



**SF Environment**

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A Department of the City and County of San Francisco

London Breed  
Mayor

Tyrone Jue  
Acting Director

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To: San Francisco Commission on the Environment  
From: Shoba Iyer, PhD, IPM Program Manager  
Toxics Reduction & Health Ecosystems Program  
Date: August 4, 2022  
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 that the IPM Program follows, 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 IPM Ordinance only applies to City-owned properties. From 2010 (baseline year) through 2021, City departments have reduced the use of the most hazardous (Tier I) herbicides within City limits by 97.4%.

As part of its implementation of the Integrated Pest Management Ordinance (Environment Code Chapter 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, SFE 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 12, 2022. One member of the public was in attendance and provided public comments.

*Commission on the Environment approvals:* The RRPL is on the agenda for two Commission meetings this year: the Policy Committee meeting on August 8, 2022, and the full Commission meeting on September 27, 2022. Under the IPM Ordinance, the Commission must review the RRPL annually.

*Request for written comment on the RRPL:* The Commission on the Environment Secretary posted the draft Reduced Risk Pesticide List as ATTACHMENT A for public comment on August 4, 2022. As a best practice, the Department strongly urges members of the public to submit comments in writing well before 5:00 p.m. the day before any scheduled public meeting, so that staff and commissioners have sufficient time to review your input. While all written public comment received after August 8, 2022, 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 August 8, 2022. Please submit written comment to: [kyle.wehner@sfgov.org](mailto:kyle.wehner@sfgov.org).

*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 addition of Reliant, the removal of Cambistat and Cambistat Row, and cholecalciferol blocks for rodent control, and use limitation amendments to use up existing stocks of Agri-Fos and Garlon 4 Ultra.

Reliant is a Tier II fungicide used on high-value trees to control fungal pathogens, including those responsible for Sudden Oak Death. Reliant is proposed for addition to the list to eventually replace Agri-Fos, which is a similar product that is no longer sold.

Cambistat and Cambistat ROW are Tier II (more hazardous) plant growth regulators used on certain street trees. Physical control methods are currently effective on these street trees and these products have not needed to be used.

Cholecalciferol (vitamin D3) blocks are Tier II (more hazardous) single feeding rodent baits. When this product was discussed during this year's work meeting of City pest management professionals, multiple departments remarked that it was not effective and proposed removing it from the RRPL.

Agri-Fos is a Tier III (least hazardous) pesticide that is limited for use in controlling specific fungal infections on high-value Coast Live Oaks and Monterey Pines. The proposed change to the use limitations is to use up existing stocks of Agri-Fos.

Garlon 4 Ultra is a Tier I (most hazardous) herbicide used only for targeted treatments of high profile or highly invasive exotic weeds. City IPM professionals report success in substituting the safer alternative herbicide Vastlan (Tier II) for Garlon 4 Ultra. Both Garlon 4 Ultra and Vastlan have the same active ingredient, but the other product ingredients make Vastlan a safer alternative to Garlon 4 Ultra. The proposed change to the use limitations is to use up existing stocks of Garlon 4 Ultra this year, and then transition to using Vastlan or other products.

Minor language changes are proposed to six other products: Aquatrols Capsil, Debug Turbo, hydroprene-only products, Rhapsody, microbial mosquito control, and bromethalin blocks for rodent control. Examples of these edits include clarifying the language in the product type column and updating a microbial species name to reflect current taxonomy.

### **Key accomplishments from 2021**

1. Despite disruptions caused by the COVID-19 pandemic, the City maintained low levels of Tier I (most hazardous) herbicide use. Compared to the 2010 baseline, departments have reduced the use of these products by 97.4%, which is equivalent to the amounts used in 2019.
2. Pest inspections, interviews, and data analysis on 1,200 units of affordable housing were completed. The work is part a larger project funded by a \$160,000 grant from the California Department of Pesticide Regulation, which follows up on pest-preventive design elements previously installed in 3,495 units of affordable housing (the Rental Assistance Demonstration, or “RAD” program). RAD is a collaborative effort conducted with the Mayor’s Office of Housing and Community Development, the Department of the Environment’s Toxics Reduction and Environmental Justice teams, and various property developers and managers. Along with surveying the level of IPM adoption in the developments, the study measured factors such as sanitation and clutter, quantified the extent of pest prevention efforts, and explored their impact on pest infestations. Results show correlations between pest levels and certain pest prevention efforts, such as sealing radiator pipes and baseboards. Cockroaches and bedbugs declined significantly since the RAD renovations were completed, despite the adverse impact of pandemic shutdowns on pest management efforts. Staff presented study results at the 2022 International IPM Symposium and at smaller meetings with City departments. Outreach related to the project is expected to be complete by the end of 2022.
3. IPM Program staff worked with the Office of Contract Administration to create and implement a new request for proposals (RFP) for Citywide pest management services. 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. The RFP featured rigorous requirements for bidders, including pest inspections and a sample IPM plan for a designated City facility. The new contract was finalized and awarded in Fall, 2021.
4. The IPM Program continued to convene virtual monthly IPM Technical Advisory Committee meetings and continuing education units for IPM topics including, but not limited to: alternative herbicides, rodent contraceptive products, weed management in San Francisco, and management of human-wildlife interactions.

### **Planned Activities in 2022-2023**

SFE’s IPM Program is in a transition phase as it is now overseen and implemented by new staff hired within the last year. In addition to learning about and maintaining its routine activities, the IPM program plans to:

1. Explore opportunities for defined funding sources.
2. Begin discussions with San Francisco Department of Public Health and other City departments with the goal of improving collaborations on vector control efforts.
3. Conduct toxicological reviews of pesticides used on San Francisco municipal properties.
4. Transition from a virtual to a hybrid format for the IPM Technical Advisory Committee meeting

series.

5. Begin updating the IPM website.

**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