City of Rohnert Park
Integrated Pest Management

POLICY AND PROCEDURES

City of Rohnert Park Integrated Pest Management

Policy and Procedures

Purpose

The Integrated Pest Management (IPM) policy is intended to provide a basis for a pest management program that will protect public health, as well as water quality, and non-target plants and animals. The goal of the City of Rohnert Park (City) IPM policy is to utilize the most environmentally sound approaches to pest management, and to reduce the volume and toxicity of chemical pest control treatments.

Key objectives of the IPM policy are:

1. to require planning, development and coordination of the IPM program for all City departments; and
2. to provide procedural guidelines for implementation of a coordinated IPM program.

Scope and Application

The IPM Policy shall apply to all pest control activities by the City of Rohnert Park, including activities at public buildings and related facilities; grounds and open space; urban forestry, and other property owned or managed by the City of Rohnert Park and conducted by City staff and/or contractors. It is expected that all pest management on City property will adhere to industry best practices, reduce or eliminate pesticide applications to the maximum extent feasible, and include all reasonable measures to protect human and environmental health. It is further expected that all City employees monitoring or treating pest problems, or managing contractors who are conducting IPM activities on the City's behalf, are familiar with the content and principles of the policy, receive on-going annual training, provide accurate, well-documented records and conduct annual evaluations of the IPM program and practices.

Policy

The City of Rohnert Park, in planning for and implementing its pest management operations, shall:

1. assume that all pesticides (organic and conventional) are potentially harmful to the health of humans and the environment (ex. water quality and non-target species);

2. adhere to the tenets of IPM including focusing on long-term pest prevention or suppression, giving preference to reasonable non-pesticide alternatives such as cultural, mechanical and/ or biological control;
3. employ an IPM Specialist to monitor and assess pest populations, advise and oversee citywide IPM planning and pest management activities and contracts; and keep record of and report on city IPM activities;
4. pursue an organizational structure that allows the IPM Specialist to make recommendations on pest control that are independent of divisional operational constraints;
5. transition all parks to “green”/ least-toxic pest management;
6. ensure consistency and full compliance with federal, state and county regulatory requirements related to pest control;
7. contract with pest control contractors that utilize least-toxic pest control methodology and ensure contracts have language that upholds the IPM Policy and identifies damages for any violations of the Policy;
8. conduct Pesticide Hazard and Exposure Reduction (PHAER) analysis on all publicly accessible and heavily used areas such as parks, bike/ pedestrian paths, and sidewalks;
9. use pesticide risk assessment guidelines employed by the City and County of San Francisco to create and annually maintain a list of reduced-risk pesticides, and associated limitations for use, which may be applied as necessary within the City of Rohnert Park;
10. establish and coordinate a IPM Technical Advisory Committee to assist in creating and updating a Reduced-Risk Pesticide List, provide general guidance on the IPM Program, and ensure transitioning of all parks and other high use areas to “green”/ least-toxic pest management;
11. use a transparent pesticide use exemption process to justify variance from pesticide use restrictions and limitations. Exemptions shall only be considered when addressing health and safety issues, noxious pests, and/ or to test new reduced-risk pesticide products;
12. promote public transparency and education via noticing of all pest management activities, engaging residents with outreach and education regarding less toxic pest control methodology, and annual reporting to advisory commissions.

The goals of this policy are to:

1. Create awareness among City staff, contractors and citizens of IPM techniques and environmental stewardship.

2. Provide a means of educating all City maintenance crews and contractors to practice the most appropriate approach to managing pests on City property.
3. Work toward transitioning all parks and other high use areas to "green"/ least-toxic pest management.
4. Reduce and/or eliminate pesticides that pose known significant human or animal health, or environmental risks based on the best available scientific information.
5. Establish a program where pesticides categorized as having a reduced-risk to human and environmental health may be used within the City of Rohnert Park only after other alternatives have been attempted and are ineffective. If pesticides are used, provide guidelines on safe storage, handling, use, and application.

Procedures

Sec. 1 Definitions

I. Biological Control - Biological technologies to manage unwanted pests. Examples of this type of control include, but would not be limited to, the use of pheromone traps for management of Indian meal moth in food storage/preparation areas, or beneficial insect release for control of certain types of weeds or invasive insects in landscapes.

II. Chemical Control - The use or application of a chemical pesticide (green or conventional) to manage pests.

III. Contractor - A person, firm, corporation, or other entity, including a governmental entity, which enters into a contract with the City of Rohnert Park.

IV. Cultural Control - The practice of modifying the growing environment to reduce the prevalence of unwanted pests. Examples include: irrigation practices, improved and reduced fertilization applications, proper mowing practices that include mulching, and regular aeration to improve the soil.

V. Green Park – A park or high public use area where pest management is limited primarily to cultural, mechanical, and biological control methods. When chemical control methods are necessary, only "green"/ least-toxic (i.e. Tier 3) pesticides may be used.

VI. Green Pesticide - A material that is generally considered to have minimal adverse environmental or chronic health and safety impacts. Such chemicals are synonymous with Tier 3 chemicals identified on the Reduced-Risk Pesticide List. Some materials in this category contain strong acids and are not necessarily safer for the applicator.

VII. IPM - A decision-making process that analyzes, selects, and implements pest control strategies to prevent or control pest populations. IPM uses a "whole systems" approach that employs monitoring and extensive knowledge about pests, such as infestation thresholds, life histories, environmental requirements, and natural enemies to compliment and facilitate biological, cultural, mechanical and other natural control of pests. Chemical control methods are considered only when necessary.

VIII. Mechanical Control - Utilizes hand labor or equipment such as mowers, graders, weed-eaters, and chainsaws. Crack and crevice sealants and closing small entryways (e.g., around pipes and conduits) into buildings for insect and rodent management would also be mechanical methods.

IX. PCA - Pest Control Advisor: an individual licensed by the California Department of Pesticide Regulations according to Title 3, Article 5 of the California Code of Regulations. Only a licensed PCA, who is registered with the County Agricultural Commissioner may provide written pest control recommendations for agricultural pest management, including parks, cemeteries, golf courses, and rights-of-way.

X. Pest - Fungus, insect, nematode, rodent, weed, or other form of terrestrial or aquatic life form that is injurious to human or farm animal health, or interferes with economic activities such as agriculture, public utilities and landscaping.

XI. 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, animals or structures.

XII. PHAER Zone - A strategy giving structure to the implementation process of the IPM policy in parks by allowing supervisors the needed flexibility in their management options and informing the citizens about the general level of pesticide hazard on a site-by-site basis. PHAER zones are designated as Green, Yellow and Special Circumstance Zones, with Green Zones providing the lowest potential for pesticide hazard and exposure. Each Zone has limitations based on the Reduced-Risk Pesticide List and associated product tiers.

XIII. Precautionary Principle - This states that in the absence of scientific consensus, if an action or policy has a suspected risk of causing harm to the public or environment, the burden of proving the action or policy harmless falls on those implementing the action or policy. The principle implies that there is a social responsibility to protect the public from exposure to harm, when scientific investigation has found a plausible risk. These protections can be relaxed only if further scientific findings emerge that provide sound evidence that no harm will result.

XIV. Reasonable Alternative - A feasible option for pest control that takes into account the environmental, economic, and social costs and benefits of the proposed choices.

XV. Reduced-Risk Pesticide - A material which has been assessed and identified as having a reduced hazard and exposure risk using a ranking system, best available science, and technical advisory body vetting.

XVI. QAL - Qualified Applicators License authorizes and individual to apply pesticides according to Title 3, Article 3 of the California Code of Regulations. Applications may include residential, industrial, institutional, landscape, and right-of-way sites.

Sec. 2 Regulation

The following regulations apply to the IPM program:

I. Pesticide Advisor and Application Licensing and Categories

Title 3, Article 3 of the California Code of Regulations requires that individuals who apply or supervise the application of pesticides possess a valid Qualified Applicators License (QAL), issued by the Department of Pesticide Regulation (DPR). QAL certification requires that applicants take training coursework on, and test proficiently in, pesticide laws and regulations, basic principles of pest control, and at least one of the following pest control categories:

1. Parks & Buildings
2. Right of Ways (islands, sidewalks, etc.)
3. Sewer Line Root Control
4. Water Tank and Well sites

A new license may be valid for up to two years, depending on when the employee or contractor became certified. Each renewed license is valid for two years unless the employee or contractor renews late, in which case the renewal is valid for one year.

Once the employee or contractor passes the examination(s) and receives a license, he/she must accumulate a designated amount of approved continuing education (CE) hours. DPR will inform the employee or contractor of the number of approved CE hours they are required to complete. After the first renewal, he/she is required to accumulate at least 20 hours of approved CE hours every two years before license renewal. Four of the 20 hours must cover the topic of pesticide laws and regulations.

Similarly, Title 3, Article 3 of the California Code of Regulations requires that individuals who provide pest control recommendations concerning any pesticide use must possess a valid Agricultural Pest Control Adviser (PCA)

License. PCAs must have a college degree with minimum coursework in Physical and Biological Sciences, Crop Health, Pest Management Systems and Methods, and Production Systems as well as journey level experience. PCA's are authorized to make pest control recommendation in categories in which they have been found to be qualified through an examination process. Categories include:

1. Insects
2. Mites and Other Invertebrates
3. Plant Pathology
4. Nematodes
5. Vertebrate Pests
6. Weed Control

Before working as a licensed PCA in any county, that individual must register with the County Agricultural Commissioner.

Written recommendations for all pesticide use must be made in writing. Each written recommendation must be signed and dated, with a copy of each written recommendation provided to the QAL prior to the application.

II. Stormwater Pollution Prevention - NPDES MS4 Permit

The City's Phase I MS4 Stormwater Discharge Permit requires that municipal operations include the following Best Management Practices (BMPs) in their pest management programs:

1. Evaluate pesticides, herbicides, and fertilizers used and application activities performed and identify pollution prevention and source control opportunities.
2. Implement practices that reduce the discharge of pesticides, herbicides and fertilizers. At a minimum the Permittee shall:
    - Implement educational activities for municipal applicators and distributors.
    - Implement landscape management measures that rely on non-chemical solutions, including:
        - Create drought-resistant soils by amending soils with compost;
        - Create soil microbial community through the use of compost, compost tea, or inoculation;

- Use native and/or climate appropriate plants to reduce the amount of water, pesticides, herbicides and fertilizers used;
- Practice grass-cycling on decorative turf landscapes to reduce water use and the need for fertilizers;
- Keeping grass clippings and leaves away from waterways and out of the street using mulching, composting, or landfilling;
- Preventing application of pesticides, herbicides and fertilizers during irrigation or within 48 hours of predicted rainfall with greater than 50% probability as predicted by National Oceanic and Atmospheric Administration (NOAA);
- Limiting or replacing herbicide and pesticide use (e.g., conducting manual weed and insect removal);
- Prohibiting application of pesticides, herbicides and fertilizers as required by the regulations DPR 11-004 Prevention of Surface Water Contamination by Pesticides enacted by the Department of Pesticide Regulation;
- Reducing mowing of grass to allow for greater pollutant removal, but not jeopardizing public safety.

- Collect and properly dispose of unused pesticides, herbicides, and fertilizers.
- Minimize irrigation run-off by using an evapotranspiration-based irrigation schedule and rain sensors.

3. Record the types and amounts of pesticides, herbicides and fertilizers used in the permit area.

Sec. 3 IPM Coordination

I. <u>IPM Specialist</u>

The IPM Specialist's primary function is to develop, review, and implement the City's IPM Program across all departments. The IPM Specialist shall be trained in the principles of low-risk IPM, safe application of pesticides, and alternatives to pesticide use. Responsibilities of the IPM Specialist shall include, but are not limited to, the following:

- Coordinate with city departments on weed and pest control issues
- Ensure that all City IPM activities adhere to local, county, state and federal regulations
- Record keeping and regulatory reporting

- Development and coordination of the IPM
- Coordination of the review and maintenance of City IPM
- Research, evaluate and make recommendations on IPM methods and materials
- assist with post-treatment monitoring/ evaluation
- Assist city departments with staff and contractor training needs
- Outreach to citizens regarding IPM
- Coordinate volunteer weed management projects.
- Maintain applicable license(s) with state and county regulators

II. IPM Technical Advisory Committee (IPM-TAC)

This group, coordinated by the IPM Specialist, will be composed of four to five City staff, such as the IPM Specialist, Environmental Coordinator, Utilities Services Supervisor(s), and Management Analyst. This group will meet at periodically and advise on the City's IPM program. The primary functions of the IPM-TAC will be to help draft and annually maintain a Reduced-Risk Pesticide List; help guide the transition of parks and other high public use areas to "green"/ least-toxic pest management; and maintain the Anticipated Pesticide Application calendar.

Sec. 4 IPM Implementation

The City assumes that all pesticides are potentially hazardous to human and environmental health. Therefore, reasonable non-pesticide alternatives shall be given preference over chemical controls, by following this implementation process. City staff will evaluate alternatives to chemical treatment, including the cost-effectiveness of the treatments. The following process shall be followed for all pest control activities:

I. IPM Planning

1. ID, Map, Monitor - The IPM Specialist, in coordination with Parks and Landscape Division staff, shall collect baseline data on the pest ecosystem(s) to determine pest population(s) occurrence, size, density and presence of any natural enemy population(s); gather information on pest biology and different control techniques available; and document sensitive areas and conditions that may limit control options. Data shall be collected in a standardized manner that is repeatable.

   Ranking, inventory, mapping, monitoring and evaluation are methods used for determining pest management priorities. Maps and inventories depict infestations in terms of pest species, size, location and threats to resources. IPM Specialist shall monitor infestations or pest populations

and evaluate treatments over time to assess the effectiveness of various treatment strategies and their effects on target and non-target organisms. GIS mapping software may be a useful tool to database pest occurrence and track problem areas.

2. Establish Thresholds - To determine if treatment is warranted, an acceptable threshold level of treatment for each target pest and site should be established. In some instances, treatment may be required by federal or state law or address the concerns of citizens. The assessment will be based on the following:

    a. The tolerable level of environmental, aesthetic and economic damage as a result of the pest population(s) and the tolerable level of risk to human health as a result of the pest population(s); or

    b. The size or density of the pest population that must be present to cause unacceptable environmental, aesthetic and/or economic damage; and the size, density and type of pest population that must be present to create a human health risk.

II. Treatment

1. Treatment Selection and Timing Criteria - Upon determining that treatment is necessary, the following criteria should be used to help select the appropriate IPM treatment strategy:

    a. Consistent with PHAER analysis (see Section 6 PHAER Analysis below)

    b. Least-disruptive of existing biological controls

    c. Least-hazardous to human health, including applicator

    d. Least-toxic to non-target organisms

    e. Least-damaging to the general environment

    f. If pesticides are used, consistent with the Reduced-Risk Pesticide list

    g. Most likely to produce a permanent reduction in the environment's ability to support target pests

    h. Cost-effectiveness in the short- and long-term

2. Treatment Strategies - The IPM Specialist will evaluate and select appropriate and effective treatments based on site-specific requirements. Commitment to the most environmentally sound approach is expected, with non-chemical methods considered first.

Prevention, cultural control, mechanical control, biological control and chemical control are the techniques used in IPM. In general, a combination of treatments is more effective than a single approach. The following treatments are listed in the order in which they should be executed:

a. Prevention - This is the most effective pest management strategy. By reducing the capacity of the ecosystem to support target pest populations through design and appropriate management, the opportunities for pest establishment can be reduced or eliminated. Specific examples include the following:
    i. Use strategies that reduce the preferred harborage, food, water or other essential requirements of pests.
    ii. Use weed-free materials (ex. jute and coconut fiber mats, certified weed-free straw, low-no weed seed mixes, etc. for soil stabilization after construction projects or other soil disturbing activities.
    iii. Use landscape and structural design that is appropriate to the specific habitat, climate and maintenance the area will receive.
    iv. When designing projects, consider the potential impacts of pests and mitigate through the use of appropriate landscape design (water requirements, weed barriers, etc.).
b. Cultural - Cultural control is the use of management activities that prevent pests from developing due to enhancement of desired conditions. Specific examples are the following:
    i. Selection and placement of materials that encourages pest enemies and competitors.
    ii. Modification/ removal of pest habitat to reduce pest harborage, food supply and other life support requirements.
    iii. Vegetation management including irrigation, mulching, fertilization, aeration, seeding, pruning and thinning.
    iv. Waste management and proper food storage.
    v. Barriers and traps.
    vi. Heat, cold, humidity, desiccation or light applied to affected regions.

vii. Prescribed grazing.

c. Mechanical - Mechanical control is accomplished by using physical methods or mechanical equipment to control pest infestations.

i. Mowing or weed-whacking

ii. Burning

iii. Hoeing or hand-pulling of weeds

iv. Trapping

v. Flooding

d. Biological - Biological controls include the introduction or enhancement of natural predator populations to target pests. Introduction of non-indigenous organisms has an associated risk factor and should be thoroughly evaluated prior to implementation and be consistent with county, state and federal regulation. Biological controls include:

i. Conservation and augmentation of the pest's natural enemies

ii. Introduction of host-specific enemy organisms

e. Chemical – Chemical control includes the application of reduced-risk pesticides to kill target pests.

i. Herbicides kill, burn-down, or defoliate pest plant species

ii. Insecticides kill or repel invertebrate pests

iii. Rodenticides kill rodents, including gophers, moles and, voles

3. Post Treatment Monitoring/ Evaluation. The IPM Specialist will evaluate areas treated to determine if control practices were effective, and may recommend additional actions to improve control or maintain desired results.

III. Record Keeping

1. Work logs shall be kept to record treatment elements include, but are not limited to, staff name, type of treatment, date of treatment, location, product name (if applicable), US EPA registration number (if applicable), quantity used (if applicable), etc.

IV. Public Education

1. Post IPM on website.

2. Informational signs at pest management areas about management methods.
3. Provide IPM and pest management information at public events such as farmers market and community events as well as environmental programs put on by the city.
4. Foster participation in community volunteer weed management projects (ex. Adopt-a-Park)

V. Staff Training (see Section 5 Pesticide Use and Limitations, subsection III)

Sec. 5 Pesticide Use and Limitations

Pesticides will only be used as a final option in situations where other methods, upon assessment of the IPM Specialist, have proven to be ineffective or cost prohibitive (ex. does not work to control the pest or cannot be sustained due to budgetary or other constraints). The following general and specific practices shall be followed:

General

1. Precautionary Principal shall be applied whenever pesticides are considered for pest management.
2. When necessary, only those pesticides listed on the most recent annual Reduced-Risk Pesticide List may be considered for use. In rare cases, an exemption may be requested (see subsection II).
3. Applications shall be performed by or under the supervision of a qualified applicator and will avoid direct exposure to any person, animal or property on-site or adjacent areas.
4. Application(s) shall be made to time the treatment to the target species most susceptible stage.
5. Care shall be observed to prevent damage to non-target plants, especially when applying a non-selective herbicide.

Specific

1. No Tier 1 pesticides are to be applied in any City maintained playground, park or sidewalk unless conditions call for control of a hazardous condition or noxious pest. Such a decision may be made by the IPM Specialist, with written justification, and approved by the Public Works Department Director or designee (see subsection II below). In this case, the area would be closed until reentry is deemed safe. Tier 3 and 2 pesticides may be used in these locations as per specific use limitations indicated on the Reduced-Risk Pesticide List and PHAER zoning.
2. No products containing neonicotinoids may be used on City property.

3. No pesticides shall be sprayed when weather conditions are:
    a. Winds in excess of 10 mile per hour
    b. Damp or foggy
    c. Rainy or within 48 hours of 50% probability rainfall event.
    d. Temperatures are below 40°F or above 95°F

I. Reduced-Risk Pesticide Evaluation

1. The City will use pesticide assessment methodology similar to the City of San Francisco's Department of the Environment to create a list of reduced-risk pesticides that are approved for use in the City of Rohnert Park IPM program. This approval for use is based on pesticide hazard and public exposure risk, need, and availability of alternatives. The following steps will be implemented in creating this list:
    a. Hazard Assessment - The IPM Specialist will create a list of pesticides that may be needed for pest control. Based on toxicity of active and other ingredients (if identified), the IPM Specialist will place a pesticide product into a hazard tier. The process and criteria for the hazard tier assessment are listed in Attachment A.
    b. Exposure Assessment - The IPM TAC reviews the list of pesticides developed during the Hazard Assessment step and reviews/ discusses:
        - The human and environmental exposure potential based on product type, application method and location.
        - Product effectiveness. How well does it work on target pest?
        - Product need. Are there equally effective alternatives? If not, is this product the least-hazardous option for the application?
    c. Populating the Reduced-Risk Pesticide List - Based on Hazard and Exposure Assessments, the IPM TAC adds or removes products from the Reduced-Risk List. Products recommend for placement on the list are categorized in one of three ways:
        - Least Restricted – Products that are generally the least hazardous pesticides on the list.
        - More Restricted – Products have specific restrictions on allowable applications.
        - Most Restricted – Pesticides that are considered the least-hazardous chemical alternative for a particular application,

but pose the greatest concern to human or environmental health.

The IPM Specialist will maintain the Reduced-Risk Pesticide List. The current Reduced-Risk Pesticide list for the City of Rohnert Park is provided in Attachment B. It must be noted that the list is inclusive and is based on initial chemical hazard assessment and staff estimation of exposure assessment. The list is subject to periodic review, modification and updating by the IPM TAC.

II. Exemptions and Justification

1. In rare cases, such as those which address public health and safety concerns, noxious pests, or the need to test new products, the IPM Specialist or a division manager may deem it necessary to use a pesticide that is not included on the Reduced-Risk Pesticide List; a pesticide that is included on the list but a variance in restrictions of application is required; and/ or a pesticide that is absent a recommendation from the IPM Specialist. In such cases, the following exemption process will be required:

    a. Contact the IPM Specialist to discuss pest issue, alternative control methods and desired exemption.

    b. Complete the Pesticide Exemption Request form (Attachment C) and submit to the Public Works Department Director or designee for approval at least 4 business days prior to desired treatment.

    c. **Exemptions will only be granted in cases of**:

        - Documented and justified need for the variance as it relates to public health and safety and/ or noxious pest control, including alternative control measures implemented and deemed ineffective or impractical; or
        - Documented and justified need for trials/ tests, by the IPM Specialist, of new reduced risk products.

    d. Approved exemptions and associated justifications shall be submitted to the IPM Specialist for their records and entry into in an active exemptions list that is available for public review on the City website. This list shall be updated as soon as possible after exemption approval and prior to site posting and application.

    e. Exemptions will be for a one-time application and must be renewed for additional applications.

III. Training

1. Certified Applicator - Any person applying pesticides must have pesticide safety training prior to the use of each pesticide, regardless of toxicity. Training must be updated annually. A record must be made of each employee applying pesticides, and evidence of training certified by the trainer/supervisor. Copies of the record form will be kept by the employee and the City in accordance with the Records Retention Policy.
2. Training requirements - Training must be performed by a qualified person and cover the following N Series (non-agricultural) for each pesticide handled:
    - Information on the pesticide label concerning human health effects
    - Safe Use

IV. Application Documents

1. Any person applying a pesticide on City of Rohnert Park property must have access to the following documents:
    - Pest control recommendation and/or exemption justification
    - Pesticide label
    - Pesticide SDS
    - Medical Emergency Contact Information (posted at worksite or in vehicle)

V. Violation Remediation

1. All employees of the City of Rohnert Park who have been trained to apply pesticides may be required to do so as part of their regular duties. Those who possess a QAL are subject to discipline by the DPR via the Sonoma County Agricultural Commissioner if they violate various DPR regulations such as improper safety gear, application inconsistent with labels, improper posting, etc. Those employees will also be subject to the City of Rohnert Park Personnel Rules and Regulations. Employees who do not possess a QAL will be reprimanded by City of Rohnert Park if they violate DPR regulations or City policy. Pest control contracts with the City will include penalties (up to contract termination) for contract or policy violation.

VI. Pesticide Storage, Transportation and Disposal

1. Storage - Pesticides used by the City shall be stored in a consolidated manner, where practical. Pesticide storage locations must be posted with visible warning notices legible from a distance of 25 feet from any direction.

2. Transportation - Pesticides shall not be transported in the same compartment with persons, food or feed. Containers shall be secured to the vehicle during transport in a manner that will prevent spillage into or out of the vehicle.
3. Empty Containers - Empty pesticide containers, other than bags, must be rinsed and drained into the spraying equipment on site by the applicator, at the time of use, using the triple rinse method. Rinse solution should be applied to the treated areas.
4. Required Labels - All pesticide containers (including secondary and service containers) shall be labeled with the following information:
    - Entity (i.e. City of Rohnert Park)
    - Name, brand, or trademark of pesticide
    - EPA registration number
    - Active ingredient
    - Signal word (assigned by US EPA describing acute toxicity)
5. Spills - Small spills of pesticides shall be cleaned up immediately, with absorbent material such as cat litter. For major toxic pesticide spills, contact Emergency Response Personnel (call 911 or Dispatch). Note what pesticide it is, signal word, if it is threatening to enter the storm drain system, and if it is at risk of effecting public health or safety. Plug storm drains to contain the spill whenever appropriate. Document conditions with photographs.

Sec. 6 PHAER Analysis

The PHAER zone model will be tailored to all City of Rohnert Park parks and bike/ pedestrian paths. This model is based on the Pesticide Hazard and Exposure Reduction (PHAER) zone system (Boise 2004, Attachment D). The objectives of the PHAER zone system are to identify concrete reduction goals (green zones), establish a measurable timeline for risk reduction activities (transition to green zones) and to communicate to the public the general level of pesticide hazard on a site-by-site basis through multi-colored zone maps.

- Only Tier 3 pesticides may be used in areas with high traffic and exposure to people and pets.
- Areas with less traffic and exposure can be treated with Tier 3 or 2 pesticides, if needed.
- Tier 1 pesticides are the most restricted and may only be used in areas with no to low public exposure.

In rare cases, the IPM Specialist may deem it necessary to use a pesticide that is not included on the Reduced-Risk Pesticide List; is included on the list, but a variance in restrictions of application is required; or is inconsistent with the IPM Specialist's pest management recommendation. Such exemptions must be approved as detailed in the above Exemptions and Justifications section (II.1.c).

PHAER analysis will be conducted and implemented at all heavily used public areas such as parks and bike/ pedestrian paths. Consideration for PHAER analysis should be given for other areas that have unique sensitivities or exposure concerns, as necessary.

Sec. 7 City Responsibilities

The following divisions and their contractors conduct pest control operations:

- Public Works and Community Services Department
    - Parks and Landscape Division:
        - Playfields
        - Sportfields
    - Streets Division:
        - Roadside weed abatement, bike lane maintenance, traffic islands and bulb outs weed control.
    - Facilities Division:
        - City facilities (i.e. fire stations, office and community buildings, pools)
    - Sewer Division:
        - Pump Station
    - Stormwater Division:
        - Channels, retention ponds, and drainage ditches.

1. Record Keeping and Reporting – The IPM Specialist shall keep accurate records of all IPM treatments used and the results. Information on all pest management shall include how, when, and where the treatment was applied and the name of the person(s) applying the treatment (see example report form in Attachment E). The following information shall be recorded:
    a. Target pest
    b. Pest population levels or injury thresholds for treatment
    c. Treatment selection criteria with final treatment decision (IPM hierarchy checklist)

d. Area treated (including type of location and size of area)

e. Personnel hours (including volunteer) and material costs for treatment

f. If pesticides are used, record the following:

i. Pest control treatments applied prior to using pesticide (ex. prevention, mechanical, cultural, biological)

ii. Pesticide (including product trade name, active ingredient, EPA toxicity category and Reduce-Risk Pesticide List hazard tier)

iii. Quantity of product used

iv. Treatment method used (i.e. spray, injection)

v. Location of application

vi. Time and date of pesticide application

vii. Name(s) and license number(s) of Pesticide Applicator(s)

viii. Name of the department contact authorizing work

ix. Safety Data Sheets (SDS) and labels for all pesticides used

Application records shall be made available to the public upon request in accordance with all applicable state laws governing public access to information.

The above information will be maintained by the City IPM Specialist, and serve as the basis for the monthly pesticide use reports that are submitted to the County Agricultural Commissioner. The City IPM Specialist will review pest management treatments to evaluate the successes and failures of such treatments, and to plan more efficient and effective pest management strategies.

2. Public Notification

a. *Pesticide Noticing* - To inform the public on applications in areas heavily visited by the public, the IPM Specialist shall ensure that a Notice of Intent to Spray is publicly available no less than 48 hours prior to the desired day of the proposed pesticide application. The information provided includes the pesticide to be applied, the location (i.e., park, median, intersection, etc.) of the proposed application, and the date of the proposed application. The IPM Specialist provides the information to the public via the city webpage, and other appropriate outreach media. If the application is cancelled for any reason, the notification must be completed again, prior to rescheduling the proposed application. Approved

and active pesticide use exemptions shall be listed on the City's IPM webpage.

b. *Site Posting* – Consistent with applicable laws, pest management activity shall include site notification. When a decision is made for a pesticide application in a heavily visited area such as a park, a notice of a pesticide application must be physically posted at the proposed site during the treatment and the REI (restricted entry interval).

3. Contractor Notification

a. When bidding out contractual work for pest management, notify all bidders of the IPM Policy and include its guidelines in bid specifics. Contractors are encouraged to submit proposals that include nonchemical pest control methods. Proposal that include alternative control measures will receive higher ranking during the proposal review process. Contracts must include damages (up to contract termination) for any violation of the IPM Policy.

4. Personal Protective Equipment

The City of Rohnert Park will provide personal protective clothing and equipment (PPE) and related training to City personnel engaged in pest management on City of Rohnert Park property, including PPE for pesticide use as stated on the chemical manufacturer's label. Contractors are required to provide their own PPE.