

POLICY REGARDING PEST MANAGEMENT ON CITY PROPERTY

1. The purpose of this policy is to eliminate or reduce pesticide use to the greatest possible extent. The City of Madison agrees with the US EPA that “all pesticides are toxic to some degree, and the commonplace, widespread use of pesticides is both a major environmental problem and a public health issue.” For this reason, all departments will evaluate and give preference to non-pesticide management practices and use reasonably available alternative pest control methods, will minimize their pesticide use through Integrated Pest Management, and will use least risk pesticides as a last resort.
2. Definitions of terms used in this policy.
 - a. Integrated Pest Management (IPM) is a decision making process. The essential parts of IPM are monitoring, setting threshold levels for pests, identifying the causes of the pest problem, addressing the cause of the problem, and using the most effective, least harmful, methods to control the problem, before using chemical controls. IPM develops ways to change the conditions that cause the pest problem, so that pests will be prevented in the future or minimized. Preventive maintenance using pesticides for pest problems does not adhere to IPM. Prevention of pests should be managed with non-toxic methods.
 - b. Biological Controls – support or introduction of natural predators or parasites of the pests to be controlled.
 - c. Cultural Controls - practices that can reduce pests by making the environment less favorable, such as improved sanitation or horticultural practices.
 - d. IPM Coordinator – Department staff person who is responsible for developing and implementing the pest management plan for the Department.
 - e. Mechanical Controls - direct measures that either kill the pest or make the environment unsuitable for their entry, dispersal, or survival, such as tilling the soil to expose insects or hand pulling weeds.
 - f. Physical Controls - practices that physically keep pests from places where they're not wanted, such as window screens and sealing cracks and crevices.
 - g. Pesticides – substances that destroy or repel pests. For the purpose of this document, they include herbicides, insecticides, fungicides, and rodenticides.
3. Chemical pesticide may be considered if:
 - a. The non-toxic methods of pest control, such as Cultural Controls, Physical Controls, Mechanical Controls, and Biological Controls have been shown to be ineffective; and,
 - b. Monitoring has indicated that the pest will cause unacceptable health or safety hazards, or an unacceptable reduction in the intended use of the property.
4. All departments will maintain appropriate records on pest monitoring data collected, pest control actions attempted (both non-chemical and chemical), and results of pest control activity. All departments will submit by February 1st an annual report to the Public Health Commission. This report will contain the following information:
 - a. Completed Pesticide Application Summary for all pesticide applications made in the previous year. Application data must include: purpose, location, and amount of each pesticide product applied, including the amount of active ingredient.

- b. Annual summary of non-chemical pest control activities.
 - c. Estimated size of the total area managed for each pest problem in a given year. The area managed will likely exceed the area treated.
 - d. A summary of any complaints received regarding use or the perceived need for use of pesticides, including the date complaint(s) was (were) received and the nature of the complaint(s).
 - e. A pest management plan for the coming year. The plan will contain the following information for each type of pest problem:
 - 1. Definition of Roles. Identify who will: serve as the IPM Coordinator, perform pest monitoring, evaluate pest control alternatives, decide which pest control alternative to use, and implement pest control measures.
 - 2. Pest Management Objectives. Identify the action thresholds (i.e., pest population levels) to be used to decide when some type of action should be taken to control the pest problem.
 - 3. Monitoring Plan. Describe the methods to be used to monitor the pests and the frequency of monitoring.
 - 4. Control Method Selection. Describe the types of pest control methods to be evaluated and the criteria used to choose the appropriate control method. IPM control methods may include:
 - i. Modifying the environment to increase the effectiveness of biological, mechanical, cultural, or physical controls such as blocking mouse holes, keeping areas clean where insects may be attracted, improving soil health, etc.
 - ii. Destroying pests breeding, feeding, or shelter habitat.
 - iii. Using pest resistant varieties of seeds, ornamentals, trees, etc.
 - iv. Using chemical control strategies as a last resort only after a mix of other strategies is shown to be ineffective.
 - v. Using mechanical methods and biological methods (parasites, predators, disease).
 - vi. Spot-treating pest problems when chemical methods are used.
 - f. A standard notification plan that provides, at a minimum, readily visible posting for a period of 24 hours prior to a pesticide application (when possible) and a minimum of 48 hours following the application. These time intervals may be extended based on health or safety concerns. For areas that receive pesticide applications on a regular basis, permanent signs will be posted
5. Annual evaluation of pest management activities on City property will be performed in the following manner:
- a. Public Health Department staff will summarize pest management activities. This summary and individual Department reports and plans will be provided to the Pest Management Advisory Subcommittee of the Public Health Commission and the oversight commission of each department applying pesticides.
 - b. The Pest Management Advisory Committee, a commission of experts to be recommended by the Public Health Department and appointed by the Mayor's office,

shall review the annual report and make recommendations to the Public Health Commission, will:

1. Review the available data and make recommendations concerning compliance with this Policy to the Public Health Commission.
 2. Report any contractors that are not complying with this policy to the Public Health Commission.
- c. The Public Health Commission will submit recommendations and concerns to each commission charged with oversight of a department that applies pesticide on City property. The public Health Commission will also forward to the Purchasing Supervisor of the Comptroller's office the names of any contractor that does not comply with the City's pesticide policy.
- d. The oversight commission of each Department with a need to manage pests on City property will have the following responsibilities:
1. Review the Department's pest management activities and plans,
 2. Consider recommendations and concerns from the Public Health Commission, the Common Council, and the public.
 3. Take appropriate action to ensure that the Department's pest management activities and plans are in compliance with this Policy
6. All Departments with a need to manage pests on City property will assign a staff person to serve as IPM coordinator. This person will be responsible for developing and implementing the Department's plan.
- a. IPM Coordinators from all Departments will be required to meet annually to discuss past experiences and recent advances in pest management practices. The group may choose to meet more frequently as needed.
7. All Departments will report any complaints regarding health effects possibly related to pesticide applications to the Public Health Department at the earliest opportunity.
8. Any unusual amount of pesticide use due to unusual circumstances will be reported to the Director of Public Health or his/her designee at the earliest opportunity.
9. The IPM Coordinator and all supervisors having responsibility for the handling, application, disposal or storage of pesticides shall be State certified under the Department of Agriculture, Trade and Consumer Protection's Pesticide Applicator Certification Program for the appropriate type of pesticide application engaged in. All employees applying pesticides shall be State certified or working under the direct supervision of a certified applicator. All employees having any involvement with pesticide handling, application, disposal or storage shall receive basic training in pesticide safety.
10. All Departments storing, using and disposing of pesticides and pesticide containers will do so safely, according to label directions and any State and Federal regulations where applicable.
11. If the pest control program is performed through a private contractor, the contracts for these services will require the contractor to comply with this policy. The contractor must furnish

the IPM Coordinator for the Department served with the following for each pesticide applied:

- a. Date, purpose, location, amount of product, and amount of active ingredient for each application.
- b. Product labeling and material safety data sheets for each product applied,
- c. Documentation of applicator certification and conformance with other Federal and State laws.

Monitoring should not be solely performed by the contractor hired to treat the pest problem. The IPM Coordinator should oversee the monitoring.

12. If a private contractor is found to be out of compliance with this policy by the Pest Management Advisory Subcommittee, this non-compliance will be considered grounds for terminating an existing City contract with the contractor and the contractor will not be allowed enter into a contract with any City department for 1 year after the date that non-compliance was determined.
 - a. A list of non-compliant contractors will be kept by the Purchasing Supervisor. The Purchasing Supervisor shall notify all IPM coordinators of non-compliant contractors.
13. This policy does not apply to disinfectants used in the routine maintenance of city facilities.
14. The City shall NOT USE pesticides to control dandelions and other broadleaf weeds on general parklands, median strips, street terraces, roadsides, general lawn areas, and athletic fields that are not reserved, nor are fees paid for their use.
 - a. Guidelines for Pesticide Use
 1. Cosmetic use of lawn and garden areas (including medians) will be managed using non-toxic methods. These methods can be sought out and used on all city properties.
 2. Because of concern over the health of children with repeated exposure to pesticides when playing sports, lower priority athletic fields in particular should have a much higher tolerance for weeds and should use non-toxic weed management methods if desired.
 3. Golf courses have the opportunity for pesticide reduction by incorporating more cultural method and increasing weed tolerance of golfers through educational efforts, following guidelines set forth by the Audubon Golf Sanctuary Program.
 4. Olbrich Gardens and other city property managing large garden areas ought to continually seek out resources for non-toxic garden management.
 5. An Integrated Pest Management professional ought to be used as a resource by the city to help coordinate and integrate non-toxic pest management methods.
 6. All use of pesticides for conservation purposes for the control

of invasive species, must be managed by the conservation supervisor and comply with all other aspects of the pest management policy including reporting and posting requirements. No pesticide will be used for conservation management in areas dedicated for use by children.

15. Any use of a pesticide under EPA Special Review is prohibited

Date of Application ____ / ____ / ____
Month Day Year

Restricted-Use Pesticide

PESTICIDE APPLICATION RECORD

This form meets ALL federal and Wisconsin pesticide application recordkeeping requirements.

Applicator

Name _____ Business Phone (____) _____

Certification No. _____ (Exp. Date ____ / ____ / ____) License No. _____

Address (Route or Street) _____

City _____

State _____

Zip Code _____

Client

Name _____ Business Phone (____) _____

Address (Route or Street) _____

City _____

State _____

Zip Code _____

Treated Site

Location _____

Specific Crop/Commodity/Structure/Livestock/Other _____

Size/Number _____ Target Pest(s) _____

Pesticide Product(s) Used

Trade Name _____ Manufacturer (optional) _____

EPA Reg. No. _____ Active Ingredient (optional) _____

Trade Name _____ Manufacturer (optional) _____

EPA Reg. No. _____ Active Ingredient (optional) _____

Trade Name _____ Manufacturer (optional) _____

EPA Reg. No. _____ Active Ingredient (optional) _____

Application Information

Start Time ____ : ____ AM/PM End Time ____ : ____ AM/PM Mixing/Loading Location _____

Application Rate(s) _____

Total Amount of Each Product Used _____

Soil Fumigants: Additional Application Information

Soil Temperature at Depth of 5 to 6 Inches (if you used knife rig injection or chemigation) _____

Time of Inspection ____ : ____ AM/PM Results/Action Taken _____

(Inspection must take place within one hour of sunset on day of application)

Comments (optional): Place additional comments (weather, site conditions, pest populations, etc.) on back.



How to Use the Pesticide Application Record Form

Fill out the relevant sections of this form on the day that you apply any pesticide. Keep the form on file for at least 2 years (3 years if you apply an atrazine-containing product) to comply with all current federal and Wisconsin recordkeeping requirements.

Restricted-Use Pesticide: Put an 'X' in the box in the upper right hand corner of the form if you applied a restricted-use pesticide. This will make it easier to retrieve records of such applications for the USDA if you are requested to do so.

Applicator: To save time, fill out the applicator information before you make photocopies of the form. Write 'NA' (for 'not applicable') on the appropriate line(s) if you are not certified and/or licensed.

Client: Fill out this part of the form if you are a commercial applicator or if you are a private applicator making an application on another person's land, even if only for exchange of services.

Treated Site:

Location: Provide enough information that would allow someone to find the way to the location of the application. For example, if you use a field-numbering system, enter the field number on the form but also have a copy of the farm plan on file where you keep your pesticide records; that way, a person could look at the farm plan and determine how to get to the field in question.

Specific Crop/Commodity/Structure/Livestock/Other: This is the site to which you applied the pesticide. Be specific enough to accurately describe what was treated. For example, 'field corn' vs. 'sweet corn' vs. 'field corn seed' vs. 'stored corn.' Likewise, if you treat a storage structure, such as a grain bin or potato warehouse, be sure to mention whether or not it was empty at the time of treatment. Other examples of sites include dairy cows, chickens, fence rows, barns, and private ponds.

Size/Number: Generally speaking, use whatever units of measurement are mentioned on the label. Examples include acres, feet of row, cubic feet, and number of livestock.

Target Pest(s): Be as specific as you can be; this will help you determine how effective the application was. For commercial applicators, it is especially important that your client know which pests the treatment was intended to control.

Pesticide(s) Used: You can get the requested information from the product label. If you tank mix 2 or more pesticide products, record each product separately. If you use a restricted-use pesticide, even in a tank mix with nonrestricted-use pesticides, put an 'X' in the box in the upper right-hand corner of the form.

Active Ingredient(s) optional: Record the common name of the active ingredient that appears in the ingredients statement. If a product contains more than 1 active ingredient (as is the case with all pre-packaged tank mixes), record the common name of each active ingredient.

Application Information: The application rate is just your calibrated rate (pints or pounds of product per acre, percent solution, etc.). Also record the spray volume applied per acre (or the spray volume used to treat a barn, fence row, etc.). If you apply a tank mix, be sure to record the application rate and the total amount of product used for each product in the mix. The mixing/loading location is where you loaded the pesticide into the application equipment or nurse tank. To record this location, use the same guidelines described above for the location of the treated site; you can write 'site of application' if that was the mixing/loading location as well.

Soil Fumigants: Additional Application Information: Applications of a soil fumigant that contains chloropicrin or metam sodium are further regulated by a special rule (ATCP 30); refer to this Administrative Code for complete details. At the time of application, record the soil temperature measured at a depth of 5 to 6 inches. Also, monitor the site within one hour of sunset on the day of application, and record your results and/or any action taken (e.g., irrigated site because gas volatilization was occurring). Notify state agencies, if needed, as required by ATCP 30.

Comments: Although not required by law, additional comments can help you evaluate the effectiveness of the pesticide application. Examples include weather conditions, application equipment, adjuvants, and timing of application (e.g., preplant incorporated or postemergence). Because you will use a separate recordkeeping form for each application, write your optional comments on the blank back of the photocopied form.