

BEND-LA PINE SCHOOLS

Administrative School District No. 1

Deschutes County, Oregon

ADMINISTRATIVE REGULATION

Name: Integrated Pest Management Plan

Section: Support

Code: EBB-AR

Introduction

Bend-La Pine Schools ("District") desires to prevent unnecessary exposure of children and employees to pesticides and reduce the need to rely on pesticides when managing pests, by using pesticides only when pests have been identified and their presence has been verified. Selection of treatment options or corrective actions will give priority to least-risk actions whenever possible to provide the desired control of pests. The District will maintain a list of approved pesticides for use when it is determined that pesticides are needed, and they will be used strictly in accordance with the product label. Only properly licensed individuals are authorized to apply pesticides. When pesticide use is necessary, the District will comply with all applicable laws concerning notification and posting, and will maintain records of all pesticide use and other pest control actions.

To accomplish these goals, the District implements this Integrated Pest Management Plan ("IPM").

IPM Coordinator and IPM Staff

The District's Board of Directors ("Board") designates the Director of Facilities and Maintenance as the IPM Coordinator. The IPM Coordinator is responsible for ensuring that notice is provided to students, parents and staff and ensuring that warnings are posted in the affected area when a pesticide application is proposed, or when a pest emergency necessitates the immediate application of a pesticide. The IPM Coordinator is also responsible for overseeing pest prevention efforts, ensuring the proper identification and evaluation of pest situations, ensuring that the District uses the most appropriate means for managing pests that will cause the least hazard to people, property and the environment, ensuring the proper and lawful application of pesticides, evaluating pest management results, and ensuring that records are kept of the District's pest control measures.

The IPM Coordinator will work closely with building engineers and principals at each school to implement this IPM. Additionally, the IPM Coordinator will work with the District's Maintenance and Outside Services department staff to implement this IPM.

The Board authorizes the superintendent to appoint additional IPM Coordinators as appropriate and necessary to ensure the implementation of this IPM. Any additional IPM Coordinators appointed by the superintendent shall be subject to the education and training requirements imposed by statute and by this IPM.

An important part of an IPM is the frequent evaluation and adjustment of prevention and response efforts when pest issues arise, and when District budget and labor concerns change. Therefore, the Board authorizes the IPM Coordinator to make revisions to this IPM as necessary, provided that such revisions comply with all applicable federal, state and local laws.

District Pest Problems and Thresholds

Historically, District schools have not experienced significant pest issues during the colder months of October through March. During the warmer months of April through September, the District routinely employs pest control measures to address ants, mice, yellow jackets and wasps, gophers, rockchucks, and weeds. The District has established tolerance levels for each of these pests, above which pest

control measures are deemed necessary, and has established specific prevention management plans for each pest category. The tolerance levels and specific management plans are set forth in the Appendices.

Inspection and Monitoring

The District's pest control needs change depending on the season. Accordingly, the IPM Coordinator will implement the following inspection, monitoring, and reporting protocols:

Cold Season - Because District schools typically do not experience pest issues during the colder months of October through March, regularly scheduled inspections during these months are unnecessary. The district will rely on reports by district and school staff, students and visitors when they see pests in or around the schools. Staff, students and visitors will be asked to report their observations to the office manager, principal or building engineer, and the building engineer will conduct a more thorough inspection and evaluation of the problem using the recordkeeping and reporting protocols described in this IPM.

Warm Season – During the warmer months of May through September, the building engineer for each school will conduct regular monthly inspections of the interior and exterior of the school, and will document all such inspections in the school pest log. The District will also rely on reports by District and school staff, students and visitors when they see pests in or around the schools. The building engineer will conduct a more thorough inspection and evaluation of the problem using the reporting and recordkeeping protocols described in this IPM.

In addition, during the warmer months, the Outside Services staff shall conduct visual inspections of the grounds at each school during regular grounds maintenance visits.

Identification

When evidence of pest infestation is observed and reported, the Building Engineers and Outside Services crew will work together with their department directors and the IPM coordinator to accurately identify pests that have become an issue at school sites.

Recordkeeping and Reporting

School Pest Log

The Building Engineer for each school shall maintain a school pest log. The pest log will be used to record and document inspections, reports of pest issues, and treatment efforts. The school pest log shall be kept in the school office so that it is available for review by District staff as necessary.

The building engineer shall record the date, time, and location of his/her monthly inspections during the warmer months, as well as any observations from those monthly inspections. The building engineer shall also record all reports from District staff, students and visitors when pests are observed on school grounds, as well as observations from the building engineer's investigation of such reports. These reports shall include the date, time, location, identification of the reporting party, and identification of the type of pest observed, and whether the pest issue exceeds the tolerance levels identified in the Appendices.

The Outside Services crew shall not be required to keep a record of inspections or monitoring efforts unless a pest issue is observed which exceeds the tolerance levels identified in the Appendices. In the event that the tolerance level is exceeded, the Outside Services crew shall record their observations through the use of the District's work order system, described below.

Work Order System

When the building engineer or Outside Services crew observes a pest infestation which exceeds the tolerance levels identified in Appendices, and which requires the potential application of a pesticide, they shall use the District's online "work order" system to submit a work order request for the pest issue to the IPM Coordinator or designee. The person submitting the work order request shall print a copy of the request and place it in the school pest log. Future inquiries concerning the request and the resulting work order can then be tracked or accessed through the online system.

Upon receiving a work order to address a pest issue at a school site, the IPM Coordinator or designee will work together with Maintenance and Outside Services staff to confirm identification of the pest and that the infestation exceeds the tolerance levels identified in Appendices.

When a pesticide is applied to treat a pest issue, the IPM Coordinator shall ensure that all required notices and warnings are posted within the required timelines. A copy of each notice and warning posted shall be placed in the school pest log as a record of the application.

Treatment Options

The building engineer at each school is authorized to take independent preventative and remedial measures to control pests which do not involve the application of a pesticide. For example, the building engineer may employ the use of rodent traps for rodents and sticky monitors for insects. All such efforts shall be recorded in the school pest log by documenting the pest problem observed, and the time, date and location of the actions taken. The Outside Services crew is likewise authorized to take preventative and remedial measures to control pests on school grounds which do not involve the application of a pesticide. For example, the Outside Services crew may clip tent caterpillars out of trees, remove scorpions with tongs, or remove wasp nests. All such efforts shall be documented on forms provided by the District, which shall then be given to the building engineer for inclusion in the school pest log.

When the work order system is utilized and more extensive treatment is required, whenever reasonable, the IPM Coordinator or designee and staff will first attempt to address a pest problem through the use of measures that do not involve the application of pesticides using the guidelines set forth in the Appendices. When selecting treatment options, the IPM Coordinator or designee and staff shall consider strategies that are the least hazardous to human health, the least toxic to other organisms, the most likely to be permanent and to prevent recurrence of the pest problem, the easiest to carry out safely and effectively, the most cost-effective in the short-and long-term, and the most appropriate to the site and maintenance system. The IPM Coordinator or designee and staff will consider strategies such as habitat modification, design or redesign of the problem area to incorporate pest-resistant structural materials, increased sanitation efforts, elimination of sources of food and water for pests, and eliminating pest habitats.

When it is determined that pesticide use is required, the IPM Coordinator may authorize the application of a low-impact pesticide by a licensed pesticide applicator or a public applicator. The District shall use only low-impact pesticides included on the approved pesticide list in Appendix, and where reasonable, shall attempt spot-treatments rather than spraying large areas. Except in emergency situations, the use of pesticides shall be timed to achieve maximum effectiveness and to prevent exposure to District students, staff and visitors. The IPM Coordinator and staff shall strictly follow the application guidelines on the pesticide label, and shall provide all necessary notices as set forth within this IPM.

Whenever a pesticide is used, the IPM Coordinator or designee shall document the application by placing the labeling information and material data safety sheet for the pesticide on file at the school. The IPM

Coordinator or designee shall record, retain, and make available the following information for a minimum of four years following the application date:

1. The brand name or trademark of the pesticide product;
2. The U.S. Environmental Protection Agency registration number assigned to the pesticide product;
3. The pest condition that prompted the application;
4. A description of the area on campus where the application occurred;
5. The approximate amount and concentration of the pesticide product applied;
6. The type of application and whether the application proved effective;
7. The pesticide applicator or public applicator license numbers and pesticide trainee or public trainee certificate number of the persons applying the pesticide;
8. The names of the persons applying the pesticide;
9. The dates on which the plan coordinator gave any notices required by this IPM and by ORS 634.740;
10. The dates and times for the placement and removal of warning signs required by this IPM and by ORS 634.740.

Reentry Into Sprayed Areas

Except in the case of a pest emergency, if the pesticide label specifies a reentry time, a pesticide may not be applied to an area of campus where the school expects students to be present before expiration of that reentry time. If the label does not specify a reentry time, a pesticide may not be applied to an area of a campus where the school expects students to be present before expiration of a reentry time that the IPM Coordinator or designee determines to be appropriate based on the times at which students would normally be expected to be in the area, area ventilation, and whether the area will be cleaned before students are present.

Notification of Pesticide Applications

Non-Emergency Applications

When a pesticide is used in a non-emergency situation, the IPM Coordinator or designee will provide at least 24 hours advance notice to students, parents, school administrators, faculty and staff members, and visitors by posting a written notice on all main entrances to the school grounds for exterior applications, and on all main entrances to school buildings for interior applications. The notices shall identify the reason for the application, the name and registration number of the pesticide products to be used, the name of the applicator, the amount and concentration of the pesticide to be applied, the expected area of the application, the expected date of the application, the date and time the notice is posted, the name of the person posting the notice, the date and time that warning notices are posted in the area to be sprayed, and the name of the person posting the warning notices. The IPM Coordinator or designee shall also post at least 24 hours advance notice of the proposed pesticide application on the District's website.

Emergency Applications

After consultation with school faculty and administration, the IPM Coordinator or designee may declare the existence of a pest emergency. If necessary, a pesticide other than a low-impact pesticide may be used to mitigate a declared pest emergency. If a pest emergency makes it impracticable to give a pesticide application notice at least 24 hours before the application occurs, the IPM coordinator or designee shall provide notice no later than 24 hours after the application occurs by posting a written notice on all entrances to school grounds and school buildings that identifies the name, trademark or type of pesticide products, the registration number of the pesticide products, the expected area of application, the date of the application, and the reason for the application.

Warning Signs

When a pesticide is applied at a school facility, the IPM Coordinator or designee shall place warning signs around the application area beginning at least 24 hours before the application occurs, and ending no earlier than 72 hours after the application occurs. The warning signs shall bear the words "Warning: pesticide-treated area," shall give the expected or actual date and time for the application and provide the telephone number of a contact person for information. If a pest emergency makes it impracticable to place the warning signs at least 24 hours in advance of a pesticide application, the IPM Coordinator or designee shall place signs as soon as practicable but no later than at the time that the application occurs.

Evaluation of Emergency Pesticide Applications

Whenever a pesticide is applied at a school site due to a pest emergency, the IPM Coordinator shall review this IPM to determine whether modification of the plan might prevent future pest emergencies. The IPM Coordinator shall submit any recommendations for modification of the IPM to the Board.

Community Outreach

On an annual basis, the District shall alert students, their families, and District staff to the use and implementation of this IPM and all notice procedures through the Bend-La Pine Schools Family Handbook and Calendar that is distributed at the start of each school year.

Inquiries and Complaints

All inquiries and complaints concerning the District's IPM plan or its implementation shall be directed to the District's Maintenance Operations Manager. If the Maintenance Operations Manager is unable to resolve the inquiry or complaint, it shall be forwarded to the IPM Coordinator. If the IPM Coordinator is unable to resolve the inquiry or complaint, it shall be forwarded to the Superintendent or designee. At each step, a record shall be made of the inquiry or complaint, as well as efforts to resolve the issue or to forward it to the next level for response.

Staff Education

The IPM Coordinator shall complete not less than six hours of training each year, including at least a general review of integrated pest management principals and the requirements of ORS 634.700 to 634.750.

The IPM Coordinator shall also be responsible for ensuring that school custodial staff, District maintenance and grounds crew staff, kitchen staff, and school staff and administrators receive annual training on general IPM principals and on District procedures and protocols. The IPM Coordinator is authorized to use the District's annual online training modules for this purpose.

Contracting Pest Management Services

On occasion, the District may hire outside pest control contractors to perform some of all of its pest control actions. The IPM Coordinator shall ensure that any such contractors comply with the District's IPM, as well as all applicable federal, state and local laws. If a contractor intends to use a low-impact pesticide that is not currently on the District's approved list, the IPM Coordinator shall add it to the list.

Reviewed: 5/22/12

Approved: 6/12/12

Appendix A – IPM for Ants

Problem: District schools must occasionally deal with small ants, both indoors and outdoors. The two most common types of ants – pavement ants and odorous house ants – are not dangerous and do not transmit disease, but present a nuisance and a disruption when they enter school buildings in numbers that attract the attention of students and staff.

Threshold: The District authorizes the use of control measures to address an ant problem when ants are entering a school in large enough numbers to cause a disruption to the learning environment.

Protocols: When ants enter a school building in large enough numbers to cause a disruption to the learning environment, the District shall engage in the following efforts to eliminate the problem:

1. The Building Engineer or staff member primarily in charge of the specific area shall attempt to determine where the ants are coming from.
2. The Building Engineer or staff member primarily in charge of the specific area shall kill all observed ants.
3. The Building Engineer or staff member primarily in charge of the specific area shall make sure that any food or water sources are removed from the area.
4. The Building Engineer shall clean the affected and nearby surfaces with soapy water or disinfectant to remove the pheromone trails that encourage ants to enter an area.
5. When staff or the Building Engineer locates an area where an ant trail enters the room or building, the Building Engineer shall submit a work order to the District Maintenance Operations crew to seal any crack or hold where the ants are coming from. When necessary, a temporary seal can be made with duct tape.
6. When steps 5-6 fail to address the ant problem, low impact pesticide baits may be used. Baits should be placed out of sight and reach of students. Small amounts of low-impact pesticide gels or pastes may also be placed in cracks and crevices, and low-impact pesticide dusts may be sprayed into wall voids. The District shall limit its pesticide use to those pesticides on the District's approved pesticide list.

Prevention: In addition to sealing up cracks and holes where the ants are coming from, the District's Maintenance Operations crew should routinely seal up as many cracks and holes as time allows, especially around baseboards, cupboards, electrical outlets, pipes, sinks and toilets. Outdoors, pipe and electrical chases should be sealed off.

Appendix B – IPM for Mice

Problem: The District must occasionally deal with mice at school sites, both indoors and out. Mice carry diseases, and the proteins in their urine circulate in the air and can trigger asthma attacks in sensitive individuals. Mice reproduce quickly, and are adaptable to a wide range of habitats.

Threshold: The acceptable threshold for mice in District schools is zero.

Protocols: When evidence of a mouse or mice is spotted in school buildings, the Building Engineer is instructed to place multiple snap traps in the vicinity overnight. Traps can be baited with small amounts of peanut butter or a few drops of vanilla, orange or other extract oils. Mice mainly travel along walls, so traps should be placed against walls with the snap end facing the wall. Traps should be inspected and cleared in the mornings before students enter the area. Traps should be placed again approximately a week later to catch additional mice that may have become “trap-shy.”

When disposing of trapped or dead mice, Building Engineers should wear disposable gloves, and use plastic ziplock bags for disposal. The ziplock bag can be turned inside out, and with a hand inside the bag, the Building Engineer can pick up the rodent and the trap, then invert the bag over the hand and seal the bag. The mouse, trap and gloves should be disposed of in an outdoor dumpster or garbage can.

After disposing of the mouse and the trap, the Building Engineer should thoroughly clean the area with disinfectant spray.

When mice droppings are spotted, they should not be swept up or vacuumed because this may cause the droppings to become airborne. Instead, they should be sprayed with disinfectant until wet, and cleaned away with a wet paper towel. The towel should then be sealed into a ziplock bag and disposed of in an outdoor dumpster or garbage can. The area should then be cleaned again with disinfectant.

Prevention: The best prevention is to seal up access points of ¼ inch or more with a silicone or acrylic urethane product which can stretch as gaps and cracks expand and contract with weather changes. Trash should not be allowed to accumulate along exterior walls. Trash receptacles should not be placed close to exterior doorways. Dumpsters should be kept clean, and their lids should be kept closed. All school areas should be kept as uncluttered as possible, and food trash should be cleared away quickly.

Appendix C – IPM for Yellowjackets and Wasps

Problem: The District often deals with yellowjackets and wasps on school grounds, particularly during the warmer months. Both pests can sting people multiple times, causing reactions ranging from localized pain and swelling to more severe reactions in people who are allergic or sensitive. Yellowjackets are aggressive, and are attracted to food and sweet beverages. Wasps are less aggressive, but often nest close to school entrances, playground equipment and other structures, which increases exposure to students, staff and visitors.

Yellowjackets have a stocky appearance similar to bees, but they do not have the fuzzy appearance of bees. They are usually yellow and black or white and black, and they are fast fliers. Wasps have slender bodies, and their legs trail in flight, giving them a floaty-flier appearance that helps differentiate them from yellowjackets and bees.

Yellowjackets most often nest in the ground, while wasps build single-comb nests in high locations. The nests are completely exposed, and are attached to surfaces by a thin, short stalk.

Threshold: The acceptable threshold for wasps and yellowjackets in District Schools is zero.

Protocols: When yellowjackets or wasps are spotted on school grounds, the District shall engage in the following efforts to eliminate the problem:

1. The Building Engineer or staff member in charge of the specific area shall make sure that any food or sweet beverages are removed from the area, may kill all observed yellowjackets or wasps if a swatting implement is available, and attempt to determine where the yellowjacket or wasp nest is located.
2. If feasible based on the size of the nest, the number of yellowjackets or wasps, and the implements available, the Building Engineer may attempt to remove or destroy the nest. This should never be attempted, however, when children are present.
3. If nest removal is not feasible, the Building Engineer shall submit a work order through the District's online work order system to request the application of a pesticide from the approved list of pesticides.

Prevention: School garbage cans and dumpsters can become a food source for yellowjackets. Garbage cans on school grounds should have removable domed tops with vertical spring-loaded swinging doors, and should be emptied frequently enough to prevent the contents from impeding the closure of the lid. Both dumpsters and garbage cans should be cleaned frequently with a strong stream of water. Spilled food should be cleaned away quickly.

Appendix D – IPM for Weeds

Problem: When District athletic and playing fields become infested with broadleaf weeds, they can create uneven playing surfaces, which make play difficult and sometimes unsafe. The presence of weeds also creates a habitat for rodents such as gophers and squirrels, which in turn create mounds and holes that create safety hazards on athletic surfaces. Weeds, particularly in planting beds and around fence lines, also make school grounds look untidy and unmaintained.

Threshold: As a result of safety issues to students and athletes, the District has a very low tolerance for weeds growing in athletic and playing fields. When clover, crabgrass and other weeds cover an estimated four percent of playing fields and other similar areas, the District will take remedial and preventative action. The District also has a low tolerance for weeds growing in shrub beds and along fence lines.

Protocols: When weeds in athletic and playing fields exceed the District's tolerance level, and budget and labor concerns allow, the District will employ the use of cultivation, increased mowing, overseeding, top dressing, fertilization, and aeration to help grass compete with weeds to control weeds as appropriate. As a result of labor and budget shortages, however, the District will often need to apply a low-toxicity granular pre-emergent material from the approved list of pesticides to gain initial control of weeds in athletic and playing fields in the spring.

Along fence lines, the District will employ the use of string trimmers and "mow strips" under and immediately adjacent to fence lines. In planting beds, the District will employ the use of cultivation and string trimmers to control weeds. The District also encourages individual schools to establish classroom, student, and volunteer projects to maintain specific sections of school yards by hand-pulling of weeds and raking.

When the use of herbicides is necessary to eliminate or control weeds, the District shall first attempt spot treatments to target specific areas.

Prevention: Where possible and when budget and labor concerns allow, the District will employ horticultural controls to prevent weed issues from arising. Such horticultural controls include plant selection, competitive interplanting in plant beds and mulching.

Appendix E – Gophers and Rockchucks

Problem: Gophers and rockchucks often try to make their home on school grounds. They do so by burrowing in holes in athletic fields, which creates uneven playing surfaces and holes that students, staff and visitors can trip on or step into, resulting in injuries as well as a deterioration of the quality of the grass fields.

Threshold: The District has a zero tolerance for gophers and rockchucks, and will take action as soon as one fresh mound is observed in a playing field.

Protocols: When evidence of gophers or rockchucks is observed on school grounds, the District's Outside Services crew shall place traps to capture them. Traps should not be used when students are present without careful on-site monitoring.

When the infestation of gophers makes trapping impracticable in light of District budget or labor concerns, the District's Outside Services or Maintenance crew may apply a rodenticide from the approved pesticide list. The IPM Coordinator shall ensure that all notification, posting, and reporting requirements are satisfied.

Prevention: To discourage gophers and rockchucks from making their home on school grounds, the District's Outside Services crew shall make every effort to reduce deep rooted weeds and plants by using the protocols identified in Appendix D - IPM for Weeds.

Appendix F – Approved List of Pesticides

Pest	Product Name	EPA No.
Weeds	Roundup Pro Max	524-579
Wasps & Yellowjackets	Champ Wasp, Bee and Hornet Killer	498-156
Clover	Speed Zone Broadleaf Herbicide for Turf	2217-833
Weeds	Surflan	70506-44
Rockchucks Gophers	Zinc Phosphate On Oats	12455-102-3240
Rockchucks Gophers	Sodium Nitrate (emergencies only)	56228-2
Weeds	Caseron	400-168-59807
Ants	Temprid SC Insecticide	432-1483
Ants	Tempo SC Ultra	432-1363
Ants	Termidor SC	7969-210
Mice	Weatherblock XT	100-1055
Weeds	FusiladeDX	100-1070

**The District uses a marker dye called Turf Trax Blue, which does not contain any pesticide or herbicide products. It is used exclusively to mark areas that have been sprayed with pesticide or herbicide.

**The District uses a binder agent called Dyne-Amic that is mixed with certain approved herbicides to promote adhesion of the herbicide to the targeted pest.

**The District uses an anti-foaming agent called FoamBuster that is mixed with certain approved herbicides to reduce foaming during an herbicide application.