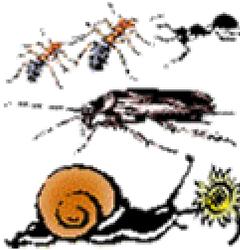


## ARTICLE XII

**Integrated Pest Management Policy for City-Owned Facilities****Section 1 Background**

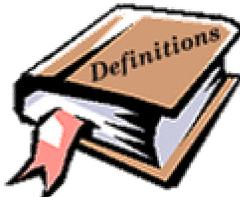
The City's National Pollutant Discharge Elimination System (NPDES) permit from the California Regional Water Quality Control Board (NPDES Permit No. 01-024) requires that the City develop and implement a pesticide toxicity control plan to address urban stream impairment by pesticides. In particular, organophosphate-containing pesticides (e.g., Diazinon and chlorpyrifos) have been found to persist in the environment and cause water quality impairment of some South San Francisco Bay area urban creeks and streams. Also, the City is required to limit discharges of copper into South San Francisco Bay by its NPDES permit. Using non-chemical controls, biological controls, and less toxic chemicals instead of using copper-based and organophosphate pesticides to deal with pest problems will help reduce the impacts to urban streams and South San Francisco Bay.

Clopyralid is the very persistent active ingredient in a number of herbicides that can be used for weed control. Very small amounts of Clopyralid contained in green waste that is collected for composting will continue to be active and cause the finished compost product to adversely affect plants to which it is applied. However, Clopyralid is also a valuable herbicide for managing the noxious thistle family of weeds that may infest native grass areas and restoration projects. Restrictions on the collection of green waste for composting from Clopyralid-treated areas are included in this policy to prevent the contamination of compost products produced at the SMaRT Station or other City facilities.

**Section 2 Purpose and Goals**

This policy sets forth the guiding principles for development and implementation of Integrated Pest Management (IPM) on all City properties. The goals of the IPM policy and its implementation throughout the city are to:

- A. Create awareness among City staff of pest management techniques
- B. Provide a means of educating all City departments to practice the most appropriate approach to managing pests on City properties.
- C. Reduce or minimize pesticide use on City properties.
- D. Eliminate adverse impacts to water quality (both in urban streams and South San Francisco Bay) due to pesticide usage.
- E. Prevent adverse impacts of pesticide usage on the quality of composted green waste.

**Section 3 Definitions**

The following definitions are used in this Article:

**Biological control** - The use of biological technologies to manage unwanted pests. Examples of this type of control include, but would not be limited to the use of pheromone traps or beneficial insect release for control of certain types of weeds or invasive insects in landscapes.

**Cultural control** - The use of IPM control methods such as grazing, re-vegetation and seeding or landscaping with competitive or tolerant species to manage unwanted weeds, rodents or plant diseases.

DPR - Department of Pesticide Regulations for the State of California's Environmental Protection Agency DPR, in partnership with Federal Environmental Protection Agency (EPA) and County Department of Agriculture, oversees all issues regarding the registration, licensing and enforcement of laws and regulations pertaining to pesticides.

Environmental Stewardship - The strategic approach to pest management in which the IPM practitioners focus on preserving the natural integrity and health of the environment, including public safety, while recommending or applying pest management methods. Environmental Stewardship philosophy helps to create awareness of the Best Management Practices (BMPs) and their relationship to maintaining a healthy environment while conducting pest management activities.

Integrated Pest Management (IPM) - IPM is the strategic approach that focuses on long-term prevention of pests and their damage from reaching unacceptable levels by selecting and applying the most appropriate combination of available pest control methods. These include cultural, mechanical, biological and chemical technologies that are implemented for a given site and pest situation in ways that minimize economic, health and environmental risks.

Mechanical controls - The use of IPM control methods utilizing hand labor or equipment such as mowers, graders, weed-eaters, and chainsaws. Crack and crevice sealants and closing small entryways (i.e., around pipes and conduits) into buildings for insect and rodent management are also mechanical controls.

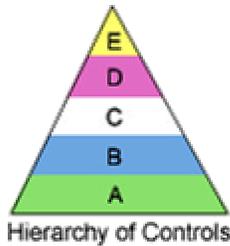
PCA - PCA or Pest Control Advisor is one licensed by the California Department of Pesticide Regulations according to Title 3, Article 5 of the California Code of Regulations. Only a licensed PCA, who is registered with the County Agricultural Commissioner may provide written pest control recommendations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

Pesticides - Defined in Section 12753 of the California Food and Agricultural Code as any spray adjuvant, or any substance, or mixture of substances intended to be used for defoliating plants, regulating plant growth, or for preventing, destroying, repelling, or mitigating any pest, as defined in Section 12754.5 (of the Food and Agricultural Code), which may infest or be detrimental to vegetation, man, animals, or households, or be present in any agricultural or nonagricultural environment whatsoever. The term pesticide applies to herbicides, insecticides, fungicides, rodenticides and other substances used to control pests. Antimicrobial agents are not included in this definition of pesticides

QAL - Qualified Applicators License is a licensed applicator according to Title 3, Article 3 of the California Code of Regulations. This license allows supervision of applications that may include residential, industrial, institutional, landscape, or rights-of-way sites.

QAC - Qualified Applicators Certificate is a certified applicator of pesticides according to Title 3, Article 3 of the California Code of Regulations. Applications may include residential, industrial, institutional, landscape, rights-of-way sites.

Structural Pest Control Operator (Branch I, II or III) - A licensed applicator for pest control within buildings and homes according to the requirements of the Structural Pest Control Board of the California Department of Consumer Affairs.



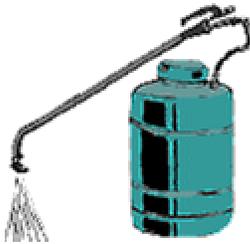
## Section 4 Integrated Pest Management (IPM) Policy

The City of Sunnyvale, including all departments and staff herein, and contractors providing pest control services on City property shall follow the City's IPM policy for the control or management of pests in and around city buildings and facilities, parks and golf courses, urban landscape areas, rights-of-way, and other City properties.

- Subd. 1 Pest Control Advisor (PCA)  
 Licensed PCAs will consider the options or alternatives listed below in the following order, before recommending the use of or applying any pesticide on City property:
- A. No controls (e.g., tolerating the pest infestation, use of resistant plant varieties or allowing normal life cycle of weeds)
  - B. Physical or mechanical controls (e.g., hand labor, mowing, etc.)
  - C. Cultural controls (e.g., mulching, disking, alternative vegetation)
  - D. Biological controls (e.g., natural enemies or predators, goats)
  - E. Reduced-risk chemical controls (e.g., soaps or oils)
- Subd. 2 Pesticide Applicator (QAL, QAC, or Structural Pest Control Operator)
- A. Those licensed or certified City staff and contractors employed by the City to control or manage pests will follow the IPM Best Management Practices and Standard Operating Procedures found in the City of Sunnyvale Urban Runoff Management Plan (URMP) Pest Management Control Program chapter.
  - B. Pesticide Applicators will use the most current IPM technologies available to ensure the long-term prevention or suppression of pest problems and to minimize negative impacts on the environment, non-target organisms, and human health.
- Subd. 3 All City Staff and Departments
- A. City departments and staff will promote non-toxic and reduced-risk alternatives for structural and landscape pest control, seeking to use the most up to date IPM technologies and best management practices.
  - B. The City will provide education for all City staff regarding IPM practices. The Public Works Department/Environmental Division will also provide information to residents and special districts within the City regarding the IPM Policy and how it is being implemented. The City, through Public Works Department/ Environmental Division activities, will establish a role model approach to encourage the use of IPM techniques for structural and landscaping pest management practices with residents, businesses, and special districts.
- Subd. 4 Pest Management Contractors Employed by the City  
 New contracts that are negotiated with pest management contractors doing work on City-owned property after January 9, 2003 will include requirements that the contractors follow the practices of the City's IPM Policy as described in the Sunnyvale Administrative Policy Manual and the Best Management Practices and Standard Operating Procedures of the Sunnyvale Urban Runoff Management Plan, Pest Management Control Program chapter.

- Subd. 5 City Property Leaseholders
  - A. The City shall use reasonable efforts to require the use of IPM practices as a part of new and renewed leases negotiated for City property after January 9, 2003.
  - B. City property leaseholders will be informed of the City's IPM Policy by Public Works Department staff and encouraged to use, whenever practical, the IPM Best Management Practices and Standard Operating Procedures described in the Sunnyvale Urban Runoff Management Plan.

**Section 5 Pesticide Application**



- Subd. 1 Who May Apply Pesticides
  - A. Only City employees or pest control contractors employed by the City who are authorized and trained to recommend or apply pesticides (i.e., hold PCA, QAL, QAC, or Structural Branch Operator I, II, or III certifications or licenses) may apply any pesticides to City property.
  - B. City employees who are not authorized and trained in pesticide application are prohibited from using any pesticides, including over-the-counter brands, in or around the work place. If insects or other pests are infesting a work area, contact Facilities Management (x7761) to arrange for a pest management contractor to apply the appropriate control methods.
  
- Subd. 2 Pesticides of Concern
  - A. City employees and/or contractors employed by the City who are trained to recommend or apply pesticides will not use organophosphate pesticides (e.g., those containing Diazinon and chlorpyrifos) or copper-based pesticides unless:
    - 1. Their use can be justified,
    - 2. Other approaches and techniques have been considered, and;
    - 3. Adverse water-quality impacts are eliminated.
  - B. Pesticides that contain Clopyralid are of concern because they are persistent and must not enter the green waste recycling/composting process. Therefore, City employees or pest control contractors employed by the City will not apply Clopyralid-containing pesticides to City property unless:
    - 1. Their use can be justified,
    - 2. Other approaches and techniques have been considered, and;
    - 3. Green waste (grass clippings, etc.) from areas where Clopyralid-containing pesticides are to be applied will not be collected for composting, but will be left on site to promote a healthy thatch layer.
  
- Subd. 3 Water Quality Management
  - A. When recommending pesticides for use or applying pesticides, the element of Environmental Stewardship must always be taken into consideration. City employees or pest control contractors employed by the City will select and apply IPM methods that will have the least impact on water quality and the environment.

- B. City employees or pest control contractors employed by the City will always avoid applications of pesticides that directly contact water, unless the pesticide is registered under Federal and California law for aquatic use. Pesticides that are not approved for aquatic use will not be applied to areas immediately adjacent to water bodies where through drift, drainage, or erosion, there is a possibility of a pesticide being transported into surface water.
- C. Discharges of pollutants from the use of aquatic pesticides to the waters of the United States require coverage under a NPDES permit. Those city employees or pest control contractors employed by the City who apply pesticides directly to waters of the United States will obtain a NPDES permit from the California State Water Quality Resources Control Board Region 2, prior to making any pesticide applications.



**Section 6 Employee and Pest Control Contractor Training for PCA, QAL, QAC or Structural Pest Control Operators (Branch I, II, and III)**

- A. All Pest Control Advisors and Applicators employed by the City or its pest control contractors will be licensed by the State of California Department of Pesticide Regulations (DPR) as a Pest Control Advisor or licensed Qualified Applicator.
- B. All other employees involved with pesticide applications as a normal part of their job duties and pest control contractors hired by the City will be trained as required by State of California DPR rules, the County Agricultural Commissioner, and/or the Structural Pest Control Board. They will work directly under the supervision of a licensed applicator.
- C. All City Departments responsible for pest management on City property will provide annual training to all employees who apply pesticides as a normal part of their job duties on:
  - 1. Pesticide Safety,
  - 2. The City's IPM Policy, and
  - 3. Appropriate BMPs and SOPs from the Sunnyvale Urban Runoff Management Plan, Pest Management Control Program chapter.



**Section 7 Education and Outreach on the Sunnyvale IPM Policy and Implementation Plan**

- Subd.1 The Public Works Department/Environmental Division, in participation with the Santa Clara Valley Urban Runoff Pollution Prevention Program, will continue with its existing program to encourage people who live, work, and/or attend school in Sunnyvale to:
  - A. Obtain information on IPM techniques to control pests and minimize pesticide use;
  - B. Use IPM technologies for dealing with pest problems; and
  - C. Properly dispose of unused pesticides and their containers.

- Subd. 2 The Public Works Department/Environmental Division will expand its current public outreach program on the topics described above to include:
- A. City employees who are not authorized to apply pesticides as a part of their normal job duties.
  - B. Selected business owners (i.e. landscape gardeners and commercial pesticide applicators).
  - C. Special Districts that occur within the Sunnyvale city limits.
  - D. School District staff that may be involved with pest management.



## Section 8 Reporting

- Subd. 1 To provide details on the previous year's pesticide use on City-owned property, each City department and pest control contractor employed by the City will submit copies of their State of California Monthly Summary Pesticide Use Report (Form PR-ENF-060) to the Environmental Division Manager of the Public Works Department in January of each calendar year. This information is reported as a part of the City's NPDES Stormwater Permit Annual Report compiled by the Public Works Department/ Environmental Division.
- Subd. 2 Each City department that applies pesticides will conduct an annual inventory by December of each calendar year to identify pesticides that are no longer legal or appropriate for applications per Federal, State, County, or City requirements. Results of the inventory will be reported to the Environmental Division Manager of the Public Works Department in January of each calendar year for the previous year's inventory. This information is reported as a part of the City's NPDES Stormwater Permit Annual Report compiled by the Public Works Department/ Environmental Division.
- Subd. 3. Each City department that applies pesticides will conduct an annual review and evaluation process of the effectiveness of the City's IPM Policy, BMPs and SOPs. They will provide a written evaluation to the Environmental Division Manager of the Public Works Department in July of each year that discusses:
- A. New IPM techniques that could be used to improve results
  - B. Staff training needs with a focus on the safe use, disposal, and storage of pesticides
  - C. Suggested modifications to the City's IPM Policy, BMPs, and SOPs to ensure that the Policy and implementation plan continue to be effective.