

POLICY AND PROCEDURES 5-02/PWD

Effective: October 2001

Revised: July 2020

CMR: 343:01



INTEGRATED PEST MANAGEMENT POLICY

OVERVIEW

The purpose of this Integrated Pest Management (IPM) Policy is to establish landscape and structural pest management practices that reduce ecotoxicity and protect water quality and human health.

The City's IPM procedures will be guided by the Bay Area Municipal Regional Stormwater Permit (MRP) and other National Pollution Discharge Elimination System Permit requirements, state-of-the-art IPM practices, and staff pest management priorities.

The City will educate staff and the public about its IPM commitment in an effort to role model environmentally thoughtful, less-toxic approaches to structural and landscaping pest management.

DEFINITIONS

1. **Integrated Pest Management (IPM)**, also known as reduced-risk or less-toxic pest management, encourages long-term pest prevention and suppression through a combination of techniques including: biological controls, habitat manipulation, pest-resistant plant varieties, improved landscape and building hygiene, and structural maintenance and pest barriers. The IPM approach allows for the use of chemical control (pesticides) only as a last resort and only with the use of least-toxic products available as detailed in this policy.
2. **Pesticide**
For the purposes of this policy, pesticides are defined as:
 - a) any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest. Pesticides may include herbicides, fungicides, insecticides, rodenticides, and molluscicides.
 - b) any substance or mixture of substances intended for use as a plant regulator, defoliant, or desiccant.

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PROCEDURES**1. IPM Committee and IPM Coordinator**

The City will maintain an IPM Committee comprised of City staff whose job functions include pest management and environmental regulatory compliance. The Committee will usually consist of departmental representatives from Community Services (Open Space, Parks, and Golf), Public Works (Watershed Protection, Facilities, Trees), and Utilities (Water, Gas, Wastewater). The Committee will typically be led by a Public Works–Watershed Protection (PWD-WP) staff person, who will serve as the City’s IPM Coordinator. The Committee will meet periodically to discuss annual pest management needs, pesticide use trends, priority IPM projects, training needs and regulatory updates.

2. IPM Policy Training

Per the MRP, all staff responsible for pest management and pesticide applications will:

- a) receive annual IPM policy training;
- b) receive annual pesticide safety training; and
- c) Supervisors will:
 - i. track the number of employees that applied or used pesticides within the scope of their duties each reporting year;
 - ii. track the number and percentage of these employees, who received training on the city’s IPM policy and safety training within each reporting year, and the date the training was provided.

3. Pesticide Tracking and Reporting:

- a) the City will annually quantify staff and contractor pesticide use amounts using procedures and tools developed by the Public Works–Watershed Protection Division;
- b) Reports detailing the City’s pesticide use, location of use, pest management and pesticide use trends, and opportunities to improve pest management and reduce pesticide toxicity will be drafted biennially. PWD–Watershed Protection shall lead and coordinate drafting the reports;
- c) Periodic (usually annually) inter-departmental meetings will be led by PWD–Watershed Protection to review pest management and pesticide use trends, and priority IPM goals for the following year(s);
- d) Directions for creating the annual report and maintaining the City’s IPM database are located on the shared U:\Pesticides.

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4. Pesticide Use

- a) Due to MRP requirements, insecticides that contain the following active ingredients will not be used unless an exemption is approved by the IPM Coordinator(see Section 4c) because of water quality toxicity associated with their use:
- i. Carbamates: Aldicarb, carbaryl, propoxur, oxamyl and terbucarb
 - ii. Diamides: Broflanilide, chlorantraniliprole, cyantraniliprole, cyclaniliprole, cyhalodiamide, flubendiamide, tetraniliprole;
 - iii. Diuron;
 - iv. Indoxacarb;
 - v. Organophosphates: chlorpyrifos, diazinon, and malathion;
 - vi. Pyrethroids such as: allethrin, bifenthrin, cyfluthrin, cyhalothrin, cypermethrin, cyphenothrin, deltamethrin, esfenvalerate, etofenprox, flumethrin, imiprothrin, metofluthrin, momfluothrin, permethrin, prallethrin, resmethrin, sumethrin [d-phenothrin], tau-fluvalinate, tetramethrin, tralomethrin (unless these are placed in containerized baits or used in a manner where they cannot be washed into storm drain inlets or creeks by rain or irrigation runoff);
- b) In addition, beyond the MRP requirements, the following chemicals will not be used in order to protect pollinators, and to avoid ecotoxicity and potential human health issues:
- i. Neonicotinoids such as: acetamiprid, clothianidin, dinotefuran, imidacloprid, imidaclothiz, nitenpyram, nithiazine, paichongding, thiacloprid, and thiamethoxam will not be used;
 - ii. Rodent poison baits which pose secondary poisoning threats;
 - iii. Glyphosate will only be used where weeds may pose a potential threat to public safety and the natural environment (e.g. poison oak, unsafe playing surfaces, obstructed line of sight, invasive plant species) and only after non-chemical weed control measures have failed. Glyphosate applications will be based on need and not calendar scheduling. Per California Department of Pesticide Regulation, areas treated with glyphosate or other pesticides will be flagged and signed until the product is completely dry. Examples of authorized application areas include:
 - i. enclosed areas of utility substations;
 - ii. center road medians that are not adjacent to schools;
 - iii. natural areas to control invasive weeds that can overtake native terrestrial or aquatic plants.

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c) **Staff pesticide purchases and prohibited products:**

Retail purchase of pesticides using PCards (City credit cards) or Petty Cash is prohibited except by:

- i. supervisors from Public Works–Facilities, Public Works–RWQCP, Public Works–Trees, Community Services Open Space, Parks and Golf, and Utilities or their designee;
- ii. an exemption for emergency use of pesticides listed above that is authorized by the IPM Coordinator, Stormwater Manager, or Watershed Protection Manager.

Petty cash and PCard written guidelines and trainings will reflect these requirements. Warehouse stock items must be approved by Watershed Protection to comply with MRP requirements.

5. Plan Review and Staff Training

The City will create, implement and periodically review written IPM plans and provide related staff training for priority pests.

6. Weed management: Herbicides may be used to for:

- i. invasive weeds that can overtake native plants or threaten wildlife;
- ii. weeds such as thistles and foxtails, which harm dogs and trail users;
- iii. weeds that impact the playability of the Palo Alto Golf Course and the Palo Alto Lawn Bowl Club; and,
- iv. weeds, such as puncturevine, that impact the safety of playing fields.

7. Pollinator Protection

In recognition that systemic pesticides contribute to insect and bird pollinator decline and may contribute to creek toxicity from polluted runoff, the City will avoid the use of systemic pesticides (e.g. neonicotinoids, pyrethroids) which travel to plant pollen and nectar where pollinators may ingest or carry pesticides to other locations. The City shall take additional measures to protect pollinators and encourage public tolerance for stinging insects (e.g., bee colonies in trees, wasps, yellow jackets) when public safety is not an imminent threat. Procedures for responding to public complaints about stinging insects are located at U:\Pesticides.

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8. Pesticide-free Locations

No pesticides of any kind shall be used:

- a) on designated Pesticide-free Sites. Pesticide-free sites will be added by CSD– Parks as resources allow. Current list of Pesticide-free locations is listed at U:\Pesticides.
- b) within 100 feet of any playgrounds;
- c) within 100 feet of any creeks, unless the herbicide application is specifically targeted for invasive plant species which threaten the greater health of the creek. These applications will be used as a last resort when mechanical removal is insufficient.

An exemption may be approved for these requirements by a Parks supervisor with approval by the IPM Coordinator, Stormwater Manager, or Watershed Protection Manager.

9. Contractor Compliance

Structural and landscape contracts which include pest control services, must include requirements that:

- a) ensure that contract language reflects IPM Policy provisions and require contractors to adhere to IPM Policy and Procedures;
- b) requires contractors provide annual pesticide use information within ten business days of request. The form for contractors to submit annual use information is located at U:\Pesticides. All pesticides used by contractors must be approved for use prior to application;
- c) contractors must agree to the MRP provision that requires City of Palo Alto staff to periodically shadow contractor work to confirm that pesticide applications conform with pesticide practices outlined in the contract;
- d) structural pest management contractors must be EcoWise Certified or equivalent with approval from contract manager and IPM Coordinator.

10. Pesticide Application Public Notice

All areas treated with pesticides must be flagged, signed and monitored during and after pesticide application until material is completely dry according to product label, SDS, and California Department of Pesticide Regulations. Contractors shall supply signs for treatments applied by contractor. No unprotected person or pet may enter a treated area until all re-entry intervals have been satisfied.

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11. Public Outreach

The PWD–Watershed Protection Division will provide public outreach about integrated pest management through regional and local outreach campaigns and special events in recognition that most pesticide impacts in local waterways originate from residential use of pesticides (homeowner and contractor applications).

12. Wastewater Sources of Pesticide

When possible, the City will participate in regional studies that help identify pesticide sources, fate, and IPM solutions for pesticides that travel via the sanitary sewer system.

Recommended:	<small>DocuSigned by:</small> <i>Brad Eggleston</i> _____ Public Works Director	9/17/2020 _____ Date
Approved:	<small>DocuSigned by:</small> <i>Ed Shikada</i> _____ City Manager	9/17/2020 _____ Date
	<small>DocuSigned by:</small> <i>Tim Shimizu</i> _____ City Attorney or Designee	9/24/2020 _____ Date

Certificate Of Completion

Envelope Id: 2EE2237D2F0E4309A7211B1316BB87A3	Status: Completed
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Document Pages: 6	Signatures: 3
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	Palo Alto , CA 94301
	ingrid.velasquez@cityofpaloalto.org
	IP Address: 199.33.32.254

Record Tracking

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8/3/2020 1:17:06 PM	ingrid.velasquez@cityofpaloalto.org	
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Signer Events

Brad Eggleston
 brad.eggleston@cityofpaloalto.org
 Director of Public Works
 City of Palo Alto
 Security Level: Email, Account Authentication (None)

Signature

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Ed Shikada
 ed.shikada@cityofpaloalto.org
 Ed Shikada, City Manager
 City of Palo Alto
 Security Level: Email, Account Authentication (None)

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Tim Shimizu
 Tim.Shimizu@CityofPaloAlto.org
 Deputy City Attorney
 Security Level: Email, Account Authentication (None)

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In Person Signer Events

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Editor Delivery Events

Status

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Agent Delivery Events

Status

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Intermediary Delivery Events

Status

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Certified Delivery Events

Status

Timestamp

Certified Delivery Events	Status	Timestamp
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Carbon Copy Events	Status	Timestamp
Julie Weiss julie.weiss@cityofpaloalto.org Project Manager City of Palo Alto Security Level: Email, Account Authentication (None)	<div style="border: 2px solid blue; padding: 5px; display: inline-block; font-weight: bold; color: blue;">COPIED</div>	Sent: 9/24/2020 1:27:58 PM
Electronic Record and Signature Disclosure: Not Offered via DocuSign		

Witness Events	Signature	Timestamp
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Notary Events	Signature	Timestamp
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Envelope Summary Events	Status	Timestamps
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Payment Events	Status	Timestamps
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