



City of Santa Barbara
Public Works Department

Interoffice Memorandum

DATE: February 3, 2022
TO: Jazmin LeBlanc & The IPM Advisory Committee
VIA: Sarah Clark, Acting Downtown Plaza and Parking Manager
FROM: Mark Nunez, Facilities Maintenance Supervisor
SUBJECT: Request for IPM Exemption for the Fumigation of City Building

The Downtown Parking Section of Public Works is requesting review for exemption by the IPM Advisory Committee to fumigate the following structures:

- 1) 209 State St. Santa Barbara Amtrak Building – This is a historic structure, approximately 6050 square feet, which is open to the public.

There is no history of prior fumigation or other treatment for the above-listed building. Unfortunately, the damage is beyond localized treatment, and in all cases fumigation was deemed as the proper course of action by the Facilities Division and the fumigator for multiple reasons.

If you have any questions regarding this request, please contact Mark Nunez, Facilities Maintenance Supervisor at (805) 564-5657

Attachments: IPM exemption request packages

City of Santa Barbara
MATERIAL EXEMPTION REQUEST FOR PESTICIDE APPLICATION

Dept Public Works IPM Coordinator Mark Nunez Phone 805 564 5657

Pesticide Applicator (employee or company) Name Escalera Pest Control Phone 805-964-4651

Application Site 209 State St Specific Location Entire Building

Date(s) of Application March 2022

Product Name Vikane, Chloropicrin Active Ingredient Sulfuryl Fluoride, Chloropicrin

Number of Applications: One-time Other _____

• Type: Emergency Trial Programmatic Other _____

Product type: Herbicide Insecticide Fungicide Other _____

Application: Ornamental Turf Golf Vector Control Park Tree Street Tree
 Right of Way Vertebrate pest Other Termite eradication

Is the pesticide on the *Tiered Materials List*? No Yes If yes, provide the Tier _____

If the pesticide is not on the *Tiered Materials List*, provide the following screening information. See the IPM Strategy and the *Tiered Materials List* for instructions on screening the pesticide.

EPA Reg # 1015-78, 62341-15 Signal Danger Estimated Tier 1

Restricted No Yes/Describe Inhalation toxicity

P Waste _____ PBT _____ WA PBT _____ Persistent _____ Mobil _____

Cancer _____ Repro _____ Neuro _____ Endocrine _____

Bird _____ Fish _____ Bees _____ Wildlife _____

Attach product label and MSDS to this form.

Describe the pest problem.

Response: There is visible termite damage throughout the structure. There is likely damage in concealed areas. Fumigation is recommended by the pest control company.

Describe the management goals and objectives for this site.

Response: To maintain the structure in a structurally-safe and thereby usable condition. This building is a City of Santa Barbara recognized historic building, which is also open to the general public. Fumigation work is provided with a two year warranty from the contractor.

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

Response: Fumigation for the drywood termite populations is past due. As the Facilities Maintenance Supervisor, my opinion is of concurrence with that of the pest control company that successful fumigation of the building will be highly beneficial to maintaining structural stability. No records were found of prior fumigation.

Describe the monitoring of the pest and potential predators that was conducted and the control methods previously used at the site.

Response: Fumigation history is not available. Internal reports and site visits have been ongoing as part of general building inspections by City staff, with notice of termites.

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

Response: Contract for proposed work requires project execution be in accordance with the manufacturer's guidelines and instructions. The structure is planned for a one-time 48-hour tenting. The manufacturer's recommended concentrations of 3850 ppm (1 lb/1000ft³) of gas. The manufacturer recommend Chloropicrin introduction 10 minutes prior to release of the fumigant. The manufacturer's recommended dispersion of the gas from the pressure vessels to the

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MATERIAL EXEMPTION REQUEST FOR PESTICIDE APPLICATION

tented volume from the exterior via tubing that terminates in the airstream of multiple fans for increased dispersion.

What non-target impacts are anticipated?

Response: Building will be closed, sealed and otherwise barred access to from humans. Pests will not be cleared and will be killed. Spiders and ants will, unfortunately, also be killed.

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

Response: The product is recognized for its fumigation purposes and will rid the infestation populations from eating at the structure. Maintaining structural integrity is the main goal. Fumigation is considered palliative care for the structure themselves and curative in regards to ailments affecting the building lifespan (considering the lack of prior fumigation).

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

Response: The building are periodically investigated for termite activity. No visible termite presence for three years, with minor activity in the following years would be a success.

Describe site conditions, for example consider the following: restricted access, distance from a creek or body of water, degree of runoff, site is a pesticide-free zone, etc.

Response: Clearance of the railroad tracks must be maintained at all time. The building is approximately 47 feet away from the railroad tracks along the south side and no work can be performed within 25 feet of the railroad tracks without a Southern Pacific Rail Road flagman on site. The building is approximately 250 feet away from Mission creek. The location and surrounding the building endear it to a significant level of homeless overnight use. Being a city building, property is considered a pesticide-free zone.

List alternatives considered, alternatives implemented and why they were eliminated.

Response: Heat treatment was not considered due to the building having critical electrical equipment that must remain in place during fumigations. The building also has an automatic fire suppression system that will open at the heat treatment temperatures. Spot treatment was not considered sufficient due to the termite evidence in multiple locations and suspected in concealed areas. The location and surrounding the building endear it to a significant level of homeless overnight use. Being a city building, property is considered a pesticide-free zone.

Justification: describe why is applying this pesticide is the best solution and why a less-hazardous chemical, non-chemical option or taking no action is not feasible.

Response: At this time, fumigation with the proposed chemicals is the most cost effective method, most thorough and longest lasting treatment method available. Taking no action is considered infeasible due to the remaining life expectancy of the building. In addition, this option would conflict with the goals of the City of Santa Barbara Historic Landmarks Commission.

Was outside expertise utilized? No Yes / Describe

Response: The pest control company was consulted, and provided comments, and selected the fumigants.

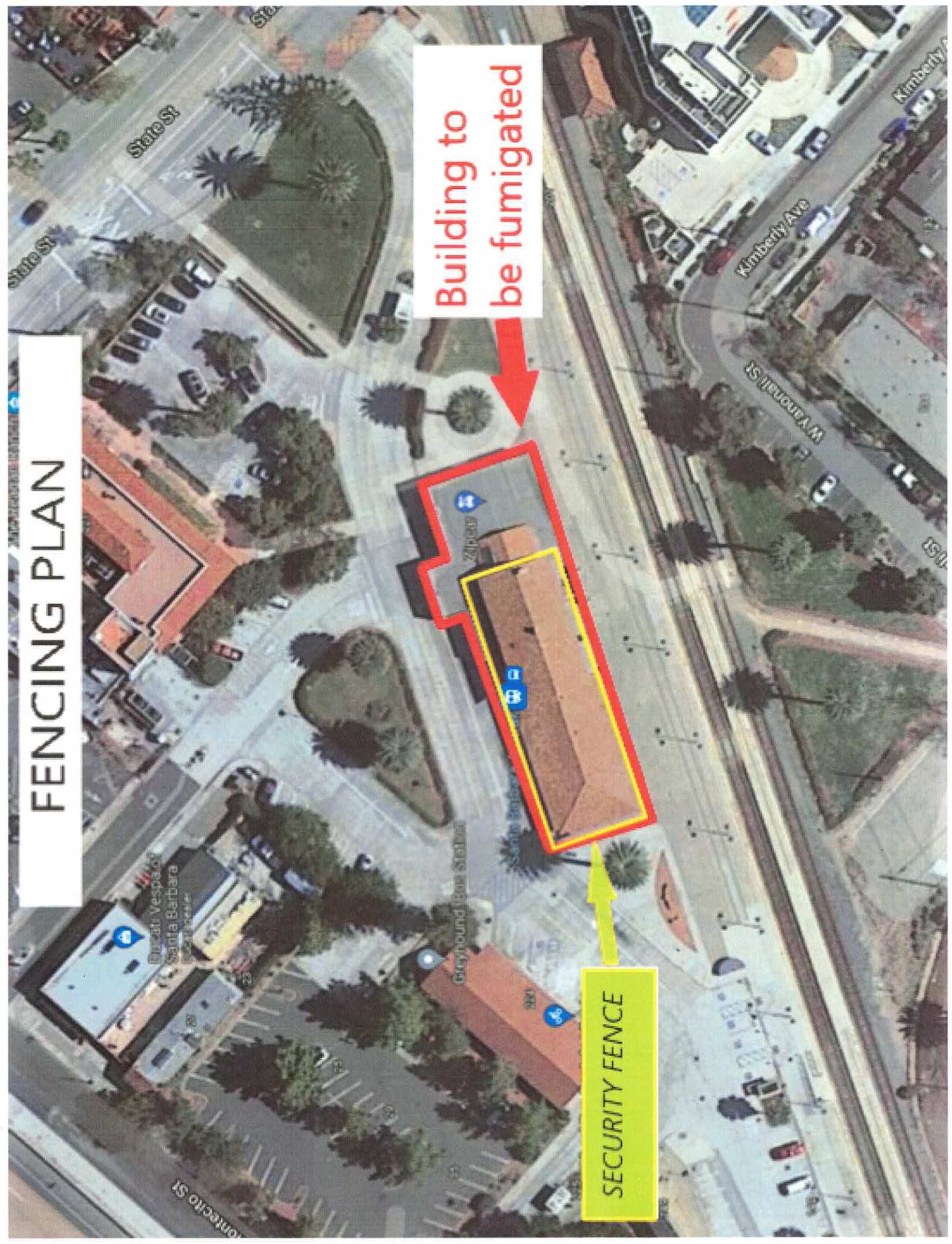
Describe future plans to prevent using the chemical again.

Response: With more regular inspections, we anticipate that using spot treatment will be sufficient to maintain the infestation to relatively minor levels.

FENCING PLAN

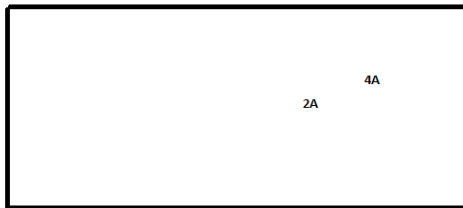
Building to be fumigated

SECURITY FENCE



WOOD DESTROYING PESTS AND ORGANISMS INSPECTION REPORT

Building No. 209	Street State St	City Santa Barbara	Zip 93101-3833	Date of Inspection 02/18/2022	Number of Pages 1 of 6
Escalera Pest Control 55 S La Cumbre Road #3 Santa Barbara, CA 93105 Tel 805-964-4651 Fax 805-964-7792 Registration #: PR4479			A LICENSED PEST CONTROL OPERATOR IS AN EXPERT IN HIS/HER FIELD. QUESTIONS RELATIVE TO THIS REPORT SHOULD BE REFERRED TO HIM/HER. Report #: 7466		
Ordered by: The Amtrak Depot Station 209 State St Santa Barbara, CA 93101-3833 805-570-5915		Property Owner and/or Party of Interest: The Amtrak Depot Station 209 State St Santa Barbara, CA 93101-3833 805-570-5915		Report sent to: The Amtrak Depot Station 209 State St Santa Barbara, CA 93101-3833 805-570-5915	
COMPLETE REPORT <input type="checkbox"/>		LIMITED REPORT <input checked="" type="checkbox"/>		SUPPLEMENTAL REPORT <input type="checkbox"/>	
General Description: 2 story, comm. building, slab, tile roof		Inspection Tag Posted: attic			
		Other Tags Posted:			
An inspection has been made of the structure(s) shown on the diagram in accordance with the Structural Pest Control Act. Detached porches, detached steps, detached decks and any other structures not on the diagram were not inspected.					
Subterranean Termites <input type="checkbox"/> Drywood Termites <input checked="" type="checkbox"/> Fungus/Dryrot <input type="checkbox"/> Other Findings <input checked="" type="checkbox"/> Further Inspection <input type="checkbox"/> If any of the above boxes are checked, it indicates that there were visible problems in accessible areas. Read the report for details on checked items.					
Key: 1 = Subterranean Termites 2 = Drywood Termites 3 = Fungus/Dryrot 4 = Other Findings 5 = Unknown Further Inspection					



Inspected By: Fred Swetman State License No.: OPR13501 Signature:

You are entitled to obtain copies of all reports and completion notices on this property reported to the Structural Pest Control Board during the preceding two years. To obtain copies contact: Structural Pest Control Board, 2005 Evergreen Street, Suite 1500, Sacramento, CA 95815

NOTE: Questions or problems concerning the above report should be directed to the manager of the company. Unresolved questions or problems with services performed may be directed to the Structural Pest Control Board at (916) 561-8708, (800) 737-8188 or www.pestboard.ca.gov.

WOOD DESTROYING PESTS AND ORGANISMS INSPECTION REPORT

Building No.	Street	City	Zip	Date of Inspection	Number of Pages
209	State St	Santa Barbara	93101-3833	02/18/2022	2 of 6

General Comments

THIS IS A STRUCTURAL PEST CONTROL REPORT: NOT A BUILDING INSPECTION REPORT THEREFORE NO OPINION IS BEING RENDERED REGARDING THE STRUCTURAL INTEGRITY OF THIS BUILDING.

A Wood Destroying Pest & Organism Inspection Report contains findings as to the presence or absence of evidence of wood destroying insects or organisms in visible and accessible areas on the date of inspection, and contains recommendations for correcting any infestation, infections, or conditions found. The contents of Wood Destroying Pest & Organism Inspection Reports are governed by the Structural Pest Control Act and its rules and regulations.

The Structural Pest Control Act requires inspection of only those areas which are visible and accessible at the time of inspection. Some areas of the structure are not accessible to inspect, such as inaccessible attics or portions thereof; the interior of hollow walls; spaces between a floor or porch deck and the ceiling or soffit below; such structural segments as enclosed bay windows, buttresses, and similar areas o which there is no access without defacing or tearing out lumber, masonry or finished work; built-in cabinet work; floors beneath coverings, areas where storage conditions, furnished interiors or locks make inspection impracticable. These areas will be inspected if they are make accessible by the owner at his expense.

NOTE: It is not economically feasible to open and check areas mentioned above and similar enclosed conditions. These areas are excluded from this report. Also, detached wooden fences, garden trellises, and similar detached are not part of this report. This inspection covers the structure indicated on the diagram.

Showers over ceilings are not water tested unless water stains are evident below. In which case, recommendations will be made for further testing.

THE EXTERIOR SURFACE OF THE ROOF WILL NOT BE INSPECTED. IF YOU WANT THE WATER TIGHTNESS OF THE ROOF DETERMINED, YOU SHOULD CONTACT A ROOFING CONTRACTOR WHO IS LICENSED BY THE CONTRACTOR'S STATE LICENSE BOARD.

This property was not inspected for the absence of health related molds or fungi. By California law we are neither qualified or authorized, nor licensed to inspect for health related molds or fungi. If you desire information about the presence or absence of health related molds, you should contact an industrial hygienist.

NOTE: WE DO NOT REMOVE FLOOR COVERINGS AT THE TIME OF INSPECTION. WE ASSUME NO RESPONSIBILITY FOR ANY DAMAGE DETECTED TO ANY WOOD FLOORS AFTER THE FLOOR COVERINGS HAVE BEEN REMOVED. THESE AREAS WILL BE INSPECTED IF THEY ARE MADE ACCESSIBLE PRIOR TO OUR INSPECTION.

NOTE: REPORTS ON THIS STRUCTURE PREPARED BY VARIOUS COMPANIES SHOULD LIST THE SAME FINDINGS (I.E. TERMITE INFESTATION, TERMITE DAMAGE, ETC...) HOWEVER RECOMMENDATIONS TO CORRECT THESE FINDINGS MAY VARY FROM COMPANY TO COMPANY... YOU... HAVE A RIGHT TO SEEK A SECOND OPINION...FROM ANOTHER COMPANY.

When Work Is Recommended

Escalera Pest Control, Inc. agrees to use all reasonable care int eh performance of our work, but we cannot assume any responsibility should any damage occur to plumbing pipes, electrical pipes embedded in the ground or overhead, roof or other facilities, plants and shrubs, or for injuries or death of animals.

NOTE: It is recommended that building permits be obtained for all work requiring permits, prior to beginning the recommended repairs. For information concerning the building department and permit requirements, contact the local building department. Work performed as required under a permit from the building department should be approved, accepted and signed off by the department prior to considering such work to be completed. Building department may require installation of smoke/hear detectors as a condition of obtaining a building permit.

This company will re-inspect repairs done by others within four (4) months of our original inspection. A charge, if any, cannot be greater than the original inspection fee for each re-inspection. The re-inspection must be done within ten (10) working days of the request. The re-inspection is a visual inspection, and, if inspection of concealed areas are desired, inspection of work in progress will be necessary. Any guarantees must be received from parties performing repairs.

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NOTE: The charge for services that this company subcontracts to another licensed company may include the companies charges for arranging and administering such services in addition to the direct costs associated with paying the subcontractor. You may accept Escalera Pest Control, Inc.'s bid, or you may contract directly with another licensed company. Escalera Pest Control, Inc. will not be responsible for any act or omission in the performance of work that you directly contact with another to perform.

NOTE: If any infestation, infection or damage is discovered in a concealed area during the course of performing any recommendations on this report, or any remodel work, this company will file a supplemental report. This company is not responsible for controlling such infestation or infections nor responsible for controlling such damage. If the additional work is within the scope of this companies operation a cost will be provided with the supplemental report.

All payments are due upon completion of work. In the event an attorney is employed to enforce payment, the under-signed agrees to pay reasonable attorney fees and other costs of collection. Any balance after thirty (30) days will be subject to a 1 1/2% finance charge on the unpaid balance.

Under California Mechanics lien law, any structural pest control operator who contracts to do work for any contractor, subcontractor, laborer, supplier or their person who helps to improve your property, but has not paid for his work or supplies, has a right to enforce a claim against your property. This means that after a hearing, your property could be sold by a court officer and the proceeds of the sale use to satisfy the debt. This can happen even if you have paid your contractor in full, if the subcontractors, laborers, or suppliers remain unpaid. We reserve the right to file a claim or lien against your property, certain claimants such as subcontractors or material suppliers are required to provide you with a document entitled "Preliminary Notice". General contractors and laborers for wages do not have to provide this notice. A preliminary notice is not a lien against the property. Its purpose is to notify you of persons who ma have a right to file a lien against your property if they are not paid.

This is a separated report; it is defined as Section 1 and Section 2 conditions evident on the date of inspection.

Section 1: Contains item where evidence exists of active infestation, infection or condition that have resulted in or from infestation or infection.

Section 2: Contains items deemed likely to lead to infestation or infection, but where no visible evidence of such was found.

Further Inspection: Contains items defined as recommendations to inspect area(s) which, during the original inspection, did not allow the inspector access to complete the inspection and cannot e defined as Section 1 or Section 2.

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This is a separated report which is defined as Section I/Section II conditions evident on the date of the inspection. Section I contains items where there is visible evidence of active infestation, infection or conditions that have resulted in or from infestation of infection. Section II items are conditions deemed likely to lead to infestation or infection but where no visible evidence of such was found. Further inspection items are defined as recommendations to inspect area(s) which during the original inspection did not allow the inspector access to complete the inspection and cannot be defined as Section I or Section II.

Description of Findings

SECTION: I DRYWOOD TERMITES

Finding: 2A Evidence of Drywood Termites noted at attic as indicated on the diagram.
Recommendation: Cover structure and fumigate for the elimination of Drywood Termites. Vikane or Zythor will be used as the fumigant in combination with chloropicrin as a warning agent. Although we take every precaution, we cannot be responsible for damage to plants, paint, roofs and/or antennas. Fumigation cannot be performed during rains or heavy winds. THREE YEAR WARRANTY. NOTE: IF SWALLOWS NESTS ARE ACTIVE, FUMIGATION, BY LAW, MUST BE CANCELLED. ACCORDING TO THE DEPARTMENT OF FISH AND GAME, PREVENTION THROUGH EARLY DETECTION MAY BE THE BEST COURSE OF ACTION FOR HOMEOWNERS. IF THE MUD NESTS ARE DESTROYED BEFORE THEY ARE ONE-THIRD COMPLETE, NO LAWS ARE BROKEN.

Price: \$8,324.00

SECTION: II OTHER FINDINGS

Finding: 4A Water stains noted at attic as indicated on the diagram.
Recommendation: Owner to employ a licensed contractor to inspect and repair as deemed necessary.
Price: Others

Section I Total:	\$8,324.00
Section II Total:	\$0.00
Grand Total:	\$8,324.00

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Disclaimer

At the request of agent, this report is a limited inspection of attic as described herein and as indicated on the diagram.

State law requires that you be given the following information: CAUTION- PESTICIDES ARE TOXIC CHEMICALS. Structural Pest Control Companies are registered and regulated by the Structural Pest Control Board, and apply pesticides which are registered and approved by the California Department of Pesticide Regulation and the United States Environmental Protection Agency. Registrations is granted when the state finds that, based on existing scientific evidence, there are no appreciable risks if proper use conditions are followed or that the risks are outweighed by the benefits. The degree of risk depends upon the degree of exposure, so exposure should be minimized.

IF WITHIN 24 HOURS FOLLOWING APPLICATION, YOU EXPERIENCE SYMPTOMS SIMILAR TO COMMON SEASONAL ILLNESS COMPARABLE TO THE FLU, CONTACT YOUR PHYSICIAN OR POISON CONTROL CENTER AT 800-662-9886 AND YOUR PEST CONTROL OPERATOR IMMEDIATELY.

FOR FURTHER INFORMATION CONTACT ANY OF THE FOLLOWING:

ESCALERA PEST CONTROL, INC 805-964-4651

COUNTY HEALTH DEPARTMENT (HEALTH QUESTIONS)

SANTA BARBARA COUNTY 805-691-4900

VENTURA COUNTY 805-654-2813

COUNTY AGRICULTURAL COMMISSION (APPLICATION)

SANTA BARBARA COUNTY 805-681-5600

VENTURA COUNTY 805-388-4222

STRUCTURAL PEST CONTROL BOARD (REGULATORY INFORMATION)

2005 EVERGREEN STREET, SUITE 1500

SACRAMENTO, CA 95815 800-737-8188

We recommend that a complete inspection of the property be performed. On that report, all evidence of active infestation or infection will be noted. There will be an additional charge for the inspection. Cost for the inspection will be quoted upon request.

Price quoted are current for 90 days from the date of inspection with exception to instance of increase in sub-contractor labor fees and/or material costs. Owner will be advised of such increases prior to commencement of work.

Escalera Pest Control will warranty all work completed by this company for a period of two years from the date of completion unless otherwise noted. Subterranean Termite chemical treatment is limited to the immediate area of treatment and is warranted for a one year period only unless otherwise noted in the body of the report.

NOTE: ESCALERA PEST CONTROL DOES NOT PERFORM FINISH PAINTING, THEREFORE, IT IS THE RESPONSIBILITY OF OWNER TO HIRE A LICENSED PAINTER AFTER WOOD REPAIRS HAVE BEEN PERFORMED.

NOTE: DUE TO AGE OF MANY STRUCTURES, MILLING OF WOOD MAY BE NECESSARY TO MATCH EXISTING WOOD AT ADDITIONAL COST.

NOTE: IF PERMITS ARE REQUIRED TO PERFORM REPAIRS, ADDITIONAL COST WILL BE QUOTED AT OWNER'S EXPENSE.

The roof surface and perimeter areas of the structure(s) must be walked upon. Escalera Pest Control and/or sub-contractor may use foam pads on the roof surface during the course of fumigation. However, Escalera Pest Control

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and/or sub-contractor will assume no responsibility for any damage that may occur. Any resulting costs for repair will be the sole responsibility of owner(s).

NOTE: A ROOF RELEASE WILL BE REQUIRED.

NOTE: ESCALERA PEST CONTROL RECOMMENDS THAT ALL PARTIES OF INTEREST BE PRESENT ON THE FIRST DAY OF FUMIGATION WHILE TENT IS BEING TARP OVER STRUCTURE AND THE LAST DAY WHILE TENT IS BEING REMOVED.

Climbing plants and vines and/or trellises must be removed prior to the fumigation crew's arrival. To lessen damage to the shrubbery in close proximity to the structure(s), all trees, plants and foliage must be cut back at least 6 to 8 inches away from the structure(s) walls.

Plants left unattended that are too close to the building to allow proper sandbagging of tarps will die or be damaged in the fumigation. Escalera Pest Control and/or sub-contractor will not assume responsibility for such damage.

NOTE: A PLANT RELEASE WILL BE REQUIRED.

NOTE: EFFECTIVE OCTOBER 28, 2002, THE SOUTHERN CALIFORNIA GAS COMPANY AND SAN DIEGO GAS & ELECTRIC COMPANY HAVE DETERMINED THAT ONLY UTILITY PERSONNEL MAY SHUT-OFF (CLOSE) AND RESTORE (TURN-ON) GAS SERVICE BEFORE AND AFTER TENTED FUMIGATION JOBS. FUMIGATION CONTRACTORS ARE NO LONGER AUTHORIZED TO PERFORM THESE SERVICES FOR SAID GAS CUSTOMERS.

THE FUMIGATION COMPANY IS RESPONSIBLE FOR CALLING GAS COMPANY TO TURN GAS SERVICE OFF. IT IS THE RESPONSIBILITY OF OWNER OR OWNER'S AGENT TO CALL GAS COMPANY AT LEAST 48 HOURS PRIOR TO RESUME SERVICE. THE GAS COMPANY REQUIRES AN ADULT TO BE PRESENT ON PROPERTY FOR ACCESS INTO STRUCTURE AND ALSO REQUIRES PROOF THAT PROPERTY HAS BEEN CERTIFIED FOR RE-ENTRY. (THIS NOTICE IS POSTED BY FUMIGATION COMPANY).

GAS SERVICE TURN-ON ORDER CAN BE SCHEDULED BY CONTACTING THE GAS COMPANY AT 1-800-427-2200.