City of Brisbane
Agenda Report

TO: Honorable Mayor and City Council

FROM: Director of Public Works/City Engineer via City Manager

SUBJECT: Updated Integrated Pest Management Policy

DATE: September 19, 2011

City Council Goals:

To develop plans and pursue opportunities to protect natural resources. (#8)

To promote intergovernmental opportunities that enhances services and/or reduces cost of operations and services to city residents. (#10)

Purpose:

The recommended item is consistent with the community's value of ensuring the highest level of water quality.

Recommendation:

Review and approve Resolution No. 2011-40 Adopting an Updated Integrated Pest Management Policy.

Background:

In 2003, the City approved Resolution No. 2003-47, adopting an integrated pest management (IPM) policy in accordance with the State's 1999 stormwater requirements to develop performance standards for municipal pest management. The 2003 policy was based on a template developed by the San Mateo Countywide Water Pollution Prevention Program (Countywide Program) and was adopted by most jurisdictions in the county.

The San Francisco Bay Regional Water Quality Control Board (Water Board) adopted a municipal regional stormwater permit (MRP) in October 2009, requiring the city and each of the other 75 public agencies covered by the MRP to implement pesticide control programs to minimize reliance on pesticides that pose a threat to water quality and require IPM in municipal operations and on municipal property (MRP Provision C.9).

The City was required to submit its existing IPM policy to the Water Board as part of its annual stormwater report in September 2010. Water Board staff indicated in a February 10, 2011 memorandum that the policy adopted by San Mateo jurisdictions did not meet the MRP's requirements because it was expressed as recommendations and not requirements. In addition, the existing 2003 version of the IPM policy lacked specificity about the hierarchical decision-making process and multi-step approach that should be used to control pests and, only where and when needed, address problems using the least toxic pesticides. In May 2011, Water Board staff expressed its intent to issue Notices of Violation to municipalities that did not adopt updated IPM policies.

In response to these reported deficiencies, the Countywide Program's Parks Maintenance and IPM Work Group developed an updated version of the model IPM policy, incorporating input from both the San Mateo County Agricultural Commissioner and Water Board staff.

Discussion:

The primary changes to the 2003 version of the IPM policy were to incorporate more specificity and clarify IPM is not a recommended activity, but a description of the city's commitment to minimize the use of pesticides that threaten water quality.

More specificity was incorporated into the updated IPM policy by incorporating ten steps that will be followed to control pests through a process that includes pest prevention, biological and habitat controls, and chemical controls when needed using reduced risk pesticides at the minimum amounts needed to be effective.

In addition, the MRP's requirements that are included in the updated version of the IPM policy include the following:

- Clarify that the pesticides of concern are those that threaten water quality. The MRP contains a list of these pesticides.
- Commit the city to establishing written standard operating procedures for pesticide use to ensure implementation of the IPM policy and to require employees and pest control contractors to comply with the standard operating procedures.
- Track the use of pesticides and summarize this information in the annual municipal stormwater report consistent with the MRP's requirements.
- Review purchasing procedures and service agreements with pest control contractors to determine what changes, if any, may be needed to support the implementation of the IPM policy.

In accordance with Item 2, above, the Countywide Program's Parks Maintenance and IPM Workgroup developed written standard operating procedures for pesticide use that can be customized for utilization by each agency. The City is already implementing those procedures. Also, at the suggestion of Water Board staff and similar to other IPM policies adopted in the Bay Area, the IPM policy states that each department that

performs pest management activities will identify an IPM coordinator who will be responsible for assisting staff to implement the city's IPM policy.

Fiscal Impact:

The costs associated with adopting and implementing the updated IPM policy are considered to be negligible because the city has an existing IPM policy. The updated policy mainly adds specificity to the existing IPM policy so that the city's hierarchical pest control decision-making process is clear and consistent with the MRP requirements. In addition, by adopting an updated policy meeting MRP requirements, the City will likely avoid future enforcement actions that could include financial penalties based on Water Board staff's determination that the 2003 version of the IPM policy was inadequate.

Measure of Success

An updated IPM Policy that satisfies the Water Board's interpretation of requirements found within the MRP.

Attachments:

Resolution No. 2011-40

Director of Public Works/City Engineer

City Manager

RESOLUTION NO. 2011-40

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF BRISBANE ADOPTING AN UPDATED INTEGRATED PEST MANAGEMENT POLICY

WHEREAS, the Environmental Protection Agency, under the 1987 amendments to the Federal Clean Water Act, imposed regulations mandating local governments control and reduce the amount of stormwater pollutant runoff into receiving waters through compliance with municipal stormwater permits issued under the National Pollutant Discharge Elimination System (NPDES); and

WHEREAS, under the authority of California Porter-Cologne Water Quality Control Act, the State Water Resources Control Board delegated authority to the Regional Water Quality Control Boards to issue NPDES permitting requirements upon counties and cities; and

WHEREAS, in October 2009, the San Francisco Bay Regional Water Quality Control Board adopted a Municipal Regional Stormwater NPDES Permit No. CAS612008 (MRP) under the NPDES program; and

WHEREAS, the MRP includes specific requirements mandating municipalities adopt Integrated Pest Management policies to limit water quality impacts from municipal pest management activities; and

WHEREAS, the City of Brisbane seeks to protect the health and safety of its employees and the general public, the environment and water quality, as well as provide sustainable solutions for pest control, through the reduced use of pesticides on property owned or managed by the City to the maximum extent practicable.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Brisbane that the attached San Mateo Countywide Water Pollution Prevention Program Model Integrated Pest Management (IPM) Policy be adopted and implemented by all appropriate city departments and contractors.

This Resolution supersedes the City's IPM Policy outlined in Resolution No. 2003-47 adopted on October 20, 2003.

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Cyril G. Bologoff, Mayor

I hereby certify that the foregoing Resolution No. 2011-40 was duly and regularly adopted at a regular meeting of the Brisbane City Council on September 19, 2011 by the following vote:

AYES:
NOES:
ABSTAIN:
ABSENT:

Sheri Marie Spediacci, City Clerk

SAN MATEO COUNTYWIDE
Water Pollution
Prevention Program
Clean Water. Healthy Community.

Final Version

San Mateo Countywide Water Pollution Prevention Program
Model Integrated Pest Management (IPM) Policy

GOAL

The City of Brisbane seeks to protect the health and safety of its employees and the general public, the environment and water quality, as well as to provide sustainable solutions for pest control through the reduced use of pesticides on property including buildings owned or managed by the City/County by applying Integrated Pesticide Management principles and techniques. The municipal regional stormwater permit requires that the City of Brisbane minimize reliance on pesticides that threaten water quality.

REQUIRED USE OF INTEGRATED PEST MANAGEMENT

Employees implementing pest management controls will use Integrated Pest Management (IPM) techniques that emphasize non-pesticide alternatives. Pesticides will only be used after careful consideration of non-chemical alternatives and then the least toxic chemicals that are effective shall be used. Pest control contractors hired by the City of Brisbane are required to implement IPM to control pests. This will be achieved by hiring only IPM-certified pest control contractors or by including contract specifications requiring contractors to implement IPM methods.

The City of Brisbane will establish written standard operating procedures for pesticide use to ensure implementation of this IPM policy and to require municipal employees and pest control contractors to comply with the standard operating procedures.

The City of Brisbane will track employee and contractor pesticide use and prepare an annual report summarizing pesticide use and evaluating pest control activities performed consistent with the municipal regional stormwater permit's requirements.

The City of Brisbane will review its purchasing procedures, contracts or service agreements with pest control contractors and employee training practices to determine what changes, if any, need to be made to support the implementation of this IPM Policy.

The City of Brisbane will perform educational outreach and/or support Countywide or regional efforts to educate residential and commercial pesticide users on a) goals and techniques of IPM, and b) pesticide related water quality issues consistent with the municipal regional stormwater permit's requirements.

The IPM-based hierarchical decision making process that will be used to control pests will include the following:

1. Based on field observations evaluate locations and sites where pest problems commonly occur to determine pest population, size, occurrence, and natural enemy population, if

present. Identify conditions that contribute to the development of pest populations, and decisions and practices that could be employed to manage pest populations
2. Design, construct, and maintain landscapes and buildings to reduce and eliminate pest habitats;
3. Modify management practices including watering, mulching, waste management, and food storage to discourage the development of pest population;
4. Modify pest ecosystems to reduce food, water sources, and harborage;
5. Prioritize the use of physical controls such as mowing weeds, using traps, and installing barriers;
6. Use biological controls to introduce or enhance a pests' natural enemies;
7. When pest populations reach treatment thresholds (based on how much biological, aesthetic, economic or other damage is tolerable) non-pesticide management activities will be evaluated before considering the use of pesticides;
8. When pesticides are necessary, select reduced risk pesticides and use the minimum amounts needed to be effective;
9. Apply pesticides at the most effective treatment time, based on pest biology, monitoring, and other variables, such as weather, seasonal changes in wildlife use, and local conditions; and
10. Whenever possible, use pesticide application methods, such as containerized baits, that minimize opportunities for mobilization of the pesticide in stormwater runoff.

Departments performing pest management activities will identify an IPM coordinator who is responsible for assisting staff with implementation of this IPM policy.

BACKGROUND

Pesticides are defined as: any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest. Pests can be insects, rodents and other animals, unwanted plants (weeds), bacteria or fungi. The term pesticide applies to herbicides, fungicides, insecticides, rodenticides, molluscicides and other substances used to control pests.

Integrated Pest Management (IPM) 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. Pesticides are used only after monitoring indicates they are needed according to established guidelines, and treatments are made with the goal of removing only the target organism. Pest control materials are selected and applied in a manner that minimizes risks to human health, beneficial and nontarget organisms, and the environment.

IPM techniques could include biological controls (e.g., ladybugs and other natural enemies or predators); physical or mechanical controls (e.g., hand labor or mowing, caulking entry points to buildings); cultural controls (e.g., mulching, alternative plant type selection, and enhanced cleaning and containment of food sources in buildings); and reduced risk chemical controls (e.g., soaps or oils).

City of Brisbane owned or managed property/facility includes but is not limited to parks and open space, golf courses, roadsides, landscaped medians, flood control channels and other outdoor areas, as well as municipal buildings and structures.