



Parks and Open Space

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TO: Parks and Open Space Advisory Committee

DATE AND LOCATION: Thursday July 23, 2009, Commissioners Hearing Room, 3rd floor
Boulder County Courthouse, 1325 Pearl Street, Boulder, CO

AGENDA TITLE: Roundup Ready Sugarbeet Request

PRESENTER: Tina Nielsen, Special Projects Manager, Boulder County Parks and Open Space

ACTION REQUESTED: Recommendation to BOCC

Background

A group of six Boulder County Parks and Open Space Agricultural tenants wrote a letter to the County Commissioners in December 2008, requesting permission to raise Roundup Ready sugarbeets on open space agricultural properties that they lease. Boulder County adopted GMO protocols relating to glyphosate tolerant corn (Roundup Ready and Liberty Link) and insect resistant corn (Bt) in 2003. The protocols set forth conditions, and state that any crops not explicitly addressed can only be planted on Boulder County land with approval from the County Commissioners. The staff has taken several steps to help advisory board members formulate a recommendation to the BOCC on this question.

- On May 28, 2009 BCPOS held joint study session on this topic with the Parks and Open Space Advisory Committee (POSAC) and the Food and Agricultural Policy Committee (FAPC). The staff memo, White Paper and Attachments are posted on the Boulder County Parks and Open Space web site: <http://www.bouldercounty.org/openspace/Sugarbeets.htm>. Committee members had a list of questions at the end of the study session. Staff responses are in Attachment 1 to this memo.
- FAPC Vice Chair Jim England submitted a list of additional questions following the May 28 Study Session. Staff responses are included as Attachment 2.
- On June 12, Parks and Open Space staff hosted a roundtable discussion with several experts and two of the applicant farmers to brainstorm alternatives to sugarbeets that might be pursued by the farmers. The notes from this session are included as Attachment 3.
- On July 15, 2009, the staff is hosting a field trip for board members to visit the fields where conventional and Roundup Ready sugarbeets are grown. Notes from this discussion will be posted on the Parks and Open Space web site <http://www.bouldercounty.org/openspace/Sugarbeets.htm> when they are available.

Discussion

The BCPOS recommendation focuses narrowly on the question of whether to permit Boulder County's agricultural tenants to grow Roundup Ready sugarbeets on county open space land. Staff acknowledges that there is a larger discussion around GMOs, conventional practices, organic practices and other alternatives, and BCPOS is actively pursuing a host of sustainability initiatives, but that is not the focus of this recommendation.

BCPOS staff relies on the Parks and Open Space mission and goals for guidance.

Parks and Open Space Mission: To conserve natural, cultural and agricultural resources and provide public uses that reflect sound resource management and community values.

Goal #6: To promote and provide for sustainable agriculture in Boulder County for the natural, cultural and economic values it provides.

Sustainability is usually represented as a triad with three dimensions: environmental sustainability, economic sustainability and social sustainability. While BCPOS does not have a formal sustainability policy, BCPOS follows and seeks to encourage sustainable agricultural practices in all three of these dimensions. (For more details, see discussion in Attachment 1.)

How does Roundup Ready technology fit into the sustainability framework?

- From an environmental sustainability perspective, POS believes that using Roundup Ready technology results in a reduction of toxicity from herbicide application compared to conventional practices. Roundup Ready also complements strip tillage practices, which result in lower energy/fuel consumption, increased soil and water conservation, and improved carbon sequestration.
- From an economic sustainability perspective, Roundup Ready technology reduces costs of weed control and enhances yields, thus increasing profits. It enables the farmers to continue raising sugarbeets in the possible absence of reliable supply of conventional seed. This helps with risk management through diversification in the crop portfolio, and ensures that farmers will meet their sugarbeet coop obligations.
- From a social sustainability perspective, access to federally approved technology improvements is equitable, and it helps maintain stable farm incomes.
- The county's leadership responsibility lies in ensuring that the environmental safeguards are in place as new technology is adopted. In addition to existing lease requirements regarding soil and water conservation and weed control, POS seeks to ensure responsible use of Roundup Ready technology through conditions of approval that address notification, prevention of weed resistance, and protection of aquatic habitats.
- In summary, Boulder County's agricultural tenants are our "partners in conservation." They provide a vital service caring for the public's lands. It is in the county's interest to ensure that they are economically viable so that they will continue to farm Boulder County lands. If farmers can't make a living farming on open space land, we will have a difficult time keeping farmers on open space land.

Another way to consider the request is to compare Roundup Ready sugarbeet technology with Roundup Ready Corn technology, which was approved in 2003. The adopted GMO

protocols address concerns about gene flow with buffer zones and distances, identity preservation, notification to adjacent property owners, preventing development of insect resistance (pertains to Bt Corn), conflict resolution, and monitoring and compliance. Compared to Roundup Ready Corn, Roundup Ready Sugarbeets have minimal concerns.

- The probability of gene flow for sugarbeets is close to zero in our area. In our cool climate, sugarbeets do not produce seed or pollen until the second season, but since they are harvested in the first season this concern is all but eliminated. The proposed conditions of approval include a requirement to monitor for early bolting plants and to remove them. This condition is also part of the grower's contract with the seed provider, Monsanto.
- From a human health perspective, the sugar produced after processing is chemically indistinguishable from sugar produced from conventional sugarbeets.

What would Boulder County accomplish by denying the growers' request?

Denying the request would be a philosophical stand. This would not be unprecedented; a number of counties and communities have taken a stand against GMOs, while many others have taken a stand in favor (see Attachment M to Attachment 1). As a practical matter, such a stand would not likely influence national or global trends in use of GMOs. Such a stand would not make a difference in the overall use of GMO technology or the use of pesticides. Such a stand would put our tenants at a competitive disadvantage in the market place and harm their ability to continue farming profitably. If the farmers try to meet their coop obligations without using County lands, such a stand may also have the effect of pushing rotations to shorter time frames on our tenants' privately owned or rented lands, with negative agronomic consequences. BCPOS staff feels that denying the growers' request will ultimately hurt the Department's ability to care for the public's farmland.

Staff Recommendation:

Parks and Open Space staff recommends approval of the growers' request to plant Roundup Ready sugarbeets on Boulder County land, with the following conditions:

1. Notification. BCPOS growers are required to notify Parks and Open Space Agriculture staff by February 15 of their plans to plant Roundup Ready sugarbeets. BCPOS growers are required to keep BCPOS staff informed of any changes in their plans.
2. Prevent Gene Flow. To prevent any possibility of gene flow, BCPOS growers are required to check crops for rogue bolts every two weeks at a minimum, and promptly remove any bolted plants found.
3. Resistance Management. To prevent development of weed resistance to glyphosate, BCPOS growers are required to rotate to a non-Roundup Ready cropping system in the year following a Roundup Ready crop. If this is not possible and Roundup Ready cropping is done in two consecutive years then a field must stay out of Roundup Ready cropping system for two years before returning to a Roundup Ready crop. In years out of Roundup Ready crops weed control in a field may not include glyphosate.

4. Protect water quality and aquatic habitat. BCPOS growers are required to leave a 50-foot buffer free from Roundup Ready sugarbeet plants around areas of surface water, including rivers, streams, lakes, ponds and wetlands.

POSAC Action Requested: Recommendation to the BOCC to approve the growers' request to raise Roundup Ready Sugarbeets on County land.

ATTACHMENTS (available at <http://www.bouldercounty.org/openspace/advisory/posac.htm>)

1. Staff responses to POSAC and FAPC questions from May 28, 2009 Study Session
2. Staff responses to questions submitted by FAPC Vice Chair Jim England
3. Notes from June 12, 2009 Roundtable discussion about possible alternatives to sugarbeets
4. Correspondence