

**Integrated Pest Management Policy for Commercial Buildings**

Effective date: July 23, 2019 (Updated July 2024)

**i. Scope**

This plan applies to all interior spaces in the building and all portions of the site and grounds for the buildings listed under the Roles and Responsibilities section. 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**

<b><u>Operational element</u></b>	<b><u>Goal</u></b>	<b><u>Performance measurement unit</u></b>
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**

<b>Property Address</b>	<b>Tower Building Engineer &amp; Property Manager (Responsible Parties)</b>	<b>Pest Management Company</b>

2000 Tower Oaks Blvd. Rockville, MD 20852	Carlos Diaz (Chief Engineer) Kelli Reed (Director of Property Management)	Kenmore Pest Control
1101 Wootton Parkway Rockville, MD 20852	Carlos Diaz (Chief Engineer) Kelli Reed (Director of Property Management)	Ehrlich
1707 L St NW, Washington DC, 20036	Eric Harris (Chief Engineer) Donna Nurmi (DC Commercial Property Manager)	Ehrlich
1828 L St NW, Washington DC, 20036	Marvin Atwell (Chief Engineer) Donna Nurmi (DC Commercial Property Manager)	Ehrlich
1909 K St NW, Washington, DC 20006	Mike Newman (Chief Engineer) Donna Nurmi (DC Commercial Property Manager)	Ehrlich

The pest control vendor is responsible for adhering to the procedures outlined in this plan and reporting the results of site inspections to the Chief Engineer and Senior Property Manager. If at any time integrated and alternative pest control methods fail and chemical pesticides are necessary, the pest control vendor must notify the Chief Engineer and Senior Property Manager prior to using the chemical pesticides and wait for approval from both responsible parties prior to applying the pesticides so that property notification to building occupants can be done.

Each client in the building has designated a point of contact for communications regarding pest control and other building procedures. When the use of non-least toxic pesticides is necessary, the Chief Engineer will notify the Senior Property Manager who will assist with contacting the main client point of contact and the client contacts are then responsible for notifying the occupants in their space.

**iv. Standard Operating Procedures and Implementation**

**Strategies Pest Control Strategies**

The building interior and exterior will be inspected monthly 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 barrier will be placed in between the building and the adjacent landscape such that the landscape

is at least 18 inches from 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 those ranked as Tier 3 products on San Francisco's Pesticide Hazard Screening List: <http://www.sfenvironment.org/article/pest-management/least-toxic-pesticides-for-green-buildings>

If a pesticide is not listed on San Francisco's Pesticide Hazard Screening List, the San Francisco Pesticide Hazard Review Process (which can also be found at the link above) will be used to determine whether the pesticide is Tier 3 (least toxic). 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, any product classified as a Tier 1 or 2 pesticides on the San Francisco Pesticide Hazard Screening list, or any product that meets the Tier 1 or 2 criteria according to the San Francisco Hazard Review Process (which can also be found at the link above). 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 Senior Property Manager will notify the client contacts via email of the pesticide application, including the pesticide name, the EPA registration number, the treatment location, and the date of the application. Under normal circumstances, clients will be given 72 hours notification prior to the application. Under emergency circumstances, clients will be given notification within 24 hours of the application. The client contacts are

then responsible for distributing the notification to the occupants in their office space. 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.

**Client Communication plan**

If pests are observed in a client space, it is the responsibility of the client to notify the responsible party via the online maintenance request service (Building Engines). Within the same business day (or within one business day, maximum), the Chief Engineer or Senior Property Manager will contact the pest control vendor to inspect the situation and determine whether the regular action threshold or the emergency action threshold has been met. The pest control vendor 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.

<b>Pest Type</b>	<b>Action thresholds</b>
<b>Ants</b>	<p>Regular treatment will be performed if any ants are noted in the building and their presence is confirmed through monitoring.</p> <p>Emergency treatment may be used if there are ten or more reported cases or complaints of ants within a two day period.</p>
<b>Other insects</b>	<p>Regular treatment will be performed if nuisance insects are noted in the building and their presence is confirmed through monitoring.</p> <p>Emergency treatment may be used if there are ten or more reported cases or complaints of nuisance insects within a two day period.</p>
<b>Cockroaches</b>	<p>Regular treatment will be performed if any cockroaches are noted in the building and their presence is confirmed through monitoring.</p> <p>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.</p>
<b>Rat, Mouse</b>	<p>Regular treatment will be performed if rats or mice are noted in the building and their presence is confirmed through monitoring.</p> <p>Emergency treatment may be used if the presence of rats or mice is confirmed in two or more different spaces within the building.</p>
<b>Bed bugs</b>	<p>Emergency treatment may be used if the presence of bed bugs is confirmed in the building.</p>

<b>Other occasional invaders</b>	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 log book. 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 San Francisco's Pesticide Hazard Screening List"
- 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.

The Chief Engineer will record each pest that is reported by clients in the IPM tracking log book and notify the pest control vendor accordingly. The pest control vendor will record the applicable items from each site visit in the IPM tracking log book too.

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 responsible party will work with client contacts and the IPM vendor as necessary in order to appropriately adjust the action thresholds.

**vi. Quality Assurance/Quality Control Processes**

On an annual basis, the responsible parties and pest vendor 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 the pest vendor and client contacts will be educated on the adjustments made to the plan

**For any questions about the Integrated Pest Management Policy, please contact:**

**Kelli Reed**  
 Director of Property Management  
 2000 Tower Oaks Blvd. 9<sup>th</sup> Floor  
 Rockville, MD 20852  
 301-692-1506  
 Email: [Kelli.Reed@TowerCompanies.com](mailto:Kelli.Reed@TowerCompanies.com)

**Donna Nurmi**  
 DC Commercial Portfolio Manager  
 1909 K St NW Suite C180  
 Washington, DC, 20006  
 (202) 617-3751  
 Email: [Donna.Nurmi@TowerCompanies.com](mailto:Donna.Nurmi@TowerCompanies.com)

**Luke Lanciano**

Director of Sustainability  
2000 Tower Oaks Blvd. 9<sup>th</sup> Floor  
Rockville, MD 20852  
301-692-1506  
Email: [Luke.Lanciano@TowerCompanies.com](mailto:Luke.Lanciano@TowerCompanies.com)

**Carlos Diaz**

Chief Engineer  
2000 Tower Oaks Blvd. 9<sup>th</sup> Floor  
Rockville, MD 20852  
301-602-3051  
Email: [Carlos.Diaz@towercompanies.com](mailto:Carlos.Diaz@towercompanies.com)