



**SILVER FALLS
SCHOOL DISTRICT**

INTEGRATED PEST MANAGEMENT PLAN

August 2012

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I. INTRODUCTION

The Silver Falls School District Board of Directors is committed to a pest management plan that puts a priority on the health and safety of staff and students. This integrated pest management plan will be used on all Silver Falls School District instructional facilities.

The Facilities subject to this plan include:

- A. School District Office.
- B. Silverton High School and surrounding athletic fields.
- C. All district elementary schools, surrounding playgrounds and athletic fields: Bethany Charter School, Butte Creek School, Central Howell School, Community Roots Charter School, Eugene Field School, Evergreen School, Mark Twain School, Pratum School, Robert Frost School, Scotts Mills School, Silver Crest School, and Victor Point School.

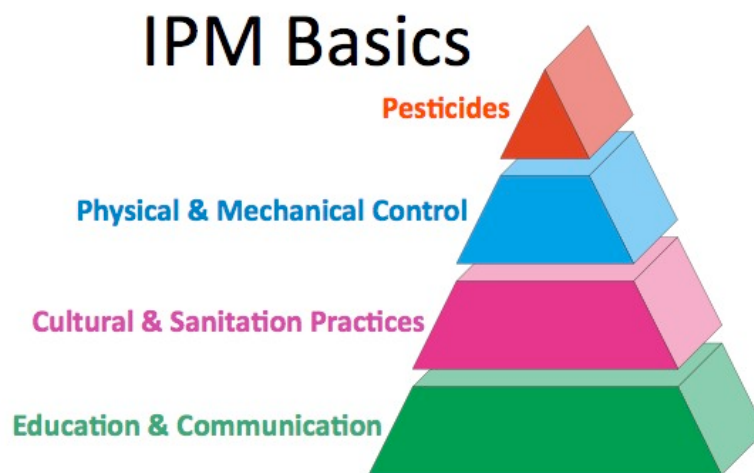
II. WHAT IS INTEGRATED PEST MANAGEMENT?

The Silver Falls School District Integrated Pest Management Plan (IPM), works to achieve long-term, environmentally sound pest suppression through a wide variety of tactics. Control strategies in this plan include structural and procedural improvements to reduce the food, water, shelter, and access used by pests. Pesticides will be used only in the most severe infestations or pest emergencies.

Fundamentals of the IPM Plan:

- A. Education and Communication:** The foundation for an effective IPM program is education and communication. We need to know what conditions can cause pest problems, why and how to monitor for pests, proper identification, pest behavior and biology before we can begin to manage pests effectively. Communication about pest issues is essential. *A protocol for reporting pests or pest conducive conditions and a record of what action was taken is the most important part of an effective IPM program.*
- B. Cultural & Sanitation:** Knowing how human behavior encourages pests helps you prevent them from becoming a problem. Small changes in cultural or sanitation practices can have significant effects on reducing pest populations. Cleaning under kitchen serving counters, reducing clutter in classrooms, putting dumpsters further from kitchen door/loading dock, proper irrigation scheduling, and over-seeding of turf areas are all examples of cultural and sanitation practices that can be employed to reduce pests.

- C. Physical & Mechanical:** Rodent traps, sticky monitoring traps for insects, door sweeps on external doors, sealing holes under sinks, proper drainage and mulching of landscapes, and keeping vegetation at least 24 inches from buildings are all examples of physical and mechanical control.
- D. Pesticides:** IPM focuses on remediation of the fundamental reasons why pests are here; pesticides should be rarely used and only when necessary.



III. IPM DECISION-MAKING PROCESS - RESPONSIBILITIES

A. Silver Falls School Board Responsibilities

1. Annually the Board will review Board Policy EBB Integrated Pest Management.
2. Approve the Silver Falls School District Integrated Pest Management Plan and review annually.
3. Annually designate the Silver Falls School District Integrated Pest Management Coordinator.
4. Monitor the district's implementation of the IPM by requesting periodic reviews from the superintendent.

B. Superintendent (or Designee) Responsibilities

1. Develop Integrated Pest Management Plan.
2. Oversee the Integrated Pest management Plan with the IPM Coordinator.
3. Review information prior to the declaration of a pest emergency.

4. Annually receive written report from the IPM Coordinator and work with Coordinator to develop action plan for issues arising from pest management.

C. IPM Plan Coordinator Responsibilities

The **Silver Falls School District designates Pete Paradis as the IPM Plan Coordinator** who is given the authority for overall implementation and evaluation of this plan. The Coordinator is responsible for:

1. Attending not less than six hours of IPM training each year. The training shall include at least a general review of IPM principles and the requirements of ORS 634.700 – 634.750.
2. Conducting outreach to the school community (custodians, maintenance, construction, grounds, faculty, and kitchen staff) about the school's IPM plan. The IPM Plan Coordinator (or designee) will provide training as outlined in Section VII below.
3. Overseeing pest prevention efforts. The Coordinator will work with custodians, teachers, and maintenance to reduce clutter and food in the classrooms, and seal up pest entry points.
4. Assuring that the decision-making process for implementing IPM in the district (Section IV) is followed. The Coordinator will continually assess and improve the pest monitoring/reporting/action protocol.
5. Assuring that all notification, posting, and record-keeping requirements in Section VIII are met when the decision to make a pesticide application is made.
6. Maintaining the approved pesticides list as per section IX.
7. Responding to inquiries and complaints about noncompliance with the plan. Responses to inquiries and complaints will be in writing and kept on record with the Coordinator.
8. Complete annual IPM report as per section VI.

D. Custodial Services Responsibilities

1. Attending annual IPM training provided by the IPM Plan Coordinator (or designee).
2. Develop a record keeping system with assigned clerical staff for all documentation related to integrated pest management.
3. Keeping records of pest complaints received via email in a log type format (work with clerical staff assigned this responsibility).

4. Placing and checking sticky insect monitoring traps in staff lounge, cafeteria, and kitchen as per the IPM Plan Coordinator's instructions.
5. Assuring floor under serving counters is kept free of food and drink debris.
6. Sealing up small cracks or holes when reported by teachers or noticed by custodian when this can be done in a short time (e.g. less than 15 minutes).
7. Recording his/her pest management actions in the pest logs (work with clerical staff assigned this responsibility).
8. Reporting pest problems that he/she cannot resolve in less than 15 minutes to the IPM Plan Coordinator via email with a cc to clerical staff responsible for IPM.
9. Reporting teachers to the building administrator who repeatedly refuse to reduce clutter and other pest-conducive conditions in their classrooms.
10. Reporting pest-conducive conditions to the IPM Plan Coordinator via email with a cc to clerical staff responsible for IPM_if the custodian cannot fix them in less than 15 minutes.
11. Confiscating any unapproved pesticides (such as aerosol spray cans) discovered during inspections or regular duties and delivering them to the IPM Plan Coordinator.
12. Following up on issues found in annual inspection report as instructed by the IPM Plan Coordinator (IPM Plan Coordinator will determine which schools receive annual inspections based on pest and pesticide use history).

E. Clerical Responsibilities

Each building will designate one clerical staff member to be responsible for managing and developing a system all record keeping related to this plan for their school. This includes: Developing a pest log and communicating any pest issues with the building engineer.

F. Maintenance Department Responsibilities

Staff involved in facilities maintenance are responsible for working with the IPM Plan Coordinator to ensure their daily tasks, projects and operations enhance effective pest management. This includes:

1. Receiving training from the IPM Plan Coordinator (or designee of the

Coordinator) on the basic principles of IPM, sealing pest entry points, and sanitation during construction projects.

2. Continually monitoring for pest conducive conditions during daily work, and sealing small holes and cracks when noticed (if they can be sealed in a short period of time – e.g., 15 minutes).
3. Working with the Coordinator to develop a protocol and priority list with deadlines for sealing holes, installing external door sweeps, and other pest exclusion needs which cannot be done in a short period of time (e.g., 15 minutes).
4. Developing protocols and provisions for pest avoidance and prevention during construction and renovation projects. The IPM Plan Coordinator has the authority to halt construction projects if these protocols and provisions are not being met.
5. Keeping vegetation (including tree branches and bushes) at least three feet from building surfaces.
6. Proper mulching in landscaped areas to reduce weeds.
7. Proper fertilization, over-seeding, mowing height, edging, drainage, aeration, and irrigation scheduling in turf areas to reduce weeds (see OSU turf management publications EC 1521, EC 1278, EC 1550, EC 1638-E, and PNW 299 - available free online at <http://extension.oregonstate.edu/catalog/>).
8. When the decision is made to apply a pesticide, following notification, posting, record-keeping and reporting protocols in Section VIII.

G. Kitchen Staff Responsibilities

1. Attending any annual IPM training provided by the IPM Plan Coordinator (or designee).
2. Assuring floor under serving counters is kept free of food and drink debris.
3. Promptly emptying and removing corrugated cardboard materials.
4. Keeping exterior kitchen doors closed.
5. Reporting pest conducive conditions that require maintenance (e.g., leaky faucets, dumpster too near building, build-up of floor grease requiring spray-washing, etc.) to building engineer and clerical staff responsible for documenting pest concerns.
6. Participating in any inspections conducted by custodian or IPM Plan

Coordinator.

7. Checking sticky trap monitors once per month for cockroaches or drain flies. Immediately reporting these pests and any sightings of rodents or rodent droppings via email to the building engineer with a cc to the assigned clerical staff.

H. All Staff Responsibilities

All staff includes any staff without a specific identified function in the IPM Plan. This includes teachers, teaching assistants, clerical staff etc.

1. Attending any annual basic IPM training provided by the IPM Plan Coordinator (or designee).
2. Keeping their classrooms and work areas free of clutter.
3. Making sure students clean up after themselves when food or drink is consumed in the classroom.
4. Reporting pests and pest conducive conditions to the building engineer via email via email with a cc to the assigned clerical staff.
5. Following first steps of protocol for ant management before notifying the custodian (clean up any food the ants are eating, kill visible ants, wipe down area where ants were with soapy water, notify custodian only if ants continue to be found after following these steps).

I. School Principal/Administrator Responsibilities

1. Scheduling time for teachers to receive annual training provided by the IPM Plan Coordinator (or designee).
2. Attending any annual IPM training for teachers.
3. Assign one clerical staff to be responsible for organization and documentation of all items related to the IPM.
4. Assuring that teachers keep their rooms clean and free of clutter in accordance with the IPM Plan Coordinator's instructions.
5. Assuring that all faculty, administrators, staff, adult students and parents receive the annual notice (provided by the IPM Plan Coordinator) of potential pesticide products that could be used on school property as per Section VIII.

6. Working with the IPM Plan Coordinator to make sure all notifications of pesticide applications reach all faculty, administrators, staff, adult students and parents.
7. Assuring that all staff fulfill their role as outlined in the district's IPM plan (reducing pest conducive conditions, participation in monitoring and pest log recording, attendance at IPM training(s), cooperation with the district's IPM Plan Coordinator).

IV. IPM DECISION-MAKING PROCESS - MONITORING REPORTING AND ACTION PROTOCOL

An important component of the Silver Falls School District integrated pest management plan is the ongoing monitoring for pests by all district staff.

A. Monitoring: Observation

All staff will provide ongoing monitoring for pests within our facilities. Any evidence of pests or pest-conducive conditions will be reported via email to the building engineer with a cc to assigned clerical staff.

The IPM Plan Coordinator (or designee) and Custodians will periodically conduct careful observations with written observations. The IPM Plan Coordinator will develop a monitoring schedule for all district facilities.

The periodic monitoring will include careful observation and written observations.

1. Buildings

- Pest conducive conditions inside and outside the building (structural deterioration, holes that allow pests to enter, conditions that provide pest harborage)
- The level of sanitation inside and out (waste disposal procedures, level of cleanliness inside and out, conditions that supply food and water to pests)
- The amount of pest damage and the number and location of pest signs (rodent droppings, termite shelter tubes, cockroaches caught in sticky traps, etc.)
- Human behaviors that affect the pests (working conditions that make it impossible to close doors or screens, food preparation procedures that provide food for pests, etc.)

- Their own management activities (caulking/sealing, cleaning, setting out traps, treating pests, etc.) and their effects on the pest population.

2. Grounds

- The condition of the plants (vigor and appearance)
- The amount of plant damage
- pH, phosphorus, and potassium levels of turf
- Kind and abundance of pests (weeds, insects, mites, moles, etc.) as well as natural enemies (ladybugs, spiders, lacewing larvae, syrphid fly larvae, etc.)
- Weather conditions (record any unusually dry, hot, wet, or cold weather in the past few weeks)
- Proper drainage
- Human behaviors that affect the plants or pests (foot traffic that compacts the soil, physical damage to plants caused by people, insistence on having certain plants grow in inappropriate situations, etc.)
- Management activities (pruning, fertilizing, mulching, aeration, treating pests, etc.) and their effects on the plants and the pest population.

B. Monitoring: Sticky Traps for Insects

Sticky traps are neither a substitute for pesticides nor an alternative for reducing pest populations, but rather a diagnostic tool to aid in identifying a pest's presence, their reproductive stage, the likely direction pests are coming from, and the number of pests.

All staff will be made aware of the traps and their purpose so they don't disturb them. Custodians will be responsible for setting them out and checking them once per month (approximately 10 minutes), and replacing them once every four months (approximately 30 minutes). Kitchen staff will be responsible for checking those in the kitchen primarily for cockroaches and drain flies once per week (approximately 4 minutes).

After receiving training in the use of pest monitoring sticky traps by the IPM Plan Coordinator (or designee), custodial staff will be responsible for checking traps placed in pre-determined "pest-vulnerable areas" in the staff room, kitchen, and cafeteria (other areas that are often pest-vulnerable are: special education or kindergarten classrooms, home

economics/life skills classrooms, concession stands, classrooms with animals/plants, custodial closets/storage) on a monthly basis, and replacing them every four months. If custodial staff cannot interpret what they find in the monitors they will contact the IPM Plan Coordinator for assistance.

C. Reporting (Pests, Signs of Pests, and Conducive Conditions)

When staff members observe pests or pest conducive conditions they will email the building engineer with a cc to the assigned clerical staff. The building engineer and assigned clerical staff will keep a record of all pest reports.

D. Reporting “Pests of Concern”

“A pest of concern” is a pest determined to be a public health risk or a significant nuisance pest. These include cockroaches (disease vectors, asthma triggers), mice & rats (disease vectors, asthma triggers), yellow jackets (sting can cause anaphylactic shock), cornered nutria, raccoons, cats, dogs, opossums, skunks (they can bite), and bed bugs (significant nuisance pest).

When pests of concern (or their droppings, nests, etc.) are observed, staff should immediately email the building engineer. The building engineer will contact the IPM Coordinator immediately.

E. Action

Any items (such as sealing up holes) that maintenance/construction staff or custodial staff observe (or see on Pest Logs) that they can resolve in less than 15 minutes should be taken care of and this follow up action should be noted in the Pest Log.

The building engineer and assigned clerical staff will review Pest Logs weekly and any items he/she cannot resolve in less than 15 minutes should be marked in order of priority.

Pest Logs will be emailed to the IPM Plan Coordinator monthly. However, if there are pest concerns, the building lead custodian will contact the IPM coordinator as soon as possible via email. Any pest issues requiring district action will be documented on the district maintenance list and discussed for completion at the bi-monthly maintenance meetings.

The Coordinator will keep records of time and money spent to manage the pest, including copies of original receipts.

The appendices to this plan provide threshold levels for specific pests and the district response for each pest.

F. Acceptable Thresholds (Pest Population Density Levels)

A threshold is the number of pests that can be tolerated before taking action. The acceptable threshold for cockroaches, mice, rats, raccoons, cats, dogs, opossums, skunks, and nutria is 0.

Acceptable thresholds for other pests will be determined by the IPM Plan Coordinator and the governing body.

G. Inspections

1. Routine Inspections

The IPM Plan Coordinator will conduct routine inspections of different schools throughout the year (schedule and schools to be determined by the governing body and the Coordinator). Site custodians are required to accompany the Coordinator during the inspections. The inspections will typically last one to two hours and will focus on compliance with this plan and an inspection of the kitchen, staff room, and any other place of concern. After each routine inspection the Coordinator will write a one-page report on findings and recommendations. The report will be submitted to the school principal and custodian.

2. Annual Inspections

The IPM Plan Coordinator will conduct annual inspections at individual schools. Site custodians are required to assist the Coordinator with the annual inspection. The annual inspections will be more thorough than the routine inspections, and will use the Annual IPM Inspection Form (see Appendix 2) to guide the inspections. The specific schools to be inspected will be determined by the IPM Plan Coordinator and governing body based on a review of the annual number of pest problems and pesticide applications reported in the Annual IPM Report and Annual Report of Pesticide Applications.

V. PEST EMERGENCIES (See also Section VIII. B. below)

Pesticide use may be permitted in the event of a pest emergency. The IPM Coordinator may declare a pest emergency after consultation with the Superintendent or designee determines that the presence of a pest or pests immediately threatens the health or safety of students, staff, faculty members or members of the public using the campus, or the structural integrity of campus facilities, he or she may declare a pest emergency. Examples include (but are not limited to) yellow jackets swarming in areas frequented by children, a nutria in an area frequented by children, a half a dozen mice or rats running through occupied areas of a school building.

IMPORTANT: If a pest emergency is declared, the area must be evacuated and cordoned off before taking any other steps.

VI. ANNUAL IPM REPORT (Completed by IPM Plan Coordinator)

In January of each year, the IPM Plan Coordinator will provide the governing body and the OSU School IPM Program Coordinator an annual IPM report. The report will include a summary of data gathered from Pest Logs, as well as costs for PMPs and pesticides (including turf and landscape pesticides). Costs for items such as sealants, fixing screens, door sweeps and other items that would not normally be considered part of pest control will not be recorded. See Appendix 9 for a template for the annual IPM report.

Prevention and management steps taken that proved to be ineffective and led to the decision to make a pesticide application will be copied and pasted or incorporated into the annual report of pesticide applications (see Section VIII. D)

VII. REQUIRED TRAINING/EDUCATION

ORS 634.720 (2) requires that the IPM Plan Coordinator “shall complete not less than six hours of training each year. The training shall include at least a general review of IPM principles and the requirements of ORS 634.700 to 634.750.

As required in ORS 634.700 (3) (i) all staff will receive education on the principals of IPM and sanitation, monitoring and inspection of pest control measures. After the initial training, the district will train all new staff with the same training. Basic training on the principals of IPM and the main points of this IPM Plan will also be provided to coaches who use athletic fields and will include an overview of basic monitoring and IPM practices for turf so they understand key pest problems to look out for and when to report them.

Each year the IPM Coordinator will determine based on pest concerns and documentation any need for annual or additional training of district staff. The need for training will be based on the job functions for each employee group and will be tailored to the IPM requirements for the individual employee groups.

VIII. PESTICIDE APPLICATIONS: REQUIRED NOTIFICATION, POSTING, RECORD KEEPING, AND REPORTING

Any pesticide application (this includes weed control products, ant baits, and all professional and over-the-counter products) on school property must be made by a licensed commercial or public pesticide applicator. At the beginning of each school year, all faculty, administrators, staff, adult students and parents will be given a list of potential pesticide products that could be used in the event that other pest management measures are ineffective. They will also be informed of the procedures for notification and posting of individual applications, including those for pest emergencies. This information will be

provided to all the above via e-mail as well as hard copy to adult students and parents.

A. Notification and Posting for Non-Emergencies

When prevention or management of pests through other measures proves to be ineffective, the use of a low-risk pesticide is permissible. Documentation of these measures is a pre-requisite to the approval of any application of a low-risk pesticide. This documentation will remain on file with the IPM Plan Coordinator and at the office of the head custodian where the application takes place.

No non-emergency pesticide applications may occur in or around a school until after 3:30 PM on a Friday while school is in session, unless the IPM Plan Coordinator authorizes an exception. If the labeling of a pesticide product 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 labeling 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 Plan Coordinator 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.

The IPM Plan Coordinator (or a designee of the Coordinator) will give written notice of a proposed pesticide application (via the method most likely to reach the intended recipients) at least 24 hours before the application occurs.

The notice must identify the name, trademark or type of pesticide product, the EPA registration number of the product, the expected area of the application, the expected date of application and the reason for the application.

The IPM Plan Coordinator (or a designee of the Coordinator) shall place warning signs around pesticide application areas beginning no later than 24 hours before the application occurs and ending no earlier than 72 hours after the application occurs.

A warning sign must bear the words "Warning: pesticide-treated area", and give the expected or actual date and time for the application, the expected or actual reentry time, and provide the telephone number of a contact person (the person who is to make the application and/or the IPM Plan Coordinator).

B. Notification and Posting for Emergencies

1. The IPM Plan Coordinator may not declare the existence of a pest emergency until after consultation with school faculty and administration.
2. If a pesticide is applied at a campus due to a pest emergency, the Plan Coordinator shall review the IPM plan to determine whether modification of the plan might prevent future pest emergencies, and provide a written report of such to superintendent or designee.
3. The Superintendent or designee shall review and take formal action on any recommendations in the report.
4. The declaration of the existence of a pest emergency is the only time a non low-impact pesticide may be applied.
5. If a pest emergency is declared, the area may need to be evacuated and cordoned off before taking any other steps.
6. If a pest emergency makes it impracticable to give a pesticide application notice no later than 24 hours before the pesticide application occurs, the IPM Plan Coordinator shall send the notice no later than 24 hours after the application occurs.
7. The IPM Plan Coordinator or designee shall place notification signs around the area as soon as practicable but no later than at the time the application occurs.
8. Note: ORS 634.700 also allows the application of a non-low-impact pesticide “by, or at the direction or order of, a public health official”. If this occurs, every effort must be made to comply with notification and posting requirements above.

C. Record Keeping of Pesticide Applications

The IPM Plan Coordinator or designee shall keep a copy of the following pesticide product information on file at the head custodian’s office at the school where the application occurred, and at the office of the IPM Plan Coordinator:

1. A copy of the label.
2. A copy of the MSDS.
3. The brand name and USEPA registration number of the product.
4. The approximate amount and concentration of product applied.

5. The location of the application.
6. The pest condition that prompted the application.
7. The type of application and whether the application proved effective.
8. The pesticide applicator's license numbers and pesticide trainee or certificate numbers of the person applying the pesticide.
9. The name(s) of the person(s) applying the pesticide.
10. The dates on which notices of the application were given.
11. The dates and times for the placement and removal of warning signs.
12. Copies of all required notices given, including the dates the IPM Plan Coordinator gave the notices.

The above records must be kept on file at the head custodian's office at the school where the application occurred, and at the office of the IPM Plan Coordinator, for at least four years following the application date.

D. Annual Report of Pesticide Applications

In July of each year, the IPM Plan Coordinator will provide the Superintendent or designee and the OSU School IPM Program Coordinator an annual report of all pesticide applications made the previous year. The report will contain the following for each application:

1. The brand name and USEPA registration number of the product applied.
2. The approximate amount and concentration of product applied.
3. The location of the application.
4. The prevention or management steps taken that proved to be ineffective and led to the decision to make a pesticide application.
5. The type of application and whether the application proved effective.

IX. APPROVED LIST OF LOW-IMPACT PESTICIDES

Note: All pesticides used must be used in strict accordance with label instructions.

According to ORS 634.705 (5), the governing body of a school district shall adopt a list of low-impact pesticides for use with their integrated pest

management plan. The governing body may include any product on the list except products that:

(a) Contain a pesticide product or active ingredient that has the signal words “warning” or “danger” on the label;

(b) Contain a pesticide product classified as a human carcinogen or probable human carcinogen under the United States Environmental Protection Agency 1986 Guidelines for Carcinogen Risk Assessment; or

(c) Contain a pesticide product classified as carcinogenic to humans or likely to be carcinogenic to humans under the United States Environmental Protection Agency 2003 Draft Final Guidelines for Carcinogen Risk Assessment.

As a part of pesticide registration under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA) and re-registration required by the Food Quality Protection Act (FQPA), EPA Office of Pesticide Programs (OPP) classifies pesticide active ingredients with regards to their potential to cause cancer in humans. Depending on when a pesticide active ingredient was last evaluated the classification system used may differ as described above.

The National Pesticide Information Center: <http://npic.orst.edu/> can be contacted at 1.800.858.7378 or npic@ace.orst.edu for assistance in determining a pesticide i.e. cancer classification.

The most current list of approved low-impact pesticides is available on our website at: <http://silverfallsschools.org>

For questions or inquiries regarding the Silver Falls School District’s Integrated Pest Management Plan please contact: stanley_lorin@silverfalls.k12.or.us