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DATE: March 18, 2024

TO: Honorable Mayor and Members of the City Council through City Manager

FROM: Patrick Carter, Assistant to the City Manager  
Drew Halter, Director of Parks and Recreation

SUBJECT: Resolution Approving an Integrated Pest Management Policy for City Employees, Contractors, and Lessees

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### **RECOMMENDATION**

It is recommended that the City Council adopt the attached Resolution Approving an Integrated Pest Management Policy for City Employees, Contractors, and Lessees.

### **BACKGROUND**

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 and chemical treatments are used only after monitoring indicates they are needed according to pre-established guidelines. 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 non-target organisms, and the environment.

The City's existing IPM policy was adopted in 1999. Under that plan, pest (including nuisance plants, insects, and animals) control practices included a combination of chemical and mechanical means. As environmental research and industry best practices continued to evolve, the City's goal is to update its IPM program to better align with our community's values of transparency, fostering environmental and public health best practices, and ensuring public lands are well maintained while the City strives to become a leader in combating the effects of climate change.

In February 2016, the City's Parks Division ceased the use of glyphosate-based products for weed suppression and facilitated a pilot program to better understand the effectiveness and costs of alternative organic herbicides applied across different city landscapes and applications. In 2017, staff initiated an update to the existing integrated pest management plan, following leading research available and in alignment with methods and criteria for evaluating impacts adopted by neighboring jurisdictions including the City of Davis, San Francisco, Richmond, and Marin

County. Since 2017, Parks and Recreation staff have largely pivoted to a mechanical pest control system, using chemicals as a last resort such as public safety and prevention of especially noxious pests. The City has continued to maintain the prohibition on the use of glyphosate (often sold under the Round Up™ brand name) from City operations, City leased properties or contracted service providers.

The results of the pilot program reinforced the City's policy to eliminate the use of glyphosate-based products, however it largely demonstrated limitations to the effectiveness of several of the organic herbicides available. The analysis done following the program showed significant cost increase in both labor as well as quantities of organic herbicides required to be effective. The findings also showed concerns with the safety of staff applicators who noted skin and eye irritations as well as noting the challenges of implementing a manual weed abatement program in several sites with poor access or vehicular traffic. The summary of findings was first presented to the Recreation, Music, and Parks Commission (RMPC) for community input in June 2017 followed by incorporating initial feedback and community input into the September 2017 regular meeting. The IPM has remained in draft form since 2017, however the Council's inclusion of the IPMP update in its top 10 list of goals in 2022 renewed the focus for the plan's completion.

In the Fall 2021, the City entered into an agreement with Blankinship and Associates to assist the City in the development of an update to the IPMP, including an extensive review of existing IPM program documents, comprehensive interviews with staff, contractors, and site reconnaissance, coordinating community outreach via public and stakeholder meetings, providing staff training and public education materials on transitioning away from more chemical dependent practices, and ultimately assisting in the draft update to a new Integrated Pest Management plan. The team from Blankinship scheduled several site visits during the spring and summer of 2022 and coordinated dozens of interviews with maintenance staff, facility managers, contractors, operators and department teams to better understand unique challenges facing Petaluma's different maintenance operations. In addition to staff coordination, Blankinship joined staff in meetings with a passionate group of community members to better understand learned experience and collaborate on strategies to bring the City closer to its goals of less reliance on chemical means. This working group met in February 2022 followed again in August 2022 to hear updates on industry research, share other jurisdiction's IPM policies and hear feedback on the IPM plan's development.

The RMPC received a draft IPMP at its January 18, 2023 meeting where it provided feedback regarding the exemption process, inclusion of an IPMP task force, an IPM Coordinator's responsibilities, and use of a certification process (such as OMRI, WSDA, or the National Organics Program) to identify organic pesticides allowed for use at City facilities, and the prohibition of anticoagulants and pre-emergent herbicides.

During the February 15, 2023 RMPC meeting, the Commission expressed an interest in forming an Ad Hoc Committee which would work closely with staff to:

1. Provide a framework for the role and responsibilities of the IPM Coordinator
2. Provide recommendations for the role and responsibilities of an IPM Task Force
3. Draft language for least toxic method exemption protocol
4. Provide a recommendation for pesticide use related to certifications (e.g. OMRI, WSDA)

Working with the Ad Hoc Committee, it was determined that an IPM Task Force would add administrative burden and that the transparency benefit that is sought through the establishment of the Task Force would be better addressed through a robust reporting process and producing updates on City websites for any policy exemption or newly identified pests.

At the October 18, 2023 RMPC meeting, numerous comments were received from Rooster Run Golf Course users concerned with the inclusion of the golf course in the IPMP. Concerns generally related to the golf course's need to apply pesticides that would not be allowed without exception under the draft IPMP, and concerns that even if exemptions were allowed, they would not be allowed quickly enough to prevent damage to the greens which would result in significant costs to replace and likely lost revenue due to customers seeking other courses with more favorable course conditions. As a result of the discussion, the RMPC directed the ad hoc to discuss the concerns with Rooster Run staff. The ad hoc and staff met with Rooster Run staff in December 2023, where the concerns were reiterated and Rooster Run staff agreed to provide the list of potential pesticides needed to maintain current functionality. Staff received operational information from Rooster Run staff including herbicides as well as preventive measures and maintenance techniques aimed at mitigating opportunities for pests to proliferate, particularly on the course greens.

On February 28, 2024, the RMPC considered and recommended the IPM policy update be presented to City Council for review and consideration for adoption.

## **DISCUSSION**

The update to the Integrated Pest Management plan consists of two parts – the IPM Policy and the IPM Program. The IPM policy is a broad, foundational document that outlines what the IPM Program must include and is subject to approval by the attached resolution (Attachment 1). The draft IPM Program (Attachment 3), contains more details of program implementation and is intended to be a living document to be updated by the IPM Coordinator as needed to reflect new pest control techniques and exemption locations and durations.

The IPM Policy (Attachment 1) is subject to Council approval, as would subsequent amendments. As currently drafted, the IPM Policy largely memorialized existing pest control practices for City operations, as the current practices are consistent with the proposed policy. Differences include providing greater transparency on pest control techniques performed by City employees, contractor, and lessees. The policy describes the elements of what must be included in the program, specifically the following:

1. List of approved IPM control methodology, including preventative measures.
2. List of prohibited products or processes.
3. Procedure for considering and allowing exemptions to this policy.
4. List of exempted product names, the location at which application is allowed, and the duration for which the exemption has been granted.
5. Process for receiving, compiling, and making public records available related to this policy.

The draft IPM Program (Attachment 3) is intended to be a living document which is updated administratively and frequently by staff to reflect the most current best practices, pest threats, and

exemptions to the policy. While the program document is provided for context and as an example of how the IPM Policy is implemented, the intent of the program is for the City's selected IPM Coordinator to be responsible for implementing and maintaining the program. The draft program contains all five elements listed in the policy but provides more details on each element. The program appendix includes the exemption form, threat matrix, and location-specific methodology.

To initially fulfill the roles and responsibilities assigned to the IPM Coordinator, staff recommends soliciting services of a third-party contractor specializing in organic IPM programs and municipal operations. This would allow staff to determine the level of hours and areas of expertise required for the position and will inform new job descriptions or determine whether the coordinator functions are incorporated into an existing job class. Indications from the Town of Windsor, whose IPM program informed the development of this proposed IPM policy, are that the IPM Coordinator position requires less than 25% of one staff member's time. Contractor assistance would allow staff to ground truth that assumption over an initial period not expected to exceed one year and plan for staff assumption of that role accordingly.

### **PUBLIC OUTREACH**

This agenda item appeared on the City's tentative agenda document on March 11, 2024 which was a publicly-noticed meeting.

Staff and contractors have met with stakeholder groups within City operations, community groups focused on pesticide use reduction, and lessees operating on City-owned parcels to discuss IPM. The background section details the discussion which took place at the RMPC meetings, as well as the recommendation for Council approval at the February 28, 2024 RMPC meeting.

### **COUNCIL GOAL ALIGNMENT**

Development of the Integrated Pest Management Plan has been a top priority of the Council since the adopted City Council Goals and Priorities update in 2022.

### **CLIMATE ACTION/SUSTAINABILITY EFFORTS**

For City operations, adoption of the attached Resolution approving the Integrated Pest Management Policy for City employees, contractors, and lessees memorializes the status quo, so the climate impacts are minimal. For lessees, there may be operational changes needed to comply with the IPM policy, unless exemptions are reviewed and supported by the IPM Coordinator and approved by the City Manager.

### **ENVIRONMENTAL REVIEW**

Adoption of the Integrated Pest Management Policy is exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Section 15061(b)(3) of the CEQA Guidelines (Commonsense Exemption) because it can be seen with certainty that amending the City's pest management practices to reflect the updated pest management practices that reduce herbicides will have a significant effect on the environment. The project is also categorically

exempt pursuant to CEQA Guidelines Sections 15301 (Existing Facilities) and Section 15304 (Minor Alterations to Land) as the use of the pesticides will result in minor and temporary changes to already existing public facilities, which will be less invasive than prior City practices.

### **FINANCIAL IMPACTS**

Implementation of the IPM Policy is not expected to result in immediate or significant financial impacts to City operations other than initial staff time required to set up and maintain the reporting mechanisms required by the policy, as the policy reflects the status quo for City employees and contractors. Citywide operations have largely transitioned to a reliance on manual maintenance techniques since 2016, however and the adoption of an organics only program reinforces the need to maintain staffing levels and equipment for maintenance staff as acreage and additional facilities are brought online.

Estimated annual costs for contracting part-time consulting services as the City's IPM Coordinator range from \$35,000 to \$50,000 in the first year. The initial investment towards implementing the IPM program, provide community education, staff training and development tools, and manage the initial exemption process would give staff time to evaluate whether an existing job class or a new job description should be included in the development of the Fiscal Year 2026 Annual Budget.

### **ALTERNATIVES**

Council could provide direction on the following alternative actions:

- No action, in which case the existing 1999 Integrated Pest Management Policy would guide staff, contractors, and lessees.
- Amend the policy to allow the use of synthetic pesticides – the City's consultant, Blankinship and Associates, indicated that the removal of synthetic pesticides as a treatment option sets the proposed policy apart from the generally accepted principles of Integrated Pest Management. Including synthetic pesticides outside of an exemption was not supported by community groups or the Recreation, Music, and Parks Commission.

### **ATTACHMENTS**

1. Resolution (with Exhibit A - Draft Integrated Pest Management Policy)
2. Existing Integrated Pest Management Policy (1999)
3. Draft Integrated Pest Management Program