

Do you use pesticides in the parks?

Milwaukee County Parks follows a least-use chemical policy. So for example in our open green spaces like Veteran's Park, we do not use fertilizer, pesticides or insecticides. On our Golf courses we do utilize chemicals as needed to maintain good turf conditions, but we do so in a responsible manner. We also utilize Integrated Pest Management Plans so that we are not solely dependent on chemicals on the courses. In the case of invasive plant species in our natural areas, such as Buckthorn or Honeysuckle, our staff will treat cut stumps, but do not administer broadcast treatments. We address these invasive species so that they do not overtake our native plants.

Here's our full policy:

Milwaukee County Integrated Pest Management Plan

The purpose of this plan is to reduce pesticide use to the greatest possible extent within the park system. Milwaukee County Parks agrees with the United States Environmental Protection Agency's (EPA) position that states: "all pesticides are toxic to some degree, and the commonplace, widespread use of pesticides is both a major environmental problem and a public health issue." For this reason, all Milwaukee County Park divisions will evaluate and give preference to non-pesticide management practices, use reasonably available alternative pest control methods, and will minimize their pesticide use through an Integrated Pest Management Plan (IPMP).

- 1. DEFINITIONS
 - a. *Biological Controls* – support or introduction of natural predators or parasites of the pests to be controlled. Caution should be used when initiating this technique, because biological controls have led to significant ecological damage across the country. In numerous cases, the introduced bio-control has done more damage than the pest species it was introduced to control. State and/or federal permits will be likely when this technique is used.
 - b. *Cultural Controls* - practices that can reduce pests by making the environment less favorable, such as improved sanitation, adhering to best management practices for land management, or improved horticultural practices (ex: preventing the installation of vegetative material considered invasive).
 - c. *EPA Special Review List* - EPA may initiate the Pesticide Special Review process when it has reason to believe that the use of a registered pesticide may result in unreasonable adverse effects on people or the environment. The EPA lists the pesticides that are under Special Review.
 - d. *Integrated Pest Management Plan (IPMP)* is a decision-making process. The essential parts of IPMP are monitoring, identifying the causes of the pest problem, addressing the cause of the problem when applicable, and using the most effective methods to control the problem, before using chemical controls. IPMP develops ways to change the conditions that cause the pest problem, so that pests will be prevented in the future or minimized to the greatest extent possible. Prevention of pests utilizing non-toxic methods is preferred.
 - e. *IPMP Coordinator* – Department staff person who is responsible for developing, implementing, and reviewing the pest management plan for the Department.
 - f. *IPMP Committee* – Assigned staff members from Administration and Planning, Operations, and Recreation and Business Services divisions who will serve as liaisons between their corresponding divisions and the IPMP Coordinator.

- g. *Mechanical Controls* - direct measures that either kill the pest or make the environment unsuitable for their entry, dispersal, or survival, such as: tilling the soil to expose insects, selective mowing, prescribed burning, erosion control, trapping, or hand removal of undesirable vegetation.
- h. *Personal Protective Equipment* – Personal Protective Equipment or PPE is equipment worn to minimize exposure to a variety of hazards. Examples of PPE include such items as gloves, foot and eye protection, protective hearing devices (earplugs, muffs) hard hats, respirators and full body suits.
- i. *Physical Controls* - practices that physically keep pests from places where they're not wanted, such as window screens and sealing cracks and crevices.
- j. *Pesticides* – substances that kill or repel pests. For this document, they include herbicides, insecticides, fungicides, and rodenticides.

- 2. NON-PESTICIDE MANAGEMENT

- Milwaukee County Parks follows a “least-use” plan on all parkland and works to minimize, if not eliminate, the use of pesticides in heavy traffic areas for children, families, and animals. Heavy traffic areas include playgrounds, farmer’s markets, outdoor concert spaces, and dog exercise areas. Non-pesticide management is practiced using Cultural Controls, Physical Controls, Mechanical Controls, and Biological Controls prior to the use of any pesticide.

- 3. PESTICIDE USE

Pesticides may only be used if:

- a. The non-toxic methods of pest control, such as Cultural Controls, Physical Controls, Mechanical Controls, and Biological Controls have been shown to be ineffective based on-site conditions; and,
- b. Monitoring has indicated that the pest will cause unacceptable ecological, health, or safety hazards, or an unacceptable reduction in the intended use of the property.

- 4. USE OF PRIVATE CONTRACTOR

If a pest control program is performed through a private contractor, the contracts for these services will require the contractor to comply with the Parks Pesticide Management plan. The contractor must furnish the IPMP Coordinator for the division served with the following for each pesticide applied:

- a. Specific pesticide product that is desired and rate of use prior to application. Milwaukee County Parks reserves the right to deny the use of any pesticide that it deems inappropriate for site conditions.
- b. Date, purpose, location, amount of product, and amount of active ingredient for each application.
- c. Product labeling and material safety data sheets for each product applied.
- d. Documentation of applicator certification and conformance with all Federal and State permits.

- e. Monitoring should not be solely performed by the contractor hired to treat the pest problem. The IPMP Coordinator or appropriate staff should review a portion of the affected area for quality control purposes.

- 5. MONITORING AND REPORTING

All divisions will maintain appropriate records on pest monitoring data collected, pest control actions attempted (both non-chemical and chemical), and results of pest control activity. The Parks Departments will submit annual report to the County Board for the March 2020 cycle. This report will contain the following:

- a. Completed Pesticide Application Summary for all pesticide applications made in the previous year. Application data will include: purpose, location, and amount of each pesticide product applied, including the amount of active ingredient.
- b. Annual summary of non-chemical pest control activities.
- c. Estimated size of the total area managed for each pest problem in a given year.
- d. A summary of any complaints received regarding use or the perceived need for use of pesticides, including the date complaint(s) was (were) received and the nature of the complaint(s).
- e. A standard notification plan that provides, at a minimum, readily visible posting for the designated length of time following the application required by the pesticide's label.

- 6. IPMP COORDINATOR AND IPMP COMMITTEE

Milwaukee County Parks will designate an IPMP Coordinator and create an IPMP Committee. The duties of the Coordinator and Committee shall include:

- a. IPMP Committee members collect pesticide application reports from corresponding staff and contractors and deliver them to the IPMP Coordinator.
- b. The IPMP Committee will meet once annually to discuss past experiences and recent advances in pest management practices. The group may choose to meet more frequently as needed.
- c. The IPMP Coordinator will annually review the EPA Special Review list and make staff aware of pesticides currently on that list.
- d. Host annual training for staff who may use pesticides as part of their required work activities.

- 7. TRAINING & EMPLOYEE SAFETY

The IPMP Coordinator and all supervisors having responsibility overseeing the handling, application, disposal or storage of pesticides shall be certified under the Department of Agriculture, Trade and Consumer Protection's Pesticide Applicator Certification Program. All employees applying pesticides shall be State certified or working under the direct supervision of a certified applicator. All employees having any involvement with pesticide handling, application, disposal or storage shall receive basic training in pesticide safety during their annual training as well as annual training and updates. State-required Personal Protective Equipment (PPE) shall be available to all employees having any involvement with pesticide handling,

application, disposal, or storage. Signage on proper pesticide handling, application, disposal, and storage will be clearly posted. Directions on proper pesticide handling, application, disposal, and storage will be readily available to all employees having any involvement with pesticides.

- 8. PUBLIC SAFETY

- Milwaukee County Parks is committed to the public's safety. Milwaukee County Parks will protect the public in relation to pesticides through:
 - a. Minimizing the use of pesticides by using this IPMP including, Cultural Controls, Physical Controls, Mechanical Controls, and Biological Controls prior to pesticide use, especially in heavy traffic areas.
 - b. Limiting the use of fertilizers, pesticides, and insecticides on open green spaces, and restricting application to periods of low use by the public
 - c. Administering pesticides on baseball diamonds, only at the request of user groups, and then only during times of least use
 - d. Placing signage and proper notice whenever pesticides are used
 - e. Requiring that all employees having any involvement in pesticide handling, application, disposal, and storage of pesticides are properly trained. All full-time Parks Operations employees shall be certified through the Department of Agriculture, Trade and Consumer Protection's Pesticide Applicator Certification Program administered by the State of Wisconsin, and will recertify every five years.
 - f. Experimenting with non-selective organic weed killers, such as Finalsan, in place of traditional pesticides
 - g. Annually training and updating employees on safe handling, application, disposal, and storage of pesticides.
 - h. Educating the public by making this IPMP easily accessible on the Parks' website
- 9. STORAGE

All divisions storing, using, and disposing of pesticides and pesticide containers will do so safely according to instructions on the product label and any State and Federal regulations where applicable. The Parks Department will regularly conduct a collection and disposal program of expired pesticides for its internal facilities.

- 10. SPECIAL CONDITIONS

- a. If a private contractor is found to be out of compliance with this plan by the IPMP Coordinator or an IPMP Committee member, this non-compliance will be considered grounds for terminating an existing Milwaukee County Parks contract with the contractor and the contractor will not be allowed enter into a contract with any Milwaukee County Parks for one year after the date that non-compliance was determined.
- b. All use of pesticides for conservation purposes, for the control of invasive species, must be reviewed and approved by the Natural Areas Program Manager, and comply with all other aspects of this pest management plan including reporting and posting requirements.

- c. Golf courses have the opportunity for pesticide reduction by incorporating more cultural methods and increasing weed tolerance of golfers through educational efforts, following guidelines set forth by the Audubon Golf Sanctuary Program.
- d. Boerner Botanical Gardens and other Milwaukee County Parks sites managing large garden areas will continually explore and implement opportunities for non-toxic garden management.

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