

City of Larkspur Integrated Pest Management Policy

A. LARKSPUR'S COMMITMENT TO IPM INTEGRATED PEST MANAGEMENT

It is the policy of Larkspur to utilize a system of pest abatement that prioritizes non-chemical or cultural practices over the use of chemical pesticides. These practices began in the 1960's. Larkspur adopted its' first IPM policy in 2004 and has managed pest management operations per this plan for the last decade. These efforts have significantly reduced pesticide use in Larkspur publicly maintained facilities and eliminated use of the significantly hazardous pesticides.

With the knowledge and understanding that we are all the stewards of this earth, the City of Larkspur and the entire City staff dedicate ourselves to providing an IPM (Integrated Pest Management) approach. The City has committed to the IPM Policy. The City brings this policy to the community, with the clear intent of reducing the dependence of chemical products to control pests, utilizing an Integrated Pest Management approach.

It is the purpose and intent of this IPM Policy to reduce reliance on and minimize use of pesticides (as defined in Section 12753 of Chapter 2 of Division 7 of the California Food and Agricultural Code) that threaten water quality in CITY's operations and on CITY's property.

It is also the purpose and intent of this IPM Policy to outline how CITY departments are to perform pest management and to ensure compliance with the CITY's IPM Policy. In addressing pest management needs, the CITY shall focus on long-term prevention or ongoing suppression of pest problems, including consideration of a "no action" approach to minimize or preclude the need to use chemical pest control methods. The CITY recognizes that pesticides are potentially hazardous to human health, wildlife, and the environment and the CITY shall give preference to available, safe, and effective non-pesticide alternatives and cultural practices when considering options for pest management on CITY property.

In addition, by adopting an IPM Policy the CITY will also comply with the 2013 Phase II Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES) Permit¹ (hereafter Phase II Permit). Phase II Permit Attachment G outlines Total Maximum Daily Load (TMDL) requirements under the *Urban Creek Diazinon and Pesticide Toxicity TMDL* (Resolution No. R2-2005-0063). The Pesticide TMDL requires the adoption of an Integrated Pest Management (IPM) Policy or Ordinance applicable to all the CITY's operations and property and consistent with the TMDL implementation plan requirements.

Finally, the Phase II Permit requires the CITY to implement a landscape design and maintenance program to reduce the amount of water and pesticides used during CITY operations and activities. The CITY must evaluate pesticide use and application activities performed and then implement practices that reduce the discharge of pesticides. By implementing the IPM Policy the CITY will comply with the pesticide-related landscape management measures.

B. CITY Policy

It is the policy of the CITY that:

1. Departments performing pest management will comply with the CITY's IPM Policy. This policy will apply to all property owned, leased, or managed by the CITY, including all CITY departments.
2. Departments will require contractors providing pest management services to comply with the CITY's IPM Policy.
3. The CITY's IPM program will include the following components:
 - a) Educate and train CITY staff in the IPM program, practices and policy.
 - b) Require CITY pesticide application contractors to implement the IPM Policy on all property owned, leased, or managed by the CITY and to report the types and amounts of pesticides used by the contractor on CITY said property.
 - c) Reduce to the maximum extent practicable the use of pesticides.
 - d) Consider taking a "no-action" approach in addressing certain pest control issues.
 - e) Review and consider available non-chemical options before using a chemical pesticide.
 - f) Identify pests and least toxic methods to control pests.
 - g) Identify, evaluate and minimize or eliminate conditions that encourage pest problems.
 - h) Conduct careful and efficient inspection, monitoring, and assessment of pest problems by designated personnel or contractor knowledgeable of IPM methods.
 - i) Maintain records by CITY departments on IPM methods considered and used to prevent and control pests.
 - j) Comply with all applicable state and federal regulations, including pesticide use and reporting.
 - k) Provide open public access to all IPM program information and records.
 - l) Conduct decision-making based on the best available science and data to the extent feasible.
 - m) Refer residents and pest control operators to the Marin County Stormwater Pollution Prevention Program and/or the University of California Cooperative Extension for information on less toxic methods of pest control; and,
 - n) Keep the County Agricultural Commissioners informed of water quality issues related to pesticides and of violations of pesticides regulations (e.g., illegal handling) associated with storm water management;

C. DESIGNATION OF INTEGRATED PEST MANAGEMENT COORDINATOR:

The Public Works Director will act as the Integrated Pest Management Coordinator (IPM Coordinator). The IPM Coordinator will be primarily responsible for implementing the IPM Policy and coordinating efforts to adopt IPM techniques. The IPM Coordinator will communicate goals and guidelines to the City Council, City Manager, staff and personnel. The IPM Coordinator will provide staff training, track pesticide use and ensure that related information is available to the public. The IPM coordinator, will, at the discretion of the Town Council present an annual report to the Town Council evaluating the progress of the IPM Policy implementation (IPM Program).

D. EDUCATION AND TRAINING OF IPM COORDINATOR AND PESTICIDE APPLICATORS;

CITY staff who work with or are potentially exposed to hazardous materials will receive training in Integrated Pest Management, Hazard Communication Standards and the safe use of those hazardous materials in their workplace. Whenever a new pesticide is introduced, additional training will be provided, prior to the initial use. In addition, regular safety meetings will be used to review the information presented in the initial training.

E. EDUCATION AND TRAINING OF STAFF, ADMINISTRATIVE PERSONNEL:

Education and training of appointed personnel is critical to the success of the IPM Program. Staff, including custodial staff, landscape maintenance staff, building maintenance staff and other pest managers, will be educated in the least toxic, IPM policies and procedures. Training of the objectives of the IPM Program will be updated periodically and reviewed. Education will include formal classroom training, on-site training, and informal meetings with those employees responsible for providing pest control, at least once a year. Training will be verbal and in person. No pesticides may be used at CITY sites, except in accordance with the CITY's IPM Policy.

F. IPM Policy General Requirements

- a. Eliminate Category I and II pesticides.
- b. Minimize the use of Category III and IV pesticides.
- c. Eliminate the use of pesticides that are classified by government agencies as known probable or possible carcinogens, reproductive toxicants (teratogens, mutagens), endocrine disruptors, carbamates, organophosphates, or ground water contaminants.
- d. Use pesticides only when necessary and select a pesticide that is both effective and least toxic.
- e. Designate turf grass areas, playgrounds, and picnic table areas on CITY property as pesticide-free.
- f. Comply with the Phase II Permit by implementing the following landscape maintenance and design practices by June 30, 2015:
 - i. Create a soil microbial community through the use of compost, compost tea, or inoculation;
 - ii. Use native and/or climate appropriate plants to reduce the amount of water, pesticides and fertilizers used;
 - iii. Prevent application of pesticides and fertilizers during irrigation or within 48 hours of predicted rainfall with greater than 50% probability as predicted by National Oceanic and Atmospheric Administration (NOAA)20;

- iv. Limit or replace pesticide use with alternatives such as conducting manual weed and insect removal as practicable.
- v. Prohibit application of pesticides as required by the regulations DPR 11-004 Prevention of Surface Water Contamination by Pesticides enacted by the Department of Pesticide Regulation;
- vi. Minimize irrigation run-off by using an evapotranspiration-based irrigation schedule and rain sensors.

G. IPM APPLICATIONS / APPLICATIONS AND GUIDELINES;

Only persons specifically authorized by the IPM Coordinator as Pesticide Applicators, will be permitted to bring or use pesticides on CITY property. Use of pesticides by pesticide applicators is limited to those products on the Approved Use or Limited Use Product list. Pesticide applicators must follow regulations and label precautions. Applicators will have training in IPM and must comply with the CITY's "Components of an IPM, Least Toxic Program".

H. METHODS AND PRODUCT SELECTION AND PRODUCT USE APPROVAL

It is the policy of the CITY to use least-toxic IPM principles to manage pest populations. Except for pesticides granted an emergency exemption, the CITY will not use any products on the banned use product list below. If it is determined that an EPA registered pesticide must be used, then the least-toxic material will be chosen.

Products will be divided into three classifications: Approved Use List, Limited Use List and Banned Use List. If the use of a material not on either the Approved Use List of the Limited Use List is deemed necessary, the IPM Coordinator may apply for an emergency exemption.

I. APPROVED USE PRODUCTS LISTS;

The IPM Coordinator shall maintain a list of all pesticides that are approved for use, along with any restrictions for such use. This list shall be referred to as the Approved Use Products List.

- a. The Approved List shall include, but not be limited to:
 - i. Insecticides, rodenticides bats and traps;
 - ii. Caulking agents and crack sealants;
 - iii. Borates, silicates and diatomaceous earth;
 - iv. Soap based products;
 - v. Natural products on the FIFRA's 25 (b) list (40 CFR part 152.25 (g) (I));
 - vi. Natural products on the California Certified Organic Farmers organic list;
 - vii. EPA GRAS-generally recognized as safe products pursuant to federal EPA;
 - viii. Cryogenics, electronic products, heat and lights;
 - ix. Biological controls, such as parasites and predators;
 - x. Microbial pesticides;
 - xi. Insect growth regulators;
 - xii. Physical barriers;

b. Limited Use Products;

On an annual basis, the IPM Coordinator may submit a written recommendation to the City Council for approval, that a particular pesticide (s) not on the Approved List be approved for use for a specific and limited purpose. The request must be reviewed by the City Council and signed by the IPM Coordinator. The City Council may grant a limited use exemption upon a finding that the CITY department or pesticide applicator has:

- i. Identified a compelling need to use the pesticide;
- ii. Made a good-faith effort to find alternatives to the particular pesticide;
- iii. Demonstrated that effective, economic alternatives to the particular pesticide do not exist for the particular use; and,
- iv. Developed a reasonable plan for investigating alternatives to the banned pesticide during the exemption period.

The Limited Use Products will be allowed to be used for a short and defined exemption period, not to exceed one year.

c. Banned Use Products List:

The following high health-risk pest management products are completely banned from use on CITY property:

- i. Pesticides on the California's Proposition 65 list (the Safe Drinking Water and Toxic Enforcement Act of 1986, materials known to the State to cause cancer or reproductive or developmental toxicity).
- ii. Pesticides classified as Toxicity Category I and Category II by the United States Environmental Protection Agency (USEPA).
- iii. Pesticides on California's Department of Pesticide Regulation groundwater protection list (Food and Agricultural Code 13145(d)).
- iv. Organophosphates, or organochlorines, or carbamates listed by the United States Environmental Protection Agency (Office of Pesticides Programs, Document 735-F-99-14, May 1999), or California Environmental Protection Agency, Department of Pesticide Regulation Chemical Inquiries Database.
- v. A known carcinogen, probable carcinogen, or possible carcinogen by the United States Environmental Protection Agency as per "List of Chemicals Evaluated for Carcinogenic Potential".
- vi. Any known endocrine disruptor listed by the United States Environmental Protection Agency or the European Union, Endocrine Disruptors website.
- vii. Foggers, bomb, fumigants or sprays that contain pesticides identified by the State of California as potentially hazardous to human health (CFR 6198.5).

d. Banned use areas:

Except in the case of an emergency, no pesticides will be applied on the following CITY property:

- i. Turf grass areas
- ii. Playgrounds
- iii. Picnic table areas

J. NOTIFICATION OF PESTICIDE APPLICATIONS:

The CITY shall provide the public and its employees with notification of pesticide applications through the use of signs, voice mail, and the CITY website.

- a. Signs should be posted at all regular public and employee points of entry to the treated area pursuant to state and/or federal law, CITY IPM Policy, and according to product label instructions.
- b. Signs shall be posted four days in advance of application and remain in place for four days following the application unless the manufacturer's product label specifies a longer posting period. If volatile pesticides are sprayed indoors for structural application, notification signs shall be posted seven days in advance of application and remain in place for seven days following the application.
- c. Signs shall contain the name and active ingredient(s) of the pesticide product, the target pest, signal word indicating the toxicity category of the pesticide product, the re-entry interval as determined by the product label or regulation, the name and contact number for the CITY department responsible for the application, and the web address of the CITY website.
- d. Signs should be of a standardized design that is easily recognizable to the public and employees.
- e. When using approved Category IV, Eco-exempt or OMRI approved pesticides, posting, as above, may be on the day of application and remain in place for at least four days.
- f. For every building and site where pesticide baits are used, signs shall be posted at a conspicuous location and include information as outlined above (# 3).
- g. CITY departments shall not be required to post signs in right-of-way locations that the general public does not use for recreation or pedestrian purposes, such as median strips. However, notification of pesticide applications in right-of-way locations shall be available on the public access telephone number and the CITY website.
- h. At least four days prior to the application of a pesticide, the department seeking to apply the pesticide shall provide the IPM coordinator with all relevant notification information and the IPM coordinator shall post that information to the CITY website as soon as possible.
- i. CITY departments may obtain authorization from the IPM coordinator to apply a pesticide without providing a one to four day advance notice if there is a compelling need to use the pesticide, such as a threat to public health, safety, CITY property, or substantial economic detriment. Signs meeting the requirements as outlined above (# 2), shall be posted as soon as possible prior to application, and remain posted four following the application.

K. PEST CONTROL AND RECORD KEEPING OF PESTICIDE APPLICATIONS

The CITY shall maintain records of all pesticide applications to CITY property at City Hall for a period of four (4) years, and shall make the information available to the public, upon request. Each application record shall include the following information:

- a. All the information listed below will be documented on an official Pest Control Recommendation and be supplied by either a PCA or the licensed Qualified Applicator prior to any pest control operation. The form will include:
 - i. Name of the entity responsible.
 - ii. Specific site of the application.
 - iii. The target pest.
 - iv. The date the pesticide was used and re-entry period if applicable.
 - v. Date of expiration of the PCA recommendation.
 - vi. Schedule, timing and conditions.
 - vii. The name and active ingredient of the pesticide to be applied and EPA registration number.
 - viii. The pesticide signal word.

- b. The IPM Coordinator or Pest Control Applicator will prepare a follow up record to include:
 - i. The effectiveness of the pesticide or management action;
 - ii. Prevention and other non-chemical methods of control used;
 - iii. If application was undertaken in a pest control emergency, provide explanation of circumstances of the emergency.

L. EMERGENCY EXEMPTION PROCESS;

The IPM Coordinator will make a recommendation to the City Council to allow staff, or an outside landscape contractor to apply a pesticide not on the Approved Use List or Limited Use List based upon a finding that the protection of public health requires the use of that pesticide due to an emergency. The City Council intends that such exemptions shall be granted on a per-case basis and shall apply to a specific pest problem for a limited time, with selection of pesticides conforming to the spirit and intent of this policy as is deemed practicable. The IPM Coordinator may grant emergency exemptions if action is required before the next meeting of the City Council. The IPM Coordinator shall report all such emergency exemptions to the City Council for review. To the greatest extent practicable, the notification requirements apply in an emergency situation.