CITY OF SANTA BARBARA

IPM STRATEGY

Adopted by City Council

January 26, 2004

TABLE OF CONTENTS

Preamble

On June 17, 2003, the City Council of the City of Santa Barbara adopted a resolution directing staff to develop an Integrated Pest Management Strategy for all City Departments. Prior to this event all City Departments were practicing least toxic measures and IPM principles; however, there was no united City policy creating consistency of practice throughout the departments. Pesticide use over a ten-year period (1990-2000) was reduced by half the volume of materials used in a calendar year in Parks, the Golf Course, and at the Airport. This strategy was developed to provide an ongoing specific program to further reduce the amount and toxicity of pesticides used on City property and, where feasible, to eliminate pesticide use in public areas using alternative methods.

In an effort to allow this program to be the most effective and of the most benefit to the public, City departments will coordinate their efforts with the County's IPM efforts to have policies consistent for all open space and park areas in the region. City departments will also continue to participate in Regional IPM Coalition efforts and collaborate with other local agencies facing similar challenges. Other cities that have a history of quality IPM programming will also be utilized as resources in the development and implementation of pesticide reduction efforts. Specifically, the City/County of San Francisco, California, and Seattle, Washington, have extensive IPM programs that offer models of learning for the City of Santa Barbara.

At the January 26, 2004 City of Santa Barbara, City Council Meeting, Council adopted the following Integrated Pest Management strategy. Council further directed staff work toward the goal of having pesticide free parks.

I. Mission Statement

It is the mission of the City of Santa Barbara IPM Policy to promote environmentally sensitive pest management while preserving assets and protecting the health and safety of the public and our employees. All costs and impacts associated with pesticide use, including community and environmental health, will be considered. The following IPM Strategy describes the City's goals and demonstrates how the City will achieve these goals.

II. Purpose

The purpose of this IPM Policy is to ensure that the City:

- Reduces and eliminates the use of pesticide products that pose known, likely, or probable human health or environmental risks;
- Promotes the use of non-hazardous and/or reduced risk alternatives that are protective of human health and the environment;

- Applies pesticides in a manner that protects and enhances our region's natural resources and public health;
- Pesticide use is a model of environmental stewardship in the eyes of the public;
- Maintains a leadership role in developing both ecologically sensitive and aesthetically pleasing landscapes and structures;
- Practices a consistent standard of environmental stewardship by departments managing structures, landscapes, and other grounds;
- Establishes a program where pesticides categorized as toxic or persistent (Tier 1) are only used when there is a threat to public health, safety or the environment, or when use is warranted to prevent economic damage and only after other alternatives have been implemented and shown to be ineffective or considered and found infeasible;
- Establishes a clear criteria for pesticide use, to reduce the amount and toxicity of pesticides and eliminate pesticide use on City property and where feasible.

This IPM Strategy also provides for periodical re-evaluation of pesticides used by the City. The Strategy requires updates, which outline pesticides that are being used in all departments, and will allow employees involved in pesticide use to make conscious decisions about the control mechanism selected, to employ the of use pesticides wisely, and to make full use of pesticides purchased. All departments responsible for overseeing construction projects; managing City-owned structures, grounds, landscapes; and purchasing and/or using pesticides are affected. In addition, all contractors that are applying pesticides on the City's behalf will be required to subscribe to the IPM Strategy. Disinfectants used to protect human health are excluded from this strategy and the IPM policy.

III. Definitions

Contract-
A binding written agreement requiring the services of an outside provider for grounds maintenance or any pest control related services or services that may include pest control activities.

Contractor-
A person, firm, corporation, or other entity, including a governmental entity, that enters into a contract with a department.

Emergency-
A pest outbreak that poses an immediate threat to public health or significant economic or environmental damage.

Exemption-
A process by which materials not on the approved materials list, can temporarily be used, but only after all alternatives have been reviewed, evaluated, and or implemented and only after the IPM Committee has authorized the use of the pesticide for the specified purpose. The application for an exemption shall be filed on a form specified by the IPM Committee and signed by the IPM Coordinator. Exemptions may be one-time or programmatic and the decision to approve an exemption will be based upon an evaluation of the failure of success of alternatives, and taking into consideration public health, environmental, and financial risks. (See Addendum A)

Hazardous Material-
A chemical or mixture that may pose a physical hazard, health hazard, or environmental hazard and that is regulated under the law to control its harmful effects. This definition is not intended to be rigid or legalistic because all materials regulated in this manner merit special attention and consideration under this program.

IPM Committee-
Oversight Committee consisting of representatives from each City department designated as the Department's IPM Coordinator, two Community representatives and other department representatives as deemed appropriate by individual departments involved in the IPM strategy implementation. This oversight committee shall be responsible for guiding the agency-wide implementation of the approved IPM strategy. The IPM committee shall meet a minimum of four times per year.

IPM Coordinator-
Individual designated for those departments that apply pesticides or contract with pesticide applicators. The City Administrator may appoint a person to coordinate these activities on a citywide basis to serve as the primary point of contact. The IPM coordinator(s) shall be trained in the principles of low risk IPM, safe application of pesticides, and alternatives to pesticide use.

The IPM Coordinator shall be responsible for:
1. Coordinating efforts to adopt IPM techniques.
2. Communication with all staff on the goals and guidelines of the program.
3. Coordinating training programs for staff.
4. Facilitating meetings with the IPM Committee.
5. Tracking all pesticide use and ensuring that the information is available to the public.
6. Presenting an annual report to evaluate the progress of the IPM program.
7. Coordinating with other public agencies that are practicing IPM programs.

Integrated Pest Management (IPM)-
A decision-making process for managing pests that uses monitoring to determine pest levels and tolerance thresholds and combines biological, cultural, physical, and chemical tools to minimize health, environmental, and financial risks. The method uses extensive knowledge about pests, such as infestation thresholds, life histories, environmental requirements, and natural enemies to compliment and facilitate biological and other natural control of pests. The method uses the least toxic pesticides only as a last resort and includes the following guiding principles.

1. Monitor each pest ecosystem to determine pest population, size, occurrence, and natural enemy population, if present. Identify decisions and practices that could affect pest populations. Records of all such monitoring shall be kept.
2. Set threshold and action levels. The threshold level refers to the point where a pest problem causes an unacceptable impact. The action level is the level of vegetation or pest population at a specific site at which action must be taken to prevent the population from reaching the threshold level.
3. Consider a range of potential treatments for the pest problem. Employ non-chemical management tactics first. Consider the use of chemicals only as a last resort, select and use the least toxic formulation effective against the target pest, and use pesticides only in accordance with other provisions of this policy.
4. Monitor treatment to evaluate effectiveness. Such monitoring records shall be kept.
5. Ongoing education of the public.
6. Special circumstances, i.e. protection of botanical specimen, or other mitigating factors may allow exemptions to the process outlined above.

Landscapes-
Grounds that are actively managed such as parks, plantings, lawns around public buildings, right-of-ways, watersheds, and open space, etc., excluding large tracts of forestland.

Tiered Materials List-
List of pesticides classified into four tiers on the basis of their hazard potential, updated annually by the IPM Committee. All pesticides considered for use by City departments are screened through the hazard criteria and will fall into one of the following tiers:

Tier 1: Highest concern

Tier 2: Moderate concern
Tier 3: Lowest concern
Tier 4: Insufficient information available to assign to above tiers

The Tiered Materials List will constitute the approved list of acceptable materials required in the IPM Resolution adopted by City Council June 17, 2003.

Pesticide Free Zones–
A site or area within a site so designated as a "Pesticide Free Zone" by specific departments in order to further reduce and eliminate pesticide use in areas of higher public exposure or areas with high environmental sensitivity. Any pesticide use deemed necessary for the protection of public assets, public safety and environment in these zones will only be authorized through the exemption process.

Pesticide-
Any substance, or mixture of substances, used for defoliating plants, regulating plant growth, or for preventing, destroying, repelling, or mitigating any pest, which may be detrimental to vegetation, humans, or animals.

Sustainable Design, Construction, and Maintenance-
Principles, materials, and techniques that conserve natural resources and improve environmental quality throughout the life cycle of the landscape and its surrounding environment. Sustainable designs for buildings and landscapes incorporate methods that reduce the potential for pest problems from the start and with long-term maintenance needs in mind.

Toxicity Category I Pesticide Product-
Any pesticide product that meets United States Environmental Protection Agency criteria for Toxicity Category I under Section 156.10 of Part 156 of Title 40 of the Code of Federal Regulations.

Toxicity Category II Pesticide Product-
Any pesticide product that meets United States Environmental Protection Agency criteria for Toxicity Category II under Section 156.10 of Part 156 of Title 40 of the Code of Federal Regulations.

IV. Descriptions of Roles and Responsibilities

- Department Head
- Departmental IPM Coordinator
- IPM Committee
- A Governing Body

Department Head

Department Heads shall be responsible for:

1. Ensuring that departmental procedures, budget, and staffing decisions support implementation of the IPM Strategy.
2. Providing training to grounds management staff in the requirements of this IPM Strategy.
3. Designating an Integrated Pest Management Coordinator to ensure products used by the Department meet the standards outlined in this IPM Strategy and represents the Department on the IPM Committee.
4. At least annually and in conjunction with the IPM Committee, report to the IPM governing body on the Department's implementation of the IPM Strategy.

Establishing an Integrated Pest Management Coordinator

Each department will be responsible for designating an Integrated Pest Management Coordinator. Departments will be responsible for providing Integrated Pest Management training in addition to opportunities for the Coordinator and other employees responsible for pest management.

The Coordinator will be responsible for:

1. Managing the IPM program for the Department.
2. Selecting a location for any IPM pilot project to take place.
3. Reviewing requests for new products to ensure that the products meet the standards of the IPM Plan and submitting the product for review to the IPM Committee.
4. Attending meetings of the IPM Committee.
5. Presenting an IPM Annual Report to the Department Head for presentation to the governing body on an annual basis.

Annual Report

The report should, as a minimum:

1. Identify the types of pest problems that the Department has encountered.
2. Identify the types and quantities of pesticides used by the Department.
3. Identify the alternatives currently used for phased out pesticides.
4. Identify the alternatives proposed for adoption within the next 12 months.

5. Identify any exemptions currently in place and granted during the past year.
6. Identify planned changes to pest management practices.
7. Evaluate the effectiveness of any changes in practice implemented.
8. Discuss any IPM Committee dissentions on any issues

IPM Committee

This advisory committee is responsible for:

1. Meeting on a regular basis to review and discuss pest management practices.
2. Develop, adopt, and periodically review the Tiered Materials List.
3. Review, approve, or deny exemptions to the Phased-Out Pesticide approved List.
4. Review emergency pest control decisions.
5. Prepare the IPM Annual Report.
6. Investigate low-risk/least hazardous alternatives to conventional treatments.
7. Assist departments in implementing the IPM Strategy by developing educational information for staff and public users about IPM plans and programs.
8. Annually review the written IPM Strategy and recommend appropriate revisions to ensure the program meets the intended purpose and goals of IPM.

The Committee is made up of IPM Coordinators, two Community representatives and staff involved in the day-to-day operations and oversight of pest management operations. The Committee's role is supportive of the IPM Coordinator. Any dissentions on any decisions should be noted and reported in the IPM Annual Report.

Governing Body

The role of the governing body is to provide direction and support to the departments, review and commenting on the IPM Annual Report, and considering public input. The governing body shall consist of the City Council or the Park and Recreation Commission as assigned by the City Council.

V. Notification

(a) Any department that uses any pesticide shall comply with the following notification procedures:

(1) Signs shall be posted at least two working days before application of the pesticide product and remain posted at least three working days after application of the pesticide.

(2) Signs shall be posted at every entry point where the pesticide is applied if the pesticide is applied in an enclosed area, and in highly visible locations, signs will be posted around the perimeter of the area where the pesticide is applied if the pesticide is applied in an open area.

(3) Signs shall be of standardized designs that are easily recognizable to the public and workers. (See Addendum B)

(4) Signs shall contain the name and active ingredient of the pesticide product, the target pest, the date of pesticide use, the signal word indicating the toxicity category of the pesticide product, and the name and contact number for the Department responsible for the application. (See Addendum B for sample sign)

(5) Signs will be bilingual in English and Spanish.

(6) Individual copies of posted signs shall be retained for record keeping purposes for one year.

(b) Departments shall not be required to post signs in right-of-way locations where public use and potential exposure is limited or on the airfield areas at the Santa Barbara Municipal Airport where public access is restricted. However, each department that uses pesticides in such locations, where the use of those pesticides is not posted, shall develop and maintain a public access telephone number or web site with information regarding pesticide applications in these areas. Information will be readily available by calling the public access number or accessing the web site. Information shall remain on the web site on all pesticides that will be applied within the next three days or have been applied within the last four days. In addition, a description of the area of the pesticide application, the name and active ingredient of the pesticide product, the target pest, the date of pesticide use, the signal word indicating the toxicity category of the pesticide product, and the name and contact number for the City department responsible for the application will also be listed. Information about the public access telephone number shall be posted in a public location at the Department's main office building.

(c) Posting for pesticide use at the Santa Barbara Golf Club shall consist of signs placed at the first and tenth tee and in the Pro Shop.

(d) Pesticide Free Zones established by each department will require a fourteen-day advance posting in the event an exemption is approved by the IPM Committee or Coordinator and shall remain in place three days after the application.

(e) Departments may obtain authorization from the Committee to apply a pesticide without providing a two-day advance notification in the event of a public health emergency or to comply with worker safety requirements. Signs meeting the requirements of Subsection (a)(2) through Subsection (a)(4) shall be posted at the time of application and remain posted four days following the application. (See section VI C)

(f) The Committee may grant exemptions to the notification requirements for one-time pesticide uses and may authorize permanent changes in the way City departments notify the public about pesticide use in specific circumstances, upon a finding that good cause exists to allow an exemption to the notification requirements. Prior to granting an exemption pursuant to this subsection, the Department requesting the exemption shall identify specific situations in which it is not possible to comply with the notification requirements and propose alternative notification procedures. The Committee shall review and approve the alternative notification procedures.

(g) Departments are responsible for making pesticide use information available to staff and the public upon request. Each department shall maintain a list of all materials applied on a site-specific basis. This list shall be available at each department's main offices or made available to the public upon request.

VI. Tiered Materials List and Exemption Process

The IPM Committee shall develop a tiered risk assessment of pesticides. A prioritized list of materials will be developed to identify materials that may be targeted for future phase-out based on IPM Committee review of the product's contents, precautions, need for the product, and adverse health and environmental effects. The IPM Committee will make product recommendations and establish and prioritize the Tiered Materials List for future materials phase out. The lists shall be submitted as part of the annual report to the City Council and Park and Recreation Commission. A material on the Phased-Out Pesticides List may be used if determined appropriate by the IPM Committee in compliance with the emergency exemption process.

Criteria for developing materials lists shall be based on acute and chronic toxicity of products and chemicals known to cause cancer and known to cause reproductive toxicity. Environmental impacts of the products shall also be considered. The approved materials list shall screen pesticides for the following risk parameters:

A. Acute Toxicity: The potential for a pesticide to cause immediate harm.

1. Hazard Category

Each pesticide product registered by EPA is assigned hazard category I, II, III, or IV by the Agency based on characteristics of the full product formulation, including acute toxicity, and skin and eye irritation. In evaluating the acute data, EPA assigns the hazard category based on the greatest hazard, i.e. ingestion, inhalation, skin absorption, eye irritation, etc.

The table below shows the toxicity ranges that apply for each category. (Note: LD50 indicates lethal dose 50%; LC50 indicates lethal concentration 50%.) A relatively non-toxic product (via ingestion, inhalation, or skin absorption) could be placed in the highest hazard category merely on the basis of extreme eye irritation. Products in category I are most hazardous and bear the signal word DANGER on their labels. Those in category II are labeled WARNING. Both category III and IV products are labeled with CAUTION. Product category was determined from label signal words, and category III and IV products were not distinguished from each other.

EPA Category	**I**	**II**	**III**	**IV**
Signal Word	**DANGER**	**WARNING**	**CAUTION**	**CAUTION**
Oral LD50 (mg/kg body wt)	Less than 50	Between 50 and 500	Between 500 and 5000	More than 500
Inhalation LC50 (mg/liter air)	Less than 0.2	Between 0.2 and 2	Between 2 and 20	More than 20
Dermal LD50 (mg/kg body wt)	Less than 200	Between 200 and 2,000	Between 2,000 and 20,000	More than 20,000
Eye Effects:	Corrosive Non-reversible opacity	Severe irritation Reversible opacity Persisting 7 days	Moderate irritation No opacity Reversible 7 days	No irritation
Skin Effects:	Corrosive	Severe irritation	Moderate irritation	Mild irritation

2. Restricted Use Pesticides

Some pesticides are restricted for use by the state to only certified pesticide applicators and are not available to the general public because of high toxicity, particularly hazardous ingredients, or environmental hazards.

B. <u>Chronic Toxicity</u>: The ability of the pesticide to cause long lasting harm.

1. Carcinogens (active ingredients only)

For the purposes of the City of Santa Barbara IPM Strategy, this will include all pesticides on the State of California Environmental Protection Agency Office of Environmental Health Hazard Assessment Safe Drinking Water and Toxic Enforcement Act of 1986 list of Chemicals Known to the State to Cause Cancer or Reproductive Toxicity.

2. Reproductive/Developmental Toxicants (active ingredients only)

“Chemicals known to the State of California to cause cancer or reproductive toxicity."
The source used for the development of the Materials Phase-Out List is the State of California Environmental Protection Agency Office of Environmental Health Hazard Assessment Safe Drinking Water and Toxic Enforcement Act of 1986 list of Chemicals Known to the State to Cause Cancer or Reproductive Toxicity.

3. Endocrine Disruptors (active ingredients only)

These are pesticides with the ability to mimic or block the effects of hormones in humans and other wildlife. Because of the similarity of the endocrine system across many species, its critical role in development and reproduction, and its extreme sensitivity to very low levels of hormone-like compounds, there is the potential for endocrine disrupting substances in the environment to adversely affect wildlife and humans.

Although the science is relatively new and in many cases highly controversial, considerable evidence of effects in wildlife and some evidence in humans has caused many scientists to warn of potential dangers from exposure to endocrine disrupting chemicals. Under the Food Quality Protection Act, the EPA is required to screen pesticide ingredients for endocrine system effects. Until that screening is done, a comprehensive list of endocrine disruptors will not be available.

For the purpose of this strategy development, the source used for the development of the Tiered Materials List is the State of Illinois Environmental Protection Agency list of known, probable, or suspected of causing endocrine system effects (Illinois EPA Endocrine Disruptors Strategy, February 1997.).

4. Ecotoxicity (active ingredients only)

Based upon the required precautionary statements on product labels, pesticides that warn of potential toxicity to non-target wildlife species will be considered in the development of the Tiered Materials List. Of primary concern is toxicity to:

- Birds
- Aquatic Organisms
- Bees
- Other wildlife or domestic animals

5. Persistence

Pesticides are considered to be persistent if their half-lives exceed 100 days. For the purposes of the approved materials list, the Oregon State University Extension Pesticide Properties Database, the Agricultural Research Service/US Department of Agriculture Pesticide Properties Database or Hazardous Substances Databank will be used in that priority.

6. Water Pollution Hazard (active ingredients only):

- Leaching potential
- Runoff potential

The Ground Water Ubiquity Score (GUS) index is used to identify those pesticides that have a high potential to contaminate the ground water.

Ranking by Tiers

Materials will be classified into tiers on the basis of their hazards.

Tier Definitions

Tier 1: Highest concern
Tier 2: Moderate concern
Tier 3: Lowest concern
Tier 4: Insufficient information available to assign to the above tiers

The criteria for assigning materials to tiers are as follows:

Tier 1: (Any of the following are true)

- Products in EPA Hazard Category 1, Signal Word DANGER
- Restricted use pesticides
- Products with known, likely, or probable carcinogens as active ingredients (EPA list of Chemicals Evaluated for Carcinogenic Potential classified as Carcinogenic To Humans, and Likely To Be Carcinogenic To Humans)
- Products with reproductive toxicants as active ingredients (CA Prop 65 list)

- Products with known or probable endocrine disrupters as active ingredients
- Products labeled as highly toxic or extremely toxic to birds, aquatic species, bees, or wildlife
- Products with active ingredients with soil half lives greater than 100 days (not applicable to products used only indoors on to products used in bait stations)
- Products with active ingredients with mobility ratings high or very high or with specific label warnings about groundwater hazard (Not applicable to products used only indoors on to products used in bait stations)
- Products containing the rodenticides brodifacoum, bromethalin, or bromadionone

Tier 2:

- All products not assigned to Tier 1 or Tier 3

Tier 3: (All of the following are true)

- Product contains no known, likely, or probable carcinogens
- Product contains no reproductive toxicants (CA Prop 65 list)
- Product contains no ingredients listed by Illinois EPA as known, probable, or suspect endocrine disrupters
- Active ingredients has soil half-life of thirty days or less
- Product is labeled as not toxic to fish, birds, bees, wildlife, or domestic animals

Tier 4: Not enough information

The Tier 1 list of pesticides will be used by the IPM Committee to determine future product elimination.

C. **Emergency exemption**

A department may apply to the IPM Committee for an emergency exemption in the event that an emergency pest outbreak poses an immediate threat to public health or significant economic damage will result from failure to use a pesticide that has been placed on the Phased-Out Pesticide List. An application for an exemption shall be filed on a form specified by the IPM Committee. (See Addendum A) The IPM Committee shall respond to the application in a timely manner. If the requesting department is unable to reach the IPM Committee, the IPM Coordinator may authorize the one-time emergency use of the required pesticide. The IPM Coordinator must notify the IPM Committee members of the determination to use the pesticide prior to its application in the event that the IPM Coordinator is unable to make the request at the IPM Committee meeting. The IPM Committee will review the circumstances of the emergency permit issued by the IPM Coordinator at the next scheduled IPM Committee meeting. Signs shall be posted at the time of application and remain posted four days following the application. The IPM Committee may impose additional conditions for emergency applications.

D. Establishing "Pesticide Free Zones"

Pesticide Free Zones are sites or areas within a site established to be free of pesticide applications. All pesticide applications will be done only through the exemption process. These zones will be posted with permanent signage indicating them as pesticide free zones. The following have been established as Pesticide Free Zones.

- **Playgrounds** – No pesticides will be applied within 100 feet of playgrounds.
- **Picnic Areas** – No pesticides will be applied within twenty-five feet of picnic facilities.
- **Alice Keck Park Memorial Gardens** – The entire park will be a Pesticide Free Zone. This will be a demonstration garden for the community for the use of alternatives to pesticides. Sustainable landscape management practices will be practiced.
- **Chase Palm Park** – All turf areas will be considered Pesticide Free Zones on both sides of Cabrillo Boulevard.
- **Shoreline Park** – The entire park will be considered a Pesticide Free Zone.
- **Oak Park** – The entire park will be considered a Pesticide Free Zone.
- **Alameda Park** – Entire block of East and West Alameda Park will be considered a Pesticide Free Zone.
- **The following Neighborhood Parks:**

    - Willowglen Park
    - Los Robles Park
    - Hilda Ray Park
    - Sunflower Park
    - Parque De Los Niños
    - Eastside Neighborhood Park
    - Escondido Park
    - La Mesa Park
    - Stevens Park

- **Creeks** – Within twenty feet of the top of banks in any creek or wetland.
- **Douglas Family Preserve –**No pesticides will be applied. Habitat restoration projects will require justification of herbicide use through the exemption process with an extra step of review by the Douglas Family Preserve Advisory Committee.

The IPM Committee will base decisions to add to the list of Pesticide Free Zones upon monitoring the effectiveness of alternatives and other factors. It is the intention over time to expand these zones as time and resources allow.

E. Timetable for phase out of materials

This Strategy commits the City departments to the following timetable to reduce and eliminate pesticide usage on public sites.

By January 1, 2004

- Eliminate the use of all EPA Hazard Category 1 materials
- Eliminate pesticides listed by the State of California Environmental Protection Agency Office Prop. 65 chemicals known to cause cancer or reproductive toxicity
- Eliminate pesticides on the EPA Chemicals Evaluated for Carcinogenic Potential list of pesticides that are Carcinogenic to Humans and Likely to be Carcinogenic to Humans.
- Eliminate pesticides categorized as known or probable endocrine disruptors by the State of Illinois.

By April 1, 2004

- Develop the Tiered Materials List.

By July 1, 2004

- Develop a list of pesticides for elimination on the Tier One list and or best management practices for the use of those to remain on the approved materials list.

By December 31, 2004

- Develop "Zone Concept" of pesticide use tied to the Tiered Materials List to limit pesticide use based upon potential human exposure.
- Determine additional sites as "Pesticide Free Zones".

VII. Record Keeping

(a) Each department that uses pesticides shall keep records of all pest management activities. Each record shall include the following information:

(1) The target pest;
(2) The type and quantity of pesticide used;
(3) The specific location of the pesticide application;
(4) The date the pesticide was used;
(5) The name of the pesticide applicator;
(6) The application equipment used
(7) Prevention and other non-chemical methods of control used;

(8) Experimental efforts; and
(9) Exemptions granted for that application.

(b) Each department that uses pesticides shall maintain a pest management record as a part of their individual departments Integrated Pest Management Strategy and provide it to the governing body when requested. A summary of record keeping results will be included in the IPM Annual Report.

(c) Pest management records shall be made readily available to the public upon request.

VIII. Training

Increasing knowledge of staff and contractors who design and maintain buildings and landscapes is critical to the success of the IPM Program. Consequently, providing ongoing training and educational opportunities to City staff and contractors regarding building and landscape IPM concepts, practices, and products will be a priority.

The IPM Coordinator shall invite speakers and arrange for other educational opportunities to assist departments in implementing the IPM Program each year. Department Directors shall ensure that IPM Coordinators inform employees on departmental policies and procedures relevant to this IPM Program and keep staff current with best landscape-management practices and technologies that utilize Integrated Pest Management. Department Directors shall also support employee involvement in identifying and implementing strategies to minimize the use of pesticides and in evaluating replacements to chemicals targeted for phase-out.

- All staff associated with planning, design, construction, and maintenance of buildings and landscapes shall receive an orientation to the IPM Strategy and their roles and responsibilities in implementing it in a written or verbal format.
- All personnel involved in pest management activities shall receive training on:

    - An orientation to the IPM Strategy.
    - Identification and lifecycles of typical southern California pests, weeds and beneficial insects; determining threshold levels for different types of landscapes; monitoring techniques; and strategies for successful management of these pests
    - Noxious weed identification, control, and regulations
    - Pesticide laws and safety
    - Specific best management practices as appropriate

Training will be provided by City/County staff, IPM consultants, IPM technical advisors, and invited guest speakers. The IPM Coordinator, with assistance from the IPM Committee, will schedule training. Training and educational opportunities, both formal and informal, will also occur at landscape staff meetings. Managers and supervisors are not only expected to participate in the training, but to fully support involvement of their staff and contractors in the training.

In making landscaping staffing and budget decisions, departments shall consider the potential environmental tradeoffs; for example, will reduced staffing require increased use of pesticides to maintain the landscape at the same standard? Will short-term IPM expenditures result in long-term savings?

IX. Program Review & Coordination

Tracking Progress and Evaluating the Program

Annually, the Committee will gather information for the Annual IPM Report. Each department will submit a summary of the previous year's pilot projects, a timeline for implementing pilot project recommendations and viable changes at other sites, and plans for any new pilot projects including changes that can be implemented in the next fiscal year and a timeline for their implementation. Pilot projects will also evaluate costs and cost savings. The Committee shall compile this information and any recommendations for future direction of the program and shall submit the report to the Park and Recreation Commission and City Council.

X. Public Information

Efforts will be made to educate the public about reduced risk pest management goals and practices implemented under this policy in the most effective manner given time and budget constraints. Various venues may be utilized for public education and information including:

- Departmental web pages
- Water bill inserts
- Public workshops/symposiums and sustainable park sites
- Articles in City publications
- Sharing of IPM information with the Community Development Department Planning Division in regards to this IPM Strategy, pesticide usage and alternatives

XI. Reviewing Plans for New Construction and Landscape Projects

Poorly planned landscape designs may require intensive maintenance and greater reliance on pesticides for pest control than landscapes created with integrated pest management design specifications.

Departments participating in a City project that includes the design of new landscape or renovation of an existing one shall design and construct the project consistent with IPM design specifications. The IPM Coordinator for each department will review all project plans to ensure that, where possible, the design considers IPM measures and the following strategies.

In planning, designing, and installing landscape owned and managed by the City, site objectives shall include future management and maintenance practices that protect and enhance natural ecosystems. A landscape, facility, or road right-of-way should be planned and designed taking into account parameters that will enhance the intended use of the land and minimize pest problems. Design will take into account such factors as types of uses, soils, grading and slope, water table, drainage, proximity to sensitive areas, selection of vegetation, and vector control issues. City grounds designers, planners, managers, crews, and their contractors shall give priority to IPM strategies when designing new and renovating existing landscaped areas. These include:

- Using proper soil preparation and amendment
- Specifying weed-free soil amendments
- Using mulches to control weeds, conserve water, and build healthy, biologically diverse soils
- Use weed control fabrics under organic mulches
- Use site adapted and pest resistant plants: “the right plant for the right place”
- Group together plants with similar horticultural needs
- Retain and use regionally native trees, shrubs, and perennials where appropriate, preferably from genetic stock
- Pre-plant control of noxious weeds and invasive, non-native plant species
- Plant for erosion and weed control
- Assess whether landscapes can still meet the intended site use objectives while modifying the aesthetic standard and/or applying less maintenance
- Match maintenance standards to site objectives in the design stage
- Construct walkways so as to prevent weed intrusion; and
- Plant vegetation that will encourage the presence of beneficial insects and birds

XII. Contractors

When a Department enters into a new contract or extends the term of an existing contract that authorizes a contractor to apply pesticides to property, the contract shall obligate the contractor to comply with all provisions of this IPM Policy. In addition, the contractor shall submit to the City an IPM implementation plan that lists:

- The types and estimated quantities, to the extent possible, of pesticides that the contractor may need to apply to property during its contract;
- Outline actions the contractor will take to meet the IPM Policy to the extent feasible; and
- Identify the primary IPM contact for the contractor.

A contractor, or department on behalf of a contractor, may apply for any exemption authorized under the exemptions section of this policy.

XIII. Precautionary Principle

It is the policy of the City to adopt, properly implement and practice low risk/least hazardous Integrated Pest Management with the goal of immediately minimizing the risk of pesticide exposure to staff, the environment, and the public. This policy is based on what is referred to as the 'Precautionary Principle' of pest management. The guiding principles in this policy are based on the following: (1) No pesticide is free from risk or threat to human health, (2) all reasonable alternative measures of pest management have been attempted and have been shown, and documented in writing, to be unsuccessful, and (3) pesticides suspected of being in conflict with the mission and goals of this policy shall not be used without an exemption, or until it is determined that a specific product is safe for use around sensitive individuals (i.e. children, elderly, asthmatics, etc.).

The Precautionary Principle should guide decision-making processes when it comes to the health and safety of staff and public. All aspects of the program will be in accordance with federal and state laws and regulations and county policies. All departments within the City must conform to the IPM Strategy.

Addendums

ADDENDUM A
MATERIAL EXCEPTION REQUEST FOR
PESTICIDE APPLICATION

Dept:_____IPM Coordinator:_____Phone:_____
Pesticide Applicators (company) Name:_____Phone:_____
Site Name:_____Date:_____
Name of Product:_____
(Attach the product label and MSDS to this form)

Product exemption request is:

- ☐ One time exemption
- ☐ Programmatic exemption

Product type:

- ☐ Herbicide
- ☐ Insecticide
- ☐ Fungicide
- ☐ Other_____

Application:

- ☐ Ornamental
- ☐ Turf
- ☐ Golf
- ☐ Street Tree
- ☐ Park Tree
- ☐ Right of Way
- ☐ Vector control
- ☐ Vertebrate pest

Describe the management goals and objectives for this site.

Describe the pest problem.

What is the damage threshold for this pest at this site?

What monitoring of the pest and potential predators (where applicable) has been conducted and what control methods have been previously used at the site?

Describe how the product would be applied including frequency, concentration, and method of application.

What non-target impacts do you anticipate?

How does the use of this product help achieve the site management goals and objectives? Note if this is curative or preventative.

How will the effectiveness of this product be monitored? Include your expected results and indicators of success.

Describe the site conditions. Please note if this is a restricted access area, within 0 feet from a creek or body of water, subject to runoff or in a designated "Pesticide Free Zone."

Describe the alternatives considered and detail why they were eliminated. Include an analysis of why this is the most environmentally prudent option and why a less-hazardous chemical, non-chemical option, or taking no action is not feasible.

- **Exemption Request ☐ Approved ☐ Denied**

If denied, give the reason:

If approved, follow the attached best management practices.

Signatures:_____ _____
Department IPM Coordinator **City IPM Coordinator**

ADDENDUM B

NOTICE OF PESTICIDE APPLICATION

Day _____ **Date** _____

The material(s) being applied is (are):

_____

Product Toxicity Category: _____
(Signal Word)

Target Pest: _____

Area Treated: _____
(Attach map if necessary)

Signs will remain 72 hours after pesticide application.

If you have questions, please call us at:

(805) _____

ADDENDUM C
MONTHLY ALTERNATIVE USE REPORT

Location	Supervisor	Month	Year

- **MECHANICAL / PHYSICAL / CULTURAL / BIOLOGICAL**

Location	Approximate Sq. Ft.	Time/Hours Per Person	Type of Method and Target Pest	Comments

ADDENDUM D

CITY OF SANTA BARBARA
PARKS AND RECREATION DEPARTMENT

- **MONTHLY PESTICIDE USE REPORT**

(Due by the 1st of every month)

Location	Supervisor	Month	Year

	Date/Park	Product & Manufacturer	EPA Reg. #	How Applied	Specific Area Treated & Target Pest	Rate	Total Product Used	Weather Conditions	Applicator (Print)
1									
2									
3									
4									
5									