

INTEGRATED PEST MANAGEMENT

Purpose

The purpose in establishing this policy is to help provide a safe and healthy learning, working, and playing environment for students, staff, families and users of the Oak Harbor School District properties. We propose to achieve this through the implementation of this Integrated Pest Management Policy ("IPM Policy"). The IPM Policy is intended to keep unwanted vegetation and pests at acceptable levels in effective, environmentally safe, and economical ways. The health and safety of our students, staff and families are our primary concern.

Practices

The Integrated Pest Management Program ("IPM Program") is an ecological approach to controlling unwanted vegetation, plant diseases, and problem pest populations by the use of preventive methods of pest and vegetation management that minimize risks to human health and the environment while remaining economically feasible for the school district.

For the purposes of this Policy, a "pest" includes 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 District. A pest does not include viruses or microorganisms on or in a living person or animal, but shall include plant diseases.

The term "pesticide" includes any chemical agent registered as a pesticide by the Washington State Department of Agriculture, which can be a herbicide, insecticide, rodenticide, fungicide, or other chemical that repels, changes the regular growth rate of, kills, or otherwise reduces levels of a targeted pest or pests.

The threshold level refers to a point in growth of a vegetation or pest population where it will cause an unacceptable impact on: public safety, recreation, or health; natural and/or managed ecosystems; aesthetic values; economic damage to desirable plants; the integrity, function, or service life of facilities.

Action level is the level of development of a vegetation or pest population at a specific site at which action must be taken to prevent the population from reaching the threshold level.

The District will perform regular monitoring to determine if and when intervention is necessary and may employ physical, biological, and educational tactics as primary controls to prevent intolerable damage or annoyance from pests. Least-toxic pesticides may be used as a last resort.

Integrated Pest Management ("IPM") uses preventive and non-chemical methods of control first. These control methods are recorded, monitored, repeated when necessary, and evaluated to determine their degree of success. If the desired effect is not achieved, other alternative methods will be considered in each specific case. When alternative methods have been employed, evaluated and determined to be unsuccessful, as a last resort, chemical controls may be used in accordance with the Pesticide Use and Selection section of this Policy.

The Pesticide Use and Selection section of this Policy provides the criteria that determine what pesticides may be used. When pesticides are deemed necessary, minimal use of the least toxic herbicides or pesticides and use of formulations with the least potential for human exposure shall be used. Applications will be timed to minimize exposure to students and staff and to minimize the pesticide's effect on the environment (including surface and ground water, animal and bird populations, and beneficial organisms). If applications become necessary, they will be timed to fall at the beginning of summer, winter and spring breaks, whenever possible.

Vegetation and pest control activities will be conducted only after consideration is given to potential student exposure both outdoors and within buildings, as well as its effects on classroom activities.

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The District will work toward the use of compost to help improve soil quality and promote beneficial soil micro-organisms that will help ward off plant diseases and unwanted vegetation. Vegetative waste generated as the result of grounds maintenance will be composted and used where possible.

The Grounds Department will implement pest control strategies aimed at eliminating some of the causes of pest infestation, such as preventative practices, natural landscaping, soil improvements, and aeration.

Pesticide Use and Selection

Soil amendments and fertilizers to be used by the District must be determined to be free of toxic waste or other hazardous materials. Fertilizers will not include those containing herbicides or moss killers. Fertilizers will be of the slow-release nitrogen types to minimize excess run off and contamination of surface water and will be the minimum necessary to achieve management goals. The District Grounds Department will make every effort to apply fertilizers to play fields and lawn areas when students, staff, coaches or others will not be present for at least 24 hours following fertilizer applications.

Pesticides will be used only if necessary to protect the health and safety of students and staff, or as a last resort in controlling problematic vegetation or pests according to the methods prescribed in the previous section, Integrated Pest Management Practices. No high-hazard pesticides will be used. If a pesticide meets any of the following criteria, it will constitute a high-hazard pesticide:

1. The pesticide is classified as highly acutely toxic (Hazard Category I or II) by the United States Environmental Protection Agency (signal word for Hazard Category I or II products - DANGER or WARNING);
2. The pesticide is a restricted use pesticide (use of the product is restricted to certified pesticide applicators);
3. The pesticide contains ingredients that the United States Environmental Protection Agency has determined to be possible, probable, known or likely carcinogens;
4. The pesticide contains reproductive toxicants (CA Prop 65 list);
5. The pesticide contains ingredients listed by Illinois EPA as known, probable or toxic suspected endocrine disruptors;
6. The pesticide contains nervous system toxicants (neurotoxic by mode of action-defined as pesticides in the organophosphate, carbamate, pyrethrin, and pyrethroid classes of chemicals);
7. The pesticide contains ingredients that have a soil half-life of more than 100 days;
8. The pesticide contains ingredients that have high or very high mobility in soil, according to Groundwater Ubiquity Score (GUS) Index;
9. The pesticide is labeled as toxic to fish, birds, domestic bees (except products used specifically to control wasps/hornets/yellow jackets in situations where they pose a hazard to humans), wildlife, or domestic animals.

In cases where preventive and non-chemical pest control strategies prove inadequate, and pests present a human health or safety hazard, least-toxic pesticides may be used as a last resort. Criteria that are favorable are:

10. The pesticide's active ingredient has soil half-life of 30 days or less (unless the active ingredient is a mineral);
11. The pesticide's active ingredient has extremely low or very low mobility in soil.

No pesticide will be used if the District does not have information on all the pesticide's active ingredients.

No routinely scheduled (e.g. seasonal, monthly, or weekly) pesticide applications will be made. No indoor pesticide fogging or space spraying will be performed. Insecticides will be used only in containerized baits, or for spot treatments targeted to insect nests or problem areas where a minimal amount of material will be used.

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Roles and Responsibilities

The IPM Committee will include: Executive Director for Operations, Director for Maintenance and Grounds, a grounds staff member, a school nurse, the district athletic director or designee, and individuals from each of the following groups: parents, staff, students and environmentally concerned community representatives. Fifty percent of the members will constitute a quorum for conducting a meeting.

The IPM Committee will:

1. Function as advocates for the IPM Program in the District and in the community by acting in an advisory capacity for staff, teachers, students, parents, caregivers, or community members, and by providing information about the IPM Policy when requested.
2. Provide oversight for the Director for Maintenance and Grounds in setting annual objectives for pest control strategies for each site.
3. Act as a resource for information concerning the addition of any new pesticide proposed for use by the Director for Maintenance and Grounds or the Grounds Department.
4. Act in an advisory capacity to the Director for Maintenance and Grounds when special or challenging situations arise that would benefit from committee research, and/or consideration and input.
5. Review the list of least-toxic pesticides proposed for use under the Pesticide Use and Selection section of the IPM Policy. A majority vote of a quorum of the IPM Committee is required for approval of a pesticide to be added to or deleted from the list of least-toxic pesticides.
6. Make recommendations for amendments to the IPM Policy to the Superintendent.
7. Conduct an annual Progress Review that meets the requirements of the Progress Review section of the IPM procedures.

Director for Maintenance and Grounds will:

1. Ensure compliance with District IPM Policy (6610) and with applicable laws, rules, regulations, and policies.
2. Adhere to the following decision making hierarchy concerning IPM:
 - a. Prevention of pest problems by building healthy soil and using appropriate plants.
 - b. Set pest thresholds for taking preventive action.
 - c. Monitor conditions to know when pest thresholds are reached.
 - d. Take the least toxic preventive action when pest thresholds are reached.
 - e. If all else fails, use of least toxic chemicals may be considered to control pests.
3. Coordinate the development of landscape and engineering design criteria for use in facility and landscape improvement/development projects.
4. Be responsible for final approval of all pesticide applications.
5. Perform research needed to facilitate implementation of the IPM Program. The Director may request assistance from the IPM Committee when needed.
6. Coordinate development of site inventories and pest control strategies for each site.
7. Coordinate training of all staff members involved directly in vegetation and pest management, as well as staff whose functions could help support the implementation of the IPM Program. These staff members must undergo training in accordance with state requirements.
8. Implement the annual student, parent/caregiver, and staff awareness letter.
9. Create an annual pest management plan.

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Notification and Timing

1. The Oak Harbor School District will provide written notification annually, or upon enrollment to parents or guardians of students and employees describing the District's pest control policies and methods including posting and notification requirements. Interested parents, guardians and employees will also be invited to file a request for individual written notification to be provided prior to each proposed application.
2. OHSD will notify interested parents or guardians of students and employees in writing; at least forty-eight hours before a pesticide application to a school facility, and will provide posting of the notification in a prominent place in the main office of the affected school.
3. All notifications to parents, guardians, and employees shall include the heading "Notice: Pesticide Application," and at a minimum will state:
 - a. the product name and active ingredient(s) of the pesticide to be applied;
 - b. the intended date and time of application;
 - c. the location to which the pesticide is to be applied;
 - d. the pest to be controlled; and
 - e. the name and phone number of a contact person at the school.
4. A school facility application will be made within forty-eight hours following the intended date and time stated in the notification or the notification process will be repeated.
5. A school will, at the time of application, post notification signs for all pesticide applications made to school facilities.
 - a. Notification signs for applications made to school grounds by school employees will be placed at the location of the application and at each primary point of entry to the school grounds. Notification signs for applications made to school facilities other than school grounds will be posted at the location of the application. The signs will be a minimum of 8 1/2 by 11 inches and will include the heading, "Notice: Pesticide Application"; "THIS LANDSCAPE HAS BEEN RECENTLY SPRAYED OR TREATED WITH PESTICIDES BY OAK HARBOR SCHOOL DISTRICT" as the headline and "FOR MORE INFORMATION PLEASE CALL" as the footer.
 - b. At a minimum, the sign will state:
 - 1) the product name and active ingredient(s) of the pesticide applied;
 - 2) the date and time of application;
 - 3) the location to which the pesticide was applied;
 - 4) the pest to be controlled;
 - 5) the name and phone number of a contact person at the school; and
 - 6) the boxed-off warning stating: "CAUTION: Individuals taking medication, pregnant women, infants, children and individuals with respiratory or heart disease, chemical sensitivities, or weakened immune systems may be particularly susceptible to adverse health effects due to pesticide exposure."
 - c. Notification signs will be printed in colors contrasting to the background.
 - d. Notification signs will remain in place for at least 24 hours from the time the application is completed. In the event the pesticide label requires a restricted entry interval greater than 24 hours, the notification sign will remain in place consistent with the restricted entry interval time as required by the label.
6. A school facility application does not include the application of anti-microbial pesticides or the placement of insect or rodent baits that are not accessible to children.

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7. The pre-notification requirements of this section do not apply if the school facility application is made when the school is not occupied by students for at least two consecutive days after the application.
8. The pre-notification requirements of this section do not apply to any emergency school facility application for control of any pest that poses an immediate human health or safety threat, such as an application to control stinging insects. When an emergency school facility application is made, notification consistent with the school's notification system will occur as soon as possible after the application. Normal posting requirements will be followed.
9. OHSD is not liable for the removal of signs by unauthorized persons. OHSD will not be held liable for personal property damage or bodily injury resulting from the unauthorized removal of signs.

Record Keeping

The Director for Maintenance and Grounds will maintain records of pesticides used, dates on which the pesticides were applied, weather conditions, amounts and locations of treatments, and target pests. Records will also be kept on preventive measures and natural or alternative treatments used. The records of pesticide Material Safety Data Sheets ("MSDS"), pesticide labels, chemical fact sheets with information on the health effects of particular chemicals, and manufacturer information about all pesticide ingredients, will be on file at the Office of the Director for Maintenance and Grounds and accessible to interested persons.

Progress Review

Each fall, the IPM Committee will review the IPM Program to evaluate how well prevention and control objectives are being met and to identify areas where improvement is needed. This will include a review of the pesticide application records and a review of all products used or proposed to be used during the coming year. The Committee will prepare a report of its findings, which shall include the following information:

1. Name, active ingredient(s) and quantities of each pesticide used. This information should be totaled by school and for the district as a whole. Each pesticide used should have an evaluation of its effectiveness.
2. Target pest of each pesticide used.
3. Non-chemical vegetation or pest prevention strategies and control measures implemented (including an evaluation of their effectiveness).
4. Pest management plan for the coming year including proposed and approved pesticide products.

This report will be presented to the Superintendent for his approval and presentation to the District Board of Directors. It will also subsequently be made available to the public upon request. Notice of its availability will be included on the District website Grounds web page.

Nothing in this procedure should interfere with the supervisory chain of command from Superintendent to grounds staff.