

Carlsbad Unified School District

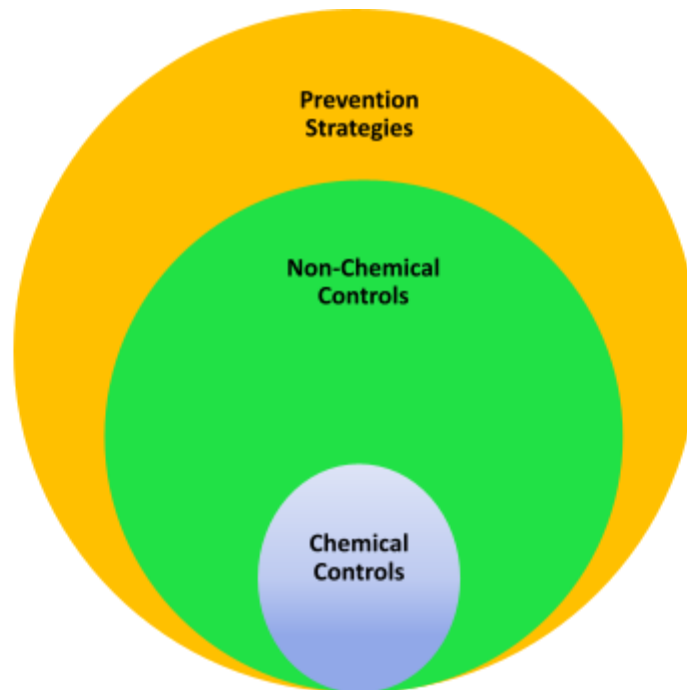
Integrated Pest Management (IPM) Program

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1.0 Introduction

Consistent with Federal and State of California requirements, Carlsbad Unified School District (CUSD) Maintenance & Operations Department (M&O) follows an Integrated Pest Management (IPM) Program for landscape and building maintenance on all CUSD maintained properties. Integrated pest management focuses on prevention of pest activity through sanitation recommendations, building repairs and habitat modifications. The IPM Program incorporates the use of prevention strategies, non-chemical controls, and chemical controls (i.e., pesticides). A pesticide is any substance, or mixture of substances, used for defoliating plants, regulating plant growth, or for preventing, destroying, repelling, or mitigating any pest that may be detrimental to vegetation, humans or animals. By definition, whether the substance is organic or synthetic, it is still a pesticide if the intent is to kill or control pests. The guiding principles of the program and a pest control ranking overview are provided below:



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CUSD Integrated Pest Management Guiding Principles

1. Prioritize the use of pest prevention strategies to avoid the use of non-chemical pest control methods or pesticides.
2. Use non-chemical controls for pests before the consideration of pesticide use.
3. Limit the use of chemical applications (i.e., pesticides) to situations where non-chemical controls have failed.
4. Emphasize the use of exempt, very low hazard and organic pesticides when chemical controls are required, and only use more hazardous pesticides as necessary to protect public health and undue economic impact.
5. Limit exposure to pesticide applicators and nearby persons or animals (especially where children, faculty and the general public congregate) and ensure proper notification before and after each use.
6. Use only pesticides that have been pre-approved by the CUSD [Maintenance & Operations Department](#)
7. Follow all [Healthy Schools Act](#) requirements and the [CA DPR School & Child Care Program](#)
- 8.

Elaboration and guidance regarding these principles is contained in the following sections;

2.0 Pest Control Protocols

CUSD prioritizes prevention and non-chemical control measures over the use of pesticides by following a systematic approach that uses extensive knowledge about pests and their hosts, such as infestation thresholds, life histories, and environmental requirements to compliment and facilitate biological and other natural control of pests. The [California Academy of Sciences Integrated Pest Management Plan](#) is used as a reference model for developing CUSD specific practices.

3.0 Prevention Strategies

CUSD implements practices to prevent the development of pest conditions that may require control. Examples include selecting plants compatible with a site's environment; maintaining good housekeeping practices, sealing points of entry into buildings, using organic materials as often as possible and applying landscape design adjacent to buildings that reduce pest habitat.

4.0 Non-Chemical Control Methods

CUSD implements non-chemical (and generally non-controversial) biological, cultural, and physical methods as a first choice to control pests. Examples include using deterrents, elimination of attractive sources i.e. shelter, food and water sources and the physical removal of pests.

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5.0 Chemical Control Methods

CUSD uses chemical controls (i.e., pesticides) only when available non-chemical resource methods fail to provide adequate control. The Maintenance & Operations Department reviews and approves specific pesticide products for specific uses within CUSD. Approved and banned products and related use restrictions are maintained in the CUSD Pesticide Inventory list available [here](#). CUSD, and its retained contractors, can only use approved pesticides from this inventory list. This inventory list will be reviewed and updated a minimum of one time per calendar year.

Pesticides are chemicals that may be used to kill fungus, bacteria, insects, plant diseases, snails, slugs, or weeds among others. These chemicals can work by ingestion or by touch and death may occur immediately or over a long period of time.

5.1 Pesticide Rankings

The CUSD Pesticides Inventory groups pesticides as follows:

- Preferred; approved pesticides can be used at discretion of trained CUSD staff when non chemical methods are not successful. These include products that are:
 1. California Healthy Schools Act Exempt (CA HSA exempt); or
 2. An Environmental Protection Agency (EPA) signal word category IV (very low toxicity).
- Exception; approved pesticides can only be used after non-chemical and “Preferred” pesticide methods are not successful, and when needed to protect risks to public health or to avoid undue economic impact. They can only be used with prior approval from a CUSD Maintenance & Operations supervisor.
- Banned; unapproved pesticides as listed on the current [AB-405 Prohibited Pesticide Products List](#) for use in California Schools and Child Care Facilities by the CA Department of Pesticide Regulation (DPR) or specifically by the Maintenance & Operations Director are prohibited from use within CUSD.

For both “preferred” and “emergency exception” pesticides, preference is given to the selection of organic based pesticides certified by the Organic Materials Review Institute ([OMRI](#)) or an equivalent certifying body.

Provisions for the use of the highest hazard products are necessary to prevent CUSD from being vulnerable to infestations, loss of plant materials, diminished use of facilities, and risks to public health.

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5.2 Ranking Resources

CUSD ranks chemical hazards primarily using the following resources for reference:

1. California Healthy Schools Act Exempt Flowchart (9/13/16)
 - a. http://apps.cdpr.ca.gov/schoolipm/hsa_flowchart.pdf
 - b. Incorporates Federal Insecticide, Fungicide, and Rodenticide Act ([FIFRA](#)) section 25b minimum risk pesticides criteria.
 - c. Gives preference to gel/paste bait formulations self-contained bait traps due to their reduced risk of exposure to people.
2. EPA Office of Pesticide Programs Label Review Manual, Chapter 7 (July 2014)
 - a. <https://www.epa.gov/pesticide-registration/label-review-manual>
 - b. Defines signal word category criteria.
3. Pesticide Action Network North America; Pesticide Database
 - a. http://www.pesticideinfo.org/Search_Chemicals.jsp
 - b. Database containing toxicity and regulatory information for pesticides.
4. Organic Materials Review Institute Product List
 - a. [OMRI Search](#)
 - b. OMRI reviews their products against the organic standards and develops clear information and guidance about materials.