



## **RECOMMENDATION**

Staff recommends that Council adopt the following policy:

- The City of Palo Alto will carry out its pest management operations using reduced-risk IPM techniques to reduce or eliminate chemicals to the maximum extent. Chemicals will be used only as a last resort for pest management problems. Each division that applies pesticides will maintain an active IPM plan to ensure the long-term prevention or suppression of pest problems with minimum negative impact on human health, non-target organisms, and the environment.
- The City will actively pilot non-toxic alternatives for structural and landscape pest control, seeking to use the most recent technology, best management practices and least toxic methods for all pest control measures.
- The City will use appropriate venues to educate staff and the public about its IPM commitment in an effort to role model less toxic approaches to structural and landscaping pest control.

## **BACKGROUND**

Pesticides are defined as: any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest. Pests can be insects, mice and other animals, unwanted plants (weeds), or fungi. The term pesticide applies to herbicides, fungicides, rodenticides, molluscicides and other substances used to control pests. Antimicrobial agents are not included in this definition of pesticides.

IPM, also referred to as reduced risk pest management, [encourages reduced risk, long term pest prevention and suppression through a combination of techniques. These techniques include: biological controls, habitat manipulation, use of resistant plant varieties, improved landscape and building hygiene, and structural repair and pest barriers.](#) IPM only sanctions synthetic chemical pesticides as a last resort, and only with the least toxic chemicals available. IPM depends on understanding a pest's environmental requirements and natural enemies in order to facilitate less toxic control and requires ongoing monitoring for pests so that small infestations do not become large ones. IPM seeks to minimize pest concerns while minimizing human health, environmental and financial risks.

Increasing evidence demonstrates that pesticide use can pose significant health risks to children and adults who are exposed to certain pesticides even when these chemical applications are used as product directions instruct. A recent illustration of this is the Federal Environmental Protection Agency's (EPA) action to phase out two of the most commonly used household chemicals, diazinon and chlorpyrifos, after recent studies concluded that their potential toxicity to children is much greater than previously understood.

In addition to human health concerns, there are environmental concerns. Several local creeks and the San Francisco Bay are listed on Federal Clean Water Act Section 303(d) list as impaired by diazinon. While a majority of pesticides enter creeks and the Bay via run off from homes and gardens, these health and environmental concerns are prompting local municipalities to role model the less toxic pest management strategies they ask the public to adopt. Examples of cities who have adopted IPM ordinances or policies include San Francisco, Saratoga, Marin, and Santa Monica.

## **DISCUSSION**

The RWQCP storm water permit requires Palo Alto to develop and begin implementation of an IPM plan by September 1, 2001. To respond to this requirement, a committee which included representatives from Parks and Golf, Open Space, and the Public Works Department divisions of Trees, Water Quality, and Facilities began meeting regularly to formulate mutually agreed upon city wide and division-specific IPM strategies. (Parks and Golf has already been operating with an IPM plan, has [annual training requirements and is very proactive in sustainable IPM programs and staff training.](#))

Plan components currently include: an agreed list of restricted chemicals, staff education and training, improved record keeping, an annual public report and public outreach, contractor compliance, and commitments to test less-toxic pest management strategies. Because this is a County storm water permit requirement, Public Works Environmental Compliance Division is coordinating the IPM effort and will be responsible for annual report writing.

The adoption of a City policy coupled with an expanded City wide IPM procedures would align all departments who interact with pesticides with the same standards. Specifically, the policy and subsequent procedures will result in:

- **Procedures which maximize least toxic approaches** to structural and landscape pest control, and which minimize the purchase and application of pesticides, using only those chemicals [that are the least toxic to humans, and the environment.](#)
- **Mechanisms to prohibit targeted chemicals that are of concern** due to regulatory, human health, or wildlife and ecosystem health concerns. Current chemicals to be prohibited would include: all Toxicity Category I chemicals as listed by the Environmental Protection Agency (EPA), diazinon and chlorpyrifos. Additional chemicals would be evaluated by the IPM Committee and likely be phased out over time.
- **Prohibition of pesticide purchases by City staff** (unless they are a licensed staff Pest Control Advisor or authorized by a Pest Control Advisor). Since this is an issue predominantly associated with structural pests (e.g., ants and rats), Facilities Maintenance would be the first contact point for employees who have structural pest problems. This would centralize and facilitate the use of IPM to manage pests, and

decrease risks associated with staff who currently use or purchase pesticides that are available through local hardware stores with whom the City has blanket accounts.

- **Annual inventory and storage “cleanout” for unwanted or prohibited chemicals**
- **Revised contract language with pest control contractors** requiring their adherence to the City IPM policy and procedures.
- **Improved education and training for all City staff on least-toxic approaches to pest management**
- **Annual report made available to the public**, which would include a complete list of all chemicals (applied by City staff and contractors) used on City property including parks, golf courses and other landscaped areas. Information would include the location, date, and pesticide used at each site, and alternative approaches piloted to manage pests.
- **City functioning as a role model for the behaviors it asks the public to adopt** regarding pesticide management and watershed protection.

**RESOURCE IMPACT**

There are no significant resource impacts foreseen in the immediate future as a result of implementing the policy.

**POLICY IMPLICATIONS**

This recommendation is consistent with existing City policies, including the Council-adopted policy on sustainability.

**ENVIRONMENTAL REVIEW**

The policy does not constitute a project under CEQA and no environmental review is required.

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