



## MEMORANDUM

**TO:** Mayor and Council

**FROM:** Jose M. Guerrero, P.E., Interim Director  
Watershed Protection Department

**DATE:** March 19, 2019

**SUBJECT:** Council Resolution No. 20180628-071, Integrated Pest Management

The purpose of this memorandum is to provide you with a deliverable (attached) as required by Council Resolution No. 20180628-071 pertaining to Integrated Pest Management (IPM).

The attached report regarding IPM policy and activities at the City includes:

1. Contact information and a summary of the activities and responsibilities of the City's IPM Coordinators;
2. A summary of City codes, criteria and policies related to IPM;
3. A summary of how the IPM Program complies with federal and state regulations; and
4. A summary of City outreach and education programs aimed at reducing potential impacts of residential and commercial pesticide use.

Additionally, staff has taken the following steps to comply with the resolution:

1. Contractors performing weed and pest abatement activities for the City have been notified of the decision to end its use of chlorpyrifos and neonicotinoid pesticides and limit its use of glyphosate. This was done through an email sent out to all contractors on the City's vendor list registered as providing services for pest, weed and vegetation control.
2. Residents have also been alerted of the City's decision to end its use of chlorpyrifos and neonicotinoid pesticides and limit its use of glyphosate. We have encouraged them to follow the City's example. This was done through Watershed Protection Department social media accounts.
3. Staff has worked to ensure that all employees and hired contractors who apply or use pesticides within the scope of their duties on property owned or maintained by the City will adhere to the City's IPM Policy. This has been done through outreach to departmental pest management representatives regarding this new policy at the annual TPDES/IPM coordination meeting on February 25<sup>th</sup>, 2019, and through a follow-up email to those representatives.

Should you have any question about the attached document or IPM-related activities at the City, please feel free to contact John Clement, Environmental Program Coordinator, by phone at 512-974-1475, by email at [john.clement@austintexas.gov](mailto:john.clement@austintexas.gov), or Denise Delaney, Environmental Program Coordinator, by phone at 512-974-2581, or by email at [denise.delaney@austintexas.gov](mailto:denise.delaney@austintexas.gov).

cc: Spencer Cronk, City Manager  
Rey Arellano, Assistant City Manager



## **The City of Austin Integrated Pest Management (IPM) Program**

**Administered by the Watershed Protection Department**

March 6, 2019

The following information provides a description of the City of Austin's Integrated Pest Management (IPM) Program as administered by the Watershed Protection Department (WPD). The purpose of the Watershed Protection Department is to efficiently and effectively protect lives, property, and the environment of our community by reducing the impact of flooding, erosion and water pollution. The IPM Program was established in 1991 in response to the community's desire to protect human health and the environmental quality of our water resources. The program also assists in maintaining City compliance with state and federal rules regarding the application of pesticides (including herbicides, insecticides and fungicides) on City property.

The WPD IPM program is landscape-based and does not apply to pesticide applications in and around buildings as they are not considered potential non-point sources of water pollution. The City does not currently have a structure-based IPM program that evaluates, tracks, monitors or regulates pest control associated with buildings. All structure-based pest management activities in Texas are regulated by the state Structural Pest Control Service (SPCS). Contracts for structural pest control at City facilities generally include a requirement that applicators be licensed by SPCS and must otherwise comply with state law regarding pesticide usage in and around buildings.

### **What is IPM?**

Integrated Pest Management (IPM) is an approach which evaluates different control options for the regulation of weeds, horticultural diseases, insects and others. IPM is based on effectiveness, environmental impact, site characteristics, economics and worker/public health and safety. Control options include biological, cultural, manual, mechanical and chemical methods to prevent, or remedy unacceptable pest activity or damage. IPM utilizes all appropriate pest management options. The goal of an IPM system is to manage pests and the environment to balance benefits of control, costs, public health, and environmental quality.

## Program Responsibilities

The IPM program is co-coordinated by two WPD staff members, one in the Environmental Resource Management division (ERM) and the other on the Public Education team.

### **ERM IPM Coordinator**

John Clement

512-974-1475

[john.clement@austintexas.gov](mailto:john.clement@austintexas.gov)

### **Public Education IPM Coordinator**

Denise Delaney

512-974-2581

[denise.delaney@austintexas.gov](mailto:denise.delaney@austintexas.gov)

The WPD IPM coordinators share the following responsibilities:

- 1) Provide guidance to City departments in their use of IPM to manage pests and protect water quality.
- 2) Review IPM plans associated with new development as required by City codes and criteria or Council-approved development agreements.
- 3) Assist in maintaining compliance with state and federal law regarding application of pesticides
- 4) Educate homeowners, landscape professionals and other community members regarding IPM and water quality through the Grow Green program.

## IPM Policy

City policy on IPM and the use of pesticides on City property currently consists of the following elements:

1. All City departments with staff that perform pesticide application are responsible for complying with state laws and regulations regarding the individual pesticide applicator licenses.
2. All City departments that perform pesticide applications either through their own staff or through contractors are requested to:
  - a. Appoint a Single Point of Contact (SPOC) who will:
    - i. Attend an annual Texas Pollutant Discharge Elimination System (TPDES) compliance meeting hosted by WPD IPM staff
    - ii. Respond to WPD IPM staff questions and coordinate communication between their department staff and WPD IPM staff as needed
    - iii. Provide pesticide application records for their department to WPD IPM staff on an annual basis

- iv. Provide copies of current State of Texas pesticide applicator licenses on an ongoing basis to WPD IPM staff for all staff using pesticides on City property
- b. Have an IPM plan that accurately reflects their department's pest management practices
- c. Coordinate with WPD IPM staff whenever new products are proposed for use
- d. Report any potential adverse incidents regarding herbicide/pesticide use to WPD IPM staff.

### City Codes and Criteria

The following types of development require an approved IPM plan. Reference to City Code or criteria is provided in parentheses.

- Community Gardens (City Code 14-7-1)
- Urban Farms (City Code 25-2-863)
- Market Gardens (City Code 25-2-864)
- Vertical Mixed-Use development in the Drinking Water Protection Zone (City Code 25-2 Subchapter E, 4.3.4A4c)
- Traditional Neighborhood District (TND) Green Builder Standards (TND Criteria Manual 8.7.4)
- Open space, sustainable agriculture and athletic field development in the Critical Water Quality Zone (Environmental Criteria Manual 1.5.3B)
- Wet ponds, green stormwater controls, and retention/irrigation (ECM 1.6.3 and 1.6.7)
- Green Roof (ECM Appendix W)
- Single-family and multi-family development in the Barton Springs Zone requires a Public Education Plan, which includes IPM principles (ECM 1.6.9.2)
- The use of pesticides is prohibited in Critical Environmental Feature buffers in Barton Springs Zone (ECM 1.10.5.2.G)

IPM is also required for Youth Sports Organizations that maintain publicly-owned fields (Building Criteria Manual Section 14.2 Appendix D).

### Regulatory Compliance

Texas state law requires that a person performing pesticide application for a political subdivision possess a commercial or non-commercial pesticide applicator license, as regulated by the Texas Department of Agriculture. As stated above, City policy is that individual departments are responsible for compliance with laws governing individual licenses.

In 1998 the WPD IPM program was given the responsibility to assist in maintaining City compliance with elements of the National Pollutant Discharge Elimination System (NPDES), administered by the United States Environmental Protection Agency (EPA). This regulatory authority is now administered at the state level by the Texas Commission on Environmental Quality (TCEQ) through the Texas Pollutant Discharge Elimination System (TPDES). The City's TCEQ-approved Stormwater Management Plan describes the TPDES compliance elements of the IPM program in the 'Pesticide, Herbicide and Fertilizer Application' and 'Public Education' sections.

In 2011 the WPD IPM program began coordinating City compliance with the TCEQ Pesticide General Permit (PGP). IPM staff review pesticide application records on an annual basis to evaluate whether the City continues to meet criteria as a self-certified Level II operator under the PGP. Program staff also communicate with other City land managers regarding PGP requirements for recordkeeping, reporting, notification and taking of corrective actions as needed.

### Outreach and Education

The City of Austin provides IPM and sustainable landscaping information to homeowners, landscape professionals and other community members through the Grow Green program ([www.growgreen.com](http://www.growgreen.com)). Additional information is provided at [www.austintexas.gov/ipm](http://www.austintexas.gov/ipm). The Grow Green program is conducted in partnership with the Texas AgriLife Extension Service of Travis County. In addition, Grow Green coordinates landscape-related outreach efforts conducted by other City of Austin departments, including the following:

- Austin Energy - landscape-related energy conservation and green building
- Austin Fire Department – Austin Firewise wildfire risk management approaches
- Austin Resource Recovery – home composting and recycling
- Austin Water - water conservation and municipal sewage sludge composting
- Development Services Department – supporting a healthy urban forest
- Parks & Recreation Department – supporting sustainable landscaping through demonstration gardens and outreach
- Other departments – as needed basis, for events and new projects/programs

Additional information regarding the City of Austin IPM Program can be obtained by contacting either of the IPM Coordinators listed above.