



## **The City of Laredo Integrated Pest Management (IPM) Program Administered by the Environmental Services Department**

The city of Laredo Integrated Pest Management (IPM) Program is currently administered by a collaboration between the Environmental Services Department (ESD), which is in charge of implementing the Texas Pollution Discharge Elimination System (TPDES), and the Parks and Recreation Department (PRD). The purpose for incorporating this program is to more effectively and efficiently protect lives, property, and the community's environment by reducing the potential for water quality degradation from pesticide stormwater runoff to our Municipal Separate Storm Sewer System (MS4) and water bodies of the state. The IPM program was created in response to the community's desire to protect human health and quality of our water resources. The program also assists in maintaining City compliance with state and federal rules and regulations regarding the application of pesticides (which include herbicides, insecticides and fungicides) around city owned open public areas.

The ESD/PRD IPM program is landscaped-based and does not apply to pesticide applications in and around buildings as they are not considered potential non-point sources of stormwater 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.



## Historical City Regulatory Compliance

Since 1992, the Environmental Division of the Engineering Department was given the responsibility of preparing a stormwater pollution prevention program in order to comply with the Federally mandated National Pollutant Discharge Elimination System (NPDES) Stormwater Discharge Permit, which is administered by the United States Environmental Protection Agency (EPA). This federal regulatory entity has transferred the program's administrative duties to each of the union's states; thus, in Texas, through the Texas Pollutant Discharge Elimination System (TPDES), such duty has become the responsibility of the Texas Commission on Environmental Quality (TCEQ) regulatory agency. In 2001 the City Council voted to upgrade the Environmental Division of the Engineering Department to the Environmental Services Department. The City's TCEQ approved Stormwater Management Plan (SWMP) includes the City's TPDES compliance elements of the IPM program in the 'Pesticide, Herbicide and Fertilizer Application' section of the plan.

### IPM Definition

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. Optional 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 different city staff members, one in the ESD and the other in the PRD.

### **Assistant Director**

Tomas Ramirez  
Parks & Recreation Department  
956-795-2350  
tramirez2@ci.laredo.tx.us

### **Environmental Specialist**

Eddie Herrera  
Environmental Svcs. Dept.  
956-794-1650  
eherrera@ci.laredo.tx.us

### **The ESD/PRD coordinators share the following responsibilities:**

1. Provide guidance and annual educational trainings to all City pesticide applicators in their use of IPM to manage pests, prevent pesticide runoff to MS4 and protect the water quality of state surface water bodies.
2. Review of IPM plans associated with New Development as required by City Ordinance Codes and Criteria or any Council-Approved Development Agreements.
3. Making sure that any private contracted pesticide applicators are professionally certified with any required federal and/or state pesticide applicator licenses/certifications, that all city employee pesticide applicators also become federal and/or state certified applicators and that they remain current with their license accreditations and continuing education hours.
4. Educate homeowners, landscape professionals, city employee pesticide applicators and other community members regarding IPM, Stormwater Protection Regulations/Penalties, available Best Management Practices BMP's, Alternative Mechanical Pest Control Methods, How pesticide runoff



may reach and affect Surface Water Quality, and the Potential Health Effects on the Ecosystem Food Chain, from the Microscopic Organisms, to the Water Flora & Fauna, and ultimately to Humans.

## **IPM Policy**

In the past, the City has worked with licensed commercial applicators and has partnered with the Agricultural Extension Service to conduct trainings. Also, the Parks and Recreation Department has distributed educational information to its employees and has looked towards subcontracting Pest Control Services to private companies. The City has looked for alternatives to using pesticides and herbicides and has utilized lady bugs (released at Keep Laredo Beautiful Events) and other beneficial insects for pest control as well as conducting Tire Roundup Events and Minnow releases for Mosquito control, but there has not been a formal plan of action added to any city ordinance.

The new City policy on IPM was prepared in order to apply the safest and most effective method to control pests while reducing the amount of pesticide utilized and minimizing the possibility of having storm water pesticide runoff, from city grounds, into the MS4 or directly into surface waters of the state. The City IPM has evolved and its plan includes the following elements:

1. 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. City policy follows that individual departments are responsible for compliance with laws governing individual licenses. All City staff from those departments which 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 private contractors, are required 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 ESD/PRD IPM staff
- ii. Require and coordinate active participation of their application staff with ESD/PRD IPM staff in interactive experience sharing discussion sessions, which includes the application of the most practical and effective IPM Best Management Practices (BMPs), and if necessary, reviewing the particular pesticide safety application techniques and the appropriate safety equipment needed for the job at hand. Such interactive discussion sessions are focused at determining the best course of action for the job that will best treat the particular pest problem at hand while leaving the use of pesticides as a last resort.
- iii. Provide copies of current State of Texas Pesticide Applicator Licenses, from all staff using pesticides on City grounds, on an annual basis to ESD/PRD IPM staff.
- iv. Collect and Maintain Pesticide Application Records, from all their staff applying pesticides on city grounds, in order to Provide such records to ESD/PRD IPM staff, who in turn will prepare and enter the data, in its appropriate format, into an annual TPDES City Permit Report, which in turn will be submitted to the Texas Commission on Environmental Quality (TCEQ).



- b. Have an IPM plan that accurately reflects their individual department/business Pest Management Practices.
- c. Coordinate with ESD/PRD IPM staff whenever new products are proposed for use.
- d. Report any potential adverse incidents regarding herbicide/pesticide use to ESD/PRD IPM staff.