



ADMINISTRATIVE INSTRUCTION

SUBJECT: Integrated Pest Management Program

NUMBER: II-4-26

EFFECTIVE DATE: March 11, 2019

PAGE: 1 of 15

I. Purpose

The purpose of this Administrative Instruction (AI) is to establish policies and procedures that reduce the use of chemical pesticides and minimizes pesticide exposure to humans and the environment. This policy will enable the City to:

- Reduce human and animal exposure to both pesticides and pests;
- Protect and enhance the City's and region's natural resources, particularly the Santa Monica Bay;
- Comply with federal and state pest control laws and stormwater pollution prevention regulations;
- Provide long-term, cost effective control of pests;
- Create awareness and knowledge among City staff of integrated pest management techniques;
- Serve as a model of environmental stewardship for the community and other cities and counties.

II. Scope

This Integrated Pest Management (IPM) AI shall apply to all pest control activities and pesticide use in buildings and related facilities, grounds and open spaces, and other property owned or managed by the City of Santa Monica and conducted by City staff or contractors hired by the City. This policy does not apply to residents or businesses within the City.



ADMINISTRATIVE INSTRUCTION

SUBJECT: Integrated Pest Management Program

NUMBER: II-4-26

EFFECTIVE DATE: March 11, 2019

PAGE: 2 of 15

III. Definitions

Integrated Pest Management (IPM): A coordinated decision-making and action process that uses the most appropriate and least hazardous pest prevention and control methods in an environmentally and economically sound manner to meet pest management objectives. The elements of integrated pest management include:

1. Preventing pest problems by implementing behavioral, physical, biological, mechanical, and least-toxic chemical strategies to control pests;
2. Monitoring for the presence of pests and pest damage;
3. Establishing a threshold density level of the pest population, which if exceeded can be correlated with a damage level sufficient to warrant treatment of the problem based on health, public safety, economic, or aesthetic thresholds;
4. Containing pest populations below harmful levels using strategies which consider human health, ecological impact, feasibility, and cost effectiveness;
5. Evaluating the effects and efficacy of pest treatments;
6. Selecting and applying pesticides in a manner that minimizes risks to human health, beneficial and non-target organisms and the environment.

IPM Coordinator: A City employee in the Office of Sustainability and the Environment responsible for implementing this AI within the City of Santa Monica. The IPM Coordinator's responsibilities are listed in Appendix A.

IPM Liaison: An employee designated by the department head who is responsible for ensuring implementation of the policies and procedures contained in this AI. The IPM Liaison responsibilities are listed in Appendix B.



ADMINISTRATIVE INSTRUCTION

SUBJECT: Integrated Pest Management Program

NUMBER: II-4-26

EFFECTIVE DATE: March 11, 2019

PAGE: 3 of 15

IPM Plan: A plan outlining a department's/division's plan for complying with this AI. A plan will include the designated IPM Liaison contact information, anticipated pests, tolerance levels, reporting procedures, non-chemical and chemical control measures, training and more. The level of detail required in a Plan will vary among departments depending on the intensity of pests and pesticide usage. An IPM Plan template is contained in Appendix C.

Pest: Any insect, rodent, nematode, snail, weed, fungus, or other form of plant or animal life that adversely interferes with the aesthetic, health, safety, environmental or economic goals of the City. For the purpose of this policy, the term "pest" does not refer to viruses or microorganisms on or in a living person or animal, but shall include plant diseases.

Pest Control Advisor ("PCA"): A person who offers a recommendation on any agricultural use, holds himself/herself as any authority on any agricultural use, or solicits services or sales for any agricultural use. A PCA must be currently licensed by the California Department of Pesticide Regulations and registered with the County Agricultural Commission.

Pesticide: Chemicals that are designed to target pests and are purposely introduced into the environment to manage insects, bacteria, weeds, rodents or other pests. The California Department of Pesticide Regulations defines a pesticide as any substance or mixture of substances that is a pesticide as defined in the Food and Agricultural Code and includes mixtures and dilutions of pesticides. Pesticides include, but are not limited to, insecticides, herbicides, rodenticides, and fungicides.

Treatment: the implementation of a chemical, mechanical or biological control to manage the pest activity.



ADMINISTRATIVE INSTRUCTION

SUBJECT: Integrated Pest Management Program

NUMBER: II-4-26

EFFECTIVE DATE: March 11, 2019

PAGE: 4 of 15

IV. Policy

This policy is designed to effectively manage pests in City parks, landscapes and facilities while minimizing the use of pesticides. Therefore, emphasizing and implementing prevention measures - such as exclusion and sanitation - which prevent pests from occurring in the first place shall be a priority. If pest control is needed, the use of non-chemical controls, such as mechanical and biological measures, shall be utilized whenever and to the greatest extent possible. The use of chemical pesticides will be used as a last resort.

The IPM Coordinator will work with the department IPM Liaison/s to develop and implement an IPM Plan for their respective department/division. An IPM Plan outlines a department/division's plan to comply with this AI. An IPM Plan template can be found in Appendix C. For all pest control activities, the IPM procedures outlined in this AI shall be followed.

A. **Prevention** – this is the most effective, long-term 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:

1. Use strategies that reduce the preferred harborage, food, water or other essential requirements of pests;
2. Use landscape and structural design that is appropriate to the specific habitat, climate and maintenance the area will receive;
3. Manage waste and properly store food;
4. Select and place materials that provide life-support mechanisms for pest enemies and competitors;
5. Observe vegetation best management practices, including irrigation, mulching, fertilization, aeration, seeding, pruning and thinning;
6. Utilize barriers and traps.



ADMINISTRATIVE INSTRUCTION

SUBJECT: Integrated Pest Management Program

NUMBER: II-4-26

EFFECTIVE DATE: March 11, 2019

PAGE: 5 of 15

B. ***Pest Identification, Monitoring and Data Collection*** - the initiation of any pest management activity begins with the identification of a pest. Some examples include:

1. When a City employee calls to report that there are pests (ants) in the kitchen. In this case, the pest activity shall be reported to the designated IPM Liaison. The IPM Liaison can then either submit a work order request to Facilities Maintenance or contact the City's contracted pest control operator directly.
2. When the City's Pest Control contractor reports increased pest (rat) activity at a facility on their inspection report form;
3. When a regulatory agency, such as the Los Angeles County Environmental Health, directs the City to control vector borne disease carriers, such as ground squirrels carrying fleas, which can carry the plague;
4. When a Groundskeeper identifies weeds on a regularly scheduled park maintenance visit. In this case, the weeds would be reported to the Parks Supervisor per Public Landscape's Park Maintenance Standard.

Communication of pest activity to appropriate personnel is a crucial first step in the successful and effective management of pests. Subsequently, proper identification of the pest by knowledgeable personnel is key to making good decisions about pest control.

C. ***Establishing Threshold Levels*** - to determine if treatment is warranted for pest activity, an acceptable threshold level of treatment for each target pest and site should be established. In some instances, state or county law may require treatment. The assessment will be made by the IPM Coordinator and IPM Liaison and be based on the following:

1. 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;



ADMINISTRATIVE INSTRUCTION

SUBJECT: Integrated Pest Management Program

NUMBER: II-4-26

EFFECTIVE DATE: March 11, 2019

PAGE: 6 of 15

2. 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.

Tolerance will vary depending on each situation. For instance, the presence of ants outside a building may be tolerable while those infesting a kitchen will not be; or some weeds on the City Hall lawn are tolerable and may simply be mowed, while those growing on a lawn bowling green would not be tolerated.

Furthermore, tolerance may need to be balanced against treatment options. After establishing the type and degree of treatment which would be required to achieve tolerance levels established by this step, it may be advisable to reevaluate tolerance to avoid or reduce significant negative impacts from treatment.

D. ***Treatment Selection Criteria*** - upon determining that treatment is necessary, the following criteria should be used to help select the appropriate IPM treatment strategy:

1. Likely to achieve the tolerance level for the identified pest;
2. Least hazardous to human health;
3. Least damaging to the general environment;
4. Least toxic to non-target organisms;
5. Least disruptive of natural controls;
6. Most likely to produce a permanent reduction on the environment's ability to support target pests;
7. Cost effective in the short and long term;
8. Provide the greatest long-term control of target pests.



ADMINISTRATIVE INSTRUCTION

SUBJECT: Integrated Pest Management Program

NUMBER: II-4-26

EFFECTIVE DATE: March 11, 2019

PAGE: 7 of 15

E. *Non-Chemical Pesticide Treatment Strategies and Control Methods* – non-chemical treatment options should be the first line of defense and include the following:

1. Mechanical - Mechanical control is accomplished by using physical methods or mechanical equipment to control pest infestations. Examples include:
 - a) Mowing, using hand tools or string trimming weeds;
 - b) Sticky traps for insects;
 - c) Hand pulling of weeds.

2. Biological - Biological controls include the introduction or enhancement of natural enemy populations to target pests. Introduction of non-indigenous organisms has an associated risk factor and should be thoroughly evaluated prior to implementation. Biological methods may include:
 - a) Conservation and augmentation of the Beneficials, (such as predatory and parasitic insects occurring in nature, often used as a pest control mechanism in IPM programs);
 - b) Introduction of host-specific enemy organisms.



ADMINISTRATIVE INSTRUCTION

SUBJECT: Integrated Pest Management Program

NUMBER: II-4-26

EFFECTIVE DATE: March 11, 2019

PAGE: 8 of 15

F. ***Chemical Pesticide Purchasing and Application*** – if non-chemical pesticide control measures prove to be inappropriate, ineffective or non-existent, chemical pesticides will be allowed. Only pesticides registered by the US Environmental Protection Agency and the California Department of Pesticide Regulations may be used. Pesticide applications shall emphasize the least toxic pesticide applied in the most targeted manner.

1. Who May Apply Pesticides?

Only City employees or Pest Control contractors who are licensed, registered, and/or trained to apply pesticides, as regulated by State pest control laws, may apply pesticides on City property. In general, outdoor or “agricultural” applications are regulated by the California Department of Pesticide Regulations and the County Agricultural Commission and indoor or “structural” applications are regulated by the State of California Department of Consumer Affairs Structural Pest Control Board. Applicators and Pest Control Advisors are involved in agricultural applications. Applicators must be licensed, certified, and/or trained annually to apply pesticides. Only a Pest Control Advisor (PCA) can recommend a pesticide.

Structural pest control is performed by City’s approved contractors. City employees who are not licensed and/or trained in pesticide application are prohibited from using any pesticides, including over-the-counter brands, in or around the work place.



ADMINISTRATIVE INSTRUCTION

SUBJECT: Integrated Pest Management Program

NUMBER: II-4-26

EFFECTIVE DATE: March 11, 2019

PAGE: 9 of 15

2. Santa Monica's Approved Pesticide Products List

The Approved Pesticide Products List represents those pesticide products currently authorized for use in the City, both by City staff and contractors. Products not on this list may not be used unless they are approved by the IPM Coordinator for one-time use. The products on this list have been evaluated based on potential effects to human health and the environment, including chronic health effects (e.g. cancer and reproductive harm), environmental effects (e.g. persistence, bioaccumulation, mobility, water quality), and non-target effects (e.g. impact on bees, wildlife, aquatic organisms). According to this system, each product is classified into one of three tiers on the basis of their effects on human health and the environment. These tier ratings are used to identify and target pesticides for eventual phase-out, and to determine their respective application and use limitations, and necessary mitigation measures. Additionally the products on this list have been determined to be effective in controlling targeted pests and cost-effective. The List and an explanation of the Tier rating system can be found in Appendix E.

The IPM Coordinator will maintain the Approved Pesticide Products List, which will be kept on file at the Office of Sustainability and the Environment. Copies will be distributed to departmental staff and contractors, covered by this policy and be available on the citywideshare drive. This list must be reviewed and approved annually by the IPM Coordinator with input from the IPM Liaisons. The list may be updated on an as-needed basis to reflect the addition of new reduced risk products and the removal of discontinued pesticide products.



ADMINISTRATIVE INSTRUCTION

SUBJECT: Integrated Pest Management Program

NUMBER: II-4-26

EFFECTIVE DATE: March 11, 2019

PAGE: 10 of 15

3. Reviewing requests for new products

In some cases chemical pesticides not on the Approved Pesticides Product List may be required to achieve control of pests. For this reason, exceptions for the application of new pesticides have been established. In order for a new pesticide to be added to the list, a "Pesticide Product Approval Request" form must be submitted for evaluation and approval to the IPM Coordinator and OSE Manager by a IPM Liaison or a City hired Pest Control contractor detailing the reason for the request, target pest, the pesticide to be applied, IPM control measures that failed to control the pest, and other relevant information necessary to make an appropriate determination. A sample of the "Pesticide Product Approval Request" form is contained in Appendix D. The IPM Coordinator will work with the requesting group and appropriate experts and stakeholders to determine whether or not the pesticide product will be allowed as a "one-time use" product or added to the City's Approved Pesticide Product List.

4. Evaluation

Evaluation and approval for the one-time application of a pesticide product not listed on the Approved Pesticide Products List will be considered based on one or more of the following:

- a) A description of the pest problem;
- b) Rationale for chemical control with the proposed product;
- c) A description of how the product will be used;
- d) Legal requirements;
- e) Public health and safety requirements, including protection of sensitive and vulnerable populations;
- f) Preservation of landscape assets;
- g) An evaluation of all feasible alternatives including non-chemical and no action alternatives; and
- h) The safety, health, and environmental impacts of any alternatives.



ADMINISTRATIVE INSTRUCTION

SUBJECT: Integrated Pest Management Program

NUMBER: II-4-26

EFFECTIVE DATE: March 11, 2019

PAGE: 11 of 15

5. Pesticide Application

- a) Pesticide applications shall be made in accordance with applicable federal, state, and local regulations;
- b) No exterior application of pesticides will be made immediately before, during, or immediately after a rain event or when water is flowing off the area to be applied;
- c) No banned or unregistered pesticides will be stored or applied;
- d) When mixing and applying pesticides, all label precautions must be followed.
- e) Signs shall be posted at all buildings and facilities, and park, open space, and recreational facilities, and adjacent to schools when any application of a pesticide is performed that could result in exposure to humans and their pet/s. Specific requirements for posting are as follows:
 - 1) Post signs at treated area for 24 hours following an application.
 - 2) Signs must read "Warning-Pesticide Treated Area" and include product/manufacturer's name, areas of application, reason for application and a City contact telephone number.
 - 3) Signs must be visible to anyone entering the treated area.
 - 4) Exemptions to these posting requirements will be made for exempt pesticides, such as containerized baits and crack and crevice treatments per the California Healthy Schools Act.



ADMINISTRATIVE INSTRUCTION

SUBJECT: Integrated Pest Management Program

NUMBER: II-4-26

EFFECTIVE DATE: March 11, 2019

PAGE: 12 of 15

G. *Training and Education*

Changing the behavior of people around the issue of pest control requires much more than a carefully worded policy. All people affected by the City's IPM policy from the IPM Liaisons to the Pest Control contractors, Parks Supervisors and building occupants, must understand the nature of this policy and what role they play in managing pests in their own work environment. To this end, increasing knowledge of City staff and contractors involved in pest management activities is critical to the success of this policy. Consequently, providing ongoing training and educational opportunities to City staff and contractors regarding landscape and structural pests, and IPM concepts, practices, and products will be a priority.

Training may be provided by the IPM Coordinator, Certified Pesticide Applicators, IPM Liaisons, IPM consultants, IPM Technical Advisors, and invited guest speakers. The IPM Coordinator may assist departmental staff in scheduling trainings. Training and educational opportunities, both formal and informal, will occur. Managers and Supervisors are expected to participate in and fully support involvement of their staff and contractors in the training.

H. *Biennial Reporting*

Every two years, the IPM Coordinator shall prepare an Integrated Pest Management Report. This Report shall include updated information on the City's Approved Pesticide Product List, an update on progress towards meeting the City's pesticide reduction goals, a discussion of the major pests and measures taken to manage both pests and pesticides. The Integrated Pest Management Report shall be used to determine program effectiveness and shall be forwarded to the Task Force on the Environment for review.



ADMINISTRATIVE INSTRUCTION

SUBJECT: Integrated Pest Management Program

NUMBER: II-4-26

EFFECTIVE DATE: March 11, 2019

PAGE: 13 of 15

V. Procedures and Responsibilities

PROCEDURE

RESPONSIBLE PERSON(S)

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| 1. Departments that have recurring pest concerns and routinely apply pesticides shall designate one or more employees, as needed, to serve as IPM Liaisons to coordinate implementation of the Integrated Pest Management AI. | Department Heads |
| 2. Maintain a master list of all IPM Liaisons. | OSE/IPM Coordinator |
| 3. Develop an IPM plan for their department/division. A standard Plan will be developed for departments with minimal and routine pest issues, such as Information Services and Planning and Community Development. For departments with more intense pests and pesticide challenges, such as Public Works, Big Blue Bus and the Libraries, the IPM Coordinator and Liaisons will work together to develop more detailed Plans. | OSE/IPM Coordinator with assistance from the IPM Liaison |
| 4. Develop, coordinate and provide IPM training and education for City staff, IPM Liaisons, and contractors. | OSE/IPM Coordinator |
| 5. Submit work order request to Facilities Maintenance or contact City's pest control contractor if pest control is needed in or immediately around a structure. | IPM Liaison |



ADMINISTRATIVE INSTRUCTION

SUBJECT: Integrated Pest Management Program

NUMBER: II-4-26

EFFECTIVE DATE: March 11, 2019

PAGE: 14 of 15

V. Procedures and Responsibilities

PROCEDURE

RESPONSIBLE PERSON(S)

- | | |
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| 6. Coordinate IPM implementation, including monitoring and reporting of pest activity, for a Department. Pest activity and pesticide use shall be entered in a database to track the effectiveness of IPM Plans. | IPM Liaison |
| 7. Develop and maintain current listing of City's Approved Pesticide Products List, including use limitations. | OSE/IPM Coordinator |
| 8. Work closely with departmental staff to identify and implement pilot projects and IPM strategies. | OSE/IPM Coordinator |
| 9. Submit a biennial IPM Report to the Task Force on the Environment. | OSE/IPM Coordinator |

VI. Appendices

- A. IPM Liaison Responsibilities
- B. IPM Coordinator Responsibilities
- C. Guidelines for a Departmental Integrated Pest Management Plan
- D. Pesticide Product Approval Request form
- E. Santa Monica Approved Pesticide Product List



ADMINISTRATIVE INSTRUCTION

SUBJECT: Integrated Pest Management Program

NUMBER: II-4-26

EFFECTIVE DATE: March 11, 2019

PAGE: 15 of 15

VII. Sources of Additional Information

Office of Sustainability & the Environment: Division Manager

Finance Department / Risk Management: Safety Officer

VIII. Authorized By

Rick Cole
City Manager

IPM Coordinator Responsibilities

The Division Manager of the Office of Sustainability and the Environment shall designate an employee to serve as the IPM Coordinator to provide oversight of the City's IPM AI. The IPM Coordinator's responsibilities include the following:

- Facilitate implementation of this AI;
- Development and maintenance of the City's Approved Pesticide Products list;
- Review and approval of all pesticide product requests;
- Coordination of IPM training and education for City staff and contractors;
- Outreach to residential and business community regarding IPM;
- Research, identify, and communicate best practices in IPM design in structures to the City's Civil Engineering and Architecture Division to ensure that technical specifications for City building and renovation projects reflect these best practices, where practicable;
- Work closely with departmental staff to identify and implement pilot projects and IPM strategies;
- Make necessary revisions and updates to this AI;
- Submit an annual IPM report to the Task Force on the Environment.

IPM Liaison Responsibilities

Departments that have recurring pest concerns and routinely apply pesticides shall appoint an IPM Liaison(s) responsible for carrying out the objectives of this AI and their respective IPM Plans. The IPM Liaisons' responsibilities include the following:

- Review and become familiar with this IPM AI;
- Coordinate IPM activities for their department/division/facility;
- Ensure that all employees in their department/division receive necessary information and training on IPM;
- Request pest control services when needed;
- Submit requests for new products to the IPM Coordinator for review and approval;
- Participate in periodic IPM meetings;
- Assist with the selection and implementation of IPM pilot projects, as needed;
- Participate in training and educational opportunities, whenever possible;
- Assist with the development and periodic review of their IPM Plan.

Guidelines for a Departmental Integrated Pest Management Plan

- 1) Department/Division:
- 2) Location/s:
- 3) Description of facility/s:
- 4) IPM Liaison contact information:
- 5) Description of facility maintenance and pest control service:
- 6) Pest control reporting procedure:
- 7) Description of likely pests, and prevention and control measures:
- 8) Environmental stewardship:
- 9) Short and long range plans for management:
- 10) Training and licensing requirements:
- 11) Emergencies:
- 12) Training:

Pesticide Product Approval Request

- 1) Name and contact information for requester:
- 2) A description of the pest problem:
- 3) Description of non-chemical control measures that are unable to reduce pest activity to a tolerable level:
- 4) Is this a new product or replacing another pesticide product? If replacing, please identify product being replaced:
- 5) A description of how the product will be used:
- 6) Legal requirements:
- 7) Public health and safety requirements:
- 8) Preservation of landscape assets:
- 9) An evaluation of all feasible alternatives including non-chemical and no action alternatives; the safety, health, and environmental impacts of the alternatives also will be evaluated.

Note: A safety data sheet and product label information must be provided.

Santa Monica Approved Pesticide Product List

This List is maintained by OSE and will be provided to IPM Liaisons and affected contractors.

This List is not static, but dynamic, and will change to reflect current pesticide products, regulations, technology and research.