

Integrated Pest Management Plan

EFFECTIVE DATE: 8/24/2022

I. SCOPE

This plan applies to all interior spaces in the building and all portions of the site and grounds for Twelve01West. This plan will be consulted prior to taking action on pest management in the building or on the building grounds. Pests include plants or animals that are detrimental to the property, a nuisance to building occupants, or unwanted on the building grounds for other reasons.

II. GOALS

Operational Element	Goal	Performance Measurement Unit
Cases that do not warrant emergency treatment	Prior to applying chemical pesticides or baits, alternative pest control methods will be used in 100% of cases	Number of cases
Cases that do not warrant emergency treatment	If alternative methods fail, least-toxic pesticides will be used prior to resorting to the use of non-least toxic pesticides or baits in 100% of cases	Number of cases
Occupant notification	In 100% of non-least toxic pesticide applications, occupants will receive notification according to the notification procedures described below	Number of cases

III. ROLES AND RESPONSIBILITIES

Integrated Pest Management Team

Name/Title	Responsibilities
Overall responsible party: Amy Schult	<ol style="list-style-type: none"> Ensuring that this plan is executed Ensuring that the contracted IPM vendor is fully trained on this plan and adheres to the plan procedures

	<ul style="list-style-type: none"> 3. Coordinating site visits by the vendor for regular inspections and as needed for implementation of pest controls 4. Overseeing work performed by the vendor 5. Approving the use of pesticides when they are necessary 6. Providing proper notification to occupants when non-least toxic pesticides are applied 7. Ensuring employees are aware of the procedures in this plan 8. Evaluating performance and making updates to the plan as necessary
Pest control vendor: Smithereen Pest Management Services	<ul style="list-style-type: none"> 9. Adhering to the procedures outlined in this plan 10. Identifying pests during site visits and inspections 11. Reporting the results of site visits and inspections to the overall responsible party 12. Notifying the overall responsible party when pest action thresholds are reached or exceeded 13. Obtaining approval to approve from the overall responsible party pesticides when necessary
Employee	<ul style="list-style-type: none"> 14. Reporting pest issues in respective employee spaces to the overall responsible party

Smithereen Pest Management Services is responsible for adhering to the procedures outlined in this plan and reporting the results of site inspections to the Property Manager. If at any time integrated and alternative pest control methods fail and chemical pesticides are necessary, Smithereen Pest Management Services must notify the Property Manager prior to using the chemical pesticides and wait for approval from the Property Manager prior to applying the pesticides.

Employees are responsible for reporting pest issues in their space to the Property Manager. When the use of non-least toxic pesticides is necessary, the Property Manager will notify the employees.

IV. STANDARD OPERATING PROCEDURES AND IMPLEMENTATION STRATEGIES

Pest control strategies

The building interior and exterior will be periodically inspected for the presence of pests and preventive measures will be taken to avoid pests. If any pests are detected, integrated (nonchemical) methods will be implemented as the first control step, including sanitation measures, exclusion measures, and the use of traps.

Sanitation: Potential food and water sources available to pests will be evaluated and minimized

or eliminated. This can be done by thoroughly cleaning and maintaining food service areas and break rooms, fixing leaking pipes and faucets, and altering landscape features to eliminate standing water.

Exclusion: Cracks, crevices, and holes in the building envelope will be sealed. A plant-free zone will be maintained immediately adjacent to the building.

Traps: For insects and rodents, non-chemical baits (such as peanut butter) will be used to trap pests. No chemical baits for rodents will ever be used indoors. If chemical rodent baits are necessary outdoors, they will only be used as solid blocks placed in locked outdoor dispensers. No second-generation (single-feed) rodent baits will be used.

If integrated pest control measures are unable to resolve the problem, least toxic pesticides will be used prior to resorting to the use of non-least toxic pesticides. Least toxic pesticides include any pesticide product for which all active ingredients and known inert ingredients meet the least toxic Tier III hazard criteria under the San Francisco Hazard Review Process (<http://sfenvironment.org/article/residents/leasttoxic-pesticides-for-green-buildings>).

Products that are not regulated as pesticides by the EPA because they primarily contain low-risk ingredients, such as garlic oil, may also be considered least toxic options, even if they are not listed as Tier 3 by San Francisco. Nonrodent pesticides that exceed the Tier 3 criteria are considered least toxic if they are used in self-contained baits and placed in locations that are inaccessible to occupants. Rodent baits are not considered least toxic under any circumstances.

Non-least toxic pesticides include all chemical rodent baits and any product that meets the Tier 1 or 2 criteria according to the San Francisco Hazard Review Process. Non-least toxic pesticides may only be used under the following circumstances:

1. Alternative, integrated, and least toxic pest control measures have been exhausted and the pest action threshold is still exceeded
 - a. In this situation, notification (according to the procedures below) must be given to building occupants at least 24 hours before the pesticide is applied to the building or grounds
2. The emergency action threshold has been exceeded
 - a. In this situation, notification (according to the procedures below) must be given to building occupants no more than 24 hours after the pesticide is applied to the building or grounds

The use of non-least toxic pesticides or rodenticides as pest control in areas requiring frequent treatment on a permanent basis is not an acceptable strategy for this credit. Non-least toxic pesticides will not be continuously applied in the building and on the site. Integrated and alternative pest control measures will be resumed once the action threshold specified below for the applicable pest is no longer exceeded.

Pesticide application notification

The Property Manager will notify the employees via email of the pesticide application, including the pesticide name, the EPA registration number, the treatment location, and the date of the application. In addition, the Property Manager will post a sign at the application site, such that an occupant reading the sign can choose to avoid the application area (for example, if the

pesticide is applied in a break room, all entrances to the break room shall have a sign posted). The sign will also include the pesticide name, the EPA registration number, the treatment location, and the date of the application.

Employee Communication plan

If pests are observed in the space, it is the responsibility of the employee to notify the Property Manager of the pest via email. Within one business day, the Property Manager will contact Smithereen Pest Management Services to inspect the situation and determine whether the regular action threshold or the emergency action threshold has been met. Smithereen Pest Management Services will then take the appropriate actions.

Action thresholds

Regular treatment includes the use of first non-chemical controls (sanitation, exclusion, traps using non-chemical baits), followed by the use of least-toxic control methods if the situation is not resolved, and then non-least toxic control methods is the situation is still not resolved.

Emergency treatment includes the use of the most effective control method as a first step, which may be non-least toxic.

Pest Type	Action Thresholds
Ants	Regular treatment will be performed if any ants are noted in the building and their presence is confirmed through monitoring. Emergency treatment may be used if there are ten or more reported cases or complaints of ants within a two day period.
Other insects	Regular treatment will be performed if nuisance insects are noted in the building and their presence is confirmed through monitoring. Emergency treatment may be used if there are ten or more reported cases or complaints of nuisance insects within a two day period.
Cockroaches	Regular treatment will be performed if any cockroaches are noted in the building and their presence is confirmed through monitoring. Emergency treatment may be used if the presence of cockroaches is confirmed in two different spaces within the building OR if the presence of a large population of cockroaches is confirmed in one space in the building.
Rat, Mouse	Regular treatment will be performed if rats or mice are noted in the building and their presence is confirmed through monitoring. Emergency treatment may be used if the presence of rats or mice is confirmed in two or more different spaces within the building.
Bed bugs	Emergency treatment may be used if the presence of bed bugs is confirmed in the building.
Other occasional invaders	If the pests pose a threat to occupants' health, emergency treatment may be sought. Otherwise, regular treatment will be performed.

V. PERFORMANCE MEASUREMENT AND SCHEDULE FOR REASSESSMENT

All pest control activity, including inspections, will be recorded in the IPM tracking tool. The

following items will be tracked:

- Pest type and name
- Pest population density and monitoring frequency
- Pest action threshold observed
- Prevention measures implemented
- Product applied (name)
- Toxicity of the product (the tier level as determined by the San Francisco Hazard Review Process)
- Date and time of product application (if applicable)
- Date and time of occupant notification (if applicable)
- Emergency application? (Y/N). If yes, an explanation of the emergency will be included.

Smithereen Pest Management Services will record the applicable items from each site visit in the IPM tracking tool.

On an annual basis, performance will be evaluated against the goals specified above. If the goals are not being met adjustments will be made to this plan in order to facilitate goal achievement. If adjustments to the action thresholds are necessary, the Property Manager will work with employees and vendors as necessary in order to appropriately adjust the action thresholds.

VI. QUALITY ASSURANCE/QUALITY CONTROL PROCESSES

On an annual basis, the Property Manager will evaluate performance against the goals specified earlier in this plan. If the goals are not being met, adjustments will be made to this plan in order to facilitate goal achievement, and Smithereen Pest Management Services and employees will be educated on the adjustments made to the plan.