

IPM POLICY RECOMMENDATIONS SUMMARY

Annotated

The Task Force received nearly 150 recommendations; many of which overlapped and/or re-stated provisions in the current policy so not all are included here. Please forgive the formatting inconsistencies as ideas were drawn from multiple sources; this document should be considered a working draft. [It was discussed by the Task Force on 2/18/19 and 3/11/19. Annotations are based on meeting notes and subsequent discussion by Steering Team.](#)

PROCESS includes what approach to take, who drafts and what is the timeline.

General agreement to revise the current policy

- Clarify & simplify where possible
- Add new sections (e.g. values, best practices)
- Invite public input from stakeholders and user groups
- Clarify chain of command, enforcement mechanisms
- Adoption by Common Council
- Review every 5 years, update as necessary
- Provide operational specifics in plans (not policy) at the city-wide and departmental level; Administrative Procedure Memoranda as needed

Drafters should be knowledgeable about IPM, open to public input and scientific information. Extension of the Task Force timeline and structure was a recommendation; another recommendation was a staff team with expert advice. Potential for adding representation of (or inviting review by) WI department of Ag, Trade, and Consumer Protection, County land management professionals. Important that some members of the current task force (Dumas, T. Green, Hausbeck and Laschinger) are certified pesticide applicators.

Deadline suggested was 2020, before the growing season, i.e. by [April/May](#). Process should involve all city agencies that use pesticides and IPM strategies in their operations, including CDA and Housing; [Purchasing \(list of non-compliant contractors\)](#); set a regular meeting schedule, provide public input opportunities, review by oversight committees of agencies affected, approval by the Common Council

CONTENT

Values and goals (a new section)

1. IPM Institute suggested language: “Overreliance on pesticides can have unintended affects on the environment, humans and non-target organisms. Integrated Pest Management can be used to effectively manage pests without unnecessary pesticide use. The City of Madison is committed to sustainability and protecting the health of its residents and natural resources. 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, will use least-risk pesticides as a last resort, and will report annually to the department oversight commission and the City-wide IPM Coordinator on the justification for pesticides used.”
2. Emphasize the opportunity to reduce costs and improve public health & environment with diligent practice of IPM and proactive planning. IPM Institute Basics & Benefits [slide PPT–presentation](#) (11/5/18) noted: [this list focuses primarily on buildings, expand to include land management practices](#)
 - a. Fewer staff (and student) absences
 - b. Improved productivity
 - c. Fewer pests, fewer costly (time & money) pest complaints
 - d. Greater staff satisfaction
 - e. Lower liability
 - f. Food safety
 - g. Fire safety (rodents chewing wires may cause 20-25% of fires)
 - h. Energy, water conservation
 - i. Better buildings (design and maintenance)
 - j. Direct pest management costs (time, materials)
 - k. Indirect costs (environmental health, pollinators)
3. Public health and safety should be evaluated equally with environmental and fiscal impacts (utilize [The Natural Step sustainability framework](#) matrix, “triple bottom line” type analysis). [Compare the cost of using pesticides vs. not using pesticides](#)
4. Improve environmental stewardship
 - a. Preserve habitat, increase wherever possible
 - b. Support biodiversity, especially native species
 - c. [Control \(eliminate\) invasive species](#)
 - d. Improve soil health to
 - i. Eliminate erosion and standing water
 - ii. Increase water infiltration and retention
 - iii. Increase organic matter to support beneficial organisms
 - iv. Reduce the use of chemical fertilizers and pesticides

~~e.~~_____ Minimize management techniques that disturb ecosystems

5. Commitment to transparency through public education, input and notification; even though expectations and priorities might not match staff's plans and resources, acknowledge community values
6. Alignment with other City plans and policies, e.g. [Comprehensive Plan](#), Sustainability Plan and The Natural Step [sustainability](#) framework (see charter), Racial Equity & Social Justice [Initiative](#), other? [Pollinator Protection Task Force report \(adopted by Common Council, implemented by Madison Food Policy Council\)](#) [State and Federal requirements \(e.g. building codes\)](#)

Best practices (a new section)

1. List comprehensive IPM management steps, including
 - building design & improvements
 - landscaping options
 - organic alternatives and biological controls
 - thresholds for pesticide use
 - least toxic options
 - lists of chemical pesticides allowed and not allowed ([included in department-level implementation plans](#))
2. ~~Categorize~~ [Recognize that \(and require management plans for\)](#) different types of land uses and facilities requiring different approaches, [and require appropriate management plans](#) e.g.
 - general, parks, conservation parks, golf courses
 - stormwater drainage areas, greenways, medians
 - building facilities and grounds
 - [special areas \(e.g. State Street mall, Olbrich Gardens\)](#)
3. Most common best practices taken from National Institute Director Dr. Thomas Green's presentation on Municipal IPM [plans](#) include:
 - Regulatory compliance
 - Designs for pest prevention
 - Regular inspection for pest-conducive conditions
 - Monitoring
 - Goal setting
 - Non-chemical options first
 - Approved/prohibited pesticide list(s)
 - Site/emergency use/pilot exemptions
 - Pesticide risk tiers
 - Evaluate results of interventions
 - Pesticide drift mitigation
 - Posting/[notification](#)
 - Staff education/training
 - Public education/training

- Contractor qualifications/oversight
- Pesticide use data collection
- Program evaluation
- Internal reporting
- External reporting
- Ongoing IPM committee

4. Seek advice from UW-Extension, Weed Science, Noer turf grass research facility, DNR, and professional land management entities that specialize in alternative techniques

5. Standardized formats for reporting – by departments and outside contractors

6. Pay special attention to Madison’s unique environments (e.g. shorelines)

7. Consider “no spray zones”

8. Actively protect beneficial species, e.g. pollinators

9. Provide public access to all reports [and methods for providing input.](#)

Standards the City could look to for guidance

1. Precautionary Principle -- implies that there is a social responsibility to protect the public from exposure to harm, when scientific investigation has found a plausible risk (e.g. carcinogenic potential of glyphosate). Developed in Racine, at R.C. Johnson’s headquarters on January 15, 1998, it is often referred to as the Wingspread Statement: “When an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some cause and effect relationships are not fully established scientifically.” These protections can be relaxed only if further scientific findings emerge that provide sound evidence that no harm will result.

2. EPA (e.g. signal word and special review categories)

3. Green Shield certification, LEED design for buildings, [Midwest Grows Green](#)

4. IPM Institute organic and low-risk product recommendations

5. Other? [NOFA Organic Land Care program - http://www.organiclandcare.net/](#)

Reporting – develop standard formats for annual reports and plans

Parks provided a good list of what evaluator would want

1. Objectives of management practices
2. Factors influencing management practices
3. Product applied, active ingredient, pounds of a.i. used
4. Toxicity Category/signal word should be included
5. How it was applied

6. Where it was applied
7. Why it was applied
8. What other IPM measures were utilized

Request copies of any other reports agencies are filing, e.g. DATCP

Consider including checklists for noting non-pesticide actions taken, alternative methods considered; also risk/benefit analysis matrix (charter example)
(checklists could be limiting when there's good information on how to deal with a specific pest, e.g. DNR recommendations on invasive species control; a table of actions might be more effective)

Costs of actions (proactive, reactive) and inaction need to be quantified, compared with benefits. Consider short and long term outcomes, and how to quantify them.

Standardize formats for staff and outside contractor reports

Standardize form for applicators who report to agencies they work for (same requirements as department reports above)

IMPLEMENTATION A number of approaches were suggested. Acknowledge there are budgetary implications that will need to be addressed at the City-wide and in departmental level IPM plans.

Internal Process Ideas:

- reports and plans developed by staff and/or IPM coordinator(s)
 - Single IPM coordinator for the City?
 - Team of staff who are IPM coordinators?
- drafts submitted to oversight committee for each agency
- drafts submitted to reconstituted advisory committee
 - or
 - drafts submitted to city-wide team of coordinators,
 - drafts submitted to reconstituted advisory committee
 - then
- final review and report produced (by whom?)
- report made available to the public
 - enforced by
 - Public Health of Madison and Dane County (through its Board of Health?)
 - Department Head?
 - Mayor?

External Process Ideas:

- agency reports collected
- summarized by an internal staff team for review by outside experts

- experts are employed or contracted by the City
- experts provide a report/evaluation to the Board of Health, Common Council and/or enforcement authority

Hybrid Process Idea: [generally supported over the other two approaches](#)

- annual reports and plans for the coming year developed by staff and/or IPM coordinator(s) in each relevant agency (internal)
- [a comprehensive report or summary would be prepared \(by whom?\)](#)
- submitted to reconstituted advisory committee (comprised of residents and local experts) for initial review, public input and comment (public)
- advisory committee creates a report (public)
- report reviewed and recommendations provided by outside contractor (external)
- outside contractor report shared with boards and commissions of relevant agencies [and Common Council](#) (internal)
- enforcement actions taken as needed by appropriate authority (internal)

Compliance and remedies for non-compliance?

- Hausbeck (who has been determining compliance for Public Health) noted:
 - Standard forms are needed
 - Forms and reports must be completed on time
 - Consistent evaluation is important
 - Variation in application of IPM principles must be considered
 - Comparisons must be year to year in each department
 - Changes in pest load (challenges) considered
 - Changes in weather from year to year
 - What is least toxic
- Green Shield certification provides a structure
- Non-compliant departments should be required to hire/train employees

Support for departments/divisions – administrative, training, reporting, etc. –

Training strongly supported and should be required

- Provide budget for professional development, [process improvement](#)
- Hold regular gatherings of IPM coordinators city-wide [to share knowledge](#)
- Schedule annual update by IPM experts
 - invite applicators, supervisors, speakers
 - update scientific developments,
 - public health topics
 - environmental health and justice topics
- Encourage pilot projects for new management techniques
- [Grant funding opportunities](#)

Other

Consider updating/reviewing how pesticides implicate management across the City. If [certain pesticides could](#) not [be](#) used, what would it mean?

Require management plans [for different land uses](#), updated every 5 years

Standardize form for applicators who report to agencies they work for (same requirements as department reports above)

Guidelines/requirements for volunteers

Metrics –

- pesticide use (with goals for reduction in 10 years)
 - [pesticide risk threshold – if you use a lower-risk pesticide, you may need to use more of it](#)
- [acres of land, square feet of buildings managed](#)
- [cost of IPM methods, cost of pesticides](#)
- [complaints](#)
- [impacts \(?\)](#)
 - [Usage? Efficacy? Externalities/ramifications?](#)
- [soil health](#)
- [ecosystem diversity](#)
- [public health](#)
- other