



SF Environment

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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 14, 2020
RE: Draft Reduced Risk Pesticide List and IPM Program Updates

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 2019, City departments have reduced the use of the most hazardous (Tier I) herbicides within City limits by 96.1%.

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 Tier I 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 August 10, 2020. Four 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 14, and the full Commission on September 22. 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 August 25, 2020. Comments received by the

end of the Policy Committee on September 14, 2020 will be incorporated into an Issues and Responses Document for the September 22 Commission meeting. While all written public comment received after September 14, 2020 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 14, 2020. Please submit written comment to: katie.chansler@sfgov.org. Should you wish to provide public comment after the deadline of September 14, 2020, 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 change to the list of products is the addition of a new, less hazardous herbicide called Weed Slayer®. City IPM Coordinators, along with their counterparts at the Presidio Trust and other agencies, have been pilot testing this product since 2019 as a possible alternative to certain herbicides of concern such as Roundup® (glyphosate products). The active ingredients of Weed Slayer® are clove oil and a specific strain of bacteria that the manufacturer claims can transport the chemical into plant tissues ("systemic action"), thus killing roots along with above-ground vegetation. Finding safer herbicides with systemic action has been one of the key obstacles to further reductions in traditional herbicide use. There was consensus among City IPM Coordinators that the new product cannot yet fully replace current herbicides of concern, but the results have been promising enough that we propose adding this Tier II product to the RRPL. There are no changes proposed for the RRPL Restrictions on Herbicides, which have been developed and refined over the past four years.

Key accomplishments from 2019-20

- 1) Completed the "Pest Prevention By Design Guidelines for Landscapes" resource, in collaboration with an interagency working group. 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 for the resource, unfortunately, was postponed due to the COVID-19 pandemic.
- 2) Developed experimental designs and survey instruments for a \$160,000 grant project funded by the California Department of Pesticide Regulation (DPR), to evaluate the success of pest-preventive design elements in affordable housing projects. Staff confirmed participation by several non-profit developers; however, inspections that were due to begin in March 2020 have been postponed due to the COVID-19 pandemic.
- 3) Completed pilot testing of rechargeable, battery-powered landscaping equipment as a safer alternative to fossil fuel powered equipment and herbicides for weed control. The departments of Recreation & Parks and Public Works actively participated in these trials and are exploring purchasing additional rechargeable equipment for their landscaping crews.

Planned Activities in 2020-21

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

- 1) Organize a formal rollout of the "Pest Prevention By Design Guidelines for Landscapes" resource, mentioned above.
- 2) Complete the inspections and analyses of affordable housing units as part of the DPR grant project mentioned above.
- 3) Work with the Office of Contract Administration to complete a new Request for Proposals solicitation process for Citywide IPM Services. This is a multimillion-dollar contract that covers most of the City's structural pest control needs, as well as public health mosquito and rodent controls.

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