

County Executive  
Terry Schutten




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Sacramento**

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*Inter-Departmental Correspondence*

**Date:** June 30, 2008

**To:** Agency Administrators  
Department Heads

**From:** Terry Schutten 

**Subject:** *County-wide Integrated Pest Management Policy*

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Attached is a copy of the final County-wide Integrated Pest Management Policy (IPM), and the related documents entitled "IPM Coordinator Staffing" and "Department IPM Plans." Consistent with the County initiative to be a leader in sustainability for our community, we are establishing this policy for all County operations, facilities, and properties. In addition, the County is required by a Municipal Stormwater Permit, issued by the State of California, to develop and implement an IPM policy for County operations to minimize pesticide discharges to local water bodies.

This policy was developed using a collaborative and participatory process involving representatives from the implementing departments, as well as the County's Business Environmental Resource Center (BERC), and the County Agricultural Commissioner. The County departments primarily responsible for implementing the IPM Policy, are:

- Airports
- General Services
- Regional Parks and Open Space
- Transportation
- Waste Management and Recycling
- Water Resources

Due to their pest management activities, the implementing departments are required to establish department-specific plans. In addition, we request the implementing departments to work together to establish and fund an IPM Coordinator, as outlined in the IPM Coordinator Staffing document.

Memorandum-Integrated Pest Management Policy

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Other departments and their employees may occasionally need to conduct activities in support of this policy. For example, employees of any County department might receive information to help them recognize and report conditions in their workplace that are conducive to pest populations, or be expected to help prevent pests by disposing of food waste in designated pest-resistant receptacles. The primary purposes of this policy are to:

- Promote the health and safety of employees and citizens
- Protect the environment
- Enhance the sustainability of County operations
- Maintain effective pest management through responsible pesticide use practices and the application of IPM
- Reduce risks associated with pesticide use

If you have questions about this policy, please contact Dave Tamayo, Environmental Specialist IV, with the Department of Water Resources Stormwater Quality Program, at (916) 874-8024 or [tamayod@saccounty.net](mailto:tamayod@saccounty.net).

We thank you for supporting a policy which ultimately will benefit the environment and quality of life for all County residents and employees.

Attachments: (3)

c: David Tamayo-Environmental Specialist IV, Department of Water Resources

## County of Sacramento Integrated Pest Management Policy

<p><b>County IPM Policy</b></p>	<p>Pest management activities associated with County operations, and County-owned facilities and property shall be in accordance with the principles of Integrated Pest Management (IPM), State and Federal pesticide use laws and regulations, and the Municipal Stormwater Permit. These activities shall also be consistent with this policy's definition of IPM and with guidance established by the County IPM Coordinator.</p>
<p><b>Background</b></p>	<p>The County of Sacramento recognizes that:</p> <ul style="list-style-type: none"> <li>• its citizens and environment should be protected from exposure to pesticides</li> <li>• the County, as a public agency, should model environmentally responsible practices</li> <li>• IPM is a widely established and accepted method of achieving long term, effective pest control while reducing pesticide use and the risks associated with it</li> <li>• the County is subject to the terms of a state-issued Municipal Stormwater Permit that requires minimization of pesticide use and implementation of IPM in County operations and facility management that affect water quality discharged from its municipal separate stormwater sewer system</li> </ul>
<p><b>IPM Definition</b></p>	<p>For the purposes of its IPM policy, the County adopts the following University of California Statewide Integrated Pest Management (UCIPM) definition:</p> <p style="padding-left: 40px;">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 resistance varieties.</p> <p style="padding-left: 40px;">Pesticides are used only after monitoring indicates they are needed according to established guidelines, and treatments are made with the goal of removing only 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.</p>
<p><b>Policy purpose &amp; intent</b></p>	<p>The purpose and intent of the County IPM Policy is to:</p> <ul style="list-style-type: none"> <li>• promote the health and safety of employees and citizens</li> <li>• protect the environment</li> <li>• enhance the sustainability of County operations</li> <li>• maintain effective pest management through responsible pesticide use practices and the application of IPM to</li> <li>• reduce risks associated with pesticide use, and</li> <li>• establish the need for an IPM Coordinator</li> </ul>
<p><b>Policy applicability</b></p>	<p>The County IPM Policy applies to all pest management activities (including those conducted outside areas served by the municipal separate stormwater sewer system, and those occurring in agricultural, rural, and open space areas which are exempt from the requirements of the Municipal Stormwater Permit) conducted by County staff or provided by vendors under contract to the County occurring:</p> <ul style="list-style-type: none"> <li>• as part of County operations, and/or</li> <li>• at County-owned property and facilities</li> </ul> <p>For the purposes of this policy “County operations” and “County-owned property and facilities” do not include conservation easements, utility easements, or other non-possessory interests held by a third party on County-owned property, nor property or facilities for which the County serves as a temporary “pass-through” owner of real property, pending transfer of the property to another party.</p> <p>For facilities where the County is a lessee, rather than the property owner, the County shall, when renewing a lease agreement or entering into a new one, include as a lease condition the requirement that the property owner shall control pests in a manner that meets the requirements of the County IPM policy.</p> <p>This policy does not apply to County-owned property under lease to a tenant at the time of policy adoption, until such time that the lease expires or is otherwise re-negotiated.</p> <p>In some cases, the IPM policy will also apply to other activities that have the potential to significantly affect pest populations—such as maintenance practices and facility designs.</p>

<p><b><i>Oversight: IPM Coordinator</i></b></p>	<p>The County Executive authorizes the Agricultural Commissioner to designate an IPM Coordinator as a central resource to ensure that the County IPM policy is fully implemented and in compliance with applicable State and Federal laws, regulations, and permits. The duties of the IPM coordinator listed below are intended to serve all departments, and an equitable funding mechanism shall be established by the affected departments.</p> <ul style="list-style-type: none"> <li>• Provide guidance and oversight for Department IPM Plan content and development.</li> <li>• Establish contract language for pest management vendors</li> <li>• Periodically determine adequacy of Departmental IPM Plans and their implementation.</li> <li>• Develop a common record keeping system.</li> <li>• Gather data and prepare reports to demonstrate compliance with the Municipal Stormwater Permit.</li> </ul> <p>Additional duties specific to individual departments, such as detailed technical assistance, may be conducted by the IPM Coordinator under department specific funding mechanisms:</p>
<p><b><i>Policy Implementation:</i></b></p>	<p>Implementation of the IPM policy will primarily be the responsibility of individual departments. Departments that conduct or contract for pest management shall develop and establish department IPM Plans that comply with this policy and according to guidance established by County Executive or the IPM Coordinator.</p>

# **County of Sacramento Integrated Pest Management Policy**

## **Implementation Document: Department IPM Plans**

### **IPM Policy Implementation**

In accordance with the County's IPM Policy, every County Department that engages in pest management activities (or contracts through a vendor for such) shall develop and implement a written Department IPM Plan.

This document provides direction regarding the establishment of Department IPM Plans. While originally adopted by the County Executive to facilitate and expedite initial development of Department IPM Plans, the requirements established herein may be amended from time to time by the County IPM Coordinator.

### **Department IPM Plan approval**

Department IPM Plans, and changes to them, shall be submitted to, and are subject to approval by, the County IPM Coordinator. Each Department shall submit its Department IPM Plan for approval by the County IPM Coordinator no later than June 30, 2009.

### **Department IPM Plan goals**

Each Department IPM Plan shall meet the following goals:

- support and allow the Department to effectively carry out its core mission
- maintain a safe and healthy environment for County employees, residents, contractors, and customers
- implement the principles of IPM
- contain sufficient detail to ensure adequate IPM implementation by Department staff
- provide for continuous improvement, including the investigation, and implementation where appropriate, of methods to reduce both pesticide risk and long term pesticide use through the use of cultural, mechanical, physical, and biological measures
- comply with direction from the County IPM Coordinator, and requirements of the County IPM Policy, the County's Municipal Stormwater Permit, and other applicable permits
- conform to the requirements of State and Federal pesticide use regulations

### **Required elements**

The following elements are required in the Department IPM Plan:

- A statement of adoption of the Plan by the Department
- A copy of the County IPM Policy

- Designation of staff responsible for coordination of IPM activities on a department wide or site-by-site basis, as appropriate, and to provide a primary point of contact with the County IPM Coordinator
- Identification of staff positions responsible for and participating in pest management activities and decision making, including but not limited to pesticide applications
- Written pest tolerance thresholds
- Procedures for monitoring pest populations and conditions conducive to pest populations
- Description of site specific pest prevention measures
- Written site specific pest management prescriptions, including pest control advisor recommendations, for any pesticide applications made by the Department or its vendors
- Criteria for the selection and use of pesticides, including justification for the increased or continued use of any pesticides known or likely to cause local water quality impairments, as determined by the County Stormwater Program
- Record keeping procedures for pest management activities, including monitoring, decision making, and pesticide applications. This shall include provisions to collect and retain records for pest management activities conducted by contractors
- IPM contract requirements for vendors providing pest management services (if any) including pest control advisors, pesticide applicators, and structural pest control operators
- Written plan for providing and documenting staff training
- Written procedures for storage of pesticides
- Annual assessment of pest management alternatives
- Annual performance and effectiveness evaluation of the overall Department IPM Plan to be submitted to the County Stormwater Program

Departments that do not directly manage pests, but have operations or facilities with a significant potential to affect pest populations or pest management activities, may be required by the County IPM Coordinator to develop specified elements of an IPM Plan or to participate in and support the plan or portions of a Department IPM Plan established by another Department.

# **County of Sacramento Integrated Pest Management Policy**

## **Implementation Document: IPM Coordinator Staffing**

### **IPM Policy**

The County IPM policy recognizes the need to establish an IPM Coordinator position to ensure full compliance of the policy by providing oversight and technical assistance to affected departments.

### **Focus on initial setup**

Most of the duties of the IPM Coordinator identified in the IPM policy pertain to the initial setup of components necessary for full implementation of the policy.

### **IPM Coordinator Staffing**

The initial duties of the IPM Coordinator require a significant workload and level of focus that can not be absorbed by the Agricultural Commissioner, Water Resources, or other County departments. Because the IPM Coordinator activities will be focused on initial implementation tasks, and ongoing needs beyond that are uncertain, it is recommended that the County Agricultural Commissioner hire a contractor to fulfill this role initially. After completion of the initial tasks, which may take 1-2 years, the ongoing work load and staffing needs should be evaluated.

### **Funding of shared vs. department specific work**

Many of the IPM Coordinator duties focus on tasks that are common to all the affected departments. In addition, maintaining compliance with the Stormwater Permit is the responsibility of departments that have activities subject to its requirements and provisions. It is recommended that the affected departments develop a mechanism to equitably share the costs for these tasks.

The IPM policy also recognizes that the IPM Coordinator may provide department specific services, such as detailed technical assistance in establishing or implementing a Department IPM plan. Such duties would be most appropriately funded by the individual department. At their discretion, individual departments would be free to obtain such technical assistance either from the IPM Coordinator, or from a separate contractor of their own choosing.