

Town of Moraga IPM Policy

Integrated Pest Management

Integrated pest management is an ecosystem-based strategy that focuses on long-term prevention of pests or their damage through a combination of techniques such as biological control, habitat manipulation, modification of cultural practices, and use of resistant varieties. Least toxic pesticides are used only after monitoring indicates they are needed according to the established guidelines in this policy.

COMPONENTS OF AN IPM, LEAST TOXIC PROGRAM:

1. Monitoring to determine pest population levels and identify decisions and practices that could affect pest populations.
2. Setting of injury and action levels to determine when vegetation or a pest population at a specific site cause(s) unacceptable economic or medical damage wherein corrective action should be taken
3. Eliminating pest habitats to deter pest populations and minimize pest infestations.
4. Utilizing pest prevention methods, such as structural modification, and/or employing progressive non-chemical methods
5. Employing as a last resort pesticides from the approved list, and, if demonstrated to be necessary, pesticides from the limited use list.
6. Evaluation of the success of the IPM program and its practices

PEST DEFINITION

For the purposes of this Policy, a “pest” is defined as an insect, weed, rodent or other animal, or fungus

PESTICIDE DEFINITION

For the purpose of this Policy, “Pesticide” means pesticide as defined in Section 12753 of Chapter 2 of Division 7 of the California Food and Agricultural Code, but does not include antimicrobial agents as defined by Section 21F.2(a) of the Administrative Code.

CONSTRUCTION/REMODELING

When designing new construction, reconstruction, or replacement of fences on Town maintained property, the IPM Coordinator and the Town Engineer will consider alternative designs for fencing, entrances, landscaping, etc. that would make implementing IPM more feasible.

DESIGNATION OF INTEGRATED PEST MANAGEMENT COORDINATION:

The Parks/Public Works Superintendent shall be the Integrated Pest Management Coordinator. The IPM coordinator will be primarily responsible for implementing the IPM policy and coordinating efforts to adopt IPM techniques. The IPM coordinator will communicate goals and guidelines to the Town Manager, staff, and personnel. The IPM coordinator will ensure that staff is trained and that pesticide use is tracked to ensure related information is available to the public.

EDUCATION AND TRAINING OF IPM COORDINATOR AND PESTICIDE APPLICATORS:

Everyone who works with or is potentially exposed to hazardous materials will receive training in Integrated Pest Management, Hazard Communication Standards and the safe use of those hazardous materials in their workplace by their administrator/supervisor or designee.

EDUCATION AND TRAINING OF STAFF, ADMINISTRATIVE PERSONNEL:

Education and training of appointed personnel is critical to the success of the IPM program. Appropriate staff will be educated on the least toxic IPM practices and procedures. Understanding of the objectives of the program will be updated periodically and reviewed. Education will include formal classroom training, on-site, and informal meetings for those employees responsible for providing pest control at least once per year. Training will be verbal and in person. No pesticides may be used at Town sites, except in accordance with the Town's printed IPM policy.

IPM APPLICATIONS AND GUIDELINES:

Only persons specifically authorized by the IPM Coordinator as Pesticide Applicators will be permitted to bring or use pesticides on Town property. Use of pesticides by pesticide applicators is limited to those products on the Approved Use or Limited Use Products List. Pesticide applicators must follow regulations and label precautions. Applicators will have training in IPM and must comply with the Town's IPM policy.

METHODS AND PRODUCT SELECTION AND PRODUCT USE APPROVAL:

It is the policy of the Town to use least-toxic IPM principles to manage pest populations. Except for pesticides granted an emergency exemption for the protection of public health, the Town will not use any products on the banned use product list. If it is determined that an EPA registered pesticide must be used, then, the least-hazardous material will be chosen.

Products will be divided into three classifications: Approved Use List, Limited Use List, and Banned Use List. If the use of a material not on either the Approved Use List or the Limited Use List is deemed necessary, the IPM Coordinator may apply for an emergency exemption.

Approved Use Products List

The IPM Coordinator shall maintain a list of all pesticides that have been approved for use by the Town Council, along with any restrictions for such use. This list shall be referred to as the Approved Use Products List.

The Approved List shall include, but not be limited to:

- Insecticides, rodenticide baits and traps
- Caulking agents and crack sealants
- Borates, silicates and diatomaceous earth
- Soap based products
- Natural products on the FIFRA's 23 (b) list (40 CFR part 152.25 (g) (1))*
- Natural products on the California Certified Organic Farmers' organic list
- EPA GRAS-generally recognized as safe products pursuant to federal EPA
- Cryogenics, electronic products, heat and light
- Biological controls such as parasites and predators
- Physical barriers
- Roundup**
- Sluggo
- Pheromones and attractants for traps

* **Explanation of FIFRA and 40 CFR** is included at the end of the policy.

** **Roundup**: Roundup may be applied on the medians, fence lines, undeveloped areas of the parks, and invasive species control in our open spaces. Any other use of Roundup will require the approval of the Town Manager.

Limited Products List

The IPM Coordinator may submit a written recommendation to the Town Manager for approval, that a particular pesticide(s) not on the Approved List be approved for use for a specific purpose. Limited use products may not be pesticides on the Banned Use Products List. The request must be reviewed by the Town Manager and signed by the IPM Coordinator. The Town Manager may grant a limited use exemption upon a finding that the Town Department or pesticide applicator has:

1. Identified a compelling need to use the pesticide
2. Made a good faith effort to find alternatives to the particular pesticide
3. Demonstrated that effective, economic alternatives to the particular pesticide do not exist for the particular use
4. Develop a reasonable plan for investigating alternatives to the pesticide in question during the exemption period.

The Town Manager may grant permission to use Roundup for right-of-way areas required by the Fire Marshall for fuel management should the cost of manually cutting back these areas become too costly. The use of Roundup on right-of-ways must also go through steps 1-4 in the Limited Products List.

The limited-use product will be allowed to be used for a short and defined exemption period, not to exceed 3 months.

Banned Use Products List:

The following high health-risk pest management products are completely banned from use on Town property:

1. Pesticides linked to cancer (U.S.E.P.A Class A, B, and C carcinogens and chemicals known to the State of California to cause cancer under Proposition 65)
2. Pesticides that cause birth defects, reproductive or developmental harm (identified by the U.S.E.P.A or known to the State of California under Proposition 65 as reproductive or developmental toxins).
3. Pesticides classified as Toxicity Category I and Category II by the U.S.E.P.A., Carbonate and organophosphate pesticides.
4. Foggers, bombs, fumigants or sprays that contain pesticides identified by the State of California as potentially hazardous to human health (CFR 6198.5)
5. Pesticides that interfere with human hormones

NOTIFICATION OF PESTICIDE APPLICATIONS:

The general public will be notified via post signs 72 hours prior to any pesticide application. The sign remains posted for a minimum of 72 hours after the application. Town staff or the pesticide applicator will make every effort to post signs at all usual public and employee entry points to the area where the pesticide is applied.

Additionally, information will be posted on the Town’s website 72 hours prior to application and a minimum of 72 hours after application.

Notification will include:

1. The product name, EPA Registration # and active ingredient(s)
2. Intended areas and dates of application
3. Contact name and phone number for more information

PEST CONTROL AND RECORD KEEPING OF PESTICIDE APPLICATIONS

The Town shall maintain records of all pesticide applications to Town Property at the Park/Public Works office for a period of four (4) years, and shall make the information available to the public, upon request.

Each application record shall include the following information:

- 1 Name of the entity responsible
- 2 Specific site of the application

- 3 The target pest
- 4 The date the pesticide was used and re-entry period if applicable
- 5 Schedule, timing, and conditions
- 6 The name of the active ingredient of the pesticide(s) to be applied and EPA registration number and amount used
- 7 The pesticide signal word
- 8 Prevention and other non-chemical methods of control used.

EMERGENCY EXEMPTION PROCESS:

The IPM Coordinator will make a recommendation to the Town Manager to allow staff, or an outside landscape contractor to apply a pesticide not on the Approved Use List or Limited Use List based upon a finding that the protection of public health requires the use of that pesticide due to an emergency. The Town Manager intends that such exemptions shall be granted on a per-case basis and shall apply to a specific pest problem for a limited time, with selection of pesticides conforming to the spirit and intent of this policy as is deemed practicable. To the greatest extent practicable, the notification requirements apply in an emergency situation.