

TOWN OF TIBURON INTEGRATED PEST MANAGEMENT POLICY POLICIES AND PROCEDURES

Policy No.	
Subject:	Integrated Pest Management Policy
Resolution No.	
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Prepared By:	Tiburon Public Works Department
Approved By:	Town Council, March 4, 2020

Introduction

The Town of Tiburon Public Works Department is committed to a comprehensive Integrated Pest Management (IPM) program guiding the management of its parks, landscaped areas and other public lands.

The purpose of this IPM program is to ensure and enhance the health, safety and welfare of citizens, visitors and Town staff by clearly defining the Town's pest management strategy, the priorities for administering this strategy and the various means by which these priorities may be realized. Public access to records and information relating to the Town's pesticide use is an essential component of a successful IPM program and the Town is fully committed to providing all pertinent information to the public in a timely, comprehensive and understandable manner.

Additionally, 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 which threaten water quality during Town operations and on Town property.

The Public Works Department realizes some pesticides are potentially hazardous to human health and the environment and shall administer this IPM program with a focus on long term suppression of pest problems with minimal impact on human health, non-target organisms and the environment. Least toxic pesticides are used only after monitoring indicates such a need, pursuant to the provisions of this policy.

What is IPM

IPM is a decision-making process for managing pests to determine if pest injury levels warrant treatment. It combines biological, cultural, mechanical, physical and/or chemical tools and other management practices to control pests in a safe, cost effective and environmentally sound manner that contributes to the protection of public health. This method uses extensive knowledge about pests such as infestations, thresholds, life histories, environmental requirements and natural enemies to complement and facilitate biological and other natural control of pests. IPM involves the use of

nonchemical pest control methods and the careful use of least toxic chemical methods when nonchemical methods have been exhausted or are not feasible. When IPM is properly implemented chemical controls are used only as a last resort. They are used as spot treatments and are chosen and timed to have the smallest negative impact on non-target organisms and the environment. IPM does not have percentage cutbacks and benchmarks in it, rather it states to monitor and use the least toxic methods to reduce the pest to a manageable level.

Scope of IPM Policy

This policy governs not only Department of Public Works employees but also landscape contractors hired by the Department and persons acting under the authority of the Department in the care and maintenance of Town parks, medians, landscaped areas, and other essential public lands. Although it is understood that the term "pesticide" is a general term that includes herbicides, insecticides, fungicides, rodenticides etc., the primary focus of this policy is to address the Town's use of herbicides.

As the Town plans for the maintenance and rehabilitation of existing areas, specific attention will be directed toward including specifications that eliminate or reduce the need for chemical pesticides (e.g., mow strips next to fencing, covering all new planting areas with mulch, etc.).

IPM Goals

As used in this policy, a "Category I," "Category II," "Category III" and "Category IV" pesticide shall refer to a pesticide product that falls within the commensurate toxicity category specified in Section 156.10 of Title 40 of the Code of Federal Regulations and bearing on the front label panel the word Danger, Warning, or Caution, as required therein.

IPM goals regarding pesticide selection and use shall include but not be limited to:

1. Elimination of Category I and II pesticides.
2. Minimization of Category III and IV pesticides.
3. Elimination of pesticides that are classified by government agencies as carcinogenic, reproductive toxicants (teratogens, mutagens), endocrine disruptors, carbamates, organophosphates or ground water contaminants.
4. The Town of Tiburon will use pesticides only when necessary and will select a pesticide that is both effective and least toxic.
5. Playgrounds, picnic areas, Town Hall and the Police Station will be designated as pesticide free.
6. Compliance with the Phase II, MS4, NPDES Storm Water permit requirements as outlined in F.5.f.9 (page 91 of permit)

The Director of Public Works has directed staff to implement these goals and incorporate them into agreements with outside contractors.

Integrated Pest Management Coordinator

The Superintendent of Public Works is designated the IPM Coordinator. The IPM Coordinator is primarily responsible for implementing the IPM Policy and coordinating efforts to implement IPM techniques within the Public Works Department. The Coordinator is responsible for communicating goals and policy decisions to appropriate Town staff and contractors, as well as ensuring proper training of all employees involved with the IPM program and all contractors who perform landscape maintenance on the Town's behalf.

Only individuals designated by the IPM Coordinator as Pesticide Applicators shall be permitted to apply pesticides on Town parks, landscaped areas, and other essential public lands. Applicators shall possess a Qualified Applicator Certificate or Qualified Applicator License, issued by the California Department of Pesticide Regulation. Presently, two Public Works staff are "Qualified Applicators" certified to apply pesticides.

The IPM Coordinator is responsible for ensuring that pesticide use is recorded and making those records available for public review pursuant to this policy.

Additionally, the Town of Tiburon shall support MCSTOPPP to conduct public outreach through the Our Water Our World program, monitor water and sediment for pesticides in urban creeks and keep the County Agricultural Commissioner informed of water quality issues.

Guidelines for Pest Treatment Selection

The Town shall use the following factors to determine the appropriate treatment strategy:

1. Pesticide to be applied
2. Area of treatment
3. Quantity applied
4. Date of Application
5. Least disruptive of natural controls
6. Least hazardous to human health and the general environment
7. Least toxic to non-target organisms
8. Cultural, biological and mechanical solutions have been considered
9. Prior treatments used to control the pest and an evaluation as to its success
10. Cost effectiveness in the short and long term

A Guideline has been developed to select the best pesticide to use and is found on page 8 of this policy.

Education and Training of Staff

Education and training of personnel is critical to the success of this IPM program. Employees involved in the maintenance of the Town parks, landscaped areas, and other essential public lands or with purchasing, storage, handling and application of pesticides shall receive all mandated and reasonable training required to perform

such work in an efficient and safe manner consistent with the provisions and intent of this policy.

Continuing Education in IPM and training in the use of non-chemical methods of pest control are important to a successful program. Landscape Division staff attend continuing pesticide education through the Professional Applicators Pesticide Association, (PAPA) on a yearly basis to maintain application certification. Additionally, the IPM Coordinator maintains all training records of qualified applicators. Page 12 is a sample of the Employee Pesticide Safety Training Record all applicators are required to complete.

The IPM Coordinator shall verify and document all contractors hired to perform IPM related work on the Town's behalf have received appropriate education and training. This documentation will be verified through state licenses and certifications.

The Public Works Department is dedicated to ensuring adequate funding and budget planning to maintain training and educational opportunities for all employees.

Use of Alternatives to Herbicides

The Town is fully committed to the use of pesticide alternatives whenever practicable. Currently, the Parks Division utilizes the application of mulch materials to discourage weed growth and encourage plant health. The Town works with arborists and specifies the provision of mulch material generated in the course of the tree maintenance work to be utilized by the Parks Division as a first line of defense against the proliferation of weeds. Additionally, the Town also uses the tried and true methods of hand pulling, hoeing and weed whipping.

Criteria for Selection and Use of Herbicides

There shall be no non-exempt herbicide applications permitted within Town playgrounds, picnic table areas, and on the grounds of Town Hall and the Police Department. Herbicide applications shall not be permitted on turf areas except in the maintenance of tree wells (a weed free zone around each tree), and certain landscape facilities (irrigation controllers, valve boxes, light fixture poles etc.).

It is understood that a completely weed free landscape environment is not a goal of IPM to which the Town aspires. The Public Works Department shall maintain landscaped areas as reasonably weed free to preserve the function and reasonable aesthetic appearance of public areas and Town facilities. With this goal in mind and considering the Parks Division staffing levels and ability to provide fundamental services, the Public Works Department shall select herbicides of the least toxic formulation.

Herbicides shall be used only after all other non-pesticide means of weed control have been utilized or have been determined to be not feasible in a particular application due to site factors, ability of staff to provide a particular function or service, or other pertinent factors. Application of herbicides shall comply with the provisions of this policy.

As with the criteria for selection and use of all pesticides, the selection and use criteria

for herbicides shall conform to standard IPM principles. No product from the Approved Use list shall contain any of the following:

- Pesticides classified as Toxicity Category I and Category II by the USEPA
- Carbonate (Car/Diox Gas) and organophosphate (Salts) pesticides
- Type A or B (known or probable) carcinogens, as well as mutagens and reproductive toxins
- Persistent bio accumulative toxic chemicals (PBT)

Approved Use Products

The only pesticide currently used by the Town of Tiburon is ~~Round Up Pro~~ LifeLine. Other Toxicity Category III (Caution) herbicides may be used, if approved by the Director of Public Works at the request of the IPM Coordinator, providing that the requested herbicide complies with this policy. In addition, the Town does use yellow jacket traps for their control.

As permitted by the Regional Water Quality Control Board, the Town also applies an aquacide for control of cattails in the Town maintained Railroad Marsh. This application will only take place during the months of October and September as to not disturb nesting migratory bird populations.

The Town contracts with a pest control firm to control rats in the ferry terminal and wharf area. The pesticide used is Disonone, common name Eaton's bait block and the active ingredient "diphacinone" (anticoagulant) is .005% in concentration. This project is classified as a Category III "caution" pesticide.

Notification of Pesticide Applications

The Department of Public Works will advise the public of pesticide application by posting notification 48 hours in advance. The locations requiring notification shall be maintained on a list (as Attachment A to this policy) and updated as necessary. Notification shall be accomplished by posting signs at reasonable entry point locations. Notices shall include the product name, EPA Registration # (if applicable), date(s) of pesticide application, Public Works contact phone number and any other information deemed necessary by the IPM Coordinator.

Record Keeping of Pesticide Applications

The IPM Coordinator shall be responsible for maintaining records of all pesticide applications on Town property performed by the Department of Public Works, or by contractors or persons authorized to apply pesticides on behalf of the Department of Public Works. The Town shall maintain these records for a period of four years as active files and 28 as inactive. Pesticide record information shall be made available to the public upon request. Application records shall include at least the following information:

1. Date and Site of application
2. Target pest(s) and application method
3. Name of product and active ingredient of the pesticide(s) applied and EPA registration number

4. Name of pesticide applicator and applicator identification number
5. Amount of product applied and pesticide signal word: warning, caution or danger.

The IPM Coordinator documents all applications on the State of California Monthly Summary Pesticide Use Report, a sample of which is attached as page 9 and the local form attached as page 11. In addition, IPM records shall include a list of all exemptions granted, as well as the written justifications developed for the consideration of those exemptions.

The Public Works Department shall strive to make this information available in a prompt and efficient manner with the understanding that its provision is not only the legal right of any member of the public but also a critical component of a successful IPM program.

Non-herbicidal Pesticide Use

The Town of Tiburon does not use non-herbicidal pesticides (insecticidal soaps) on any of its grounds at the present time.

Should the IPM Coordinator determine a need for applying a non-herbicidal pesticide, a recommendation and request shall be made to the Director of Public Works for approval. The Director shall approve such requests only if the IPM Coordinator has documented in writing:

1. A compelling need to use the pesticide
2. A good faith effort to find alternatives to the particular pesticide
3. That effective, economic alternatives to the particular pesticide do not exist for the proposed use
4. That the recommended pesticide is the least toxic pesticide available to control the target pest.

The public notification provisions of this policy shall also govern the application of non-herbicidal pesticides.

Exemption to This Policy

The Marin Sonoma Mosquito and Vector Control District is exempt from this policy to the extent necessary to control biting and stinging insects such as yellow jackets, wasps, mosquitoes and other similar pests.

In addition, the Town acknowledges that certain government agencies are not subject to the Town's authority with respect to pesticides and thus are exempt from this policy.

Attachment A

Locations requiring public notification for pesticide applications:

1. McKegney Green
2. Shoreline Park
3. Cypress Hollow Park
4. Zelinsky Park
5. Railroad Marsh
6. Teather Park
7. South of Knoll Park
8. Belveron Mini Park
9. Bel Aire Mini Park
10. Dairy Knoll
11. Open Space Areas
12. Highway 131 medians
13. Corporation Yard

Town of Tiburon Public Works Department

Guideline and Check List

Pest Control Treatment Selection

Guidelines	Yes	No	Alternates
Chemical to be applied _____			
Area of treatment _____			
Quantity applied _____			
Date of application _____			
Least disruptive of natural controls?			_____
Least hazardous to human health?			_____
Least toxic to non target organisms?			_____
Least damaging to the general environment			_____
Cultural, biological and mechanical solutions have been considered.			_____
Prior treatments used to control the pest and an evaluation as to its success.			_____
Cost effectiveness in the short and long term.			_____

MONTHLY SUMMARY PESTICIDE USE REPORT

INSTRUCTIONS FOR COMPLETING THIS FORM ARE INDICATED BELOW AND ON THE REVERSE SIDE

DEPARTMENT OF PESTICIDE REGULATION
ENFORCEMENT BRANCH

OPERATOR (FIRM NAME)	ADDRESS	CITY	ZIP CODE	PHONE NUMBER
OPERATOR ID/PERMIT NUMBER	LICENSE NUMBER	COUNTY WHERE APPLIED	COUNTY NUMBER	MONTH/YEAR OF USE
				TOTAL NUMBER OF APPLICATIONS

1. Complete Columns A, B, C, and D for All Users

2. Complete Column E by using one of the following codes:

- Code 10 - Structural Pest Control.....includes any pest control work performed within or on buildings and other structures.
- Code 30 - Landscape Maintenance Pest Control..... includes any pest control work performed on landscape plantings around residences or other buildings, golf courses, parks, cemeteries, etc.
- Code 40 - Right-of-Way Pest Control..... includes any pest control work performed along roadsides, power lines, median strips, ditch banks, and similar sites.
- Code 50 - Public Health Pest Control..... includes any pest control work performed by or under contract with State or local public health or vector control agencies.
- Code 80 - Vertebrate Pest Control..... includes any vertebrate pest control work performed by public agencies or work under the supervision of the State or county agricultural commissioner.
- Code 91 - Commodity Fumigation (Nonfood/Nonfeed)..... includes fumigation of nonfood/nonfeed commodities such as pallets, dunnage, furniture, burlap bags, etc.
- Code 100 - Regulatory Pest Control..... includes any pest control work performed by public employees or contractors in the control of regulated pests.

3. Complete Columns F and G, if use does not fit one of the above codes

A	B	C	D	E	F	G
MANUFACTURER AND NAME OF PRODUCT APPLIED	EPA/CALIFORNIA REGISTRATION NUMBER FROM LABEL INCLUDE ALPHA CODE	TOTAL PRODUCT USED (Check One Unit of Measure)	NUMBER OF APPLICATIONS	CODE	COMMODITY OR SITE TREATED	ACRES/UNITS TREATED
		<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> LB OZ PT QT GA				
		<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> LB OZ PT QT GA				
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		<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> LB OZ PT QT GA				

REPORT PREPARED BY _____

DATE _____

Print Form

GENERAL INFORMATION FOR COMPLETING THE MONTHLY SUMMARY PESTICIDE USE REPORT

(Page 2 of 2)

Reporting Requirements

Reporting of all pesticide applications including spray adjuvants and plant growth regulators, is required by:

1. Landscape maintenance gardener pest control businesses, agricultural pest control businesses performing residential work, and structural pest control businesses.
2. Public agencies, pest control businesses and property operators who apply pesticides for agricultural use other than for the production of an agricultural commodity. These uses include applications for the production of poultry, fish, and apiary. Pest control businesses must report uses for the production of livestock. Also, uses on golf courses, parks, rights-of-way, cemeteries, forests, ditches, fence lines, etc. must be reported.
3. Persons who use restricted materials for uses other than the production of an agricultural commodity.
4. Persons who use a pesticide for industrial post-harvest commodity treatments.
5. Persons who use a Ground Water Protection pesticide, listed in Title 3, California Code of Regulations, section 6800(b) for any outdoor, institutional or industrial use.

Report Filing Deadlines

Submit two (2) copies of this report to the county agricultural commissioner by the 10th of the month, following the month in which the work was performed. Reports may be hand-delivered or mailed, the postmark serving as the date of delivery. Retain a copy for your records.

For each month when no pest control work has been performed, licensed pest control businesses must submit a use report by the 10th day of the following month to the county agricultural commissioner in counties where they are registered. The use report must indicate that no pest control work was performed.

SPECIFIC INSTRUCTIONS FOR COMPLETING THE FACE PAGE

The operator/firm information should be filled out completely, including the address, ZIP code, and telephone number.

Identify the Operator Identification/Restricted Material Permit Number, if applicable.

Enter the name of the county where the pesticide(s) was applied.

Indicate the county number where the product(s) was applied. The county number is available from the county agricultural commissioner's office. A separate report must be filed for each county where pesticides were applied.

Enter the month and year in which the applications were made.

Enter the total number of applications (i.e., the total of column D below) made during the month.

In Column A, enter both the manufacturer and brand name of the product.

In Column B, enter the "EPA Registration Number" or "California Registration Number" that appears on the pesticide label, including alpha codes, if any (AA, ZA, ZB, etc.). Do not use the "EPA Establishment Number" (Est. No.).

In Column C, indicate the total amount of product used as formulated and packaged by the manufacturer. Do not report the total mixture after dilution. Check only one unit of measure. If necessary, decimals and fractions may be used.

In Column D, indicate the total number of applications for each pesticide used during the reporting month. Each separate site (home, apartment complex, building, right-of-way, grain silo, etc.) should be counted as one application. For tank mixes, each represented pesticide should be credited with one application.

In Column E, if the use of the product is structural, landscape, right-of-way, vertebrate, public health, commodity fumigation (nonfood/nonfeed) or regulatory, enter the appropriate code number. Leave Columns F and G blank.

In Column F, if use of the product is not included in one of the number coded categories that are identified in column E, such as food/feed commodity fumigations, seed treatment, noncrop fence lines or ditch banks, etc., enter the commodity or site treated. Leave Column F blank.

Do not enter vertebrate pest control work in production areas such as orchards or other crop areas. This work should be reported on the Production Agriculture Monthly Pesticide Use Report.

In Column G, if use of the product is not included in one of the number-coded categories that are identified in Column E, enter the amount treated and the appropriate unit of measure (acres, pounds, square feet, tons, etc.). If you have a different measure, describe it fully and enter the amount treated. Leave Column F blank.

Enter the name of the person responsible for completing the information, and date the report. This could be a licensee, a manager, the person who applied the pesticide, a bookkeeper, etc.

