



DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, LOS ANGELES DISTRICT
915 WILSHIRE BOULEVARD, SUITE 930
LOS ANGELES, CALIFORNIA 90017-3489

May 18, 2018

The Honorable Adam B. Schiff
United States House of Representatives
245 East Olive Avenue, Suite 200
Burbank, California 91502

Dear Representative Schiff:

Thank you for your letter dated January 22, 2018, detailing your concern regarding the use of herbicide containing glyphosate along the Los Angeles River (LAR) by the U.S. Army Corps of Engineers, Los Angeles District (District). We share your desire to ensure that critical maintenance activities in the LAR are not adverse to the well-being of residents and communities adjacent to the LAR.

The Environmental Protection Agency (EPA) is the lead Federal agency responsible for Federal regulation of chemicals for the protection of human health and the environment. On December 18, 2017, EPA released draft human health and ecological risk assessments for glyphosate, along with supporting documentation. EPA's assessment concluded glyphosate should be classified as "not likely to be carcinogenic to humans."

EPA plans to issue a proposed interim registration review decision for the use of glyphosate in 2019. The District will carefully monitor the decision and will implement any mitigation measures identified in that decision. As we await EPA's guidance, we will be continuing to conduct large-scale removal of invasive and non-native vegetation in non-concrete bottom areas of the LAR, generally through the use of hand labor crews that cut vegetation and then apply the highly diluted herbicide directly on the cut stumps through spot spraying, as described in detail in our December 20, 2017, letter. The current method is the least environmentally impactful approach currently cost effective for our vegetation management requirements. No pesticide can legally be used in the State of California, even if already approved by the EPA, until it receives approval from the California Environmental Protection Agency, Department of Pesticide Regulation (CDPR) where CDPR is responsible for the regulation of herbicides and other pesticides in the state to ensure safe use.

Glyphosate is one of the herbicides used in selected locations as a component of a vegetation management program. It is used for "post-emergent" weed control, applicable to weeds that are already growing. It has no soil activity, will not prevent weeds from sprouting and it does not volatilize or move offsite as a mist when properly applied. It also moves throughout the plant (translocation) which eliminates the need to apply multiple applications to the same plant for all but the most difficult to control invasive weeds.

Glyphosate works by inhibiting production of certain essential amino acids in plants. Animals do not produce their own essential amino acids, but, rather, obtain them through diet, which means glyphosate is practically harmless to animals like mammals, birds, fish and insects, including pollinators. In terms of human toxicity, glyphosate is at the very bottom of the scale

and is even less toxic than ordinary table salt as well as many other common products people regularly consume, such as aspirin, caffeine and ibuprofen. It is not well absorbed in the gastrointestinal tract and is mostly eliminated from the body through normal processes. It is cleared from the body in one day and does not bio-accumulate in any tissue. Given glyphosate's unique mode of action, which targets a plant-specific chemical reaction, it makes it both safe and extremely effective.

The District has not identified an appropriate alternative herbicide that could be utilized with minimal environmental damaging effect. We continue to evaluate and test alternate vegetation management options that could further reduce the use of herbicide where appropriate and as funds permit.

As an example of our successful use of an alternative vegetation management procedure, in November of 2017 the District's channel maintenance contractor performed mechanized removal of non-native rhizomes and rootballs in a 13.5-acre area within Reach 2A of the LAR. This method of clean excavation has been highly effective and greatly reduced the need for herbicide treatment in that area, but its use has been limited this fiscal year due to its high cost. With additional resources in future fiscal years, the District could potentially expand mechanical non-native removal activities to other reaches of the LAR to further reduce the use of herbicide spot application.

Vegetation and sediment management are the highest priority operations and maintenance activities in the LAR because these activities maintain the integrity of the concrete channel structure and restore channel conveyance capacity to reduce the risk of flooding to homes and businesses along the Glendale Narrows portion of the LAR. The District remains committed to restoring channel capacity in the District-maintained reaches of the LAR, and we continue to undertake maintenance activities for that purpose.

Thank you again for your time and concern in this matter. My staff is committed to responding to the public and to answering any questions that your office may have about our operations and maintenance activities. Should you have additional questions or concerns, please contact me directly at (213) 452-3961, or your staff may contact Ms. Lillian Doherty, Operations Division at (213) 452-3125.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kirk E. Gibbs', written in a cursive style.

Kirk E. Gibbs
Colonel, U.S. Army
Commander and District Engineer