

COUNTY OF SAN MATEO

Inter-Departmental Correspondence Department of Public Works



DATE: February 29, 2012

BOARD MEETING DATE: March 13, 2012

SPECIAL NOTICE/HEARING: None VOTE REQUIRED: Majority

TO: Honorable Board of Supervisors

FROM: James C. Porter, Director of Public Works

SUBJECT: Executive Summary: Vegetation Management

RECOMMENDATION:

Adopt a Resolution authorizing the Director of Public Works to supplement current vegetation management practices through the implementation of a program enhancement plan.

BACKGROUND:

Vegetation management within San Mateo County is generally performed by the Department of Public Works' Road Services and Parks Divisions. The primary benefits of roadside vegetation management are to minimize fire hazards along the edges of roads; maintain sight distance for road users; maintain surface drainage systems that parallel roads; preserve the structural integrity of County roads; minimize the intrusion of invasive and exotic weeds; and minimize the occurrence of stagnant water within roadside ditches. The Parks Division also manages vegetation for the purpose of minimizing the intrusion of invasive and exotic weeds, as these have the potential of jeopardizing the local ecosystem by displacing native vegetation, especially in sensitive regions such as Edgewood County Park and San Bruno Mountain County Park.

On June 8, 2010, your Board adopted Resolution No. 070851, which established an Integrated Pest Management (IPM) Policy to reduce the use of pesticides and herbicides by San Mateo County on County-owned or managed property.

In October, 2011, the County Manager's Office contracted with Baefsky and Associates for the purpose of completing an independent analysis of the County's roadside vegetation management program. The analysis was completed in January, 2012 and presented to the Environmental Quality Committee (EQC) on January 17, 2012.

EQC recommended that staff present the findings of the Baefsky report to your Board and provide your Board with alternate plans for consideration, to include a phased plan which incorporates recommendations made within the Baefsky report and an alternate

plan which further restricts herbicide use.

DISCUSSION:

The Baefsky report included recommendations on how the program could be enhanced within County policies and resource constraints. It also evaluated and rejected moving towards either an all spray or all mow program based on a number of factors, including: community concerns; effectiveness and suitability of each treatment under variable field conditions; contributions to sedimentation problems; usefulness; and cost.

The management strategies being presented to you include:

- Implementation of a roadside vegetation management program which uses a combination of mowing and spraying and incorporates programmatic enhancements as described in Exhibit "A"; and
- Implementation of a weed management program which eliminates spraying within the coastal zone boundary with the exception of spot spraying for invasive weeds.

Annual vegetation management costs are estimated to be \$510,000, which includes \$450,000 for mowing and \$60,000 for spraying. Any increases in these costs would affect our ability to perform other safety related tasks such as repairing potholes, clearing debris from roadways, removing roadway hazards, and repairing or replacing damaged signs.

County Counsel has reviewed and approved Resolution as to form.

Vegetation management practices contribute to the Shared Vision 2025 outcome of an Environmentally Conscious Community by considering strategies that minimize environmental impacts while continuing to address public safety along County roads and on County managed property.

FISCAL IMPACT:

There is no impact to the General Fund.

Cost increases associated with the Department's program enhancement proposal would be offset as described in the proposal.

The elimination of spraying for all but invasive weeds along roads within the local coastal boundary proposal is also considered cost neutral, since the County would limit its triage effort commensurate with cost reductions from reduced spray efforts.

Attachments: Exhibit "A" Enhanced Weed Management Program

("Department's Proposal")

Exhibit "B" Local Coastal Boundary Map Exhibit "C" Herbicide No-Spray Zones Map



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BACKGROUND:

Vegetation management within San Mateo County is generally performed by the Department of Public Works' Road Services and Parks Divisions. The primary benefits of roadside vegetation management performed by the Road Services Division are to minimize fire hazards along the edges of roads; maintain sight distance for road users; maintain surface drainage systems that parallel roads; preserve the structural integrity of County roads; minimize the intrusion of invasive and exotic weeds; and minimize the occurrence of stagnant water within roadside ditches which have the potential of providing mosquito breeding habitat. The Roads Division uses mowing and herbicide applications to control roadside vegetation, however, the Department's current weed management policy accommodates requests from property owners or advisory councils that herbicides not be applied in front of specific properties or within an advisory council's sphere of influence.

The Parks Division also manages vegetation for the purpose of minimizing the intrusion of invasive and exotic weeds, as these have the potential of jeopardizing the local ecosystem by displacing native vegetation, especially in sensitive regions such as Edgewood County Park and San Bruno Mountain County Park. The Parks Division uses spot herbicide applications and manual weeding efforts to manage exotic and invasive weeds. This strategy is particularly effective in challenging terrain and minimizes the spread or broadcasting of undesirable seeds caused by mowing.

On June 8, 2010, your Board adopted Resolution No. 070851, which established an

Integrated Pest Management (IPM) Policy to reduce the use of pesticides and herbicides by San Mateo County on County-owned or managed property.

In October, 2011, the County Manager's Office contracted with Baefsky and Associates for the purpose of completing an independent analysis of the County's roadside vegetation management program. The analysis was completed in January, 2012 and presented to the Environmental Quality Committee (EQC) on January 17, 2012.

EQC recommended that staff present the findings of the Baefsky report to your Board and provide your Board with alternative plans for consideration, to include a phased plan which incorporates recommendations made within the Baefsly report and an alternate plan which further restricts herbicide use.

DISCUSSION:

The Baefsky report recommends that numerous program enhancements consistent with County policies be considered as budget and organizational structure permit. It also evaluated and rejected moving towards either an all spray or all mow program based on a number of factors, including: community concerns; effectiveness and suitability of each treatment under variable field conditions; contributions to sedimentation problems; usefulness; and cost.

The management strategies being presented to you include:

- 1) Implementation of an enhanced weed management program consistent with recommendations made in the Baefsky report, as described in Exhibit "A"; and
- 2) Implementation of a weed management program which eliminates spraying within the coastal zone boundary (Exhibit "B"), with the exception of spot spraying invasive weeds.

Implementation of an enhanced weed management program consistent with recommendations made in the Baefsky report.

The Department currently uses a combination of mowing and spraying to manage roadside vegetation, and has found this method to be a safe, cost effective and efficient way to manage weeds countywide. Exhibit "C" depicts areas within the County where spraying currently may take place and areas which are considered exclusive mow zones. Because vegetation management is only performed where deemed necessary, there are many areas which do not require treatment of any kind. Along Tunitas Creek Road, for example, roadside vegetation generally does not need to be managed under the Redwood tree canopy. Thus, areas sprayed along Tunitas Creek and similar roads are limited to open areas along the roadsides. While mowing requires far greater staff and equipment resources than spraying, spraying is not performed in sensitive aquatic habitat areas or near active water sources due to regulatory restrictions, established practices, or previous commitments made by the Department to local community groups.

In reviewing the recommendations presented in the Baefsky report, we have developed

the Department's recommended enhancement strategies and identified and itemized the fiscal impacts associated with individual and cumulative enhancements. Furthermore, the Department identified which options it does not recommend for implementation, along with explanations for those recommendations. The Department's recommendations are attached as Exhibit "A".

Implementation of a weed management program which eliminates spraying within the coastal zone boundary (Exhibit "B"), with the exception of spot spraying for invasive weeds.

At present, the Department manages vegetation through spraying along approximately 24 miles of roadway within the coastal zone boundary, at an annual cost of approximately \$7,000. It is estimated that mowing these roads in lieu of spraying would cost approximately \$70,000 annually and require staffing resources the Department does not have.

Under this strategy, the Department would recommend eliminating annual vegetation management on these roads, except on a triage basis, in order to deal primarily with sight distance issues. This would be similar to the strategy incorporated by Santa Cruz County when they eliminated spraying and lacked the resources to manage vegetation using alternate methods.

In the long term, the Department does not believe this to be a sustainable strategy, as vegetation encroachment would likely narrow and damage roadways and roadside drainage would likely become ineffective in some locations.

To address these effects, the Department proposes paving roadside ditches along roads within the local coastal boundary, as budget, resources, and regulatory requirements permit. This would likely require a long term effort spanning many years and require a significant investment (it is estimated that it would cost approximately \$200,000 per road mile to pave roadside ditches). However, paved ditches are very effective at offsetting roadway and drainage-way deterioration that could be expected to result from vegetation encroachment. Further, paved roadside ditches provide a buffer between the roadway and unmanaged vegetation, thereby improving fire safety and reducing sight distance concerns associated with encroaching vegetation.

Similar work has been performed in the Emerald Lakes Hills area. While the work took several years to complete, we believe the work has significantly reduced maintenance needs and that that the reduction in maintenance costs will ultimately offset the cost of performing the work.

Annual vegetation management costs are estimated to be \$510,000, which includes \$450,000 for mowing and \$60,000 for spraying. Any increases in these costs would affect our ability to perform other safety related tasks such as repairing potholes, clearing debris from roadways, removing roadway hazards, and repairing or replacing damaged signs.

County Counsel has reviewed and approved Resolution as to form.

Vegetation management practices contribute to the Shared Vision 2025 outcome of an Environmentally Conscious Community by considering strategies that minimize environmental impacts while continuing to address public safety along County roads and on County managed property.

FISCAL IMPACT:

There is no impact to the General Fund.

Cost increases associated with the Department's program enhancement proposal would be offset as described in the proposal.

The elimination of spraying for all but invasive weeds along roads within the local coastal boundary proposal is also considered cost neutral, since the County would limit its triage effort commensurate with cost reductions from reduced spray efforts.

Attachments: Exhibit "A" Enhanced Weed Management Program ("Department's

Proposal")

Exhibit "B" Local Coastal Boundary Map Exhibit "C" Herbicide No-Spray Zones Map

Benefit Category Key:

LS = Lines of Sight FS = Fire Safety

VE = Vegetation Encroachment

RD = Roadside Drainage

	Column1	Column2	Column3	Column4	Column5	Column6
	Columnia	Columnia	Coramino	Column	Columns	Column
			Benefit level -			
Recom #	Description	Benefit Categories	Baefsky Prioritization	Cost/Cumulative Cost	Strategy	Comments Pro/ Con
	Year 1 Implementation	n Proposal				
1	On a trial basis, not spray where low growing native plants are immediately adjacent to the road and	LS/FS/VE/RD/IW/CC/LRP/WS	low - #1	negligible	Identify a few areas where low lying native vegetation has some foothold adjacent to the road, where vegetation management currently occurs. Do not spray or mow and seed bare	No downside - Because areas with low or bare vegetation are currently not mowed or sprayed (since there is little need to do so), this strategy is limited in its potential impacts
	seed bare areas with low lying native grasses.				area with similar seeds.	
2	Eliminate spraying at bottoms of slopes, overseed with low lying native vegetation	LS/FS/VE/ RD /IW/CC/LRP/WS	medium - #2	negligible	Implement in areas on coastside with steep banks adjacent to the roads	Has the potential to reduce sediment in roadside ditches and ditch erosion - May result in additional vegetation growth within ditches impeding flows.
3	Switch to aquatic herbicides when spraying near creeks	LS/FS/VE/RD/IW/ CC/LRP /WS	#4	\$1,000/ \$1,000	When spraying within 500 feet of creeks, use aquatic herbicides	Minimizes the potential for chemical invasion into drainage ways
4	Install GPS in spray truck	LS/FS/VE/RD/IW/ CC /LRP/WS	medium - not listed as a Baefsky report strategy	\$500 - initial financing through SMC Saves/ \$1,500	Install as part of GPS demo - aim for installation in April, 2012	Provides greater program transparency. Records when sprayers are engaged
5	Report Use of Adjuvants	LS/FS/VE/RD/IW/ CC/LRP /WS	low - #7	negligible		Provides greater program transparency.
6	Support getting staff licensed in pesticide applications	LS/FS/VE/RD/ IW/CC /LRP/ WS	medium - #8	\$4,000 annually/ \$5,500	Provide a step increase for staff with pesticide applicator license. Staff has received training and is in the process of testing for certification	Provides additional training to staff above and beyond annual training currently received.
7	Spray with 2 person crew on the coastside	LS/FS/VE/RD/ IW/CC/LRP/WS	medium - #10	no cost		Allows for more targeted (spot) spraying. Increases quality control levels. Reassigns staff from other necessary tasks. Slightly reduces capacity to perform other tasks.
8	At selected locations, spot spray, mow and seed unpaved ditches	LS/FS/VE/ RD /IW/ CC/LRP /WS	medium-#15	< \$1,000/ \$6,500		If found to be successful, would reduce the amount of ditch management necessary. Some efficiency losses associated with this work option.

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IW= Invasive Weeds
CC=Community Concerns
LRP=Laws, Regs & Policies
WS=Worker Safety

			0.10			
	Column1	Column2	Column3	Column4	Column5	Column6
			Benefit level -			
Recom #	Description	Benefit Categories	Baefsky Prioritization	Cost/Cumulative Cost	Strategy	Comments Pro/ Con
9	Test bare soils in specific	LS/FS/VE/RD/IW/ CC/LRP /WS	medium - #'s 20 & 21	approximately \$1,000		Would provide an assurance that chemical residues along
	turnouts where the report			per site \$10,000		turnouts are not in soils. Generally, simply confirms what the
	suspects pesticide use, for			annually/ \$16,500		Department already knows since turnouts are not currently
	pesticide residue. Test			, , , ,		sprayed.
	waterways at select					
	locations for herbicide					
	residues.					
10	Improve Posting, Reporting	LS/FS/VE/RD/IW/ CC /LRP/ WS	medium - #'s 6 & 17	\$1,500/ \$18,000	Increase sizes of herbicide application	Results in an enhanced notification process.
1-3	and Communications				notification signs, extend length of time signs	
	and communications				are left to one week after application, update	
					1	
					website to reflect program modifications.	
1.1	Continue to investigate ou	LC /EC /VE /DD /DAY /CC /LDD /DAYC	latala alta accessal la cat	TDD	Walter and a skin in a sure of the same	Mandament day
111	Continue to investigate on	LS/FS/VE/RD/IW/CC/LRP/WS	high - discussed but	TBD	Work towards achieving greater efficiencies,	No downsides
	an on-going basis,		not specifically		cost savings and greater program effectiveness	
	alternative herbicide		presented among the			
	products, including organic		Baefsky report			
	and natural products		recommendations			

Year 1 Summary:

Total program costs of \$18,000. Offset cost increases through the elimination of vegetation management along lowest priority roads.

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	Column1	Calumana	Calumana	Calumana	Column	ColumnC
	Column1	Column2	Column3	Column4	Column5	Column6
			Benefit level -			
Recom #	Description	Benefit Categories	Baefsky Prioritization	Cost/Cumulative Cost	Strategy	Comments Pro/ Con
12	If scheduling permits, mow or spray stinkwort when young	LS/FS/VE/RD/ IW /CC/LRP/WS	low - #23	low		Ideally, we target spraying and mowing for those periods of time where they would be most effective. We are in complete agreement with continuing to strive to do so. Reality dictates that limited staffing and the need to address immediate safety issues first (potholes, failing slopes, damaged infrastructure, etc.) often prevents us from performing mowing or spraying during the ideal treatment window.
13	Use hand or mechanical control under structures near creeks	LS/FS/VE/RD/IW/ CC/LRP /WS	low - #24	< \$5,000/ \$23,000		Further limits the use of herbicides near waterways. Would result in some areas being treated that are not being treated at all due to their proximity to waterways. It is not clear that this method provides benefits over and above limiting products near creeks to those that are approved for use in aquatic environments.
14	Target and abate poison oak within 10 feet of roadways with Milestone VM	LS/FS/VE/RD/IW/CC/LRP/ WS	medium - #25	\$30,000/ \$53,000	Preliminarily focus efforts in the midcoast urban areas (Montara, Moss Beach and El Granada). Limit to 10 feet (Baefsky report recommends 20 feet).	Poison oak mitigation will result in reduced worker claims and will allow for more efficient management of roadside areas that are normally prevalent with poison oak
15	Target and abate woody vegetation within 10 feet of roadway, where feasible	LS/FS/VE/RD/IW/CC/LRP/WS	medium - #26	\$60,000/ \$113,000	See above	
16	Spray "Habitat" on pampas grass and compare effectiveness with Roundup Pro	LS/FS/VE/RD/I W /CC/LRP/WS	low - #34	< \$1,000/ \$114,000	Use "Habitat" and "Round up Pro" side by side in test plat.	Limited risk in sampling the effectiveness of this product. Round Up Pro is currently quite effective, so additional levels of success would be expected to be marginal at best.

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	Column1	Column2	Column3	Column4	Column5	Column6
Recom #	Description	Benefit Categories	Benefit level - Baefsky Prioritization	Cost/Cumulative Cost	Strategy	Comments <i>Pro</i>/ Con
17	Use wood chips from green waste recycle program to mulch weedy areas for weed control in El Granada medians	LS/FS/VE/RD/IW/CC/LRP/WS	medium - #14	< \$5,000/ \$119,000	Place chips in El Granada medians	
18	Mow and spray harding grass, poison oak and pampas grass on Cloverdale Road, of PMAC permits	LS/FS/VE/RD/IW/CC/LRP/WS	low - #25	< \$5,000/ \$124,000	Cloverdale Road would be the intended test plot area	May be effective against invasive weeds and help preserve edge of pavement deterioration. Within PMAC area, spraying would require PMAC approval
19	Use surfactant when spraying where needed	LS/FS/VE/RD/IW/CC/LRP/WS	low - #18	negligible		No downside. Surfactants are already used when a need for use is identified.
20	Burn weeds in pavement with propane torch during rainy season	LS/FS/VE/RD/IW/CC/LRP/WS	medium - #28	<\$15,000/ \$139,000	Use this strategy in rural areas where vegetation into roadway areas is more prevalent	Would enable us to somewhat control vegetation encroachments in roadways. Labor intensive.
21	Spray Garlon 4 Ultra on emerged stinkwort before seeds set	LS/FS/VE/RD/ IW /CC/LRP/WS	low - #33	negligible	If resources allow.	This could result in improved management of stinkwort. Depending on resource availability, this may or may not be possible.
22	Provide endangered species training for spray and mow crews	LS/FS/VE/RD/IW/ CC/LRP /WS	low - #11	negligible	Expand current training program	This training is already provided. However, the program can be expanded to make it more comprehensive

Year 2 Summary:

Total program costs of \$139,000 (approximately27% of program budget). Savings resulting from enhancements expected to be negligible through year 2. Offset costs through elimination of vegetation management on lowest priority roads. Some return on investment, as yet undeterminable, anticipated in future years, based on the relative successes of program enhancements, some of which are intended to reduce future years efforts.

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	Column1	Column2	Column3	Column4	Column5	Column6
			Benefit level -			
Recom #	Description	Benefit Categories	Baefsky Prioritization	Cost/Cumulative Cost	Strategy	Comments Pro/ Con

Recommendations warranting further consideration but not proposed to be implemented within the current implementation plan:

Recom #	Description	Benefit Categories	Benefit level	Cost	Reason not made part of current plan
23	Improve timing of spraying	LS/FS/VE/RD/ IW/CC/ LRP/ WS	#3	Negligible. Cost is limited to inefficiency in performing tasks.	The timing of spraying is currently aligned with ideal application periods if possible. Because the timing of many other safety functions can not be delayed, it is simply a function of current staffing levels, that vegetation management can not always be performed at the most desirable times. Should the Department be able to increase staffing levels in the future, this could then be given additional consideration.
24	Hire facilitator to work with staff and citizens to improve communication	LS/FS/VE/RD/ IW/CC/ LRP/ WS	low - #'s 35 & 36	\$25.000 - \$30,000	This could be considered in the future. However, we believe several other communication enhancements are an appropriate first step, especially in light of the fact that there are no more than a handful of residents who have expressed concern in this area.
25	Use available prison work crews and DUI offenders to supplement staff	LS/FS/VE/RD/IW/CC/LRP/WS	medium - #19	Negligible. Cost is generally associated with lack of productivity associated with providing flaggers for a relatively inefficient operation	We are and continue to be interested in use of Sheriff Work Program crews and intend to further explore opportunities. However, using them alongside roadways requires that flaggers be provided to ensure worker safety which eliminates any cost and resource management benefits. Even if there were fiscal benefits, because many of our roads are narrow and windy, we do not feel comfortable with having untrained crews or crews with limited training, working in close proximity to local traffic.
26	Implement Adopt-A-Road Program	LS/FS/VE/RD/IW/CC/LRP/WS	medium - # 22	See above	See above. We are interested in this option but, as with the above, would need to be comfortable with all safety aspects of work performed through this particular program.

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		Benefit Categories LS/FS/VE/RD/IW/CC/LRP/WS	, 1	Cost/Cumulative Cost \$100,000 annually	Strategy	Comments Pro/ Con We will create long term mower replacement plans. However, a new mower is approximately \$135,000 and we do not believe the program could absorb such costs every one to two years.
28	Spray Milestone VM Plus for poison oak	LS/FS/VE/RD/ IW /CC/LRP/ WS	low - # 32	negligible		Roundup pro is currently very effective against poison oak, thus there would appear to be limited strategic benefit in switching products. If, there is a specific reason that Milestone VM or another product would be preferred, we would consider switching. However, we are currently unaware of the benefits of simply switching products.
29	Form volunteer IPM task force to assist IPM Coordinator	LS/FS/VE/RD/IW/ CC/LRP /WS	low - #36	negligible		See above.

Recommendations rejected:

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Pasam #	Description	Benefit Categories	Benefit level -	Cost/Cumulative Cost	Strategy	Comments Pro/ Con
30	·	LS/FS/VE/RD/IW/CC/LRP/WS	medium - #9	cost is generally limited to lost productivity resulting from working around active traffic zones		The spray truck travels very slowly, often on rural roads with limited sight distance. We do not believe it beneficial to have the spray truck perform spraying while people are cycling and walking nearby. Further, spraying can not be performed in winds exceeding 7 miles per hour. Because afternoons tend to be the windiest times of day, spraying would often not be possible during afternoons. The stated benefit levels are as identified in the Baefsky report and we are not in agreement with them.
31	Implement quarterly field based PCA assessments and fine tuned recommendations	LS/FS/VE/RD/ IW/ CC/ LRP/WS	low - # 29	\$20,000- \$30,000		This is identified as a strategy of medium cost and low benefit and we agree with this assessment. The spray and mow seasons are limited to a few months each year and it is felt that quarterly assessments that do not coincide with the commencement of such operations have little value in determining appropriate treatments in subsequent seasons. Periodic assessments do currently occur at a lesser frequency and we believe this to be adequate given the scale of the program.
32	Develop prescriptive IPM program based on priorities	LS/FS/VE/ RD/IW/CC/LRP/ WS	medium - # 13	\$30,000-\$40,000		The IPM document is a County-wide document and is intended to be general in nature because it applies to very diverse applications, including vegetation management in Parks, along roads, in landscaped areas and on Airport property. We believe general goals are appropriate to define overarching goals that apply to each of these uses.

Benefit Category Key:

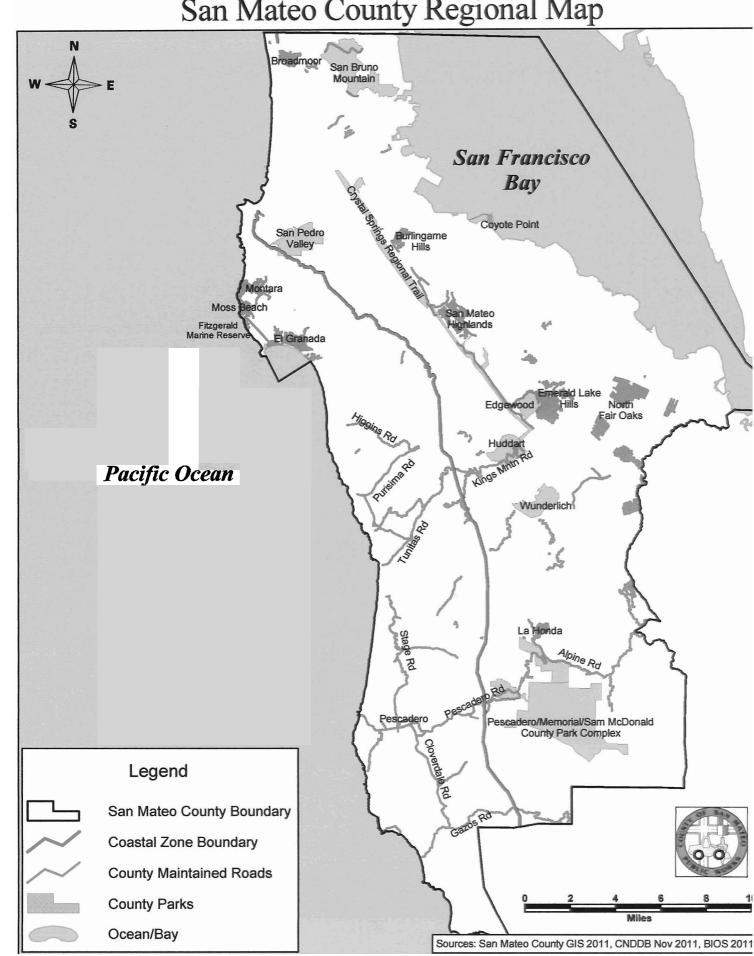
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Recom #	Description	Benefit Categories	Benefit level - Baefsky Prioritization	Cost/ Cumulative Cost	Strategy	Comments <i>Pro/</i> Con
33	Appoint Part-Time IPM	LS/FS/VE/RD/IW/ CC/LRP/ WS	low - # 35	\$10,000		In responding to the Municipal Regional Permit, the County has
	Coordinator from existing					coordination sessions in which various Department practices
	staff					are identified and discussed. The Baefsky report indicates this
						to be a low value benefit and we concur with that assessment,
						especially since overall coordination efforts already occur.
34	Hire a full time IPM	LS/FS/VE/RD/IW/ CC/LRP/ WS	low - #37	\$100,000		This has been identified in the Baefsky report has significantly
	Coordinator					costly and of minimal benefit and we concur with that
						assessment.

Exhibit "B" San Mateo County Regional Map



RESOLUTION NO.

BOARD OF SUPERVISORS, COUNTY OF SAN MATEO, STATE OF CALIFORNIA

* * * * * *

RESOLUTION AUTHORIZING THE DIRECTOR OF PUBLIC WORKS TO SUPPLEMENT CURRENT VEGETATION MANAGEMENT PRACTICES THROUGH THE IMPLEMENTATION OF A PROGRAM ENHANCEMENT PLAN

RESOLVED, by the Board of Supervisors of the County of San Mateo, State of California, that

WHEREAS, the San Mateo County Department of Public Works currently manages vegetation within unincorporated San Mateo through a combination of mowing and the application of approved herbicides; and

WHEREAS, vegetation management is necessary in order to maintain roadway safety, roadway drainage and to minimize fire safety and the spread of invasive weeds; and

WHEREAS, San Mateo County recently had an independent analysis of their program performed; and

WHEREAS, said analysis recommends continuing to manage vegetation through a combination of mowing and application of approved herbicides, but with consideration of program enhancements as organizational structure and finances permit; and

WHEREAS, the Department of Public Works has developed a program

enhancement plan which incorporates many of the recommendations made in the independent analysis.

NOW THEREFORE, IT IS HEREBY DETERMINED AND ORDERED that the

San Mateo County Department of Public Works continue to manage roadside

vegetation through a combination of mowing and spraying, but supplement its practices

with the enhancements identified in the Department's program enhancement plan.

* * * * * *