



City of Morgan Hill

Integrated Pest Management

Plan for Facilities, Parks,

Streets and Public Open Space

Table of Contents

	<u>Page</u>
IPM Definition and Plan Goals	1
Legal Requirements, Environmental and Health Concerns	1
Management Policy Statement	2
IPM Implementation Responsibilities	2
City-wide IPM Requirements	3
Staff Training	3
IPM Resources	3
Record Keeping and Annual Report	3
Public Outreach	4
 <u>Forms</u>	
Attachment A - Site Specific Integrated Pest Management Plan	5
Attachment B - Monthly Pesticide Use Report	6

I. IPM Definition and Plan Goals

The goal of the City of Morgan Hill IPM Plan is to align city maintenance practices in public buildings, parks, landscaped grounds, public right of way and open space areas with the Integrated Pest Management (IPM) approach to pest control.

Integrated Pest Management, per the California Healthy Schools Act of 2000 (Assembly Bill 2260), is "a pest management strategy that focuses on long-term prevention or suppression of pest problems through a combination of techniques such as monitoring for pest presence and establishing treatment threshold levels, using nonchemical practices to make the habitat less conducive to pest development, improving sanitation, and employing mechanical and physical controls. Pesticides that pose the least possible hazard and are effective in a manner that minimizes risks to people, property, and the environment, are used only after careful monitoring indicates they are needed according to pre-established guidelines and treatment thresholds."

Through use of a combination of preventive and suppressive pest control methods, IPM optimizes pest control effectiveness and reduces problems that can result from reliance on a single method. The IPM method does not usually include eradication as a practical or cost effective goal.

This Plan applies to all city facilities and all maintenance activities. This plan DOES NOT INCLUDE management of parks or grounds within the City limits that are privately owned, for private use, and/or managed by private entities such as HOA's or property management companies.

Typical pests that are managed under this Plan include weeds and undesirable foliage, insects, and rodents. These activities occur in the public rights of way, parks, and facilities that are within the jurisdiction of the City of Morgan Hill.

II. Legal Requirements, Environmental and Health Concerns

Many federal and state agencies have jurisdiction over pest control activities related to: use of pesticides, vegetation management, worker safety, hazardous material disposal, impacts of pesticide use on air and water quality and on wildlife. Primary pesticide regulation is by the US Environmental Protection Agency (EPA) with additional regulation and enforcement by the California Environmental Protection Agency. The California Department of Pesticide Regulation (DPR) is the regulatory arm of California EPA. Local enforcement of pesticide regulations performed by the Santa Clara County Department of Agriculture. Additional agencies with involvement in pesticide use include:

- US Occupational Safety and Health Administration
- US Fish and Wildlife Service
- California Division of Occupational Safety and Health Administration
- CA Department of Fish and Game
- CA Air Resources Control Board and Regional Air Pollution Control Districts
- CA Water Resources Control Board and Regional Water Quality Control Boards

In 2007, California AB 2865 extended the Healthy Schools Act to child care centers including public child care centers. The law requires that early childhood care and education providers designate an IPM coordinator, notify parents of pesticide use, maintain a registry of parents and staff, post warning signs and keep written records of pesticide use. Use of pesticides around children requires extra precautions since children are typically more vulnerable to the effects of pesticides in their environment than adults.

III. Management Policy Statement

The City of Morgan Hill will carry out pest management operations using Integrated Pest Management techniques to control pests effectively and also minimize the use of pesticides. Whenever feasible, non-toxic alternative pest control methods will be used. The City will seek new technology, best management practices and least toxic approaches to address all pest control issues. The City will educate staff and the public about its commitment to and implementation of IPM practices.

IV. IPM Implementation Responsibilities

- a. Implementation of a successful IPM Plan relies on the coordinated efforts of employees across the organization. To ensure necessary employee communication, training, contractor selection and public coordination, the City Manager will designate a City IPM Plan Administrator. The IPM Plan Administrator will be responsible for IPM implementation, staff training, annual reporting, public outreach and updating of the IPM Plan when needed. The IPM Plan Administrator will assist site IPM coordinators as needed in developing specific pest control plans, will track citywide pesticide usage and trends, and will research new IPM strategies to address the City's pest issues.

- b. Department managers shall designate site IPM Coordinators for major facilities and locations including:
 - Civic Center (County Library excluded)
 - Community and Cultural Center
 - Centennial Recreation Center
 - Aquatics Center
 - Corporation Yard
 - Water and Wastewater facilities
 - Public right of way
 - City owned parks and trails
 - City owned open space
 - Other City owned properties
- c. The IPM Coordinators shall be responsible for developing plans (Attachment A) to address specific pest problems at assigned location(s). Site IPM implementation shall include: identifying key pests, monitoring, establishing action threshold levels, overseeing pest prevention and suppression measures, documenting and reporting actions taken.

IPM Coordinators will report, on a monthly basis, all pesticide use by staff and by contractors, at assigned facilities, to the City IPM Plan Administrator (Attachment B).
- d. The IPM Coordinator at each child care facility shall also document compliance with the requirements of the CA Healthy Schools Act.
- e. Contractors for the City that provide pesticide management in any form within their scope are contractually bound to follow the most current City of Morgan Hill IPM, including having staff with the proper licensing and reporting the usage volumes and locations to the proper agencies. Contractors also must be able to provide records of usage upon request by the City of Morgan Hill, however these records are rarely requested as use reporting is mandatory for maintaining licensing and is overseen and reviewed by Santa Clara County and the California Department of Pesticide Regulation.
- f. Structural pest problems will be managed by Building Department staff.

V. Citywide IPM Requirements

- a. All staff and city contractors working for the City of Morgan Hill will adhere to the City IPM Plan as well as plans developed by site IPM coordinators to address specific pest problems.
- b. No pesticides shall be purchased by city staff or contractor application authorized without prior approval from the City IPM Plan Administrator.
- c. Contractors hired to perform pest control of any kind shall be familiar with IPM and shall use IPM methods in their work for the City.
- d. Prohibited Pesticides - No federal or state restricted materials, or pesticides labeled with signal word "Danger" will be used for routine maintenance by staff or by city contractors.
- e. Limitations on Certain Pesticides – Pesticides containing glyphosate shall not be used in City Parks. Pesticides labeled with the signal word "Warning" shall be limited in use and may only be used when the pesticide is organic in nature. Use of pesticides with the signal word "Warning" must be approved by the IPM Administrator and Public Services Director.

VI. Staff Training

- a. All staff who manage pest problems and who apply pesticides as part of their job must be trained according to the CA Department of Pesticide Regulations requirements.
- b. The IPM Plan Administrator will inform all city staff on an annual basis about the City's IPM Plan, restrictions on pesticide usage and appropriate procedures for controlling pests.
- c. The IPM Plan Administrator will document staff training.

VII. IPM Resources

Statewide IPM Plan information for dealing with specific pests, training and general information about IPM is available at: <http://www.ipm.ucdavis.edu/>. California School IPM requirements and detailed information about school IPM, including IPM at child day care facilities, is available at: <http://apps.cdpr.ca.gov/schoolipm/>.

VIII. Record Keeping and Annual Report

The IPM Plan Administrator will compile monthly pesticide usage reports from site IPM Coordinators into a single annual IPM Plan report. The report shall be provided to the City Manager, City Council and the public via the City website by the end March of each year.

The report is to include:

- General overview of the city's IPM Plan
- Pest problem trends
- Pesticides used during the past year, quantities used of each chemical, general locations where they were applied and target pests

- Nontoxic solutions used
- New technologies, strategies tried during the year
- Overview of staff training and public outreach accomplished
- Goals for the coming year

IX. Public Outreach

- a. The City will use appropriate opportunities (booths at special events, utility bill inserts, city website, email blasts, etc.) to communicate with the public about the IPM approach to pest management and its benefits in the home and in the workplace.
- b. When applying pesticides for seasonal weed abatement in parks or on City Streets and right of ways adjacent to schools or daycare facilities, public notification will be provided by posting signs at the entrances to the parks, or at the ends of the area to be treated on roadways and right of ways. The signs will be of a size no smaller than 11" X 17" and will be installed no later than three (3) days prior to the application and will be removed no earlier than 1 day after the area is safe to enter. The signs will be in English and Spanish, and will contain the following information:
 - i. The date of the posting
 - ii. The name of the pesticide being applied
 - iii. The active ingredient(s)
 - iv. The purpose for the pesticide
 - v. The date(s) the area will be treated
 - vi. When the area will be safe to enter
 - vii. A contact name and phone number for concerns or questions.
 1. The contact must be able to provide copies of the SDS for any pesticide being applied

Attachment A
Site Specific Integrated Pest Management Plan

IPM Coordinator	
Site	
Specific Location (provide map if needed)	
Pest	
Date identified	
Monitoring frequency	
Threshold for action	
Prevention methods: (inspections, housekeeping, altering environment, barriers, etc.)	
Nonchemical control methods: (traps, mechanical removal, etc.)	
Pesticides used - only if no other effective measures are available:	
Evaluation of current method(s) used/Notes	
Suggestions for future improvements/actions needed to deter pests	

Attachment B
Monthly Pesticide Use Report*

IPM Coordinator	
Month/Year	
Site/Location(s)	
Pesticide Name (commercial name and chemical)	
Quantity used in month	
Pest to be controlled	
Reason nonchemical methods were not used	
Pesticide Name (commercial name and chemical)	
Quantity used in month	
Pest to be controlled	
Reason nonchemical methods were not used	
Pesticide Name (commercial name and chemical)	
Quantity used in month	
Pest to be controlled	
Reason nonchemical methods were not used	

* send to IPM Plan Administrator

Document Control

Revision	Date of Revision	Changes from Previous
CMH.IPM.2015.a	8/21/2015	Added footer to include revision name, revision date and total pages. Added "Document Control" table (this table). Added "End of Document" statement.
CMH.IPM.2017	3/17/2017	Review. No Document Changes
CMH.IPM.2018	3/22/2018	Updated incorrect revision date on cover sheet (footer section stated August 21, 2015 on previous revision)
CMH.IPM.2019	2/13/2019	Removed information that previously indicated exempting water quality and sewer operations facilities. (Section I, paragraph 4) Included a statement noting the City does not provide IPM direction for private entities. (Section I, paragraph 4) Added typical pests and locations that the IPM addresses. (Section I, paragraph 5) Added contractor responsibilities. (Section IV. e.) Formatted document for consistency
CMH.IPM.2021	3/16/2021	Removed the word 'warning' from prohibited pesticides (Section V. d.) Added Section V. e. Limitations on Certain Pesticides

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