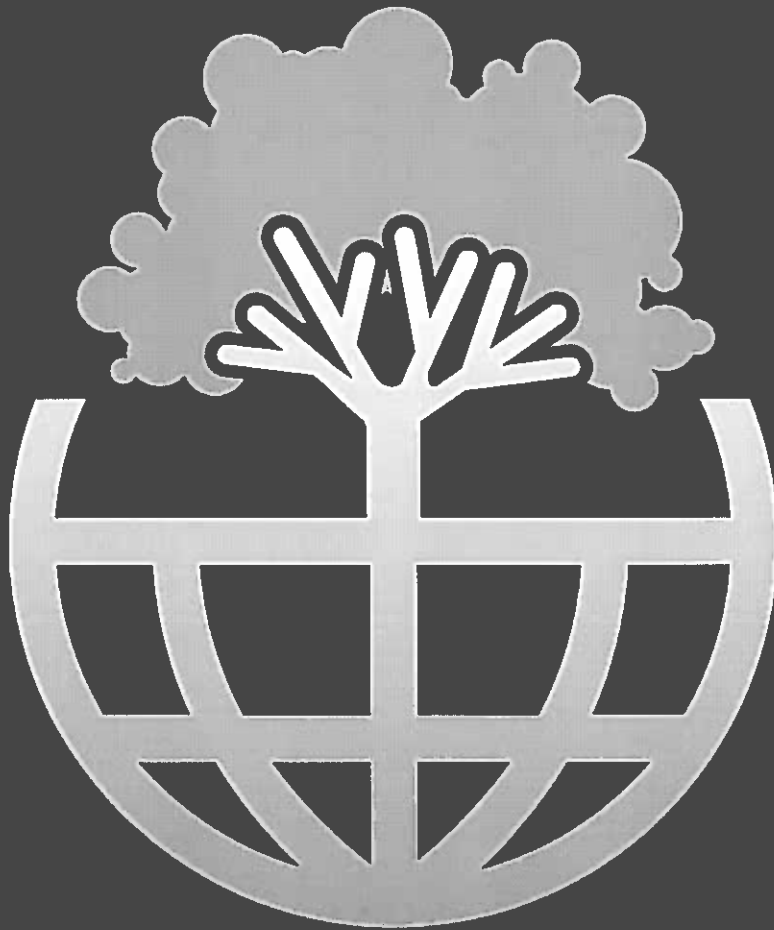


# Pesticide Use and Pesticide Reduction Efforts



A Report to the Evanston City Council in Compliance with the City of Evanston  
Sustainable Pest Control and Pesticide Reduction Policy April 23, 2018



City of  
Evanston™

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## I. Introduction and Background

In 2010, the City Council adopted Resolution 20-R-10, the *City of Evanston Sustainable Pest Control and Pesticide Reduction Policy*, which laid the groundwork for pesticide reduction across City operations and on City-owned or -leased properties (Sec. 1.1). The Resolution spells out specific steps for the City to take to reduce pesticide applications, including implementation of an Integrated Pest Management (IPM) strategy and the designation of an IPM Coordinator, to ensure compliance with the provisions of the Resolution (Sec. 1.3).

The Resolution also provides a list of prohibited pesticides (Sec.1.4), along with a list of eight exemptions for pesticides used for specific purposes (Sec. 1.5). The complete Resolution is attached to this report.

### Definitions

**Pesticide:** Any substance intended to control, destroy, repel, or mitigate a pest. Pesticides include, but are not limited to, herbicides, fungicides, insecticides, rodenticides and any other compounds and organisms, naturally occurring or otherwise, requiring registration or exempt from registration under the *Federal Insecticide, Rodenticide and Fungicide Act* (7 U.S.C. 136) and subsequent regulations under 40 CFR 150-189. (Sec. 1.2.b)

**Integrated Pest Management (IPM):** A pest management technique that gives preference to the safest pest control methods and uses conventional chemical pesticides only when no other feasible alternative exists. It addresses the underlying causes of pest problems and seeks to find effective long-term solutions that emphasize prevention. (Sec. 1.2.d)

**Prohibited Pesticides:** These include (1) those classified by the US EPA as known, probable, likely, possible, or suspected carcinogens; (2) those classified by US EPA as Toxicity Category I and Toxicity Category II pesticides under 40 CFR 156.62 and 156.64; or (3) chemicals known by the State of California to cause cancer or reproductive toxicity as published on the Proposition 65 (*Safe Drinking Water and Toxic Enforcement Act of 1986*) list pursuant to Title 27 of the *California Code of Regulations*. (Sec. 4)

### Roles and Responsibilities

The Illinois Department of Agriculture has authority over pesticide applications performed within the State on all public and private properties. The Illinois General Assembly, in the introduction to the Illinois Pesticide Act (415 ILCS 60/1 et seq.), states: "The purpose of this Act is to regulate in the public interest the labeling, distribution, use and application of pesticides as herein defined."

State law requires anyone in Illinois applying general-use and restricted-use pesticides in the course of employment to be licensed. Persons applying *restricted-use* pesticides on property they own or control must have a private applicator license. Persons

applying *general-use* pesticides on their own property are exempt from licensing requirements.

The Illinois Department of Public Health certifies and licenses individuals applying pesticides in and on man-made structures for purposes including, but not limited to, bird control, rodent control, wood treatment and insect control. City of Evanston staff and contractors hired by the City who may apply pesticides are all required to maintain a current license from the State at all times.

The North Shore Mosquito Abatement District is separately permitted through the Illinois Environmental Protection Agency, Division of Water Pollution Control. The District applies every three years for an overall permit to implement mosquito controls within its entire service area, which includes the City of Evanston.

## **II. City of Evanston Pest Control Practices and Reduction Efforts**

### **A. Health & Human Services**

#### **Bedbugs**

City inspectors offer consultation for residents and conduct onsite inspections to provide residents with information on treatment as well as tips on how to avoid bringing bedbugs into the home. In cases where bedbugs are found, the Inspectors ensure that licensed Pest Control Operators are hired and that approved methods are used to eradicate the infestation. This approach also applies to roaches and any other nuisance or disease-carrying insects.

The City also re-inspects to ensure eradication of the insects.

The table below shows the number of bedbug complaints received from 2015-2017

Year	Bedbug Complaints
2015	24
2016	8
2017	18

#### **Rodent Control**

A rise in the number of rodent complaints prompted the City to provide rodent control services through Rose Pest Solutions beginning in 2012. The Evanston Health & Human Services Department tracks and investigates 311 service requests, inspects alleys and properties for rodents, and performs and contracts for baiting and exterior treatment for residential properties.

The table below shows the City's rodent treatment requests from 2015-2017.

Year	Rodent Treatment Requests
2015	1,280
2016	1,108
2017	747

The City's professional agreement with Rose Pest Solutions requires the contractor to employ a responsible method of integrated pest management by providing services with the least possible hazards to people, property and the environment. All materials and rodenticides used must conform to applicable federal, state, county and local laws, statutes, ordinances, and regulations, and all materials used must be registered with the Environmental Protection Agency.

The rodenticides used are placed in resistant, sturdy bait boxes with small openings that will allow only small rodents such as rats to get inside. No rodenticide of any kind is allowed on private property without prior consent of the property owners by signature of a Release of Liability waiver. To encourage transparency, the City's Health Department [website](#) includes information on the rodenticides used by Rose Pest Solutions and the Release of Liability form.

## **B. Environmental Services**

### **Parks**

The public parks maintained by the City of Evanston are generally pesticide free, with a few exceptions. The majority of the parks do not receive blanket applications of any pesticides. If deemed necessary due to an outbreak of insects or disease, or a heavy infestation of weeds or invasive plants, spot spraying may be performed on that specific location and only within the limits of the problem area.

Staff does not currently use any pesticides to control grubs on any park properties, as many of these products contain neonicotinoids, which were officially banned on all City owned or leased properties in July of 2016. Recent research suggests a possible link between pesticides that contain neonicotinoids and the die-off of plant pollinators, including honey bees, native bees, butterflies, moths, and other insects. Neonicotinoids are synthetic chemical insecticides similar in structure and action to nicotine, a naturally occurring plant compound. Neonicotinoids absorbed into plant tissue can remain present in pollen and nectar, making them potentially toxic to pollinators.

The City has reduced its use of pesticides within the parks by more than 60 percent in the last five years. In 2016, the City stopped using Roundup (a non-selective herbicide containing Glyphosate) anywhere within the lakefront parks. In 2018, the City plans to cease using products containing Glyphosate altogether since the State of California recently added the herbicide to its list of chemicals known to cause cancer or

reproductive toxicity under Title 27 of the *California Code of Regulations* (Sec. 1.4. Prohibited Pesticides). Greenways staff is researching alternative products to use during the 2018 growing season.

### **Athletic Fields**

Due to the heavy usage of these locations, and in order to maintain a healthy and safe stand of turf, staff applies both fertilizers and selective herbicides to most of the formal athletic fields. Herbicides are typically applied either annually or biannually, depending on specific field conditions each fall. Additionally, beginning in 2017, the City began using only herbicides classified by the US EPA as Toxicity Category III, per the Resolution.

### **Fertilizers**

Beginning in 2012, the City switched to the use of organic fertilizers on all athletic fields and public parks. The athletic fields receive two applications of fertilizer per year, and some of the City's larger, high-use parks receive one application per year.

### **Merrick Rose Garden**

Due to the species of roses being grown at this location, the use of fertilizers and fungicides is necessary to maintain healthy plants. There are currently four different fungicides being used at the site, two of which are Toxicity Category II products, and two are Category III. Staff will research alternatives to the Category II products to determine if there are less toxic products that are effective.

### **Lovelace Park Pond**

Staff has contracted out the maintenance and control of aquatic weeds and algae at this location for the past several years. If left unchecked, the algae and weeds would overwhelm the pond and create an unhealthy condition for both park users and the fish and other aquatic life in the pond. The products that have been used to control the weeds and algae are all Toxicity Category I and II, so staff will work with the contractor to try and find alternative Toxicity Category III products for the 2018 season.

### **Treatments to Prevent Dutch Elm Disease**

Each summer, a portion of the public American elms are injected with a fungicide to prevent them from contracting this fatal disease. The fungicide, Arbotect, has been used by both staff and outside contractors every year since 2004, with a success rate of better than 98 percent each year. Since this product is classified at Toxicity Category III, its use is allowed under the Resolution guidelines. The product is mixed and diluted in water at a ratio of 1:64, or 2 ounces of product per gallon of water, and then injected through plastic tubes directly into the base of the trees. This results in minimal exposure potential to the applicators or anyone near the application site.

### **Bees/wasps and Cicada Killers**

Public Works Agency staff has seen a recent rise in the number of resident complaints about these three insects. Staff takes a very conservative approach when dealing with the complaints and rarely, if ever, uses pesticides on cicada killers (which are harmless

to humans). The bee and wasp complaints are usually one of two types: a paper wasp nest hanging low from a tree in a high pedestrian area, or a ground bee nest within or near a park playground. If and when staff confirms that the insects present a threat, then the nests are typically sprayed and removed in the very early morning hours before most residents are out and about.

### **Signage/notification**

For all public properties where pesticides are to be applied, warning signs are posted in highly visible locations around the perimeter of the area to be treated at least 72 hours prior to the application. The signs remain in place for at least four days after the application and include all required information, such as the product applied, the time and date of the application, and the name and phone number of the IPM Coordinator. City staff currently has no listing of residents who have requested direct notification prior to any pesticide applications.

The signage requirements of the Resolution are more restrictive than those of the Illinois Department of Agriculture, and the signs used go above and beyond complying with the Illinois pesticide application regulation regarding size, color and wording.

## **III. City of Evanston Training, Outreach, and Education Activities**

### **Staff IPM training**

Per the Resolution, the IPM Coordinator conducted training sessions on safe pesticide use in May of 2017 for all City Divisions involved with the application of pesticides. This general training will be held every two years per the Resolution. In addition, more in-depth training will be conducted annually with all employees who are licensed pesticide applicators in those Divisions that regularly conduct applications on City properties.

### **Website**

A new web page is under development that explains the City's IPM policy and the City's efforts to reduce overall pesticide usage. Staff anticipates the page to be completed in the spring of 2018.

### **Partnerships**

In 2015, the City of Evanston and Greenwise Organic Lawn Care launched a pesticide-free park pilot program in conjunction with the Midwest Pesticide Action Center. At that time, the program included five parks: Ackerman, Burnham Shores, Eiden, Perry, and Trahan. In 2017, the grounds surrounding the Evanston Animal Shelter were added as a sixth location. This partnership allows for alternative weed control methods to be used in the selected parks, such as mowing high to increase root strength and naturally shade out weeds and improving soil health for natural weed resistance.

### **Other Activities**

In March 2016, Mayor Tisdahl proclaimed a Monarch Butterfly Day and committed the City to 12 "Monarch Pledge" action steps. Several of these action items have already been completed, with more underway. Completed items include

- Revisions to the City Weed Ordinance (1) to ban neonicotinoid pesticides and (2) to change the definitions of weeds and mowing and landscaping requirements so as to encourage pollinator habitats.
- Installation of a monarch-friendly demonstration garden on the grounds of the Lorraine H. Morton Civic Center.
- Launching of a public communications effort in conjunction with the National Fish and Wildlife Federation to encourage citizens to plant monarch gardens at their homes or in their neighborhoods.
- Expansion of ongoing invasive species removal programs to make it possible to re-establish native milkweed and nectar plants in the landscape.

In February 2017, the City Council adopted a resolution urging the Illinois General Assembly to repeal the state's pre-emption of the right of local governments to adopt pesticide regulations that are more restrictive than State law. To learn more about efforts to repeal this law, visit the [Midwest Pesticide Action Center website](#).

#### **IV. City of Evanston Pesticide Reduction Goals for 2018-2020**

- Conduct annual in-depth training with all City employees who are licensed pesticide applicators.
- Achieve and document further reduction in toxicity of products used. Eliminate the use of Glyphosate anywhere on City property.
- Explore the use of biosolids on City property as an alternative to synthetic fertilizers and toxic pesticides.
- Develop criteria to select city properties to add to the Pesticide-Free Parks program, based on aesthetics, visibility and labor needs. Codify best practices, such as twice-yearly aeration, and metrics to use, such as percentage of dandelions reduced, to showcase the beauty and practicality of pesticide-free city properties.
- Reduce flooding/improve drainage in selected city parks as part of other capital improvement projects.
- Take photos in 2018 and again in 2020 to document progress.
- Continue to add to, and enhance the content on, the City's pesticide use and reduction webpage.
- Develop and implement a comprehensive public outreach initiative to educate residents, property managers, and landscapers about the City's Pest Control and Pesticide Reduction Policy and engage them in reducing their use of pesticides. Give special attention to the larger institutions in the community, including Districts 65 and 202, Northwestern University, Evanston NorthShore Hospital, and Saint Francis Hospital.

#### **V. Non-City of Evanston Pest Control Services and Practices**

##### **Commercial Pest Control Services**



Illinois law imposes certain requirements regarding pesticide use by “applicators-for-hire,” meaning landscapers or other commercial pest control companies.

- *Lawn markers:* After applying lawn care products to a lawn, an applicator-for-hire must place a lawn marker at the point of entry to the lawn. It must state that a lawn care application was made and must include the name and business telephone number of the applicator.
- *Advance notification of neighbor’s spraying:* Any neighbor whose property abuts or is adjacent to the property of a customer of an applicator-for-hire can receive prior notification of an application by contacting the applicator and providing his/her name, address, and telephone number. The applicator is then required, at least a day before a scheduled application, to notify the neighbor in writing, in person, or by telephone, providing the date and approximate time of day of the application.

**Schools and Day Care Centers**

Illinois law requires that schools and licensed childcare centers use an IPM program when economically feasible. Facilities requesting an exemption from the IPM requirement must notify the Illinois Department of Public Health in writing. Schools and childcare centers must maintain a registry of parents and guardians of students, as well as employees, who have requested advance notification of any pesticide applications. They must provide notification of the availability of this registry at least once each year.

**North Shore Mosquito Abatement District.**

Mosquito control in Evanston is carried out by the North Shore Mosquito Abatement District (NSMAD) and by the City of Evanston. NSMAD is funded by property taxes levied in the 13 municipalities in the abatement district, and the City staff’s participation is funded by state grants. NSMAD’s abatement program is based on IPM principles, with the goal of minimizing deleterious effects on the environment and non-target organisms while using the most effective means of mosquito control available.

Of particular concern is the mosquito-transmitted virus, West Nile Virus. In 2017, 17,318 mosquitoes were tested for the virus in Evanston. Of the 394 mosquito batches tested, 139 batches tested positive for West Nile. There have been 60 human West Nile Virus cases in Evanston since the virus was identified in Illinois in 2001. The table below shows the number of human cases in Evanston since 2012.

Year	Number of Human Cases
2012	10
2013	0
2014	1
2015	0
2016	1
2017	2

Starting this spring, the City's Health Department will reintroduce an annual West Nile Virus larvicide training program in partnership with staff from the Illinois Department of Public Health. Intended particularly for City field staff, the training will cover West Nile Virus prevention and treatment techniques while in the field.

Almost 90 percent of NSMAD's mosquito management program is devoted to larval control through placement of larval control products into known or potential breeding sites (e.g., catch basins and ditches). NSMAD's adult mosquito control program consists of (1) applying insecticides to vegetation and surfaces where mosquitos rest and (2) using truck-mounted sprayers to deliver ultra-low-volume insecticide.

Evanston residents can request advance notice of spraying in their neighborhood. Instructions can be found on the NSMAD website. More information about mosquito control can also be found on the City's Health Department website.

## **VI. Policies and Practices of Major Evanston Institutions**

### **Ridgeville Park District**

Ridgeville Park District, located in south Evanston, comprises 14 acres of parkland and four small buildings. The district follows IPM practices inside the buildings and uses a pest control company that specializes in these practices. The district does not use pesticides on its park grounds.

### **Metra/Union Pacific**

The Union Pacific Railroad uses an outside contractor to maintain the track beds along its right-of-way, from the center line of the track to a fifteen-foot width on both sides. This maintenance consists of cutting and spraying all vegetation within that area twice each year. UP does not specify to the contractor what product is to be used to spray this vegetation. The company has begun a pollinator pilot project along its right-of-way and hopes to expand this effort in the future, where space allows.

### **Canal Shores**

Canal Shores uses IPM best practices to minimize the use of conventional pesticides. In 2017 Canal Shores was certified as an Audubon Cooperative Sanctuary through Audubon International's Cooperative Sanctuary Program for Golf Courses. Meeting the certification standards was an extensive three-year process. Audubon certification signs have been installed around the golf course, highlighting this recognition.

### **Other Major Institutions**

The Pesticide Reduction Goals for 2018-2020 include developing and implementing a comprehensive public outreach initiative to engage the broader community in reducing the use of pesticides. Special attention will be given to Evanston's larger institutions, including Districts 65 and 202, Northwestern University, Evanston NorthShore Hospital, and Saint Francis Hospital.

## VII. What Residents Can Do

### Indoor pest control

Routine application of pesticides to control pests is an ineffective, outdated approach that is risky to our health. Pests respond by going somewhere else, and over time they can develop immunity to the chemicals used. IPM is a safer, more cost-effective way to control pests over the long run.

IPM involves common sense actions like removing pests' food, water, and access by such steps as keeping food contained and sealing cracks in building structures. The basic IPM strategies are inspection, identification, recommendation, treatment/control, and evaluation. IPM only uses pesticides as a last resort and only applies the least-toxic product in a targeted way – for example, using glue traps that don't expose people to the chemical, rather than sprays.

Pest control companies increasingly offer IPM services. The Midwest Pesticide Action Center provides a list of companies on its [website](#).

### Bedbugs

Contact the Evanston Health & Human Services Department to request an onsite inspection and to obtain information on treatment and on ways to avoid bed bugs.

The Midwest Pesticide Action Center's website includes multiple resources for identification, prevention, and control of bed bugs. Some prevention tips include:

- **Be on the look out** for signs of infestations such as waking up with bites, seeing live bugs, or seeing dark red or black spots on bedding, carpets, walls, and furniture.
- **Paint and caulk around sleeping areas** such as along baseboards, windows, and bed frames.
- **Inspect used furniture closely** for signs of infestation before bringing into your home.
- **Take a look around mattresses and furniture** when staying in unfamiliar places. Bed bugs can hitch a ride home on your clothing or luggage.

### Outdoor pest control

IPM principles also work in the outdoor environment. When pesticides are sprayed outdoors, people and pets can be exposed via inhalation due to pesticide "drift," skin absorption, and/or ingestion. Natural lawn care offers an effective and safe alternative. The Midwest Pesticide Action Center suggests the following natural lawn care tips:

- **Water Deeply and Infrequently.** This encourages deep root growth. One inch per week is ideal.
- **Mow High.** Keep your lawn mowed at three inches or higher. This will increase the root strength and naturally shade out weeds. Don't mow your lawn unless it needs it.

- **Use Organic Fertilizer.** Commercial fertilizers easily wash away, and many contain toxic weed killers. Choose an organic fertilizer and keep grass clippings on the lawn, as they are an excellent natural fertilizer.
- **Weed Naturally.** Proper lawn care maintenance naturally eliminates most weeds. Annual reseeding gives grass an advantage over weeds. Avoid using pesticides, as they can harm our health and harm bees, birds and fish.

Additionally, less-toxic and non-toxic products are increasingly available for weed control. The Midwest Pesticide Action Center website provides a [list of lawn care companies](#) that use no, or minimal, chemicals.

### **Garden Certification**

Evanstonians can also make their property friendly and healthy for bees and other pollinators by participating in the [Natural Habitat Evanston community certification initiative](#). This program, undertaken by Citizens' Greener Evanston, is helping Evanston achieve National Wildlife Federation certification as a Community Habitat for birds, bees, butterflies, and other pollinators, which are in decline due to the use of pesticides, habitat loss, climate change, and other threats. Evanston schools, homeowners, places of worship, parks, community gardens, and more have certified their gardens by providing pollinators with food, water, cover, and places to raise their young, and by reducing or eliminating the use of pesticides and herbicides.

### **Mosquitoes**

Residents can take steps to reduce mosquito-breeding sites by ensuring that there is no standing water on their property. In addition, there are alternatives to chemical pesticides for controlling mosquitoes on one's property. Evanston-based Greenwise Organic Lawn Care recommends misting property with sprays containing non-toxic, natural biting-bug deterrents such as essential cedar and peppermint oils, and incorporating plants into the landscape that serve as natural mosquito repellents, such as citronella grass and geraniums.

### **Runoff**

Evanston commercial and residential property owners can do a lot to help minimize stormwater problems. Following one or all of the tips below will help extend the City's efforts to prevent stormwater runoff as well as minimize pesticide contamination when a discharge does occur.

- Cut down on fertilizers, pesticides, and herbicides. If you do use these chemicals, follow directions and use them sparingly. Don't fertilize before a rainstorm. Consider using organic fertilizers.
- Compost or mulch lawn clippings. Add compost to planting soil and dress it with mulch to improve plant growth and reduce stormwater runoff.
- Preserve existing trees and/or plant new ones. Trees hold rainfall and help manage stormwater.
- Remove part or all of your lawn. Lawns require a lot of watering, mowing, and care. Replace part or all of your turf grass with native, drought-resistant plants.

- Reduce impervious surfaces and increase the vegetated land cover of your property. Impervious surfaces include your roof, driveway and patio. Reduce rooftop runoff by directing your downspouts to vegetated areas and not to the storm drain on your street. For your driveway and patio, consider installing permeable paving or patterns of cement and brick that allow water to filter through.
- Use landscape solutions to stop stormwater from damaging your property and flooding the sewer system. Berms and regrades, dry wells and creeks, swales, and French drains are all relatively easy landscape solutions that will slow down the stormwater so it can percolate and filter into the soil rather than racing over it to the sewer system.

## **Rats**

The City's Health & Human Services Department offers the following tips.

- Eliminate (and recycle) rubbish, boxes, scrap metal and other materials that give rats a place to hide.
- Control weeds, shrubs and vegetation overgrowth, especially along foundations, that give rodents the means to move from location to location without being seen.
- Keep food away. Don't put food out for stray animals. Remove bird feeders.
- Manage garbage. Use durable, City-approved trash cans with tight-fitting lids.
- Seal holes and openings in garage walls and doors.

## **VIII. Resources**

### **City of Evanston — Health & Human Services**

- Rodent control and Bedbug inspections and treatment information: <https://www.cityofevanston.org/government/departments/health-human-services/protect/pest-control>
- Mosquito control: <https://www.cityofevanston.org/government/departments/health-human-services/protect/pest-control/mosquitoes>

### **City of Evanston — Environmental Services**

- Private Dutch Elm Disease Insurance program: <https://www.cityofevanston.org/government/departments/health-human-services/protect/pest-control/mosquitoes>

**North Shore Mosquito Abatement District:** <http://www.nsmad.com/>.

**Midwest Pesticide Action Center:** <http://midwestpesticideaction.org/>

- A list of companies that offer IPM services: <http://midwestpesticideaction.org/wp-content/uploads/2017/02/PestControlCompaniesUpdated.pdf>
- A list of lawn care companies that use no, or minimal, chemicals: <http://midwestpesticideaction.org/wp-content/uploads/2013/09/MPAC-Midwest-Natural-Lawn-Care-Companies.pdf>

- Information about efforts to repeal the state law preempting local regulation of pesticides: <http://midwestpesticideaction.org/repeal-pesticide-preemption/>

#### **Citizens Greener Evanston**

- Natural Habitat Evanston community certification initiative:  
<http://greenerEVANSTON.org/community-habitat-certification-program>

#### **Greenwise Organic Lawn Care**

- Safely Protect Against Mosquito Bites with No Toxic Pesticides:  
<https://www.iamgreenwise.com/safe-mosquito-protection-pesticide-free/>

#### **Illinois General Assembly**

- Illinois Lawn Care Products Application and Notice Act:  
<http://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=1597&ChapterID=36>

#### **Illinois Department of Public Health**

- Illinois Structural Pest Control Act (IPM in schools law) information, sample school IPM policies, and more: <http://www.dph.illinois.gov/topics-services/environmental-health-protection/structural-pest-control/integrated-pest-management>

**IPM Institute of North America:** <https://ipminstitute.org/>

#### **California Department of Pesticide Regulation**

- What are the Potential Health Effects of Pesticides?  
[http://www.cdpr.ca.gov/docs/dept/comguide/effects\\_excerpt.pdf](http://www.cdpr.ca.gov/docs/dept/comguide/effects_excerpt.pdf)

### **IX. City of Evanston Sustainable Pest Control and Pesticide Reduction Policy**

<https://www.cityofevanston.org/home/showdocument?id=10691>

