs on one post unless prohibited by regulations. Benches, trash containers and picnic tables can also be labor intensive to trim. Movable picnic tables allow for mowing and reduce the need for string trimming however, security concerns dictate that in certain parks, benches must be anchored or chained in place to prevent theft or vandalism.

During the two years of the pilot program, two parks have reverted to conventional management. One had serious invasive weed species that necessitated pesticide use as a component of the non-native invasive plant integrated management program; the second park has a water feature and new landscape beds that require chemical treatments.



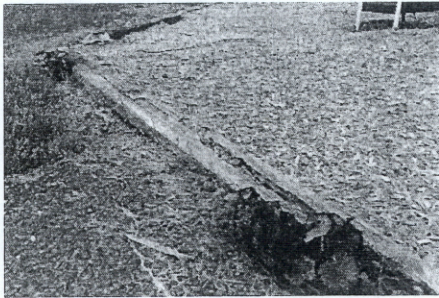
Common challenges include management of weeds in sign posts, pavement cracks and tree mulch rings.

## Pesticide-Free Playgrounds

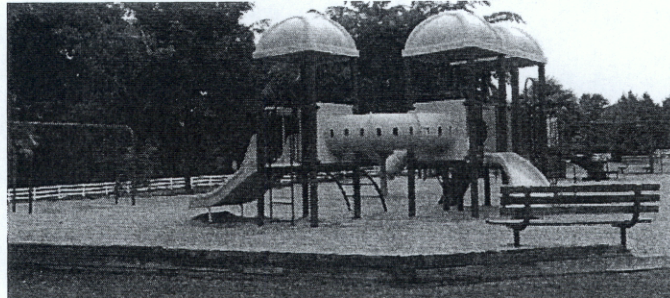
Mechanical removal of deep-rooted weeds in playgrounds is very labor-intensive and accomplished primarily by seasonal staff. Montgomery Parks received funding for two career full-time and four seasonal nine-month staff to support pesticide-free playground maintenance. Each crew is tasked with managing weeds in engineered wood fiber surfacing in playgrounds without the use of pesticides. This is accomplished by mechanical means such as digging, root slicing with a sod cutter and hand-pulling. Blowing leaves and other natural debris to reduce organic matter that supports weed growth is an additional method.

The goal is for work crews to visit each assigned playground two times per month during the growing season, March through November. At current staffing levels, playground crews have not consistently met the target of twice-monthly visits to each playground. During the winter months when seasonal staff are not available, the career staff work on playground border and larger surface renovation / replacement projects which are important for preventing weed encroachment.

Weed control levels of success have varied since the implementation of pesticide-free playgrounds due to impacts of weather, travel distance / traffic, staffing and skill levels. When seasonal staff don't return for a second year, the learning curve starts over. Parks is exploring ways to retain staff, streamline travel, effectively remove weeds, and meet the standards for playground surface safety.



Example of deteriorating playground border

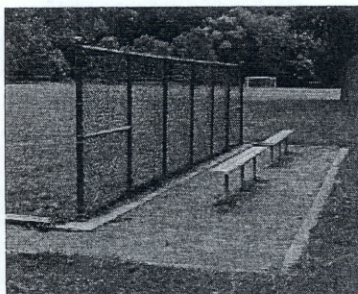


Example of replaced playground border

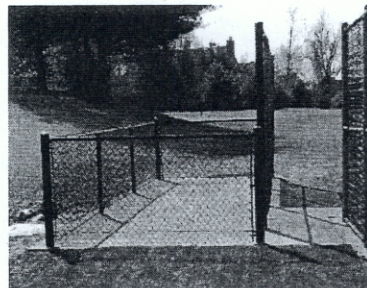
## Integrated Pest Management (IPM) of Athletic Fields

As part of the IPM approach to athletic field maintenance, Montgomery Parks staff have begun using new strategies as alternatives to pesticide applications at select athletic fields.

One strategy has been replacing bluestone player bench areas with concrete pads. Concrete pads are weed free and reduce maintenance time. In addition, by grading soil to the same level as the concrete pads, staff can mow around these pads, eliminating the need to string-trim edges.



Player bench area with bluestone



Player bench area with concrete pads

## Pesticide-Free Athletic Fields Pilot

Montgomery Parks is working on an athletic fields pilot program to compare fields managed by conventional methods to fields managed with only listed products. (see next section)

Ten rectangular, multipurpose fields in local parks have been selected for the pilot. Fields were selected in pairs based on hours of permitted play, ballfield data, and visual inspection to ensure consistent comparisons between the two different management methods.

Montgomery Parks has procured an organic turf management plan from Chip Osborne of Osborne Organics, LLC that will be implemented on the five fields being managed with only listed products. The multi-year plan is broken down into three program stages with increasing levels of maintenance as field use increases.

**Program One** – 500 to 700 hours of use (permitted use plus estimated walk-on use)  
Fertilizer – 4 applications, 2.5 lbs. total nitrogen applied  
Overseeding – 2 times/ year at 5 lbs. seed per thousand square feet per seeding  
Aeration – 3 times/ season  
Pesticides: 1 application of a pre-emergent to be made in early spring

**Program Two** - 701 to 900 hours of use (permitted use plus estimated walk-on use)  
Fertilizer – 4 applications, 3.5 lbs. total nitrogen applied  
Overseeding – 2 times/ year at 5 lbs. seed per thousand square feet per seeding  
Aeration – 3 times/ season  
Pesticides: 1 application of a pre-emergent to be made in early spring

**Program Three** – Over 900 hours of use (permitted use plus estimated walk-on use)  
Fertilizer – 5 applications/ year, 3.5 lbs. total nitrogen applied  
Overseeding – 3 times / year at 5 lbs. seed per thousand square feet per seeding  
Aeration – 4 times/ season  
Pesticides: 1 application of a pre-emergent to be made in early spring

A second management plan for the five comparable fields to be maintained using conventional products will be developed by Montgomery Parks in collaboration with a leading turf grass expert.

These two plans will define specifications for writing a maintenance contract as the basis for a request for proposal (RFP) for Montgomery Parks to hire a contractor to maintain the ten fields.

## Organic and Listed Products

Montgomery Parks has identified two pesticide-free parks and a community garden location for testing organic and listed products. To support these efforts, staff compiled a list of organic and listed products for park managers. Organic and listed pesticides are active ingredients which are on the EPA's minimum risk list or recommended by the National Organic Standards Board and included on the National List of Allowed and Prohibited Substances. Organic and listed products work best to burn weeds in sunny, hot locations such as open parking lots, curbs and courts. These products are also an option under young, newly planted trees but are a poor choice under large trees because of the shade. While organic and listed products contain natural ingredients, they require frequent re-application and specialized acid-proof equipment. Some of these products pose hazards to applicators (acids) and to the environment (salt). We are assessing training and equipment needs to include organic and listed products in our integrated weed management program.

## **Pesticide Use Protocols**

Staff implement many different protocols to reduce pesticides. Strategies include: good sanitation; proper timing and height of mowing; string trimming; spot spraying to target weeds; applying pre-emergent herbicides to prevent annual weed growth; and routine park inspections to assess for weeds, needed repairs and surfacing replacements.

Staff identified the most important protocol for eliminating weeds is changes in surface material. Installing alternative surfacing such as cement, rubber, bluestone dust and relocating trash cans, benches, picnic tables onto existing impervious surfaces or installing cement pads eliminates weeds. Repairing and filling cracks in courts, walks, curbs and parking lots will also eliminate locations where weeds tend to thrive. Weed suppression protocols along fence lines include installation of cement mow strips, removing fences wherever possible, or planting low-growing perennial plants under the fence. Removal of all unnecessary signs since weeds grow at the base of sign and light posts as well as regular dragging of sand courts and infields to uproot young weeds is also important for minimizing the need for pesticide use.

Pesticide use protocols include staff training to ensure that pesticides are applied properly and are combined with alternative strategies. Discussions in Spring 2018 focused on protocols to replace pesticide applications. Several of these protocols are mentioned in the Pesticide-free Pilot Parks section above.

## **Informing the Public and Staff Training**

Montgomery Parks' website ([montgomeryparks.org](http://montgomeryparks.org)) includes a "Pesticide Reduction and Integrated Pest Management Program" resource page. This web page includes a comprehensive overview of the program, a section of frequently asked questions and answers, copies of recent biannual pesticide use reports, a list of pesticide-free parks and contact information the public can use for further inquiries.

The web page also includes the Pesticide Application Notification grid. Staff update the grid regularly to include the location, date, time, product and cause for any pesticide applications requiring pre-notification. For these applications, white pre-notification signs are also placed at the application sites 48 hours prior to the planned application. In addition, staff maintain pesticide application records with specific locations, application details and labor hours.

Staff trainings related to pesticide use are offered on an on-going basis at multiple sites. Training topics directly relate to management of pest problems found in our parks; including tree, turf, greenhouse, playground, and invasive species pest identification and management. Class content meets requirements mandated by the Maryland Department of Agriculture for pesticide applicator compliance.

Staff training programs were re-designed in 2018 to align content with Maryland Department of Agriculture (MDA) pesticide applicator certification categories. Topics offered included: right-of-way, turfgrass pests, ornamental pests, and tree pests. We requested and received approval from the MDA for each class to also qualify for pesticide re-certification credits which increased participation by skilled certified applicators. These training changes have led to three positive outcomes: higher attendance; better test preparation for staff who need to pass the MDA certification exam; and enhanced the educational quality of each class.

## Summary and Future Steps

This report term emphasized information sharing between park management areas regarding strategies and protocols implemented to address weed problems in the pesticide-free parks and playgrounds. Increasing weed populations are leading to infrastructure deterioration, safety concerns and declining aesthetics. Infrastructure maintenance including filling court cracks and playground border replacement was implemented in several locations to prevent weed encroachment. Specific tenacious weed species that can't be controlled with mechanical removal present unique management challenges. Alternative products are being tested for weed control in some locations, however they have limitations of use and require multiple applications.

In 2018, the number of staff training opportunities increased. Content has been enhanced to better equip workers to implement integrated pest management protocols in all aspects of park and athletic field maintenance. Permanent, contract and seasonal staff attend these training sessions resulting in a more professionally competent Parks' field staff. However, we typically are not able to retain seasonal staff, so a new season begins with inexperienced seasonal staff resulting in upfront demands on supervisors' time and decreased productivity.

Montgomery Parks staff continue to try alternative solutions for pest management challenges while being committed to our mission to protect and interpret our valuable natural and cultural resources; balance demand for recreation with the need for conservation; offer various enjoyable recreational activities that encourage healthy lifestyles; and provide clean, safe, and accessible places.

**Montgomery Parks Pesticide Use Data  
January 1 – June 30, 2018**

Date	Location of Application	Product Name	Reason for Use	Start Time
1-Feb	MARTIN LUTHER KING RECREATIONAL PARK	GARLON 3 A	Non-Native Invasive Species	11:45 AM
13-Mar	LOCUST GROVE NATURE CENTER PROPERTY	GARLON 3 A	Non-Native Invasive Species	11:00 AM
26-Mar	CABIN JOHN ATHLETIC AREA	RAZOR PRO	Weeds	12:30 PM
27-Mar	BROOKSIDE GARDENS	MANICURE 6 FL	Fungal Disease	9:15 AM
27-Mar	CONSERVATORY SOUTH	Pure Spray Green Horticultural Oil	Insects/Mites: Harmful to Plants	5:00 PM
4-Apr	BROOKSIDE GARDENS ROSE GARDEN	Molt X	Insects/Mites: Harmful to Plants	8:45 AM
6-Apr	BROOKSIDE GARDENS ROSE GARDEN	ARMADA 50 WDG	Fungal Disease	9:00 AM
6-Apr	MARTIN LUTHER KING RECREATIONAL PARK	Lock Up Extra 2 0-0-7	Weeds	8:00 AM
9-Apr	WOODLAWN CULTURAL SPECIAL PARK	SNAPSHOT 2.5 TG	Weeds	8:00 AM
11-Apr	LODGE AT SENECA CREEK	SNAPSHOT 2.5 TG	Weeds	9:30 AM
12-Apr	CABIN JOHN ATHLETIC AREA	CONFRONT	Weeds	8:45 AM
12-Apr	GERMANTOWN TOWN CENTER URBAN PARK	PROSECUTOR	Weeds	7:15 AM
12-Apr	SHIRLEY POVICH FIELD	CONFRONT	Weeds	7:45 AM
17-Apr	BROOKSIDE GARDENS BOXWOOD HEDGE	IMIDACLOPRID 2F	Insects/Mites: Harmful to Plants	9:15 AM
17-Apr	BROOKSIDE GARDENS ROSE GARDEN	IMIDACLOPRID 2F	Insects/Mites: Harmful to Plants	6:30 AM
18-Apr	BROOKSIDE GARDENS	Ranger Pro	Weeds	1:00 PM
18-Apr	LITTLE FALLS STREAM VALLEY PARK UNIT #1	AQUANEAT	Non-Native Invasive Species	10:30 AM
19-Apr	BROOKSIDE GARDENS	RAZOR PRO	Non-Native Invasive Species	1:00 PM
20-Apr	BROOKSIDE GARDENS	Stonewall 13-0-0	Weeds	7:30 AM
23-Apr	CABIN JOHN ATHLETIC AREA	RAZOR PRO	Weeds	6:15 AM
23-Apr	GERMANTOWN TOWN CENTER URBAN PARK	PROSECUTOR	Weeds	10:00 AM
23-Apr	GERMANTOWN TOWN CENTER URBAN PARK	SURFLAN	Weeds	10:00 AM
23-Apr	WARING STATION LOCAL PARK	PROSECUTOR	Weeds	8:30 AM
23-Apr	WARING STATION LOCAL PARK	SURFLAN	Weeds	8:30 AM
24-Apr	DARNESTOWN HERITAGE PARK	PROSECUTOR	Weeds	10:00 AM
24-Apr	DARNESTOWN HERITAGE PARK	SNAPSHOT 2.5 TG	Weeds	8:00 AM
26-Apr	BROOKSIDE GARDENS	Twosome	Fungal Disease	9:30 AM
26-Apr	CABIN JOHN BASEBALL FIELD 1	COMPASS WDG	Fungal Disease	8:00 AM
26-Apr	CABIN JOHN BASEBALL FIELD 1	Proplant	Fungal Disease	8:00 AM
26-Apr	GERMANTOWN TOWN CENTER URBAN PARK	PROSECUTOR	Weeds	8:30 AM
26-Apr	LITTLE BENNETT CAMP GROUND	PROSECUTOR	Weeds	11:30 AM
26-Apr	ROCK CREEK REGIONAL PARK	PROSECUTOR	Weeds	8:45 AM
26-Apr	SHIRLEY POVICH FIELD	COMPASS WDG	Fungal Disease	7:00 AM
26-Apr	SHIRLEY POVICH FIELD	Proplant	Fungal Disease	7:00 AM
26-Apr	WOODLAWN CULTURAL SPECIAL PARK	PROSECUTOR	Weeds	10:00 AM
27-Apr	LAYTONIA RECREATIONAL BASEBALL FIELD 1	Strobe	Fungal Disease	7:00 AM
30-Apr	BLACK HILL PARK POLICE SUBSTATION	PROSECUTOR	Weeds	10:30 AM
30-Apr	MARTIN LUTHER KING RECREATIONAL SOCCER FIELD 1	Dismiss	Weeds	9:00 AM
30-Apr	RIDGE ROAD RECREATIONAL PARK	PROSECUTOR	Weeds	7:30 AM
30-Apr	RIDGE ROAD RECREATIONAL PARK	SNAPSHOT 2.5 TG	Weeds	7:30 AM
30-Apr	SOUTH GERMANTOWN RECREATIONAL PARK	PROSECUTOR	Weeds	12:45 PM
1-May	CABIN JOHN SOCCER FIELD 1	MSM Turf	Weeds	7:00 AM
1-May	CABIN JOHN SOFTBALL FIELD 3	MSM Turf	Weeds	7:30 AM
2-May	CABIN JOHN MANAGED TURF	RANGER PRO	Weeds	7:00 AM
7-May	WHEATON ATHLETIC AREA SOFTBALL FIELD 2	STRIKE THREE ULTRA 2	Weeds	9:00 AM
7-May	WHEATON ATHLETIC AREA	STRIKE THREE ULTRA 2	Weeds	7:00 AM
7-May	WHEATON ATHLETIC AREA BASEBALL FIELD 1	STRIKE THREE ULTRA 2	Weeds	8:00 AM
7-May	WHEATON ATHLETIC AREA SOFTBALL FIELD 1	STRIKE THREE ULTRA 2	Weeds	8:30 AM
7-May	WHEATON ATHLETIC AREA SOFTBALL FIELD 3	STRIKE THREE ULTRA 2	Weeds	10:00 AM
7-May	WHEATON ATHLETIC AREA SOFTBALL FIELD 4	STRIKE THREE ULTRA 2	Weeds	10:30 AM
8-May	BROOKSIDE GARDENS ROSE GARDEN	Fore	Fungal Disease	6:45 AM
8-May	WHEATON ATHLETIC AREA BASEBALL FIELD 1	PROSECUTOR	Weeds	8:00 AM
8-May	WHEATON ATHLETIC AREA BASEBALL FIELD 2	PROSECUTOR	Weeds	7:00 AM
8-May	WHEATON ATHLETIC AREA SOFTBALL FIELD 1	PROSECUTOR	Weeds	9:15 AM
8-May	WHEATON ATHLETIC AREA SOFTBALL FIELD 2	PROSECUTOR	Weeds	10:00 AM
8-May	WHEATON ATHLETIC AREA SOFTBALL FIELD 3	PROSECUTOR	Weeds	10:45 AM
8-May	WHEATON ATHLETIC AREA SOFTBALL FIELD 4	PROSECUTOR	Weeds	12:20 AM
9-May	BROOKSIDE GARDENS ROSE GARDEN	Ranger Pro	Weeds	9:45 AM
10-May	LODGE AT SENECA CREEK	PROSECUTOR	Weeds	10:30 AM
10-May	QUINCE ORCHARD VALLEY NEIGHBORHOOD PARK	PROSECUTOR	Weeds	9:00 AM
10-May	SPENCERVILLE LOCAL PARK	PROSECUTOR	Weeds	12:00 PM
11-May	RIDGE ROAD RECREATIONAL PARK	PROSECUTOR	Weeds	8:00 AM
14-May	CABIN JOHN WALKWAY	RANGER PRO	Weeds	7:00 AM
15-May	BROOKSIDE GARDENS	ARMADA 50 WDG	Fungal Disease	9:30 AM

15-May	OLNEY MANOR RECREATIONAL PARK	Snapshot	Weeds	12:30 PM
21-May	BROOKSIDE GARDENS ROSE GARDEN	Three-Way	Noxious Weeds	9:00 AM
23-May	BROOKSIDE GARDENS	Twosome	Fungal Disease	9:30 AM
24-May	CABIN JOHN BASEBALL FIELD 1	COMPASS WDG	Fungal Disease	9:00 AM
<b>Date</b>	<b>Location of Application</b>	<b>Product Name</b>	<b>Reason for Use</b>	<b>Start Time</b>
24-May	CABIN JOHN BASEBALL FIELD 1	Proplant	Fungal Disease	9:00 AM
24-May	SHIRLEY POVICH FIELD	COMPASS WDG	Fungal Disease	7:30 AM
24-May	SHIRLEY POVICH FIELD	Proplant	Fungal Disease	7:30 AM
25-May	GERMANTOWN TOWN CENTER URBAN PARK	PROSECUTOR	Weeds	7:30 AM
25-May	GERMANTOWN TOWN CENTER URBAN PARK	SURFLAN	Weeds	7:30 AM
29-May	BROOKSIDE GARDENS ROSE GARDEN	Myclobutanil 20EWT&O	Fungal Disease	9:30 AM
29-May	DARNESTOWN HERITAGE PARK	PROSECUTOR	Weeds	9:00 AM
29-May	SOUTH GERMANTOWN RECREATIONAL PARK	PROSECUTOR	Weeds	10:45 AM
30-May	RIDGE ROAD RECREATIONAL PARK	PROSECUTOR	Weeds	8:30 AM
31-May	AGRICULTURAL HISTORY FARM PARK	PROSECUTOR	Weeds	11:00 AM
31-May	AGRICULTURAL HISTORY FARM PARK	SNAPSHOT 2.5 TG	Weeds	12:00 PM
31-May	WOODLAWN CULTURAL SPECIAL PARK	PROSECUTOR	Weeds	8:00 AM
4-Jun	BLACK HILL REGIONAL PARK	PROSECUTOR	Weeds	9:30 AM
4-Jun	BLACK HILL REGIONAL PARK	SURFLAN	Weeds	9:30 AM
4-Jun	BROOKSIDE GARDENS ROSE GARDEN	Dimension 19-0-6	Weeds	8:00 AM
5-Jun	BROOKSIDE GARDENS	Fore	Fungal Disease	9:30 AM
5-Jun	BROOKSIDE GARDENS ROSE GARDEN	Tempo Ultra	Insects/Mites: Harmful to Plants	9:30 AM
6-Jun	BROOKSIDE GARDENS ROSE GARDEN	Three-Way	Noxious Weeds	8:00 AM
7-Jun	BROOKSIDE GARDENS	Three-Way	Weeds	8:00 AM
8-Jun	BLACK HILL REGIONAL PARK	PROSECUTOR	Weeds	12:30 PM
8-Jun	BLACK HILL REGIONAL PARK	SURFLAN	Weeds	12:30 PM
8-Jun	BROOKSIDE GARDENS	ProSedge	Weeds: Sedge	1:00 PM
8-Jun	BROOKSIDE GARDENS	Ranger Pro	Weeds	9:45 AM
8-Jun	GERMANTOWN TOWN CENTER URBAN PARK	SEDGE HAMMER	Weeds: Sedge	8:00 AM
12-Jun	BROOKSIDE GARDENS	ARMADA 50 WDG	Fungal Disease	9:30 AM
12-Jun	MARTIN LUTHER KING RECREATIONAL SOFTBALL FIELD 1	PROSECUTOR	Weeds	11:00 AM
12-Jun	MARTIN LUTHER KING RECREATIONAL SOFTBALL FIELD 1	Three-Way	Weeds	10:00 AM
12-Jun	SOUTH GERMANTOWN MINI GOLF/SPLASH AREA	ROUND UP PROMAX	Weeds	7:30 AM
13-Jun	FAIRLAND RECREATIONAL SOFTBALL FIELD 1	GLYPHOSATE PRO 4	Weeds	7:00 AM
13-Jun	FAIRLAND RECREATIONAL SOFTBALL FIELD 2	GLYPHOSATE PRO 4	Weeds	9:30 AM
13-Jun	MARTIN LUTHER KING RECREATIONAL BASEBALL FIELD 1	PROSECUTOR	Weeds	8:00 AM
13-Jun	MARTIN LUTHER KING RECREATIONAL BASEBALL FIELD 1	Three-Way	Weeds	7:30 AM
13-Jun	OLNEY MANOR RECREATIONAL BASEBALL FIELD 1	GLYPHOSATE PRO 4	Weeds	10:30 AM
13-Jun	OLNEY MANOR RECREATIONAL BASEBALL FIELD 2	GLYPHOSATE PRO 4	Weeds	11:30 AM
13-Jun	OLNEY MANOR RECREATIONAL SOFTBALL FIELD 1	GLYPHOSATE PRO 4	Weeds	12:00 PM
14-Jun	LAYHILL LOCAL SOFTBALL FIELD 1	GLYPHOSATE PRO 4	Weeds	7:00 AM
14-Jun	LAYHILL LOCAL SOFTBALL FIELD 3	GLYPHOSATE PRO 4	Weeds	9:30 AM
14-Jun	OLNEY MANOR RECREATIONAL SOFTBALL FIELD 1	GLYPHOSATE PRO 4	Weeds	11:30 AM
14-Jun	OLNEY MANOR RECREATIONAL SOFTBALL FIELD 2	GLYPHOSATE PRO 4	Weeds	10:30 AM
15-Jun	BROOKSIDE GARDENS ROSE GARDEN	Ranger pro	Non-Native Invasive Species	10:00 AM
15-Jun	DARBY HISTORICAL/CULTURAL PARK	PROSECUTOR	Weeds	7:30 AM
18-Jun	BLAIR LOCAL BASEBALL 1	Dismiss	Weeds	7:00 AM
18-Jun	BLAIR LOCAL MANAGED TURF	PROSECUTOR	Weeds	10:00 AM
18-Jun	BROOKSIDE GARDENS	Prosecutor	Weeds	6:30 AM
18-Jun	DAMASCUS RECREATIONAL BASEBALL FIELD 1	ROUND UP PROMAX	Weeds	9:30 AM
18-Jun	DAMASCUS RECREATIONAL SOFTBALL FIELD 1	ROUND UP PROMAX	Weeds	9:00 AM
18-Jun	DAMASCUS RECREATIONAL SOFTBALL FIELD 2	ROUND UP PROMAX	Weeds	10:00 AM
18-Jun	GREENWOOD LOCAL PARK	PROSECUTOR	Weeds	11:30 AM
18-Jun	HUNTERS WOODS LOCAL PARK	PROSECUTOR	Weeds	1:00 AM
18-Jun	JOHNSON LOCAL PARK	PROSECUTOR	Weeds	11:30 AM
18-Jun	LITTLE BENNETT CAMP GROUND	ROUND UP PROMAX	Weeds	6:15 AM
18-Jun	LITTLE BENNETT REGIONAL PARK	ROUND UP PROMAX	Weeds	1:30 PM
18-Jun	LITTLE BENNETT REGIONAL PARK	ROUND UP PROMAX	Weeds	12:00 PM
18-Jun	MILL CREEK TOWNE LOCAL SOFTBALL FIELD 1	PROSECUTOR	Weeds	9:30 AM
18-Jun	SOUTHEAST OLNEY LOCAL PARK	PROSECUTOR	Weeds	11:00 AM
19-Jun	BLAIR LOCAL MANAGED TURF	PROSECUTOR	Weeds	9:30 AM
19-Jun	BLAIR LOCAL SOFTBALL FIELD 1	Dismiss	Weeds	7:00 AM
19-Jun	BLAIR LOCAL SOFTBALL FIELD 1	Three-Way	Broadleaf Weeds	7:00 AM
19-Jun	BROOKSIDE GARDENS	Twosome	Fungal Disease	5:00 AM
19-Jun	DAMASCUS RECREATIONAL PARK 1	ROUND UP PROMAX	Weeds	9:00 AM
19-Jun	DAMASCUS RECREATIONAL PARK 1	ROUND UP PROMAX	Weeds	7:30 AM
19-Jun	DAMASCUS RECREATIONAL SOFTBALL FIELD 3	ROUND UP PROMAX	Weeds	8:00 AM
19-Jun	LITTLE BENNETT REGIONAL PARK	ROUND UP PROMAX	Weeds	6:15 AM
19-Jun	STRAWBERRY KNOLL LOCAL PARK	PROSECUTOR	Weeds	9:30 AM

19-Jun	WASHINGTON SQUARE NEIGHBORHOOD PARK	PROSECUTOR	Weeds	7:45 AM
20-Jun	ARORA HILLS BASEBALL FIELD 1	ROUND UP PROMAX	Weeds	1:45 PM
20-Jun	ARORA HILLS SOFTBALL FIELD 1	ROUND UP PROMAX	Weeds	2:15 PM
20-Jun	BROOKSIDE GARDENS ROSE GARDEN	DIPEL PRO DF	Insects/Mites: Harmful to Plants	7:00 AM
<b>Date</b>	<b>Location of Application</b>	<b>Product Name</b>	<b>Reason for Use</b>	<b>Start Time</b>
20-Jun	CABIN JOHN SOFTBALL FIELD 3	RANGER PRO	Weeds	6:30 AM
20-Jun	CABIN JOHN SOFTBALL FIELD 3	Trimmit	Regulate Turf Growth	6:15 AM
20-Jun	KINGS LOCAL SOFTBALL FIELD 1	ROUND UP PROMAX	Weeds	12:15 PM
20-Jun	LAYTONIA RECREATIONAL BASEBALL FIELD 1	PROPICONAZOLE	Fungal Disease	7:15 AM
20-Jun	LOCUST GROVE NATURE CENTER PROPERTY	GARLON 3 A	Non-Native Invasive Species	10:30 AM
20-Jun	NIKE MISSILE LOCAL PARK	PROSECUTOR	Weeds	8:00 AM
20-Jun	OVID HAZEN WELLS BASEBALL FIELD 1	ROUND UP PROMAX	Weeds	1:30 PM
20-Jun	OVID HAZEN WELLS SOFTBALL FIELD 1	ROUND UP PROMAX	Weeds	12:45 PM
20-Jun	OVID HAZEN WELLS SOFTBALL FIELD 2	ROUND UP PROMAX	Weeds	1:00 PM
20-Jun	STEWARTOWN LOCAL PARK	PROSECUTOR	Weeds	1:00 PM
21-Jun	BLUEBERRY HILL LOCAL PARK	PROSECUTOR	Weeds	8:00 AM
21-Jun	CLARKSBURG NEIGHBORHOOD PARK	ROUND UP PROMAX	Weeds	8:45 AM
21-Jun	DAMASCUS RECREATIONAL PARK	ROUND UP PROMAX	Weeds	1:45 PM
21-Jun	JOHN HAINES NEIGHBORHOOD PARK	ROUND UP PROMAX	Weeds	7:30 AM
21-Jun	MOYER ROAD LOCAL PARK	ROUND UP PROMAX	Weeds	12:30 PM
21-Jun	WOODLAWN CULTURAL SPECIAL PARK	PROSECUTOR	Weeds	1:15 AM
25-Jun	DARNESTOWN LOCAL PARK	PROSECUTOR	Weeds	7:30 AM
25-Jun	EAST NORBECK LOCAL PARK	GLYPHOSATE PRO 4	Weeds	10:00 AM
25-Jun	EDNOR LOCAL PARK	GLYPHOSATE PRO 4	Weeds	9:00 AM
25-Jun	GREENBRIAR LOCAL SOFTBALL FIELD 1	PROSECUTOR	Weeds	12:15 PM
25-Jun	GREENWOOD LOCAL PARK	GLYPHOSATE PRO 4	Weeds	6:30 AM
25-Jun	HOYLES MILL VILLAGE LOCAL PARK	ROUND UP PROMAX	Weeds	12:30 PM
25-Jun	KINGS CROSSING LOCAL PARK	ROUND UP PROMAX	Weeds	7:30 AM
25-Jun	LAYTONIA RECREATIONAL PARK	Battleship III	Weeds	6:30 AM
25-Jun	MANOR OAKS LOCAL PARK	GLYPHOSATE PRO 4	Weeds	8:00 AM
25-Jun	NORTH FOUR CORNERS LOCAL PARK	PROSECUTOR	Weeds	10:30 AM
25-Jun	PARKLAND LOCAL PARK	PROSECUTOR	Weeds	1:45 PM
25-Jun	WHEATON ATHLETIC AREA BASEBALL FIELD 2	PROSECUTOR	Weeds	12:00 PM
26-Jun	BLACK HILL REGIONAL PARK	ELEMENT 3A	Weeds	8:00 AM
26-Jun	BROOKSIDE GARDENS	ARMADA 50 WDG	Fungal Disease	7:00 AM
26-Jun	BROOKSIDE GARDENS ROSE GARDEN	Distance	Insects/Mites: Harmful to Plants	7:00 AM
26-Jun	CABIN JOHN ATHLETIC AREA	PROSECUTOR	Weeds	10:00 AM
26-Jun	DUFIEF LOCAL PARK	PROSECUTOR	Weeds	10:30 AM
26-Jun	SLIGO CREEK STREAM VALLEY PARK UNIT #3	PROSECUTOR	Weeds	1:30 PM
26-Jun	SOUTH GERMANTOWN RECREATIONAL PARK	ROUND UP PROMAX	Weeds	7:30 AM
26-Jun	TOBYTOWN NEIGHBORHOOD PARK	PROSECUTOR	Weeds	6:30 AM
27-Jun	BLUEBERRY HILL LOCAL PARK	PROSECUTOR	Weeds	1:45 AM
27-Jun	COLUMBIA LOCAL PARK	Avenger	Weeds	8:00 AM
27-Jun	FLOWER HILL LOCAL PARK	PROSECUTOR	Weeds	1:45 AM
27-Jun	GERMANTOWN TOWN CENTER URBAN PARK	Fusilade 2	Weeds	7:30 AM
27-Jun	JOHNSON LOCAL PARK	PROSECUTOR	Weeds	12:00 PM
27-Jun	NIKE MISSILE LOCAL PARK	PROSECUTOR	Weeds	1:15 AM
27-Jun	NORTHWEST BRANCH RECREATIONAL PARK	Avenger	Weeds	7:00 AM
28-Jun	CENTERWAY LOCAL SOFTBALL FIELD 1	PROSECUTOR	Weeds	10:30 AM
28-Jun	GERMANTOWN TOWN CENTER URBAN PARK	ELEMENT 3A	Non-Native Invasive Species	7:30 AM
28-Jun	LAYTONIA RECREATIONAL BASEBALL FIELD 1	QUIKPRO	Weeds	9:00 AM
28-Jun	QUINCE ORCHARD KNOLLS LOCAL SOFTBALL FIELD 1	PROSECUTOR	Weeds	6:30 AM
29-Jun	QUINCE ORCHARD VALLEY NEIGHBORHOOD PARK	PROSECUTOR	Weeds	10:30 AM
29-Jun	REDLAND LOCAL PARK	PROSECUTOR	Weeds	6:30 AM
29-Jun	WOODSTOCK EQUESTRIAN PARK	PROSECUTOR	Weeds	11:30 AM
29-Jun	WOODSTOCK EQUESTRIAN PARK	SURFLAN	Weeds	11:30 AM