

Background Preamble:

1. The maintenance of a safe, clean, healthy environment for students and staff is essential to learning and is a goal of the _____ school district.
2. The use of toxic chemicals to control pests and weeds may itself threaten staff and students' health and ability to learn.
3. Programs in other school districts and institutions have shown that IPM is a viable, cost effective approach to controlling pests.

Objective: The objective of the District Policy is to reduce the use of synthetic chemical pesticides and other hazardous materials.

Definition: Integrated Pest Management is a decision-making process for managing pests (including bacteria and viruses and weeds) which uses monitoring to determine pest injury levels and combines biological, cultural, physical, and chemical tools to minimize health, environmental and financial risks. The method uses extensive knowledge about pests such as infestation thresholds, life histories, environmental requirements, and natural enemies to complement and facilitate biological and other natural control of pests. The method uses the least toxic synthetic pesticides only as a last resort to control pests, weeds, bacteria and viruses.

Policy:

- I. That the District shall establish and follow an IPM policy containing the following elements:
 - A. Monitoring is essential to determine pest population levels, action threshold levels, and to identify decisions and practices, which could affect pest populations. Monitoring is the regular and ongoing inspection and observations of the areas where pest problems can and do occur.
 - B. Setting injury action levels to determine when vegetation or pest populations at a specific site cause (s) unacceptable public health risk, property damage, fire hazard or aesthetic loss can be based, in part. By asking for example:
 1. Is the pest population at an unacceptably high level?
 2. Does it appear to be increasing?
 3. Is it resulting from mating or other sporadic behavioral or growing conditions?

- C. Modifying pest habitats to deter pest populations and minimize pest infestations by using biological, cultural, or physical tools to minimize health, environmental and financial risks from pests (See Appendix A)
- D. Choosing, as a last resort, chemicals which pose the least possible hazard to people, property and the environment, but only after recognized least toxic treatments have been tried and failed.
- E. Careful monitoring of treatment(s) to evaluate effectiveness.

The IPM coordinator shall ensure that these elements are implemented.

- II. That, effective immediately, the following categories of highly toxic pesticides shall not be used by District employees or used on property owned or leased by the District except as specifically exempted by this policy:
 - A. U.S. Environmental Protection Administration (U.S. EPA) acute toxicity category I and II pesticides.
 - B. Pesticides identified by the State of California as chemicals known to the State of California to cause cancer, developmental or reproductive toxicity pursuant to California Safe Drinking Water and Toxic Enforcement Act of 1986 (Prop. 65).
 - C. Pesticides found by the U.S. EPA to show evidence of causing cancer (EPA carcinogen city categories A, B, and C).
- III. Only pesticides identified by the IPM coordinator as "reduced risk pesticides" may be used by District employees or used on property owned or leased by the District, except as specifically exempted by this policy. Reduced risk pesticides shall not be used unless: 1) I. A thru D above have failed and, 2) It is determined that the health risk of the pest is greater than the health risk of exposure to the pesticide under consideration based on risk assessments calculated specifically for children.
- IV. The District and school sites shall, through various communication means, provide pre-notification to students, parents and staff of non-bait pesticide applications, in accordance with Chapter 718 of the California Education Code and the Food and Agricultural Code. The District shall post all areas treated with non-bait pesticide applications and posted notification shall remain from three days before to three days after treatment. The District shall provide publicly posted notification that identifies areas treated with pesticide baits. (See Appendix B)

- V. The District shall distribute a fact sheet outlining the IPM program and pest control activities within the District to parents, students and staff at the beginning of the school year. The District and each site shall maintain a record of pesticide use on school grounds and make that information available to the public. (See Appendix C)

- VI. The Nevada County Superintendent of Schools shall designate an IPM coordinator who shall be responsible for coordinating the efforts of school districts to adopt IPM techniques, communicating goals and guidelines of the IPM program to staff and students, including conducting training, tracking pesticide use and ensuring that related information is available to the public, and presenting an annual report to the County Superintendent evaluating the progress of the IPM program. (See Appendix D)

- VII. The IPM coordinator may allow District staff or any company contracted to provide pest control to the District to apply a pesticide otherwise banned under this resolution based upon a finding that the protection of public health requires the use of that pesticide. Such exemptions shall be granted on a per-case basis and shall apply to a specific pest problem for a limited time.

- VIII. Education and training of personnel is critical to the success of an IPM Program. Staff, students, administrative personnel, custodial staff, pest managers and the public should be educated about potential school pest problems and the least-toxic IPM policies and procedures which will be used to achieve the desired pest management objectives.

Appendix A

Implementing the Appropriate Pest Control Action

For each pest or infestation different treatment strategies may be required that will be determined. The following area list of IPM treatment strategies in detail:

- 1) Modify Pest habits:
 - a) Food, water, harborage, entry points, and other conditions that attract and sustain pest populations will be eliminated.
 - b) Proper sanitation, which will involve a coordinated effort by ALL building occupants (students, staff, and parents), is absolutely essential. Sanitation will extend to all areas of the school facility and grounds, and must be reviewed regularly to improve performance and correct oversight. Sanitation records must be kept with regards to cleaning schedules, complaints, etc.

- 2) Coordinating the use of a range of potential treatments for pest problems including physical, biological, and horticultural pest control methods, including the following:
 - a) Physical controls:
 - vacuuming
 - desiccants (diatomaceous earth, silica aero gel).
 - barriers (stick, slippery, soapy water),
 - traps (mechanical, sticky),
 - environmental manipulation (temperature, humidity, light)
 - electric currents (electro gun, electric fences and/or traps)
 - manual removal (hands, nets, lice combs)
 - designing, constructing, and modifying indoor and outdoor areas to reduce and eliminate pest habitats
 - b) Biological controls:
 - controls include conservation of pests' natural predators, parasites, and diseases and augmentation of these natural enemies through their purchase and release.
 - c) Horticultural controls:
 - pest resistant plant varieties
 - proper management practices (watering, pruning, mowing)
 - design or redesigning landscapes to prevent pests

Posting Appendix B

The IPM District Coordinator or designee shall post each area of the school site where pesticides will be applied with warning signs. Notification signs must be placed in the area where the pesticide will be applied and must be clearly visible to the public. A notification sign must be placed at the main entrance to the building as to be clearly visible to the public. The sign shall prominently display the term "Warning Pesticide Treated Area". Signs should be of a standardized design which will be easily recognizable to the public and to workers. They will be on a neon colored placard at least 8" by 11" and include:

- 1) the product name, 2) the U.S. EPA product registration number, 3) the intended date and area of application, 4) the reason for the application, 5) the active ingredient(s) of the pesticide, 6) the target pest(s), 7) the signal word indicating the toxicity category of the pesticide, and 8) the name and telephone number of the IPM Coordinator. When applicable the signs may include: the adverse health effects of the know ingredients and the date of reentry to the treated area.
- 2) Signs shall be posted at all usual public, employee and student entry points when the pesticide is applied in an enclosed area. In open areas signs shall be posted at all usual points of entry and at 50-foot intervals (or as is practicable) around the perimeter of the treated area. Signs should also be posted pursuant to State or Federal law or regulation and by product label instructions.
- 3) Signs shall be posted 72 hours in advance of application, and remain in place for 72 hours following application. In the event of an emergency application, posting will go up at time of the application and remain in place for 72 hours following application.

Appendix C
Record-keeping of Pesticide Applications and Management Actions.

Records of each pest management action shall be available upon request to the public and kept at each District office for a period of at least four years. Each record shall include the following information:

1. The name and address of the school site
2. The location of the pesticide application
3. The target pest
4. The date and time the pesticide or management action was completed
5. The pesticide product name/manufacture
6. EPA/CALIF registration number from product label
7. Total quantity of pesticide product used i.e., tbs., oz., pt., qt., gals.
8. Rate of use per acre
9. Dilution
10. The size of the area treated
11. Application method; i.e. ground, air or other
12. The application equipment used
13. Re-entry period if applicable
14. The name of the pesticide applicator

The IPM Coordinator will prepare a follow up record to include:

- a) The effectiveness of the pesticide or management action
- b) location of posted signs re: pesticide application
- c) prevention and other non-chemical methods of control used
- d) approximate cost of the pesticide product and the management action
- e) if application was undertaken in a pest control emergency, provide explanation of circumstances of the emergency.

These forms shall be made available to the public in the District office.

The IPM Coordinator Appendix D

The Nevada County Superintendent of Schools shall designate a staff person to coordinate the IPM program. This person shall be responsible for coordinating school district efforts to adopt IPM techniques, communicate goals and guidelines of the IPM Program to staff and students, provide proper training, track pesticide use and ensure that related information is available to the public. The IPM coordinator shall be educated in the principles and practice of least toxic IPM and be responsible for:

1. Preparing in March an annual turf management and facilities plan listing all proposed products and methods of application of the proposed products. The plan shall identify all pesticide products expected to be applied at Nevada County school facilities during the upcoming year. The notice shall also contain the Internet address used to access information on pesticides and pesticide use reduction developed by the Department of Pesticide Regulation.
2. Researching, identifying, monitoring and recommending to the Districts what type(s) of IPM process will be most effective at controlling pest populations on the grounds, inside the building and in the kitchens.
3. Overseeing implementation of the IPM program and coordinating all District efforts to adopt IPM.
4. Tracking all pesticide use and ensuring that records of pesticide use are available to the public.
5. Communicating with School maintenance staff on the goals and guidelines of the program.
6. Ensuring that all notification requirements of this policy are instituted and followed.
7. Presenting an annual report to the County Superintendent evaluating the progress of the IPM programs including but not limited to, reporting of the amount and frequency of pesticide use at District school sites, as well as successes and any problems the District is having in implementing the IPM policy, as well as proposed solutions for any problems.
8. Be in compliance with all requirements of the Healthy Schools Act 2000.

9. Knowing and understanding all aspects of Integrated Pest Management, including but not limited to:
 - All aspects to mandatory record keeping required by the Cal/OSHA/DPR and Healthy Schools Act of 2000.
 - All local ordinances, restrictions and requirements
 - Product information
 - Plant, insect, and bacterial pathology and identification
 - Hazardous material training

Reference: Website: www.pesticide.org
E-mail address: info@pesticide.org