

# County of Marin Integrated Pest Management Policy

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## **I. PREAMBLE**

An Integrated Pest Management (IPM) Policy was adopted by the Marin County Department of Parks and Open Space in 1983, and an ordinance that applied to all Departments was adopted in 1998. These efforts have significantly reduced pesticide use by Marin County and eliminated use of the most hazardous pesticides. Since that time, a strong interest and concern for the environment and public health resulted in the Board of Supervisors passing a resolution supporting the Precautionary Principle on October 5, 2004 (Resolution No. 2004-108). Application of IPM principles is one concrete way that Marin County staff demonstrates their commitment to following a precautionary approach. This IPM Policy supports the goals of the Precautionary Principle and achieves County of Marin Strategic Plan Goals and Objectives to protect public health and our environment

It is the purpose and intent of this Policy to ensure effective pest management while continuing to minimize the use of chemical pest control methods with the goal of eliminating the use of pesticides.

It is also the purpose and intent of this Policy to outline how County Departments are to perform pest management and to ensure compliance with the County's IPM Ordinance. In addressing pest management needs the County shall focus on long-term prevention or ongoing suppression of pest problems, including consideration of a "no action" approach to minimize or preclude the need to use chemical pest control methods. The County recognizes that pesticides are potentially hazardous to human health, wildlife and the environment, and shall give preference to available, safe and effective non-pesticide alternatives and cultural practices when considering options for pest management on County property.

### **A. County Policy**

#### **It is the policy of the County that:**

1. Departments performing pest management will comply with the County of Marin IPM Ordinance and Policy. This Policy will apply to all property owned, leased or managed by the County, including all County Departments. This Policy will also apply to the Marin County Open Space District and the Marin County Flood Control District if adopted by their respective boards. To the extent that Marin County community service areas and special districts contract with the County of Marin for pest management services, the County of Marin IPM Ordinance and Policy shall apply;
2. Departments will require contractors providing pest management services to comply with the County IPM Ordinance and IPM Policy;
3. The County's IPM Program will include the following components:
  - (a) Education of County staff and public utilizing County facilities about pest management and IPM;
  - (b) Pest identification and least toxic methods to control pests;
  - (c) Reducing to the maximum extent the use of pesticides;
  - (d) Consideration of the outcome of taking a "no-action" approach;
  - (e) Review and consideration of available non-chemical options before using a chemical pesticide;

- (f) Identification and evaluation of conditions that encourage pest problems;
- (g) Careful and efficient inspection, monitoring and assessment of pest problems by designated personnel knowledgeable of IPM methods;
- (h) The maintenance of records by County Departments on IPM methods considered and used to prevent and control pests;
- (i) Compliance with all applicable state and federal regulations including pesticide use and reporting;
- (j) All IPM program information and records will be readily available to employees, IPM Commission members and the public;
- (k) Decision making is based on the best available science and data.

**B. IPM Goals**

**IPM goals regarding pesticide selection and use include:**

1. Elimination of Category I and II pesticides;
2. Minimization of the use of Category III and IV pesticides;
3. Elimination of pesticides which are classified by government agencies, identified in Section VII (B 1-6) as known, probable or possible carcinogens, reproductive toxicants, (teratogens, mutagens), endocrine disruptors, carbamates, organophosphates or ground water contaminants;
4. The County of Marin will use pesticides only when necessary and will select a pesticide that is both effective and least toxic;
5. Turf grass areas, playgrounds and picnic table areas on County property will be designated as pesticide free;
6. Site Specific Management Plans and Pest Specific Plans will be developed to prevent or reduce the incidence of pest problems, with careful consideration given to protect public health and safety, wildlife and the environment;
7. Pest Specific Plans will be developed within the first year following adoption of the Ordinance and Policy to address the common and widely spread pests, rodents, yellow jackets and cockroaches;
8. Expansion of IPM practices and Best Management Practices with the goal of eliminating the use of pesticides.

**II. DEFINITIONS FOR USE WITH THIS POLICY**

- A. "Antimicrobial agent" means any substance or mixture of substances intended for prohibiting the growth of, or destroying, any bacteria, fungi pathogenic to humans or other animals, or viruses declared to be pests under the California Food and Agricultural Code Section 12754.5, except slime control agents, substances intended for use in or on humans or other animals, and use in or on processed food, beverages, or pharmaceuticals. Antimicrobial agents include, but are not limited to, disinfectants, sanitizers, bacteriostats, sterilizers, fungicides and fungistats applied to inanimate surfaces, and commodity preservatives and protectants applied to raw materials or manufactured products. Antimicrobial agents used as defined herein are exempt from this policy.
- B. "Best Management Practices" or "BMP" means actions based on current science and technology that have been proven to be effective in the control and management

of the site or pests to prevent or reduce the incidence of pest problems, with careful consideration given to protect public health and safety, wildlife and the environment. Pest Specific Plans will be developed to address common and widely spread pests such as rodents, yellow jackets and cockroaches.

- C. "Best Management Practice Sheet" means a document that outlines employees' responsibilities for maintaining a pest free environment, identifies the Department's IPM Liaison, identifies pests likely to be encountered, indicates who to contact when pests are found and outlines immediate steps to mitigate the problem until pest management professionals arrive.
- D. "Board" means the Marin County Board of Supervisors and "Supervisor" means a member of the Board of Supervisors.
- E. "Contract" means a binding written agreement, including but not limited to a contract, lease, permit, license or easement, between a person, firm, corporation or other entity, including a governmental entity, and a County Department, which grants a right to use, lease or occupy property of the County of Marin for a specified purpose or purposes, or requires that the pesticides be applied.
- F. "Contractor" means a person, firm, or corporation or other entity, including a governmental entity that enters into a contract with the County of Marin; this may include pest management services.
- G. "County Department" means any department of the County of Marin and may include pesticide applicators hired by a County Department to apply pesticides on County property. County Department does not include any other local agency or any federal or state agency.
- H. "County Property" means property owned, leased or managed by the County of Marin.
- I. "Designee" means any person designated by a Department head to represent the Department as a member of the IPM Commission; these include Parks and Open Space, Public Works, and the position of the Marin County Public Health Officer (Health and Human Services).
- J. "Eco-Exempt" means pesticides designated by U.S. EPA as minimum risk pesticides by Federal Insecticide, Fungicide, Rodenticide Act Section 25(b) and California Code of Regulations Section 6147, or products approved for organic production systems by the National Organic Program.
- K. "Integrated Pest Management" or "IPM" means a decision-making, record-keeping process for managing pests that uses monitoring to determine pest injury levels, and combines biological, cultural, mechanical, physical, and chemical tools and other management practices to control pests in a safe, cost effective, and environmentally sound manner that contributes to the protection of public health and sustainability. This method uses extensive knowledge about pests, such as infestations, thresholds, life histories, environmental requirements, and natural enemies to complement and facilitate biological and other natural control of pests. The method involves the use

of non-chemical pest control methods and the careful use of least-toxic chemical methods when non-chemical methods have been exhausted or are not feasible.

- L. "IPM Coordinator" means the designated agent or employee experienced in IPM field and office work and is responsible for IPM program coordination for the County of Marin.
- M. "IPM Liaison" means the person designated by the Department to facilitate application of the County's IPM Ordinance and Policy and to serve as the Department's IPM contact.
- N. "IPM Ordinance" means the County of Marin's Integrated Pest Management Ordinance which is to be followed in conjunction with the County of Marin's Integrated Pest Management Policy.
- O. "IPM Policy" means the County of Marin's Integrated Pest Management Policy which is to be followed in conjunction with the County of Marin's Integrated Pest Management Ordinance.
- P. "IPM Program Manager" means the person designated by the Department authorized to perform pest management, to work with the IPM Coordinator in the implementation and management of the IPM program.
- Q. "National Organic Program" or "NOP" means a U.S. Department of Agriculture organic accreditation program that outlines organic certification standards, including a list of allowed and prohibited substances for organic production and processing.
- R. "Organic Materials Research Institute" or "OMRI" means an organization that determines which input products are allowed for use in organic production and processing.
- S. "Pest" means any pest as defined in Section 12754.5 of Chapter 2 of Division 7 of the California Food and Agricultural Code. Pest includes any of the following that is or is liable to become, dangerous or detrimental to the public health or the agricultural or nonagricultural environment of the state:
  - 1. Any insect, predatory animal, rodent, nematode or weed;
  - 2. Any form of terrestrial, aquatic, or aerial plant or animal, virus, fungus, bacteria or other microorganism (except viruses, fungi, bacteria or other microorganisms on or in living man or other living animals);
  - 3. Anything that the Secretary of the California Department of Food and Agriculture or the Director of Pesticide Regulation for the California Department of Food and Agriculture by regulation declares to be a pest.
- T. "Pest Control Adviser" or "PCA" means any person possessing a current pest control adviser license issued by the California Department of Pesticide Regulation. The PCA license is required for making pest control recommendations in the landscape setting.

- U. "Pest Control Operator" or "PCO" means any person possessing a current pest control operator license issued by the California Department of Pesticide Regulation. The PCO license is required when performing structural pest control.
- V. "Pest Specific Plan" means a written plan addressing the management and control of a particular pest. Components of Pest Specific Plans should include pest biology, impacts, pest thresholds, recommended treatments, monitoring frequency, cultural practices, and site modifications to prevent or reduce the incidence of pest problems, with careful consideration given to protect public health and safety, wildlife and the environment.
- W. "Pesticide" means pesticide as defined in Section 12753 of Chapter 2 of Division 7 of the California Food and Agricultural Code. Pesticide includes any of the following:
  1. Any substance or combination of substances which is intended to be used for defoliating plants, regulating plant growth, or for preventing, destroying, repelling or mitigating any pest which may infest or be detrimental to vegetation, man, animals or households or be present in any agricultural or nonagricultural environment whatsoever;
  2. Any spray adjuvant.
- X. "Pesticide applicator" means any person or company hired by a County Department who applies pesticides, as defined in this section, to property owned, leased or managed by the County of Marin.
- Y. "Pesticide List" and "List of Pesticides" is used interchangeably.
- Z. "Request for Proposal" or "RFP" means an invitation for suppliers to submit a proposal on specific supplies or services. The Request process brings structure to the procurement decision. The RFP may dictate to varying degrees the exact structure and format of the supplier's response.
- AA. "Request for Qualification" or "RFQ" requires a contractor submitting a Request for Proposal to submit a summary of relevant pest management experience and pest management practices in order to ensure that the contractor's qualifications meet the standards set forth in the IPM Ordinance and Policy.
- BB. "Site Specific Pest Management Plan" means a written plan identifying the use and management of a particular location or location types to minimize pest impacts and the use of pesticides. Site plans describe the site characteristics and site-specific management needs to address pests. These include, but are not limited to, pest biology, economic thresholds, recommended treatments, monitoring frequency, cultural practices, and site modifications.
- CC. "Site Treatment History Sheet" means a document that records pesticide use or other treatment practices within and associated with County owned, managed or leased structures.

- DD.** “Special Use Pesticides” means materials that do not meet the Ordinance criteria for use, but are considered critical to the protection of public health and safety, the environment, wildlife, or the preservation of County property.
- EE.** “Toxicity Category I, II, III, IV product” means any pesticide, as defined in this section, meeting the appropriate toxicity categories and bearing on the front label panel the word Danger, Warning, or Caution, as specified in Section 156.10 of Title 40 of the Code of Federal Regulations.

### **III. IPM COMMISSION**

#### **A. Composition of IPM Commission**

The IPM Commission shall consist of thirteen persons and will include the following representatives approved by the Board of Supervisors:

1. The Director of the Marin County Department of Public Works or designee;
2. The Director of the Marin County Department of Parks and Open Space or designee;
3. The Marin County Public Health Officer or designee;
4. A representative of the University of California experienced and educated in IPM practices;
5. A representative of Marin County Stormwater Pollution Prevention Program (MCSTOPPP)
6. A representative of the public with expertise and knowledge in the effects of pesticide and chemicals on health. Recommendations may be made to the Board of Supervisors by the Health Council for the appointment;
7. A licensed pest control applicator or pest control advisor who is supportive of least-toxic IPM practices and is not a County employee;
8. At least five persons, one appointed by each Marin County Supervisor and reporting to the Board of Supervisors. Each represents the community at large, recognized environmental, and/or health organizations;
9. An at-large, public member to serve as an alternate for the purpose of participation and voting in the absence of one of the five District public members (See 8).

Any Commission member who is not a County employee will serve a two-year, staggered term and is eligible for reappointment;

#### **B. Responsibilities of IPM Commission**

**The IPM Commission shall:**

1. Meet quarterly and coordinate agendas and location with the IPM Coordinator. All meetings shall be noticed and time will be allowed for public comment. Meetings will be conducted according to the Brown Act and Robert’s Rules of Order. The Brown Act provides for additional meetings as needed;
2. Participate in training on the Brown Act;
3. Review and understand the County IPM Ordinance and Policy;
4. Be knowledgeable concerning IPM and understand pest management;

5. Be knowledgeable concerning County pests, pest management needs and practices;
6. Work together to ensure that all decisions follow the Board of Supervisors' purposes and intents regarding the implementation of the IPM Ordinance and Policy;
7. Annually review pest management by County Departments with respect to the IPM Ordinance and Policy, including Site Specific Pest Management Plans created during that year, and include comments as part of the Commission's annual report to the Board of Supervisors. During the interim, the chair may report success and known problems as they arise;
8. Review the IPM Coordinator's Annual Report to the Board of Supervisors and Pesticide List(s) and submit comments, as needed, to the Board of Supervisors following the Commission's first quarterly meeting;
9. Comply with recordkeeping and reporting requirements as described in Section VIII, (C);
10. Help identify effective and safe substitutes to pesticides, and may identify appropriate measures that further streamlines the response to emergency pest management challenges, and may explore creative, common sense approaches for achieving transitions to least-toxic pest control, including prioritizing the elimination of pesticides;
11. Advise the Board of Supervisors on IPM issues, including review of the IPM Commission budget;
12. Review and comment on any proposed changes to the IPM Ordinance or Policy prior to the Coordinator's presentation of such changes to the Board of Supervisors;
13. Make recommendations to the Board of Supervisors regarding IPM funding opportunities or needs;
14. Review Commission bylaws and recommend changes for final approval by the Board of Supervisors.

#### **IV. IPM COORDINATOR**

##### **A. Designation of IPM Coordinator**

The Board of Supervisors shall designate an IPM Coordinator to coordinate implementation of IPM Ordinance and Policy and to provide administrative support to the IPM Commission.

##### **B. Responsibilities of IPM Coordinator**

**The IPM Coordinator shall:**

1. Ensure each County IPM Liaison has reviewed and understands the requirements of the County IPM Ordinance and Policy,
2. Organize IPM trainings for County IPM Liaisons and Department staff as needed;
3. Develop Best Management Practice (BMP) and Site Treatment History Sheets for County Departments and work with County Departments performing pest management to maintain and update those sheets;

4. Work with County Departments performing pest management to develop Site Specific Pest Management Plans;
5. Work with County Departments performing pest management to develop forms summarizing pesticide usage and a form for exemption requests;
6. Work in coordination with the County Health Officer to ensure that any public health issues are addressed as needed;
7. Create a standardized design for a pesticide application notification sign that includes the date of application, the name and type of product used, the signal word, the URL for the County IPM website and a contact telephone number where the public may call for information about the proposed application.
8. Establish and maintain an accurate pesticide application recordkeeping and reporting system;
9. Review such records and reports to ensure compliance with the IPM Ordinance and Policy
10. Review, determine, and track approved pesticide application exemption requests and report exemptions granted to the IPM Commission at their next regular meeting;
11. Track use of cultural practices, non-chemical actions and pesticides;
12. Develop and maintain a list of pesticides that may be used by the County, present the list annually for review by the Commission and then adoption by the Board of Supervisors;
13. Request information on inert ingredients from manufacturers of any pesticide used on County property and provide the information on the Web site when available;
14. Provide a copy of annual report to the IPM Commission in advance of its first quarterly meeting;
15. Provide an annual report to the Board of Supervisors at the first available board meeting in February that includes a review of the County's pesticide use, exemptions granted, pest management projects, Site Specific Pest Management Plans completed during the year, trainings offered, and any proposed modifications to the County's Pesticide List, or Special Use Category designation, and progress towards any benchmark reductions;
16. Attend County IPM Commission meetings and provide updates;
17. Provide administrative support to the IPM Commission;
18. Provide and update an IPM website.

**C. IPM Website**

After adoption of this Policy and as soon as practicable, but no more than one year, the IPM Coordinator shall provide and update an IPM website, which includes, but is not limited to:

1. List of pesticides allowed for use by the County;
2. Active ingredients for all pesticides used on County property as well as inert ingredients when disclosed by the product manufacturer;
3. Advance postings of pending pesticide applications by location and/or site in accordance with Policy;
4. Amounts and locations of pesticides used by County in the last year;
5. The annual IPM Coordinator's and Commission's reports to the Board of Supervisors;
6. Approved exemptions;

7. A link to the IPM Ordinance;
8. A link to the IPM Policy;
9. The IPM Commission meeting schedule and location;
10. The IPM Commission meeting minutes;
11. Contact information for IPM Coordinator;
12. Useful IPM related links (e.g. UC IPM, MCSTOPPP, California Proposition 65, U.S. EPA, CA Department of Pesticide Regulation, BIRC);
13. Information concerning pesticide product half life and link(s) to relevant source material;
14. Completed BMP Sheets;
15. Completed Site Treatment History Sheets;
16. Site Specific Pest Management Plans.

## V. COUNTY DEPARTMENTS

### A. Responsibilities of Departments Performing Pest Control

#### County Departments Performing Pest Control Shall:

1. Comply with the IPM Ordinance and Policy;
2. Designate an IPM Program Manager, knowledgeable and experienced in IPM practices, whose responsibilities include:
  - (a) Work with the IPM Coordinator to review Departmental pest management operations and help identify Departmental IPM needs;
  - (b) Work with the IPM Coordinator and Department Liaisons to prioritize and Site Specific Pest Management Plans or BMP Sheets within the budget process. High prioritization will be given to any sites where there is a potential need for use of a material from the Special Use Pesticide Category;
  - (c) Post and provide notification as required in this policy, including notification of the IPM Coordinator in time to update the IPM Website;
  - (d) Maintain pesticide application records and provide reports to IPM Coordinator on a monthly basis;
  - (e) Collect and summarize data on non-pesticide alternatives and provide the information to the IPM Coordinator on a monthly basis;
  - (f) Attend IPM Commission meetings as needed;
  - (g) Work with IPM Coordinator to organize staff training and encourage attendance by appropriate departmental staff;
  - (h) Disseminate pest management materials and policies at Department level;
  - (i) Attend public meetings as needed.
3. Designate IPM Liaison (see V. B. below)

### B. Responsibilities of Departments Not Authorized to Perform Pest Management

#### All County Departments not authorized to perform pest management shall:

1. Adhere to the IPM Ordinance and Policy;

2. Not apply or possess any pesticide on County properties;
3. Designate an IPM Liaison who shall:
  - (a) Act as Department contact on IPM matters and pest-related issues;
  - (b) Review and understand the County IPM Ordinance and Policy;
  - (c) Review compliance with the IPM Ordinance and Policy;
  - (d) Make completed BMP and Site Treatment History Sheets for their Department sites accessible;
  - (e) Assist IPM Coordinator in dissemination of IPM educational materials;
  - (f) Attend trainings that may be provided by the IPM Coordinator; including training on providing public access to information regarding pest management activities in County facilities.

## **VI. PEST MANAGEMENT PLANNING**

### **A. County Locations Requiring Complex and On-Going Pest Management**

For County locations requiring complex and on-going pest management, the IPM Coordinator, in cooperation with Departmental Staff, shall help in the development and maintenance of Site Specific Pest Management Plans that provide sufficient information to facilitate IPM decision making. These Site Specific Pest Management Plans should:

1. Provide education for departmental IPM contacts, staff performing pest control, and County employees.
2. Establish ongoing scouting or inspection procedures to monitor pest population levels. Perform thorough in-field assessments of each pest problem. Keep records of such monitoring. Monitoring should be performed by designated personnel or contractor knowledgeable in IPM methods;
3. Assess potential injury levels from the presence of the pest in four primary areas: human health; wildlife protection; environmental conditions and economic impacts in order to establish action levels sufficient to warrant treatment;
4. Determine corrective actions when an action level is reached, review and consider all available alternative options for acceptability and feasibility, including consideration of the outcome if no action is taken;
5. Identify and evaluate conditions that encourage pest problems. Recommend modifications to pest ecosystems to reduce access to food and living space through physical and cultural practices;
6. Evaluate landscape sites to help determine BMPs based on site needs and constraints;
7. Determine the most effective treatment time based on pest biology and other variables, such as public access, weather, seasonal changes in wildlife use and local conditions;
8. Include a review of Open Space District management plans and vegetation management plans where available;
9. Establish and maintain an accurate record-keeping system to catalog monitoring information and to evaluate effectiveness of IPM practices;

- (a) Use physical pest controls such as cultivation, traps, and barriers (exclusions);
  - (b) Employ practices, including water management, mulching, waste management and food storage to reduce pest populations;
  - (c) Design, construct or modify indoor and outdoor areas to reduce or eliminate pest habitats;
  - (d) Use pest resistant plants and planting systems that minimize pest infestations;
  - (e) Use biological pest controls whenever possible;
10. Identify the potential need for the use of any pesticide, examine alternatives to reduce the need for their use, and establish benchmarks with a goal of a 10% per year reduction based on pesticide product, pest conditions and funding. Progress will be reevaluated annually by the Departments, IPM Coordinator and IPM Commission and reported to the Board of Supervisors as part of their annual reports;
11. Evaluate the need for pesticide-free zones and appropriate buffers.

**B. County Departments and Offices Requiring Pest Control on an As-Needed Basis**

County Departments and offices requiring pest control on an as-needed basis are to maintain a pest specific Best Management Practices (BMP) Sheet which will serve as the site plan for the facility, and a "Site Treatment History" Sheet which provides a record of any treatments made at that site. BMP and Site Treatment History Sheets shall be developed by the IPM Coordinator with the assistance of County staff and IPM Liaisons.

BMP Sheets are to identify the Department's IPM Liaison, outline employee responsibilities in maintaining a pest free environment, identify pests likely to be encountered; who to contact when pests are found, and immediate steps to mitigate the problem until pest management professionals arrive.

Site Treatment History Sheets shall document any pesticide treatments on the site documenting the treatment date, pest, and material applied.

BMP and Site Treatment History Sheets are to be maintained on site and readily available to staff, IPM Commission and public upon request. These sheets will also be available on the County's IPM website.

**C. Assessment of Condition/Need**

When a report of a pest problem is received, an assessment will be performed by a person knowledgeable in pest management. This assessment should confirm and identify the pest, establish what actions have already been taken and if further action is deemed necessary, that person will contact the appropriate Department responsible for performing pest management functions. That Department, in consultation with the IPM Coordinator as needed, will determine whether a pest complaint warrants further action. Appropriate non-chemical options such as cultural practices and additional BMPs shall be considered at this time.

If it is determined that it may be necessary to use a pesticide in the landscape, an assessment of the site and pest will be done by a licensed Pest Control Adviser. For structural treatment, a licensed Pest Control Operator will determine appropriate products for treatment which will include only those pesticide products allowed for use on County property and will follow the "Guidelines for Pesticide Selection" (Section VII). These recommendations for treatment shall specify the material to be used, the pest to be controlled, the rate of application, the dilution, and specify practices to address environmental or health hazards associated with that material's use.

Turf grass areas, playgrounds and picnic areas shall be designated as pesticide-free zones. No chemical controls shall be used in these areas unless required to protect public health and safety per the Limited Use Exemption Process, Section VII (E). In the event a Limited Use Exemption is granted, special precautions will be used to reduce potential exposure: the area will be fenced off to deny access while work is in progress, the product will only be used in conjunction with a comprehensive renovation program based on best management practices and every effort will be made to reduce the need for additional treatment in the future.

Buffer zones around pesticide-free zones and adjacent to waterways and wetlands, will be determined as part of the Site Specific Pest Management Plan; Federal, state, and local requirements regarding buffer zone size will be adopted using the requirement that is the most restrictive and protective of the public, wildlife and the environment.

No rodenticide baits will be applied in Open Space areas unless under an exemption, and no such baits will be used in areas where owl boxes are present. Mechanical snap traps are to be used whenever possible and practical on County properties. In areas where it is determined appropriate to use rodenticides they shall only be used in association with anchored and locked bait boxes. Non-toxic tracking blocks will be used in boxes and monitored to establish vertebrate activity before placing a rodenticide in the box.

#### **D. Guidelines for Pest Treatment**

If it is determined that treatment is needed, the following criteria are to be used in determining the appropriate treatment strategy:

1. Least-disruptive of natural controls;
2. Least-hazardous to human health;
3. Least-toxic to non-target organisms;
4. Protective of wildlife and the native habitat;
5. Least-damaging to the general environment;
6. Cultural, biological, and mechanical solutions have been considered and evaluated;
7. Prior treatments used on site to control the pest and an evaluation of the success of that approach;
8. Most likely to produce a permanent reduction in the environment's ability to support target pests;
9. Cost effectiveness in the short and long term.

## **VII. GUIDELINES FOR PESTICIDE SELECTION**

### **A. Development of List of Pesticides allowed for Use on County Property**

It is a goal of the County to minimize the use of Category III pesticides by giving preference to Eco-exempt products and those approved by the Organic Materials Research Institute (OMRI) or by the National Organic Program for use in organic systems as available and effective.

Pursuant to the criteria listed Section VI (D), and those outlined below, and in consultation with Department personnel performing pest control and IPM pest control specialists, the IPM Coordinator will maintain a list of pesticides allowed for use as part of the County's IPM Program. This list will include the EPA registration number, the active ingredient(s), the signal word, the product formulation, use. This list will be developed by the IPM Coordinator in cooperation with departments and will be available for review and comment by the IPM Commission at their next regularly scheduled meeting, but not less than thirty (30) days after the adoption of this Policy. Once adopted by the Board of Supervisors, the list will be available on the IPM website. Any pesticide use will be in accordance with state and federal laws and in accordance with this Policy and the IPM Ordinance, whichever is most restrictive.

Departments using pesticides are to review the Pesticide List each year with the IPM Coordinator. Any proposed changes are to be reviewed by the IPM Commission before it is submitted to the Board of Supervisors for consideration for approval.

In the interim between the enactment of this policy and adoption of the Pesticide List, departments needing to use pesticides shall do so in accordance with the provisions of the previous IPM ordinance adopted in 1998.

### **B. Chemical Prohibitions for the Pesticide List**

Except as noted under the Special Use Category, pesticides included in the Pesticide List shall not contain ingredients identified in the following sources:

1. Products listed as Toxicity Category I or II;
2. California's Proposition 65 list (the Safe Drinking Water and Toxic Enforcement Act of 1986, materials known to the State to cause cancer or reproductive or developmental toxicity);
3. California's Department of Pesticide Regulation groundwater protection list (Food and Agricultural Code 13145(d));
4. Organophosphates, or organochlorines, or carbamates listed by the United States Environmental Protection Agency (Office of Pesticides Programs, Document 735-F-99-14, May 1999), or California Environmental Protection Agency, Department of Pesticide Regulation Chemical Inquiries Database;
5. A known carcinogen, probable carcinogen, or possible carcinogen by the United States Environmental Protection Agency as per "List of Chemicals Evaluated for Carcinogenic Potential";

6. Any known endocrine disruptor listed by the United States Environmental Protection Agency or the European Union, Endocrine Disruptors website.

**C. Special Use Pesticide Category**

There may be circumstances when it is necessary to use a pesticide that does not meet the criteria for use under Section B 1-6. The Pesticide List may include these special use categories of materials which are considered critical to the protection of public health, the environment, wildlife, safety or the preservation of County property. These materials will only be used in conjunction with an IPM program where there are no feasible alternatives. These products will be identified on the Pesticide List which will specify:

1. The particular criteria which is inconsistent with Section B above;
2. The specific circumstances and conditions for which the product may be used;
3. The method of application; and
4. How the site is to be managed to preclude potential exposure.

**D. Benchmark Pesticides**

Some of these Special Use Pesticide Category products may pose a particular environmental concern or health risk. There may be circumstances when the analysis of alternatives for a particular site indicates the necessity for limited use of such products. Benchmark reductions for these products will be developed as part of the Site Specific Pest Management Plans. Because these are products of particular concern, it is the goal of the County to eliminate benchmarked products and their use will be reduced over time as effective, less toxic alternatives are identified and those alternatives are added to the Pesticide List to substitute for the benchmarked pesticide.

Departments having the need to use benchmarked products will annually provide an explanation of why product use was necessary, discuss potential alternatives, and outline a plan for implementation of feasible alternatives at the appropriate IPM Commission meeting. Progress towards meeting the benchmarks for reduction will be reviewed at that time.

A pesticide product not listed in the Special Use Pesticide Category may still be targeted for benchmark reductions as part of a Site Specific Pest Management Plan.

**E. Limited Use Exemptions**

County Departments responsible for performing pest management shall submit a request for an exemption to the IPM Coordinator to use a pesticide that is not on the Pesticide List as per Sections (B) and (C) above. The IPM Coordinator may approve a Limited Use Exemption request if the material is being used in association with an active IPM program and the Department, through submittal of the Exemption Request form, has demonstrated:

1. A compelling need to use the pesticide, such as public health or safety or substantial economic detriment;
2. The investigating of all available options and finding of no viable alternatives;

3. The development of a plan to preclude the need for future use;
4. The Department's intent to use the material for a limited period of time.

The IPM Coordinator shall report any Limited Use Exemptions to the IPM Commission at their next meeting and shall include it in his quarterly communication and as part of the annual report to the Board of Supervisors.

## **VIII. CONTRACTS, NOTIFICATION AND RECORDKEEPING**

### **A. IPM Contracts**

All contractors who manage pests on County owned, leased or managed property shall be required to adhere to the guidelines established in the County's IPM Ordinance and Policy:

1. The IPM Coordinator shall assist the County Departments in developing contract language and in the selection of the successful contractor;
2. Contractors are required to maintain records of pest control activities, and submit a summary of activities to the Department on completion of the job. Contractors providing regular and ongoing service shall submit summaries to the Department on a monthly basis. Records are to include the date, name of the pest, the site/location the work was done, name of technician performing work, and corrective action taken. If a pesticide was used, the product name and amount applied must also be reported;
3. Contractors are required to comply with the notification requirements as listed in this Policy;

Within six months of the adoption of the IPM Ordinance and Policy, an RFP process is required for all contractors performing structural pest management on County-owned and/or managed property. The selected contractor must have comparable qualifications to those identified in the IPM STAR or Eco-Wise certification programs.

### **B. Notification**

The County shall provide the public and its employees with notification of pesticide applications through the use of signs, voice mail, and the IPM website:

1. Signs should be posted at all regular public and employee points of entry to the treated area, and pursuant to state and/or federal law, Marin County IPM Ordinance and Policy and according to product label instructions;
2. Signs shall be posted four (4) days in advance of application, and remain in place for four (4) days following the application, unless the manufacturer's product label specifies a longer posting period. If volatile pesticides are sprayed indoors for structural application, notification signs shall be posted seven (7) days in advance of application and remain in place for seven (7) days following the application;
3. Signs shall contain the name and active ingredient(s) of the pesticide product, the target pest, signal word indicating the toxicity category of the pesticide product, the re-entry interval as determined by the product label or regulation,

- the name and contact number for the County Department responsible for the application and the web address of the County IPM website;
4. Signs should be of a standardized design that is easily recognizable to the public and employees;
  5. When using approved Category IV, Eco-exempt or OMRI approved pesticides, posting, as above, may be on the day of application and remain in place for at least four (4) days;
  6. For the Marin County Civic Center, a sign will be created that explains that an IPM program is in place at the Civic Center and that pesticides may be used in the building. Signs will be located near each of the primary entrances, will direct the readers where to obtain further information and will contain information as to current treatment status;
  7. For every building and site where pesticide baits are used, signs shall be posted at a conspicuous location and include information as outlined above (No. 3);
  8. County Departments shall not be required to post signs in right-of-way locations that the general public does not use for recreation or pedestrian purposes, such as median strips. However, notification of pesticide applications in right-of-way locations shall be available on the public access telephone number and the IPM website;
  9. At least four (4) days prior to the application of a pesticide, the Department seeking to apply the pesticide shall provide the IPM Coordinator with all relevant notification information and the IPM Coordinator shall post that information to the County IPM website as soon as possible.
  10. County Departments may obtain authorization from the IPM Coordinator to apply a pesticide without providing a four (4) or seven (7) day advance notice if there is a compelling need to use the pesticide such as a threat to public health, safety, County property, or substantial economic detriment. Signs meeting the requirements, as outlined above (No. 2), shall be posted prior to application and remain posted four (4) or seven (7) days following the application.

### **C. Recordkeeping and Reporting**

The County IPM program is based on Site Specific Pest Management Plans and BMP Sheets that guide pest management practices, careful and efficient inspection and monitoring of pest problems, as well as the maintenance of records by designated personnel who are knowledgeable in IPM methods.

All records and information concerning the County IPM program will be made available to employees, the IPM Commission and the public upon request in accordance with all applicable State and Marin County laws governing public access to information.

#### **1. County Departments**

Each County Department that is responsible for IPM program implementation shall maintain records of pest related treatments, including management, cultural practices, and chemical methods. These records shall be maintained per the County and state records retention policies and/or law.

Departments are to annually submit to the IPM Coordinator copies of BMP Sheets as well as maintain a record of all exemption requests. Departments are to report to

the IPM Coordinator any departmental IPM needs and maintain records of IPM or pesticide related training of staff.

Records of management and cultural activities are to be provided to the IPM Coordinator at least on a quarterly basis and are to include:

- (a) The target pest;
- (b) Type of management or cultural activity used;
- (c) Treatment location and date;
- (d) Estimate of time or cost;

If pesticides are used, application records are to be provided to the IPM Coordinator on a monthly basis, and in addition to the information outlined in (a)–(d) above, shall include:

- (e) The EPA registration number of the product used;
- (f) The quantity of material applied;
- (g) The name of the applicator.

## 2. Contractors

Contractors shall maintain application records and treatment information as outlined in Section VIII, (C, 1) and are to provide this information to the responsible Department immediately upon completion of treatment so the Department can fulfill reporting obligations. For structural treatments, the contractor will also update the Site Treatment History Sheet immediately following treatment.

## 3. IPM Coordinator

The IPM Coordinator shall:

- (a) Maintain all necessary records in order to prepare an annual report for the Board of Supervisors that includes a review and summary of the County's pesticide use, cultural practices and non-chemical pest control activities, exemptions granted, training offered, any proposed modifications to the County's Pesticide List and any suggestions for amendments or resources needed for effective implementation of the IPM Policy and Ordinance;
- (b) Maintain records of IPM Liaisons, completed BMP Sheets, Site-Specific Pest Management Plans, and any other planning documents developed to guide departmental staff in implementing the IPM Policy and Ordinance;
- (c) Provide a copy of annual report to the IPM Commission in advance of its first quarterly meeting;
- (d) Provide an annual report to the Board of Supervisors at the first available board meeting in February that includes a review of the County's pesticide use, exemptions granted, pest management projects, training offered, and any proposed modifications to the County's Pesticide List, or Special Use Category designation, and progress towards any benchmark reductions.

## 4. IPM Commission

The IPM Commission shall:

- (a)** Maintain records of IPM Commission meeting minutes and agendas, and other notification documents as required under the Brown Act;
- (b)** Provide an annual report to the Board of Supervisors summarizing activities of the Commission and providing recommendations for amendments or resources needed for implementation of the IPM Policy and Ordinance;
- (c)** Submit comments to the Board of Supervisors on proposed changes to the Pesticide List on an as-needed basis;
- (d)** Establish and maintain IPM Commission by-laws and member contact information.