



SF Environment

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A Department of the City and County of San Francisco

London Breed
Mayor

Deborah O. Raphael
Director

MEMO

To: San Francisco Commission on the Environment
From: Chris Geiger, Integrated Pest Management Program Manager
Date: September 22, 2020

RE: Issues and responses on the draft Reduced Risk Pesticide List

In the Department of the Environment's public posting for the September 14, 2022 Commission on the Environment Policy Committee meeting, we promised to collate all written public comments received on the draft Reduced Risk Pesticide List, which is now before you for approval.

To date we have received one public comment on the topic. It said that "high toxicity herbicides are dangerous, unnecessary, and should never be used...especially by government agencies."
Our response: The purpose of San Francisco's Integrated Pest Management (IPM) Program was established by Chapter 3 of the City's Environment Code: "The City, in carrying out its operations, shall assume pesticides are potentially hazardous to human and environmental health. City departments shall give preference to reasonably available non-pesticide alternatives when considering the use of pesticides on City property."

The IPM Program has made substantial progress during the 24 years of its existence, including a 97.9% reduction in highest hazard pesticides since 2010. However, the IPM Ordinance does not require that herbicides (a form of pesticide) should never be used, nor do we believe that a complete ban would be in the best interests of San Francisco. There are occasional instances in which herbicides are necessary to ensure public safety, protect biodiversity, and balance the need to maintain expensive capital projects. In these cases, City staff use herbicides judiciously, as reflected by declining use trends in data provided by City departments.