

## Responses to Council Questions and Comments

3/18/2024

### Item #: 11 – Resolution Approving an Integrated Pest Management Policy for City Employees, Contractors, and Lessees

- Question: The definition of "Pesticide" is very broad and does include any material (physical or chemical or organic) that kills pests, so it does not define which actual practice needs to be documented and reported on the website. It seems to ask all actions to be documented and reported, including prevention methods. That is a big ask of staff and takes lots of time.
  - Response: The action recommended of Council under this item is to approve the Resolution and Exhibit A, which contains the IPM Policy. "Pesticide" is not defined in the Policy, but is defined in the Program (Attachment 3), a document to be updated regularly by staff. Though not the purpose of this meeting, if Council wishes to provide feedback to staff on specific terms or processes in the draft Program document, such as narrowing the scope of a definition or practice, it may do so.  
That said, staff appreciates that staff time and resources for implementing the IMP policy are being closely considered. While several terms in IPM offer broad definitions by design, the intent by both including a definitions appendix as well as sharing current practices used to treat or prevent pests, the reporting function via the website will serve as an educational repository. It will involve a multi-departmental effort and take time to build over the next year, however we feel it's time well spent as it helps establish a high bar for transparency, tools for public engagement, and benchmarks to evaluate where changes need to be made as new information and efficacy of treatments become known.
- Question: Glyphosate is listed specifically, but there is a near chemical "Sulfosate" that is very similar chemically and biologically and could be a loophole.
  - Response: Glyphosate was mentioned specifically during the stakeholder engagement as an important chemical to call out. However, the comment underscores the reality that chemical treatments continue to evolve and rather than chase a moving target, our policy centers on establishing a baseline of discontinuing the use of synthetic pesticides altogether, followed by providing an exemption policy which provides staff and the community with a transparent process for reviewing and approving specific treatments to address specific threats.
- Question: It is not clear if the Mosquito Abatement District has to fall under this policy when treating on city property and this policy of no OPs may have major impact on them now and in future. We need to hear from them if their current program can fit under this policy.
  - Response: The Marin/Sonoma Mosquito Vector Control District (MSMVCD) operates as a special district and is not required to comply with the City's IPM policy and regulations as they operate under Public Health and Safety statutes. Staff will continue to work with MSMVCD to ensure transparency and share best practices related to chemical use on City facilities.

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- Question: I expected to see a list of probable or past "pests" that the city has to monitor and expectations of who on staff will do the monitoring.
  - Response: The 'threat matrix' provided on pages 13 and 14 (Appendix C) of the IPM program is intended to provide information on identified pests, corresponding threat levels to public property/safety/environment/etc. as well as the methodology and approach to addressing the threat. Our intent was to provide some examples of known pests for tonight's discussion, and staff welcome input from Councilmembers on prioritizing the information to be included within the matrix. Once we have a consistent template to work from, next steps are to work with operations staff and the IPM coordinator to update and expand the threat matrix to include a more exhaustive (and evolving) list.
- Question: Weed cloth is listed as a preventative method. This may be controversial.
  - Response: Staff appreciates the feedback and acknowledges there is debate on the efficacy of weed cloth as a preventative method internally as well. An important distinction to note is that weed cloth is not specifically mentioned in the IPM Policy document (Exhibit A of the Resolution) and therefore a future choice by the IPM Coordinator to include or exclude weed cloth in the IPM Program would be consistent with the IPM Policy. Council need not decide on specific pest controls measures at this evening's Council meeting.
- Question: Mechanical control methods are not described and could include both hand labor with hand tools and also hand tools that are powered. Carbon emissions from gas powered tools are a threat to the environment, and I would assess a greater threat than pesticides, and needs to be listed in the IPM program as being a possible tool or not.
  - Response: Mechanical control methods largely rely on power tools and staff can certainly review how and where to reflect these realities as it relates to vegetation management in the program. It is important to note that the current baseline is largely mechanical control methods used by staff and contractors, and that as electrification of maintenance equipment improves over time (either through improvements in battery technology or through more EV/corded electric equipment improvements) the carbon footprint of maintenance equipment will decrease.
- Question: The program does not refer to worker safety in any way for either contamination, health, or physical hazards. A worker safety program should be part of IPM program.
  - Response: The safety of staff responsible for conducting maintenance activity will always remain a top priority, as safety and worker protection are foundational to all City policies and programs. Staff safety trainings and workforce development are operational specific and often required as a precursor to operating equipment. Staff conduct regular safety trainings and crew briefings prior to the implementation of new equipment or programs, and that will be the case in the event of any changes to the IPM program. An overarching goal of the IPM Policy is to consider the holistic impacts of pest management and the effects on our staff, the community, and the environment.

Sent to Council 3/18/2024 at 2:45 PM

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- Question: Traps that kill are excluded so gopher and rat controls need to include reintroduction to other locations after trapping. Is this the actual policy we want?
  - Response: The policy document (Exhibit A of the Resolution) does not prohibit traps which kill the trapped organism, nor is that the intent of the program. Furthermore, the draft IPM Program specifically allows “OMRI-approved and cruelty-free baits and traps for rodents and other mammals. Cruelty-free includes live traps that do not injure the organism trapped, and which allow for rehabilitation, or traps that instantaneously kill the organism trapped, such as electrocution traps” (Page 1, Section 1, Item 7).
- Question: Section 4 of exempted materials is completely blank. There needs to be list of all pests we already encounter for management criteria with common best practice recommended. What does this IPM program actually look like on the ground as performed by our staff? For example: Will we use copper sulfate in the aeration pond in Lucchesi Park? What is recommended method for gopher control in soccer fields? An actual program will list all of these.
  - Response: The policy has yet to be adopted by Council, and it was not staff’s recommendation to provide a blanket exemption from the policy for any product or location. Exemptions must be requested and considered before approval or rejection by the IPM Coordinator. Section 4 is intended to only list exemptions to the program, not all pests and treatment methods; the threat matrix is intended to address pests and best management practices/treatment methods. The program is intended to be refined and the threat matrix will be expanded to include more pests over time, as the program matures under an IPM Coordinator.  
Regarding treating the Lucchesi pond, the current service provider uses an organic microbial grade mix of enzymes, and does not recommend the use of copper sulfate.