

Mountain House Community Services District (MHCS D) Integrated Pest Management Policy

Effective Date: February 8, 2023

I. PREAMBLE

The MHCS D is committed to implementing an Integrated Pest Management (IPM) approach to guide the management of its facilities, landscaped areas, and rights-of-way. The IPM approach promotes the protection of the residents and visitors, as well as the local waterways, and utilizes a pest management strategy that promotes the long-term suppression of pest problems with minimum impact on non-target organisms and the environment as well as a reduction in use of pesticides. Least toxic pesticides are used only after an assessment indicates such a need, consistent with the provisions of this IPM Policy.

The adoption of this IPM Policy facilitates compliance with the Phase II Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES) Permit and the Basin Plan Amendment (BPA) for the Control of Pyrethroid Pesticide Discharges (Resolution R5-2017-0057).

II. APPROACH

For the purposes of its IPM policy, the MHCS D adopts the following definition promulgated by the University of California Statewide Integrated Pest Management¹ (UC-IPM):

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.

III. PURPOSE

It is the purpose and intent of this IPM Policy to:

- a) Reduce reliance on and minimize the use of pesticides² as a part of MHCS D operations and on MHCS D property and rights-of-way that may adversely impact water quality; and
- b) Outline how MHCS D departments are to perform pest management so that it is consistent with this IPM Policy.

IV. SCOPE

The IPM Policy governs MHCS D employees and/or contractors hired by MHCS D departments and persons acting under the authority of the MHCS D in the care and maintenance of MHCS D facilities, landscaped areas, and rights-of-way.

The term “pesticides” is a general term that includes herbicides, insecticides, fungicides, and rodenticides.

¹ <https://www2.ipm.ucanr.edu/what-is-IPM/>

² As defined in Section 12753 of Chapter 2 of Division 7 of the California Food and Agricultural Code.

V. POLICY

It is the policy of the MHCS D that:

1. Departments performing pest management will conform with the MHCS D's IPM Policy.
2. The MHCS D's IPM approach will include the following:
 - a) Educate and train MHCS D staff in the IPM program, practices, and policy.
 - b) Require MHCS D staff and pesticide application contractors to implement the IPM Policy on all MHCS D facilities, landscaped areas, and rights-of-way and to maintain records on and report the types and amounts of pesticides used, as well as IPM methods considered and used to prevent and control pests.
 - c) Reduce to the maximum extent practicable the use of pesticides.
 - d) Consider taking a "no-action" approach in addressing certain pest control issues.
 - e) Review and consider available non-chemical options before using a chemical pesticide.
 - f) Identify pests and least toxic methods to control pests.
 - g) Identify, evaluate, and minimize or eliminate conditions that encourage pest problems.
 - h) Conduct careful and efficient inspection, monitoring, and assessment of pest problems by designated personnel or contractor knowledgeable of IPM methods.
 - i) Maintain records on IPM methods considered and used to prevent and control pests.
 - j) Comply with all applicable local, State of California (State), and federal regulations, including pesticide use and reporting.
 - k) Conduct decision-making based on the best available science and data.
 - l) Refer residents and pest control operators to the MHCS D's stormwater program and the San Joaquin Department of Agricultural Weights and Measures for information on less toxic methods of pest control.
 - m) Provide public access to the MHCS D's IPM Policy.
3. IPM Policy General Requirements
 - a) Eliminate the use of Category I pesticides.
 - b) Minimize the use of Category II, III, and IV pesticides.
 - c) Eliminate the use of pesticides that are classified by government agencies as known carcinogens, reproductive toxicants (teratogens, mutagens), endocrine disruptors, carbamates, organophosphates, or ground water contaminants.
 - d) Use pesticides only when necessary and select a pesticide that is both effective and least toxic.
 - e) Designate playgrounds on MHCS D property as pesticide-free.
 - f) Develop pest-specific plans to prevent or reduce the incidence of pest problems.
 - g) Require MHCS D staff and pesticide application contractors to comply with the Phase II Permit requirements to reduce the amount of pesticides and herbicides used during municipal operations and activities.

VI. IMPLEMENTATION

This IPM Policy shall be implemented by MHCS D departments and through an IPM Coordinator. Several areas important to the implementation of the IPM Policy are outlined below, including a description of the IPM Coordinator role.

a. IPM Coordinator

The Operations and Maintenance Superintendent is designated as the MHCS D's IPM Coordinator and is responsible for coordinating with the departments involved in pest management to ensure that the IPM Policy is implemented. The IPM Coordinator is assisted by the MHCS D's Utility Manager.

The primary responsibilities include the following:

1. Education and Training:
 - a) Communicate the goals and requirements of the IPM Policy to MHCS D departments.
 - b) Request and maintain information regarding the MHCS D's IPM trainings offered or attended.
 - c) Provide information to MHCS D staff performing pest management as needed to ensure that the requisite IPM practices are implemented.
2. IPM Applications and Guidelines:
 - a) Ensure MHCS D staff and pesticide application contractors are authorized as Pesticide Applicators and are complying with the MHCS D's IPM Policy.
3. Product Selection and Product Use Approval:
 - a) Work with MHCS D staff performing pest management to develop a form for exemption requests.
 - b) Ensure that no products on the prohibited use product list are applied unless MHCS D approves an exemption request.
4. Notification of Pesticide Applications:
 - a) Use a standardized design for a pesticide application notification sign that includes the date of application, the name and type of product used, the signal word, and a contact telephone number where the public may call for information about the proposed application on all school sites as required by the Healthy Schools Act.
5. Pesticide Application Contracts:
 - a) Ensure that contracted pesticide applicators are appropriately trained and certified, implement IPM.
6. Record Keeping:
 - a) Work with MHCS D staff performing pest management to develop forms summarizing pesticide use.
 - b) Provide direction regarding the pesticide application recordkeeping and reporting of the methods and pesticides used/applied on the MHCS D's facilities, landscaped areas, and rights-of-way.
 - c) Review the pesticide application records (Pesticide Use Reports (PURs)) and follow-up reports to ensure that the activities are consistent with the IPM Policy.
 - d) Provide information to the MHCS D's Utility Manager for the stormwater Annual Report or other required reporting, as needed.

Education and Training

Education and training of appointed personnel is critical to the success of the IPM Program. Key staff and/or contractors involved in pest management or application will be educated in IPM policies and procedures. Education may include classroom training, on-site training, or informal meetings and will typically be held once a year. IPM topics discussed may include, but not be limited to, pest control action thresholds; pest management decisions; pest monitoring and identification; prevention; control; and effectiveness evaluations.

IPM Applications and Guidelines

Only persons specifically authorized by the IPM Coordinator as Pesticide Applicators will be permitted to bring or use pesticides on MHCS D property. Pesticide applicators must follow regulations and label precautions. Applicators will have training in IPM and must comply with the MHCS D's IPM Policy.

Product Selection and Product Use Approval

Except for pesticides granted an emergency exemption, the MHCS D will not use any products on the prohibited use product list below. If it is determined that an EPA registered pesticide must be used, then the least-toxic material will be chosen.

1. Prohibited Use Products: Pesticides used by the MHCS D shall not contain the following ingredients:
 - a) Organophosphates, or organochlorines, or carbamates listed by the United States Environmental Protection Agency (Office of Pesticides Programs, Document 735-F-99-14, May 1999), or California Department of Pesticide Regulation Chemical Inquiries Database.
2. Banned Use Areas: Except in the case of an emergency, no pesticides will be applied on MHCS D playground properties.

Notification of Pesticide Applications

The MHCS D shall provide the public and its employees with notification of pesticide applications through the use of signs at all school sites as required by the Healthy Schools Act.

Pesticide Application Contracts

Where pesticide management and/or applications are provided by contractors, the MHCS D will contract with IPM-trained and/or IPM-certified pest control applicators. A clause will be included within the contract to ensure that pesticide applicators implement IPM.

Contractors are responsible for the filing of all required records and reports, including, but not limited to, Notice of Intent to Apply and PURs, as specified by all county, State, and federal agencies.

Record Keeping

The MHCS D shall maintain records of the IPM methods used and pesticide applications for a period consistent with the MHCS D's record retention policy. This information may also be reported within MHCS D stormwater Annual Reports or other required reporting. The information reported shall include the following:

1. All the information listed below will be documented on an official Pest Control recommendation form to be supplied by a Pest Control Adviser (PCA) annually prior to any pest control operation. The form will include:
 - a) Name of the entity responsible.
 - b) Specific site of the application.
 - c) The target pest.
 - d) The date the pesticide was used and re-entry period if applicable.
 - e) Date of expiration of the PCA recommendation.
 - f) Schedule, timing, and conditions.
 - g) The name and active ingredient of the pesticide to be applied and EPA registration number.
 - h) The pesticide signal word.
2. The IPM Coordinator or PCA will prepare a follow-up record to include:

- a) Prevention and other non-chemical methods of control used.
- b) Chemical methods used.
- c) The effectiveness of the pesticide or management action.
- d) If application was undertaken in a pest control emergency, provide explanation of circumstances of the emergency.

VII. RECOMMENDED PEST CONTROL PRODUCTS

The MHCS D recommends that the pesticides purchased for use on MHCS D facilities, landscaping, or rights-of-way follow the guidelines of the IPM Policy such that they are the most effective and present the lowest risk to the environment. Pesticide application should only be used when needed and in combination with other approaches to ensure effective, long-term control.

Our Water, Our World (OWOW), a program that partners with cities and counties to promote less-toxic, eco-friendly pest solutions and products, has developed lists of less-toxic pesticides that are organized by:

- Brand,
- Pest, and
- Active ingredients.

The products lists are intended to capture less-toxic products that are compatible with IPM policies and can be found on the “Active Ingredients” page of the OWOW website:

<https://ourwaterourworld.org/pesticide-ingredients/>.

Those purchasing pesticides on behalf of MHCS D should consult these lists prior to selecting a pesticide for purchase. Contracted pesticide applicators should also be encouraged to utilize the lists when purchasing materials for application on MHCS D property.

VIII. DEFINITIONS FOR USE WITH THIS POLICY

1. “Basin Plan Amendment” or “BPA” means the regulatory requirements for the Control of Pyrethroid Pesticide Discharges that was adopted by the Central Valley Water Board on June 8, 2017, with the adoption of Resolution R5-2017-0057. The BPA established measurable pyrethroid concentration goals and an implementation program for the control of pyrethroid pesticides that are or could potentially impact aquatic life in the Sacramento and San Joaquin River watersheds.
2. “Contractor” means a person, firm, or corporation or other entity, including a governmental entity that enters into a contract with the MHCS D for pest management services.
3. “Integrated Pest Management” or “IPM” means 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.³
4. “IPM Coordinator” means the designated agent or employee experienced in IPM field and office work and is responsible for IPM program coordination for the MHCS D.

³ <https://www2.ipm.ucanr.edu/what-is-IPM/>

5. "IPM Policy" means this Integrated Pest Management Policy.
6. "Pest" means any pest as defined in Section 12754.5 of Chapter 2 of Division 7 of the California Food and Agricultural Code. Pest includes any of the following that is or is liable to become, dangerous or detrimental to the public health or the agricultural or nonagricultural environment of the State:
 - a) Any insect, predatory animal, rodent, nematode or weed;
 - b) Any form of terrestrial, aquatic, or aerial plant or animal, virus, fungus, bacteria or other microorganism (except viruses, fungi, bacteria or other microorganisms on or in living man or other living animals);
 - c) Anything that the Secretary of the California Department of Food and Agriculture or the Director of Pesticide Regulation for the California Department of Food and Agriculture by regulation declares to be a pest.
7. "Pest Control Adviser" or "PCA" means any person possessing a current pest control adviser license issued by the California Department of Pesticide Regulation. The PCA license is required for making pest control recommendations in the landscape setting.
8. "Pest Control Operator" or "PCO" means any person possessing a current pest control operator license issued by the California Department of Pesticide Regulation. The PCO license is required when performing structural pest control.
9. "Pest-Specific Plan" means a written plan addressing the management and control of a particular pest. Components of Pest-Specific Plans should include pest biology, impacts, pest thresholds, recommended treatments, monitoring frequency, cultural practices, and site modifications to prevent or reduce the incidence of pest problems.
10. "Pesticide" means pesticide as defined in Section 12753 of Chapter 2 of Division 7 of the California Food and Agricultural Code. Pesticide includes any of the following:
 - a) Any substance or combination of substances which is intended to be used for defoliating plants, regulating plant growth, or for preventing, destroying, repelling or mitigating any pest which may infest or be detrimental to vegetation, man, animals or households or be present in any agricultural or nonagricultural environment whatsoever;
 - b) Any spray adjuvant.
11. "Pesticide Applicator" means any person or company hired by a MHCS D Department who applies pesticides, as defined in this section, to property owned, leased or managed by the MHCS D.
12. "Phase II Permit" means the State Water Resources Control Board's Phase II Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000004, Order No. 2013-0001, adopted February 5, 2013, and subsequent reissuances of this Order.
13. "Signal Word" means the toxicity category word on the pesticide label: Danger, Warning, Caution or None Required. See Toxicity Category I; II, III, IV product.
14. "Pesticide Use Report Form" or "PUR" means a document that records pesticide use or other treatment practices within and associated with MHCS D owned, managed, or leased structures.
15. "Toxicity Category I; II, III, IV product" means any pesticide, as defined in 40 Code of Federal Regulations Section 156.10, meeting the appropriate toxicity categories and bearing on the front label panel the signal word Danger, Warning, Caution or None Required.