

# Ashland Parks and Recreation Commission

## COMMISSION POLICY

<b>TITLE:</b> Integrated Pest Management (IPM) Policy of the Ashland Parks and Recreation Commission (APRC)	PAGE 1 of 9	POLICY No. 105
<b>EFFECTIVE DATE:</b> May 24, 2010	REVISED DATE	See below

### **Policy Introduction:**

APRC follows an Integrated Pest Management Policy adopted by the Ashland Parks and Recreation Commission in 2010.

According to Oregon Statutes (ORS 262.1), Chapter 943, an IPM is defined as:

"A coordinated decision-making and action process that uses the most appropriate pest control methods and strategies in an environmentally and economically sound manner to meet pest management objectives. The elements of integrated pest management include: (a) preventing pest problems; (b) monitoring for the presence of pests and pest damage; (c) establishing the density of pest population, which may be set at zero, that can be tolerated or corrected with a damage level sufficient to warrant treatment of the problem based on health, public safety, economic or aesthetic threshold; (d) treating pest problems to reduce populations below those levels established by damage thresholds using strategies that may include biological, cultural, mechanical and pesticidal control methods and that shall consider human health, ecological impact, feasibility and cost effectiveness; and (e) evaluating the effects and efficacy of pest treatments."

Organic pesticides (OMRI-approved – or *Organic Materials Review Institute*) are approved for use according to label instructions within the nearly 800-acre APRC system.

APRC lands are 99.25% synthetic-pesticide-free but authorization is approved for use o pesticides for the following uses and areas:

- Hornets and wasps in all areas for safety, but as a last resort.
- Median strips at the north entry of Ashland for staff safety.
- North Mountain Park infields for safety.
- Controlling Poison Oak along trails for safety.

- Oak Knoll Golf Course as outlined below:
  - The golf course will occasionally require use of higher toxicity products to keep the quality of the greens and tees playable. If toxicity is higher than table salt (LD 50 = 2,500), the course will be posted at the clubhouse and at the first green or tee that is treated.
  - The Golf Division will follow the same guidelines established for the Parks Division.
  - MSDS sheets will be posted in the golf course clubhouse.
  - Greens #4, 6, 7 and tee boxes #4, 5, 7 will be exempted from the 50-foot setback from water and care will be taken to keep synthetic spraying as far from water as is feasible.
  - Golf cart paths as needed for public safety and maintenance.

### **Background**

The IPM process first determines if a pest needs to be managed, and if so, how best to do it. Key elements are information gathering, decision making, management action and monitoring of results. IPM uses effective, low-risk strategies and practices. Management actions include cultural, physical, mechanical, manual, biological and pesticidal practices. Licensed and trained APRC professionals often select a combination of methods (pesticide applications being the method of last resort) to manage specific pest populations on a case-by-case basis, with a goal of reducing reliance on pesticides. Methods employed conform to recognized standards established and endorsed by state and federal regulatory agencies, state educational institutions, and organizations such as the Western Integrated Pest Management Center.

Examples of IPM methods within APRC lands include:

- Mulching of planting beds to reduce establishment of weeds.
- Utilizing non-neonicotinoid plants with natural resistance to pests.
- Volunteer labor that includes hand weeding, trimming, mulching and more.
- Design features that include concrete curbs, mow strips and landscape designs.
- Proper mowing, irrigation and fertilization of park turf to increase vigor and reduce weed populations.
- Application of organic OMRI-approved herbicides to control invasive weeds before seed formation to prevent future weed infestations.
- Release of natural biological controls.

APRC's Integrated Pest Management Policy is based on park planning and design, manual maintenance, ecological controls and, as a last resort, use of chemical pesticides. APRC will work to reduce or eliminate the use of synthetic pesticides and will conduct an annual review of pest management activities, which will include written suggestions to the Parks Commission for the further reduction of pesticides and for alternatives to their use.

### **Pesticide Use**

Any synthetic pesticide use will be part of an IPM approach and will only be used where an exemption to the no pesticides in Ashland parks policy has been granted by the Parks Commissioners. Risk will be minimized by careful product selection and application. When developing and updating the IPM

program, APRC staff will rely on current peer-reviewed scientific opinion about potential materials and methods, including science-based information from regulatory agencies, state university departments, university extension scientists and other experts.

- The choice to use pesticides will be based on human and ecological health and the values to be gained or preserved. Budgetary and human resource factors will also be considered.
- Only the safest, lowest toxicity products available will be used. Pesticides use will comply with all local, state, and federal regulations. No "restricted use" pesticides will be used.
- For synthetic pesticide use, the area will be posted 48 hours in advance of the application, with signage remaining a minimum of 48 hours following the application, depending on the re-entry time specified on the pesticide label or MSDS sheet.
- For non-synthetic (OMRI-approved) use, informational signage will be posted at the time of application only.

### **Oversight and Training**

- A minimum of one Park Operations or Golf Operations employee will be trained and licensed as an Oregon Licensed Pesticide Applicator and will be designated by the department director to be responsible for overseeing and authorizing all pesticide use by Parks and Golf division staff. No pesticides will be used without a Licensed Pesticide Applicator on staff.
- No employee will use or apply any pesticide without prior training.
- No employee will use or apply any pesticide mechanically or by hand <u>without event-specific</u> <u>authorization</u>.
- All Parks Operations and Golf Division employees who apply pesticides will attend an annual review of policies, procedures, and reduction strategies regarding the use and applications of pesticides.
- All pesticides will be stored in a safe, labeled, secure environment. The Parks Superintendent and Licensed Applicator will have exclusive access to the area.
- Violation of any of these policies or guidelines by Parks Operations or Golf Division staff will be grounds for disciplinary action.

### **Reporting and Review**

The APRC Director or Parks Superintendent will oversee an annual review and will present the results to the commission. The report will include water quality test results and results from any other testing conducted; comparisons from previous years' spreadsheets showing amounts and locations of pesticide applications; and will recommend specific locations, management activities, cost, and targets for reductions or elimination of pesticides.

- The Parks Commission may consider updating the IPM policy during the fiscal year as new peer-reviewed scientific information about pesticides, including inert ingredients, becomes available and as other management choices develop.
- Written record on Form 1A will be filled out after each application (attached).
- MSDS sheets will be made available to the public.

 The elected Ashland Parks and Recreation Commission will serve as the overseeing board for this policy.

#### **GUIDELINES**

### PESTICIDE SOLUTIONS AND RINSES

Following are elements to consider before beginning an application. These elements will help determine the proper amount of pesticide to mix.

- Weather conditions and predictions. Call National Weather Service at 541-779-5990.
- Acreage / square footage of the job site.
- Calendar: special events, mowing, irrigation, and so on.
- Type and size of the equipment appropriate to do the job.

When applying a pesticide, use the following procedures to reduce and safely store the rinse solution. These are secondary to label information and State and Federal regulations.

- Mix only enough pesticide solution to do the job that day.
- First add measured amount of water to tank, then put in correct amount of herbicide according to label specifications.
- Use up all pesticide, applying until the tank is empty or no more solution is coming through the nozzle.
- If pesticide mix remains, completely label the tank or sprayer with labels for the products used. Also mark the current concentration for each product, the date and the name of the locked cabinet in the Lithia Park or Golf maintenance shop, in the dedicated pesticide storage cages, until the contents can be properly disposed of through an official Hazardous Materials Collection process or event.
- When resuming spray applications the next time, either use the leftover material, or add diluted water and circulate the mix thoroughly before adding new concentrate.
- If spray tank rinsate is created, store the rinsate as make-up water for the next day. The next day's pesticide should be compatible or the same. The same labeling requirements pertain to the rinsate mix. Any residual rinsate that cannot be re-used will be labeled "unusable" and stored in a locked Golf or Lithia Park maintenance shop dedicated pesticide storage cage until it can be properly disposed of through an official Hazardous Materials Collection process or event.

Rinse the sprayer if the following conditions apply:

- It is necessary to use a pesticide incompatible with that previously used.
- It is the end of a spraying cycle.

Use the following rinse process:

1. Read the pesticide label. The following should not conflict with label information or State or Federal regulations. Contact your supervisor if you see a conflict or have questions.

TITLE: APRC IPM POLICY Page 5 of 10 POLICY No. 105

- 2. Wear protective clothing, as listed on the label when handling pesticides, pesticide containers, or pesticide equipment.
- 3. Fill the spray equipment approximately 1/4 full with clean water. Shake or agitate so that all inside surfaces are washed. If possible, use the spray hose to rinse the inside surface of the tank. These procedures should coincide with all labels.
- 4. Spray the rinse water out of the spray equipment onto an approved target area. Rinse water should be run through all hoses, booms, etc. Filters should be cleaned. Because of the dilute nature of the pesticide in the rinse water, a coarse spray can be used and is recommended to save time. Do not "pond" or saturate the soil.
- 5. If the tank is to be stored, repeat step 3 and 4 above until the tank is clean.

### PESTICIDE SAFETY

- For synthetic pesticide use, the area will be posted 48 hours in advance of the application, with signage remaining a minimum of 48 hours following the application, depending on the re-entry time specified on the pesticide label or MSDS sheet.
- For non-synthetic pesticide (OMRI-approved) use, information signage will be posted at the time of application only.
- Containers will be triple-rinsed, then punctured to make sure they are not reused.
- There will be no application of synthetic pesticides from Memorial Day to Labor Day.
- OMRI-approved non-synthetic pesticides are exempt from date restrictions and can be applied throughout the year per label instructions.
- Any spills will be cleaned up immediately and reported to a supervisor for proper handling of material.
- Personal protective equipment (PPE) will be worn according to label on product and MSDS sheets (e.g., rubber gloves, goggles, long-sleeved shirts).
- Employees will change clothes before interacting with non-work associates such as family members and friends.

### PESTICIDE REDUCTION OPTIONS

Volunteers will be used for:

- Weeding
- Mulching
- Trimming
- Mulch reduce weed growth and labor costs; minimal budget impact.
- Labor staff and volunteer crew to manually trim edges. Potential large budget impact if staff and volunteers manually edge and use less spray.
- Annuals to Perennials better ground cover, minimal labor, minimal budget impact.
- Burners burn weeds using APRC labor; possible safety issues.
- Ground Covers labor to establish weeding; higher initial costs but less expensive once established.

- Hardscape curbs, walks would require high initial investment but this would serve as long-term solution to problem spots; initial high budget impact.
- Landscape Design less formal, non- native; lower initial cost but higher costs to maintain until plants are established.
- Park Branding As part of the pesticide reduction process, a park logo will be designed to inform the public about pesticide-free areas. Communication will occur through the City of Ashland website and classes will be offered to share information and ideas with the public. This is underway with the APRC Promotions Coordinator.
- Equipment Use Where Possible higher cost to purchase; efficient use of labor; able to treat large areas.
- Lawn Height Taller lawns help shade weeds and encourage stronger growth which crowds out weeds.
- Irrigation Changes initial cost of labor and materials; long-term solution; more maintenance required for smaller heads.
- Goats problem with containment in terms of what is eaten (both desired and non-desired species consumed).
- Forestry Areas 99% spray free since 1992; manually controlled.

### PESTICIDE APPLICATIONS BY NON-APRC EMPLOYEES

In special circumstances, when a certain area needs to be addressed in a specific fashion, pesticide applications by non-APRC staff will be approved:

- Employees of commercial pesticide operator companies possessing valid state pesticide applicator licenses will be considered for approval to apply pesticides to APRC property
- The licensing variance must be specifically approved by the APRC Licensed Applicators.
- The work must occur under the direction of a contractor-supplied, fully licensed supervisor
- Before approval, there must be evidence that all trained and licensed applicators have sufficient previous pesticide application experience and a safety record to satisfy APRC's approval process. Acceptable application experience may vary, but will be of sufficient assurance to APRC of employee competence and knowledge of safe work practices. Three to five months is a likely minimum experience interval for approval. Inexperienced trainee licensed applicators will not be allowed to apply pesticides to park land.

Contractors must satisfy all of the standard applicable city contractual language pertaining to pesticide applications. These subjects may include safety precautions, liability issues, and other responsibilities. These issues are dealt with in the contract language agreed to before the project commences by both city representatives and the contractor.

The performance record of contracting businesses applying pesticides to APRC lands shall also be regularly reviewed by APRC. This review shall include an examination of past work and safety performance.

Page <b>7</b> of <b>10</b>	POLICY No. 105
	Page <b>7</b> of <b>10</b>

Employees of the Jackson County Vector and Nuisance Control agency:

APRC understands that there may be situations where the county vector and nuisance control agency has the need to apply pesticides to city property as part of their mandate to further public health goals. Communications from this agency stating their need for pesticide use for these purposes on park land will be responded to by the Licensed Applicator in a timely manner. Licensed public health endorsed applicators will be considered for approval to apply pesticides to APRC property. APRC and the county will work together to arrive at mutual agreements for activities that address public health goals and good environmental stewardship.

# City of Ashland

## ASHLAND PARKS AND RECREATION COMMISSION

340 S. Pioneer Street, Ashland, OR 97520

# Pesticide Application Record (PAR)

(to be kept for 3 years)

Applicator:	Date of Application:			
Time of Applica	on: Hour(s) Spent Applying Pesticides (X.XX):			
Name of Park o	r Property: ENTER ONE CODE per Application Record:			
T I	CIRCLE ONE OR MORE below and/or fill in the blank:  TW- treewells FL-fencelines CR-Cracks BL-bleachers SH-Shrub beds P-Ponds DU-Dugouts BF-Baseball fields R-Roses W-Wasps/Hornets A-Annuals P-Paths/Trails TC-Tennis Courts SB-Sloped Banks			
(	Other:			
Chemical: ENT	TER ONE CODE FROM the APPROVED PESTICIDE LIST:			
(	Other:			
	Liquids: Tablespoons per gallon ORounces per gallon  Granular: per square feet of coverage			
Supplier:	EPA Registration No			
Target Species	(be specific) ENTER CODE(S) FROM SPECIES LIST and/or fill in blank.			
	CODE(S)::			
	Other:			
	d: CIRCLE ONE (below) or fill in the blank: pack SQ-Squeeze Bottle HA-Handheld Other:			
Weather Condit	cions: temperature: wind conditions:			
precipita	tion:comments:			
Total amount of	f product applied (Tbsp. or ounces):			
Comments:				

TITLE: APRC IPM POLICY Page 9 of 10 POLICY No. 105

### **Policy Revision**

### Per commission approval on February 28, 2011:

The commission authorized staff to replace synthetic pesticides in all Ashland parks with organic products, using the application standards outlined in the existing Integrated Pest Management Policy, with the exceptions of Oak Knoll Golf Course and poison oak in summer months.

# Policy Revision Per commission approval on June 27, 2011:

The commission granted approval for 1) the Integrated Pest Management Policy to be amended to include the following in the Special Situations Restricted Areas policy section: 1) No spraying of synthetic pesticides is permitted in any Ashland park from Memorial Day to Labor Day, with OMRI-approved herbicides exempt from this provision [overturned by the Commissioners on June 25, 2018]; and 2) at the next scheduled annual review of the IPM Policy, staff to present a revised policy that incorporates changes consistent with the use of OMRI herbicides.

# Policy Revision Per commission approval on February 27, 2012:

The commission approved allowing for the use of non-synthetic pesticides, per label instructions, in all parks at staff's discretion with the exception of limitations imposed by other regulatory bodies. They further approved changing signage requirements to allow informational signs to be posted at the time of application only and eliminating date restrictions for applications of non-synthetic pesticides to allow for their use throughout the year per label instructions.

The commission approved allowing staff to use synthetic pesticides only as a last resort to create a safe playing environment at the infields of North Mountain Park.

# Policy Revision Per commission approval on April 22, 2013:

The commission approved modifying the integrated pest management policy to allow for an exemption request outlined by staff: use of synthetic herbicides on north entryway medians for safety purposes.

### **Policy Revision**

## Per commission approval on April 28, 2014:

The commission approved, for the 2014 season only, allowing an APRC IPM policy exemption for staff use of non-organic herbicides in two requested areas: the pitching warm-up area and the warning tracks at North Mountain Park.

## Policy Revision

### Per commission approval on May 22, 2017:

The commission approved the use of synthetic wasp spray in parks as a last resort for public safety.

### Policy Revision

### Per commission approval on June 25, 2018:

The commission made minor revisions, mostly related to editing of the document.

TITLE: APRC IPM POLICY		Page <b>10</b> of <b>10</b>	POLICY No. 105
Approved:	Mike Gardiner, APRC Chair		Date:
Approved, as to form	n: Dave Lohman, City Attorno		Oate: