

**Parks Maintenance & IPM Work Group
Meeting Agenda
May 4, 2011 - 1:30 to 3:00 pm
City of San Mateo City Hall – Room B
330 West 20th Avenue, San Mateo**

1. **Introductions, Announcements, Changes to Agenda, Review of October Draft Meeting Summary - 10 min.** *Vern Bessey*

2. **Water Board Staff Expectations and Comments on Provision C.9 Portion of FY 2009/10 Annual Report – 30 min.** *Jan O'Hara, Water Board Staff*
Objective: Obtain information and provide feedback.

3. **Review of February IPM Training Workshop – 10 min.** *Fred Jarvis/
Everyone*
Objective: Review workshop and identify ways to make the next workshop more effective.

4. **Information about Proposed State Water Board's Toxicity Policy and Report on Sources of Stormwater Toxicity - 10 min.** *Fred/
Everyone*
Objective: Obtain information and agree on how to proceed.

5. **Share Information on Park Maintenance Type of Issues That Affect Water Quality - 20 min.** *Everyone*
OUTCOME: Obtain information.

6. **Discuss Possible Future Meeting Topics and Agree on Next Meeting Date and Topics - 10 min.** *Vern/
Everyone*
OUTCOME: Agree on future topics and next meeting in August (possibly on August 23).

DRAFT
Parks Maintenance & IPM Work Group Meeting Summary
City of San Mateo City Hall

Meeting Date: October 26, 2010

Work Group Action: Agreed on location of annual training workshop and many of the topics.

Requested Technical Advisory Committee Action or Feedback/Guidance (if any): None.

Other Information/Announcements:

- **Department of Pesticide Regulation Grant.** Information was discussed about the Department of Pesticide Regulation's awarding of a \$200,000 grant to the City of San Jose for a pesticide-free park and demonstration gardens. The grant funds will be used to develop a weed prevention test area, squirrel control program, and two demonstration gardens for hosting workshops and training.
- **Annual Reporting for Provision C.9 Pesticides Toxicity Control.** Fred distributed a summary of the Provision C.9 information reported by the municipalities as part of the annual report. Almost all of cities report having an IPM policy, and a number of the policies were adopted as city council resolutions. None of the cities report having an IPM ordinance. Sixteen of the agencies report using contractors to provide pest control services. Contractors have various certifications for IPM including Ecowise, Green Shield, GreenPro, and Department of Pesticide Regulation's IPM Innovator certificate. Most cities do not report using the pesticides listed in the MRP as threatening water quality. Because this was not a specific question on the MRP form the information is incomplete. In some cases it is unclear whether municipalities are including in their use of water quality threatening pesticides those applied by their contractors. Most of the pesticides that are being used are pre-emergents and herbicides. Everyone agreed that this is their predominant pesticide use.
- **MRP Requirement to Interface with County Agricultural Commissioner Staff.** Distributed a copy of the information from the Countywide Program's members only portion of the website about this work group and the Municipal Maintenance Subcommittee. Since the last meeting information was added to the website for municipalities about reporting to the County Agriculture/Weights & Measures staff any occurrence of suspected improper pesticide usage or disposal that may affect water quality. Jeremy was involved in getting this contact information posted.
- **Draft General Permits for Terrestrial Use of Pesticides That Affect Water Quality.** Information about the proposed new vector control permit and a similar permit for California Department of Food and Agriculture and US Department of Forestry was reviewed. One of the concerns expressed by the vector control agencies is the amount monitoring that the draft permit would require.
- **IPM Training.** Ideas and topics for the training were discussed. The following agreements or suggestions were made:
 1. There was strong support for again hearing from the gopher guy who presented two years ago. Gopher control is an important issue.
 2. There was agreement that Jeremy Eide should again present information about laws and regulations. There is no new information to present, but the topic is important enough to merit repetition.

3. Have a speaker talk about recycled water and where in a park it may or may not be legally used. Valerie will ask whether Courtney from Redwood City would be willing to discuss how one manages the use of treated wastewater for irrigation. The possible damage to valves and mechanical working irrigation parts would not be discussed.
4. There was agreement that John Beall should discuss invasive weed control. Valerie would be interested in what is an appropriate schedule for mowing to control yellow star thistle. Beall should also describe how the Department of Agriculture/Weights and Measures can assist people with weed identification either in house or by obtaining assistance from staff in Sacramento.
5. Interest was expressed in a talk about controlling bees and wasps. It was suggested that the Mosquito Abatement District may be able to discuss both bee/wasp control and mosquito control.

Everyone liked the Mission Blue Facility for holding the training. One suggestion was to make sure that the windows are covered so there would be good slide visibility.

Subcommittee Work That Affects Other Subcommittees: Some municipal maintenance staff would be interested in attending the IPM workshop.

Next Steps: Reserve workshop date at the Mission Blue facility, obtain commitment from workshop speakers, and have Jeremy obtain Department of Pesticide Regulations continuing education units.

Next Meeting Date: The workshop will be scheduled for February followed by an April or May work group meeting.



California Regional Water Quality Control Board

San Francisco Bay Region



Linda S. Adams
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Environmental Protection

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Edmund G. Brown, Jr.
Governor

February 10, 2011

To: Municipal Regional Stormwater NPDES Permit (Order R2-2009-0074) Permittees

Sent via email to:

Jim Scanlin, Alameda Countywide Clean Water Program: jims@acpwa.mail.co.alameda.ca.us
Geoff Brosseau, Bay Area Stormwater Management Agencies Association: geoff@brosseau.us
Tom Dalziel, Contra Costa Clean Water Program: tdalz@pw.cccounty.us
George Hicks, City of Fairfield: ghicks@ci.fairfield.ca.us
Kevin Cullen, Fairfield-Suisun Sewer District: kcullen@fssd.com
Matt Fabry, San Mateo Countywide Pollution Prevention Program: mfabry@ci.brisbane.ca.us
Adam Olivieri, Santa Clara Valley Urban Runoff Pollution Prevention Program: awo@eoainc.com
Daniel Kasperson, City of Suisun: dkasperson@suisun.com
Sam Kumar, City of Vallejo: skumar@ci.vallejo.ca.us
Lance Barnett, Vallejo Sanitation & Flood Control District: lbarnett@vsfcd.com

From: Thomas Mumley
Assistant Executive Officer

**Subject: Review of Municipal Regional Stormwater NPDES Permit Provision C.9,
Pesticide Toxicity Controls, Sections of the 2010 Annual Report**

We are sending this letter to all Permittees covered by the Municipal Regional Stormwater NPDES Permit (Order R2-2009-0074). It provides a summary of our review of sections of the 2010 Annual Report associated with permit Provision C.9, Pesticide Toxicity Controls. These include C.9.a (Integrated Pest Management (IPM) Policy or Ordinance), C.9.b (Implementation of IPM Policy or Ordinance), C.9.c (Require Contractors to Implement IPM), and C.9.h (Public Outreach). We also include recommendations to improve future Annual Reports. In addition, the enclosed spreadsheet shows our findings regarding each Permittee's compliance with the requirements of Provision C.9, except for subprovisions C.9.e (Track and Participate in Relevant Regulatory Processes), which was fulfilled at the regional level, and C.9.g (Evaluate Implementation of Source Control Actions Relating to Pesticides), which does not apply until the 2013 Annual Report.

C.9.a Integrated Pest Management (IPM) Policy or Ordinance

This subprovision requires Permittees to adopt IPM policies or ordinances no later than July 1, 2010, that include provisions to minimize reliance on pesticides that threaten water quality and to require the use of IPM in municipal operations and on municipal property. All but four Permittees submitted a written policy in their 2010 Annual Report, and some of these are very good IPM policies. However, the majority of the policies have one or more of the following deficiencies:

- The policy has not been adopted by the municipality's governing body.

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- IPM is optional or conceptual: the policy does not establish and require a hierarchy of pest control actions wherein least-toxic or non-chemical controls must be used first and use of toxic chemicals must be the last resort.
- The policy does not state that it applies to all employees and operations.
- The policy does not state that it applies to all current and future contractors of the municipality. (Municipalities that do not use contractors now may do so in the future.)
- The policy focuses solely on landscaping, and does not include structural pest control (including insects, birds, and mammals).
- The policy is vague in other ways, such as who has ultimate responsibility for implementation; how implementation will be ascertained/verified/tracked (e.g., record-keeping not required); and/or what pesticides are prohibited (if any, e.g., organophosphates, pyrethroids, fipronil). If such details are contained within an accompanying IPM Program, rather than in the IPM Policy, the Program document must be submitted as well.

The contents of an appropriate IPM policy are described in the Water Quality Attainment Strategy and Total Maximum Daily Load (TMDL) for Diazinon and Pesticide-Related Toxicity in Urban Creeks section of the San Francisco Bay Region Water Quality Control Plan (Basin Plan)¹:

Pesticide-related toxicity in the Region's urban creeks is to be eliminated and prevented by using pest management alternatives that protect water quality and by not using pesticides that threaten water quality. This can best be accomplished through the rigorous application of integrated pest management techniques and the use of less toxic pest control methods. The term "integrated pest management," as used here, refers to a process that includes setting action thresholds, monitoring and identifying pests, preventing pests, and controlling pests when necessary. Integrated pest management meets the following conditions:

- *Pest control practices focus on long-term pest prevention through a combination of techniques, such as biological control, habitat manipulation, and modification of cultural practices;*
- *Pesticides are used only after monitoring indicates that they are needed;*
- *Treatments are made with the goal of removing only the target pest; and*
- *Pesticides are selected to minimize risks to human health, beneficial and non-target organisms, and the environment, including risks to aquatic habitats.*

The IPM ordinance/policy must address structural and landscape pest control. Some Permittees submitted Bay Friendly Landscaping plans as their IPM policies. These plans are excellent for reducing pesticide use in landscaped areas, but they do not comprise a complete IPM policy. Municipalities own/operate structures such as City Halls, train stations, child care centers, civic centers, community theaters, fire stations, police stations, recreation centers and park buildings, senior centers, and maintenance facilities. IPM ordinances/policies must apply to all city facilities (buildings as well as grounds).

Some Permittees use the City/County of San Francisco's tiered list of pesticides, in which Tier 1 chemicals are of highest concern, Tier 2 are of moderate concern, and Tier 3 are of lowest concern. We support the use of this list and maintain that a fully implemented IPM program

¹ Available at

http://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/TMDLs/urbancrksdiazinontmdl.shtml

would not allow the use of a Tier 1 or 2 chemical without thorough documentation that the pest must be eradicated and all other means of control have failed.

To address the aforementioned shortcomings in many of the submitted policies, all Permittees should review their IPM policies/ordinances, revise them as needed, and resubmit them with their 2011 Annual Report. Evidence that each IPM policy/ordinance has been adopted by the municipality's governing body should also be submitted. We will defer further evaluation of the adequacy of IPM policies/ordinances until after the 2011 Annual Report submittal.

We recommend Permittees consider local "good example" IPM policies². In addition, guidance on establishing a municipal IPM program can be found at <http://anrcatalog.ucdavis.edu/pdf/8093.pdf>. We are available to discuss the IPM policies further with each Program.

C.9.b. Implementation of IPM Policy or Ordinance

This subprovision requires Permittees to report on IPM implementation by showing trends in quantities and types of pesticide used, and to suggest reasons for increases in use of pesticides that threaten water quality, specifically organophosphorous pesticides, pyrethroids, carbaryl, and fipronil. Many Permittees presented information about how they are endeavoring to control or reduce usage of pesticides. This is useful information, and we welcome a continuation of this type of reporting. **However, for all future Annual Reports, trends in quantities and types of pesticides used must be reported.** Please use the following format:

Trends in Quantities and Types of Pesticides Used^a

Pesticide Category • Specific pesticide used	2010	2011	2012	2013	2014
Organophosphates • Product a • Product b	• Amount ^b • Amount	• Amount • Amount			
Pyrethroids • Product x • Product y					
Carbaryl					
Fipronil					
...other					
...other					

^a Includes all municipal structural and landscape pesticide usage by employees and contractors.

^b Weight or volume of the product or preferably its active ingredient, using same units for the product each year.

C.9.d. Require Contractors to Implement IPM

This subprovision requires Permittees, no later than July 1, 2010, to hire IPM-certified contractors or include contract specifications requiring contractors to implement IPM and to submit documentation in the Annual Report to confirm compliance, such as contract

² Contra Costa County and Santa Clara County have good IPM policies, although these should be strengthened by explicitly stating that the policy applies to contractors (and County Roads departments) and by prohibiting use of pesticides with significant water quality impacts, such as pyrethroids and fipronil.

specifications or contractor's certification. Most Permittees submitted some form of contract specification or statement of contractor IPM certification. However, some contract specifications made IPM optional, and some call for non-IPM actions. **All Permittees should review their contract specs to determine whether they reflect the required elements of an IPM policy.** Also, both landscape and structural pest control must be covered. We will focus future Annual Report reviews more closely on C.9.d requirements.

Regarding IPM-certified contractors, at this time, acceptable IPM certifications are from EcoWise Certified, Green Shield, and GreenPro. California Department of Pesticide Regulation (DPR) licensing (Qualified Applicator License, etc.) is a basic requirement for all pest control operators and is not the same as IPM certification. DPR IPM Innovator awards are also not IPM certifications. Bay-Friendly Landscape training is good for contractors who work solely in landscaping. In all cases, Permittees must demonstrate that it requires the contractor to implement IPM, even IPM-certified contractors will implement IPM only upon request from the client.

C.9.f. Interface with County Agricultural Commissioners

This subprovision requires Permittees to summarize in their Annual Reports improper pesticide usage reported to county agricultural commissioners. Not only is it a requirement, it is in a Permittee's best interest to do so. Only DPR can regulate use of pesticides, and only DPR and county agricultural commissioners can enforce pesticide regulations. Although Permittees cannot regulate or enforce against use of pesticides, they can report to county agricultural commissioners observations of improper use of pesticide, such as presence of pesticides in storm drain systems, including along curbs. This year very few Permittees provided such reports.

C.9.h. Public Outreach

We recognize that Permittees are conducting public outreach collaboratively at the Program and regional levels, and we did not focus our review on outreach requirements this year. Please note that C.9.h.iii-iv require outreach to residents about EcoWise Certified IPM (or equivalent certification program) and outreach to pest control operators; only Santa Clara Valley Permittees reported such outreach last year. We plan to focus on these requirements in future Annual Report reviews.

To conclude, we recognize Permittees are implementing actions to control their uses of pesticides and to affect use by others. However, prevention and control of pesticide-caused toxicity remains a formidable challenge. We look forward to working with you to collectively improve the effectiveness of our pesticide toxicity control actions. For questions regarding this review, please contact Jan O'Hara at johara@waterboards.ca.gov or (510) 622.5681.

Enclosure: MRP C.9 Annual Report Review Spreadsheet



**2011 Integrated Pest Management Workshop
February 24, 2011**

SUMMARY OF WORKSHOP EVALUATIONS

Total Number of Evaluations: 34 (43% response)

Total Number of Attendees: 80*

**Number includes 72 attendees and 8 speakers and staff.*

What did you think of the following presentations?

Gopher Control –
Steven Hebert

28-Very helpful	6-Somewhat helpful	0-Not helpful	0-No answer
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Comments:
Excellent!

Recycled Water Management –
Courtney Rubin

14-Very helpful	17-Somewhat helpful	3-Not helpful	0-No answer
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GreenPro Certification –
Billy Gaither

4-Very helpful	19-Somewhat helpful	10-Not helpful	1-No answer
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Invasive Weed Detection and Control –
John Beall

20-Very helpful	14-Somewhat helpful	0-Not helpful	0-No answer
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Respirator Regulatory Refresher and Online Pesticide Use Reporting –
Jeremy Eide

24-Very helpful	5-Somewhat helpful	2-Not helpful	3-No answer
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Did this workshop meet your expectations?

Yes: 27

No: 1

Somewhat: 1

No Answer: 5

Suggestions for future workshop topics

Situation of the Bay (good, bad, etc.)

Surprise us. Just keep Gopher Control – Steven Hebert on the next agenda!!!

Project leaders for state Clapper Rail survey. Alien Cordgrass eradication projects.

Not many use respirators anymore; more lawn, weed, rodent control issues.

IPM – how to save/reduce water use, drought tolerant plants, rocks, chips, etc. IPM –ways to reduce pesticide use, any new methods, etc.

Master composting, Green Gardener Arborist/Trees and water, benefits of mulching, review of Best Management Practices.

Water use regulations (irrigation).

SPECIFICS – worst weeds, most comment weeds AND how/when to treat them; successes/failures; SM Co. policies; how to control weeds among sensitive species \implies Jeremy covered it!

General Comments

Thanks (2)

Past programs have been stronger.

You always do a great job. I always enjoy coming to this. Keep up the good work, and thanks for your time.

Helpful topics. Breaks between speakers. Better ventilation in building.

Need better sound system.

Good

Good workshop. Was here in '10 hope to be back in '12.

More lighting on guest speakers. Too dark in the room. Great workshop. Great food and drinks!

Good info.

Don't bring Bill Gaither back, he basically read his slides to us.

Speakers should have their own presentation prepared and not just read someone else's powerpoint word for word!