Background and Purpose of the Following Draft Directive and Standard (D&S)

The goal of preparing this revised D&S document and providing stakeholders with the opportunity to comment on it in draft form is to enhance common understanding of how the Integrated Pest Management (IPM)/Invasive Species Program is administered and to enhance working relationships with our project partners. This will make the program more responsive to project sponsors, more consistent throughout Reclamation, and thus more effective.

Reclamation is revising this D&S because it was originally created in the late 1990’s and had not had any major revisions to date. Since its inception, legislation, Departmental policy, program requirements, and needs have changed, and this D&S has been revised to address these changes. This D&S was developed in coordination with Reclamation’s Denver directorates and associated five regions.

Substantive changes to the D&S included specifically how to address public notification of aerial pesticide applications on lands managed directly by Reclamation. The title of the D&S was also changed for clarity and consistency with the described revisions.

The Reclamation Manual is used to clarify program responsibility and authority and to document internal Reclamation-wide methods of doing business. All requirements in the Reclamation Manual are mandatory.

See the following pages for the draft D&S.
Subject: Public Notification of Aerial Applications of Pesticides on Lands Managed Directly by the Bureau of Reclamation

Purpose: To provide instructions for the Bureau of Reclamation personnel involved in aerial applications of pesticides to lands managed directly by Reclamation. The benefit of this Directive and Standard (D&S) is to fulfill Reclamation’s responsibility to notify the public when there is going to be an aerial application of pesticides.


Approving Official: Director, Policy and Administration (Policy)

Contact: Environmental Compliance Division (84-53000)

1. **Introduction.** When implementing Integrated Pest Management (IPM), Reclamation has the responsibility to ensure aerial applications of pesticides on lands under its direct management are conducted in a manner that takes into consideration: environmental impacts, public health and safety concerns, contractual obligations, and liability issues. When aerial applications occur on lands managed directly by Reclamation, appropriate public notification is required.

2. **Applicability.** This D&S applies to all Reclamation personnel who work on IPM and Invasive Species issues on lands managed directly by Reclamation. These include acquired, withdrawn, and easements for which Reclamation has not entered into a specific agreement or contract.

3. **Scale of Public Notification.**
   
   A. When aerial applications of pesticides are to occur on lands managed directly by Reclamation, the appropriate level of public notification prior to the pesticide treatment will take place.

   B. The level and complexity of public notification will be selected by and coordinated through the area office, the Regional IPM/Invasive Species Coordinator and the appropriate Reclamation public affairs representative.

   C. The types of notification shall take into consideration the level of public use projected to occur on the areas to be treated. Selection of application dates will be considered to minimize impacts to the public while maximizing the efficacy of the pesticide application.
For example: If there is potential for public exposure to pesticides during the application, public announcements to the appropriate media services and/or signage of the area prior to treatment would be necessary to provide adequate public safety.

In contrast, where the potential for public exposure to pesticides is unlikely—public notification might consist of simple information signs on field gates or fence lines.


A. The scope and scale of the aerial pesticide application as well as the plan of notification will be documented in the IPM Plan, see RM D&S ENV 01-01.

B. If the IPM Plan does not list aerial application for the specified pesticide or it does not describe the notification plan for the aerial application of the pesticide, this information will be documented on a completed Pesticide Use Proposal (PUP) Form (see RM D&S ENV 01-01).

C. IPM Plans and PUPs are approved by the Regional Director or the appropriate delegated signatory per Paragraph 4.F.(5) of the RM Delegations of Authority.

D. If an IPM Plan has not been completed for the area where the aerial application is to take place, the treatment cannot go forward until an IPM plan is in place.

5. Definitions.

A. Aerial Application of Pesticides. Specific to aircraft application.

B. Integrated Pest Management. Is a sustainable approach to managing pests by combining prevention, biological, cultural, physical, and chemical tools in a way that minimizes economic, health, and environmental risks. Examples of tools listed in the IPM definition include, but are not limited to, the following:

   (1) prevention tools - education, using a weed barrier, planning;
   (2) biological tools - predators, parasites, and pathogens;
   (3) cultural tools - crop rotation, alterations in planting dates, and sanitation;
   (4) physical tools - barriers, traps, hand-pulling, hoeing, mowing, and tilling;
   (5) chemical tools - pesticides, such as herbicides, insecticides, or fungicides.

C. Pesticide. FIFRA Section 2(u) defines a “pesticide” as:
6. **Review Period.** The originating office will review this release every 3 years.