



**SF Environment**

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A Department of the City and County of San Francisco

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Director

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**TO:** San Francisco Commission on the Environment  
**FROM:** Chris Geiger, Ph.D., IPM Program Manager,  
Toxics Reduction & Healthy Ecosystems Program  
**DATE:** September 13, 2021  
**RE:** Draft Reduced Risk Pesticide List and IPM Program Updates

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This memo includes background on San Francisco's Integrated Pest Management (IPM) Program and the Reduced Risk Pesticide List (RRPL) for City properties, a summary of the public process followed by the IPM Program, an update on the program's current and planned activities, and staff recommendations for action by the Commission.

### **Background**

San Francisco's Integrated Pest Management Program was established in 1996 and has a long history of success in reducing the use of hazardous pesticide products while improving the effectiveness of management activities for weeds, insects, plant diseases, rodents, and other pests. It has evolved into a collaborative problem-solving program with extensive posting, recordkeeping, and training requirements, along with a science-based set of restrictions on pesticide use. The Ordinance only applies to City-owned properties. From 2010 (baseline year) through 2020, City departments have reduced the use of the most hazardous (Tier I) herbicides within City limits by 96.8%.

As part of its implementation of the Integrated Pest Management Ordinance (Environment Code Chapt. 3), the Department of the Environment (SFE) maintains a Reduced Risk Pesticide List (RRPL). These pesticides may only be used as a last resort when less hazardous pest management methods prove inadequate. Each year SFE updates the RRPL to reflect changes in products, techniques, and City needs. The RRPL update begins with a hazards review of selected pesticide products, where SFE staff categorize each product as either "Most hazardous" (Tier I), "More hazardous" (Tier II), or "Least hazardous" (Tier III) according to a published protocol. SFE then convenes an interdepartmental work meeting of City pest management professionals to review each product and ask the following questions:

1. Is the product effective?
2. Is there a safer technique or product available that could be used instead?
3. Is it truly necessary to manage the pest(s) targeted by the product?

SFE then modifies the RRPL accordingly and submits the revised RRPL to the Commission for consideration.

### **Transparency and public process**

*Annual public hearing:* Per the IPM Ordinance's requirements, the Department of the Environment organizes a public hearing each year regarding pest management activities on City properties. At the hearing, City departments explain pesticide use exemptions received and any use of "Most Restricted" pesticides. The hearing affords an opportunity for the public to learn about the activities of the City's IPM Program. It is also a venue for City IPM professionals to hear the public's concerns on pest management and pesticides. The annual hearing this year was held as a virtual meeting on July 28, 2021. Three members of the public were in attendance, and one gave testimony.

*Commission on the Environment approvals:* The RRPL is on the agenda for two Commission meetings this year: The Policy Committee meeting on September 13, 2021, and most likely the full Commission on September 28, 2021. Under the IPM Ordinance, the Commission must review the RRPL annually.

*Request for written comment on the RRPL:* The Commission on the Environment Policy Committee posted the draft Reduced Risk Pesticide List as ATTACHMENT A for public comment on September 3, 2021. While all written public comment received after September 13, 2021 and all oral public comment given in person will be incorporated into the record, the Department encourages members of the public to submit written public comments before September 13, 2021. Please submit written comment to: [katie.chansler@sfgov.org](mailto:katie.chansler@sfgov.org).

As a best practice, the Department strongly urges members of the public to submit comments in writing well before 5 p.m. the day before any scheduled public meeting, so that staff and commissioners have sufficient time to review your input.

*Pesticide use trends web pages:* SFE maintains an [interactive web page](#) showing pesticide use on City properties, updated quarterly.

*Posting of exemptions granted:* Any exemptions from RRPL requirements granted to City departments are instantly posted on a [public web page](#).

### **Key changes to this year's Reduced Risk Pesticide List**

The draft RRPL (ATTACHMENT A) includes a list of proposed products and a Restrictions on Herbicides document. The major proposed changes are the removal of Weed Slayer® and Rat Ice® from the list, additional restrictions on Roundup Custom®, and the addition of four new products.

Weed Slayer is an organic-certified herbicide that was considered a promising alternative to higher hazard herbicide products; however, in late 2020 regulators discovered that it contains undisclosed active ingredients, including glyphosate. This discovery prompted SFE to immediately remove it from the RRPL, as well as state and federal enforcement actions and class action lawsuit by organic growers against the Florida company.

Rat Ice® is a Bell Labs dry ice product that proved effective at rat control in San Francisco trials. Despite repeated inquiries and a letter from the Commission on the Environment, the company has not indicated any intention to begin distributing the product on the West Coast.

City departments' ongoing efforts to reduce the use of higher hazard herbicides have led to 99.3% reduction in glyphosate usage within City limits since the 2010 baseline, with a total of less than 4 pounds of active ingredient used in 2020. SFE has further restricted glyphosate use based on departments' lessons. Glyphosate will now be permitted only in situations where alternative herbicides are at risk of translocating into nearby, protected vegetation, or leaving residues that affect protected vegetation.

New products being added include Indemnify, a low-toxicity product for use against nematodes in golf courses. Other nematode control products are much higher hazard, and the only other alternative is to completely remove and replant turf. RPD hosted successful pilot studies on this product with UC Riverside researchers. Another new product is a foaming agent (not a pesticide) called Pyrofoam, which reduces the amount of pesticide needed for use on surfaces. A bird repellent that uses a "generally recognized as safe" ingredient is also being added, along with a generic listing for beneficial nematode-based insecticides.

### **Key accomplishments from 2020-21**

- 1) Despite disruptions caused by the COVID-19 pandemic, the City maintained low levels of Tier I (highest hazard) herbicide use: Compared to the 2010 baseline, departments have reduced use of these products by 96.8%, which is equivalent to the amounts used in 2019.
- 2) Held a two-part, virtual rollout event for the "Pest Prevention By Design Guidelines for Landscapes" resource on April 26 and 28, 2021, in collaboration with ReScape-California (formerly the Bay Friendly Landscaping Coalition). The goal of these guidelines is to reduce and prevent weed and other pest problems in landscape areas by incorporating best practices at the design stage. The guidelines are in the form of a web database as well as a standalone document. As landscapes are renovated over time, City landscape architects and project managers will be able to incorporate these best practices so that fewer pesticides will be necessary in the long term. The formal rollout event was originally scheduled for April 2020 but was postponed due to the COVID-19 pandemic.
- 3) Completed interviews with property managers regarding the adoption of IPM in affordable housing projects. The interviews are part a larger project following up on pest-preventive design elements previously installed in 3,495 units of affordable housing (the "RAD" program) – a collaborative effort conducted with the Mayor's Office of Housing and Community Development. Along with surveying the level of IPM adoption in the developments, the effort will quantify the extent of pest prevention efforts and explore their impact on pest infestations. Pest infestations will be evaluated through a series of 1,200 in-unit pest inspections; these were scheduled to begin in March 2020 but were postponed to August 2021 due to the COVID-19 pandemic. The project is funded by a \$160,000 grant from the California Department of Pesticide Regulation (DPR).
- 4) Worked with the Office of Contract Administration to create a new request for proposals for citywide pest management services. This contract is in the final stage of bid evaluation and an award is expected in September

2021. The Citywide pest control contractor provides structural pest management for the vast majority of the City's properties, as well as mosquito and rat control.

- 5) Continued to provide virtual monthly IPM trainings and continuing education units for topics that included alternative herbicides, rodent contraceptive products, anticoagulant rodenticide impacts, IPM for biting and stinging insects, animal evictions, weed management areas, and management of human-wildlife interactions (total attendance ~565 people).

#### **Planned Activities in 2021-22**

In addition to its routine program activities, SFE's IPM Program plans to pursue the following projects in the coming year:

- 1) Complete DPR grant project mentioned above to evaluate pest prevention in affordable housing.
- 2) Transition to a hybrid format for monthly IPM TAC meetings (half virtual, half in person).
- 3) Update the 2013 Pest Prevention By Design (PPBD) for Structures report into a living document format, so that new tools and tactics can be easily added.
- 4) Engage national IPM networks to assist with updating the PPBD documents for both landscapes and structures.

#### **Recommendations for Commission Action**

Staff recommend that the Commission on the Environment approve the Reduced Risk Pesticide List (ATTACHMENT A).

#### **ATTACHMENTS**

- A. Draft San Francisco Reduced Risk Pesticide List, including Restrictions on Herbicides