GUIDANCE FOR APPROVING PESTICIDE USE IN REGION 3



Southwestern Region

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PURPOSE

The purpose of this guidance is to instruct USDA Forest Service (USFS) personnel in the Southwestern Region (Region 3) about agency requirements and procedures necessary for approving pesticide use on National Forest System (NFS) lands or other USFS-administered areas. The guidance is also intended to facilitate coordination and assistance between USFS, other Federal and State agencies, and external organizations (utility companies, oil and gas companies, etc.) in the use of pesticides on NFS lands in Region 3. The Region includes 11 national forests in Arizona and New Mexico as well as 4 national grasslands associated with northeastern New Mexico, western Oklahoma, and the Texas panhandle.

PROCEDURES FOR APPROVING PESTICIDES

General USFS procedures for approving any type of pesticide (vertebrate pesticides, herbicides, insecticides, etc.) are given below in the **USFS Requirements for Pesticide Use** section, which are applicable to all pesticide activities conducted on NFS lands or other USFS-administered areas in Region 3. Additional information is provided in the **Regional Protocols for Pesticide Use** section (see page 11), which should be followed when agencies or organizations external to the USFS are specifically involved in approval processes for use of (1) predator pesticides (predacides) and (2) all other types of pesticides (non-predatory vertebrate pesticides, herbicides, insecticides, etc.).

USFS REQUIREMENTS FOR PESTICIDE USE

USFS direction – USFS procedures for approval of pesticide use on NFS lands or other USFSadministered areas are primarily based on direction provided in—

- Forest Service Manual (FSM) 2150 PESTICIDE-USE MANAGEMENT AND COORDINATION
- FSM Region 3 Supplement (FSM R3 Suppl.) 2150 PESTICIDE-USE MANAGEMENT AND COORDINATION
- 3. FSM 2320 WILDERNESS MANAGEMENT
- 4. FSM 2650 ANIMAL DAMAGE MANAGEMENT
- Forest Service Handbook (FSH) 2109 PESTICIDE-USE MANAGEMENT AND COORDINATION HANDBOOK

USFS – WO direction on policy and regulations including Regional issuances may be found at http://www.fs.fed.us/about-agency/regulations-policies. This guidance may be accessed on Region 3's website for invasive species (http://www.fs.usda.gov/goto/r3/invasivespecies).

Pesticide-use proposals – FSM 2151.2 requires completion of **Pesticide-Use Proposal (PUP)** (form FS-2100-2) for each pesticide application activity planned on the NFS and other areas managed by the USFS. The PUP is used as part of the environmental analysis to determine whether a proposed pesticide use is appropriate. The PUP form must be completed for any proposed application of a vertebrate pesticide, insecticide, herbicide, fungicide, or any other kind of pesticide registered by EPA with the exception of household pesticides (FSH 2109.14, Chapter 74). PUPs are not required for veterinary products (e.g., vaccines), which are registered by the U.S. Food and Drug Administration (FDA). The PUP form, instructions for completing a PUP, and an example of a completed PUP can be found in the appendix of this document. A fillable PUP form may be obtained from https://www.fs.fed.us/foresthealth/protecting-forest/integrated-pest-management/pesticide-management/index.shtml or from the Regional Pesticide Coordinator listed in the appendix.

To approve use of a particular pesticide, a delegated USFS line officer must sign the PUP form prior to implementation of the proposed activity (FSM 2151.2). District rangers and forest supervisors must review and approve, or disapprove, those PUPs for which they have delegated authority (FSM 2150.47). District rangers and forest supervisors must also review, consolidate, and forward PUPs not under their authority to the Regional Forester for review and approval (FSM 2150.47). Only the Regional Forester can approve PUPs for (1) designated or study wilderness areas, (2) designated or candidate research natural areas (RNAs), and (3) any use of

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sodium cyanide (FSM 2150.44).¹ PUPs requiring Regional Forester approval must meet the following criteria:

- 1. PUPs for wilderness
 - a. Are supported by documentation that describes the pest problem, the treatment plan including time frames necessary to address the pest problem adequately, the methods to be used, and the timing and duration of pesticide applications for the duration of the project.
 - b. Are site specific, including maps of proposed treatment areas.
 - c. Are supported by an already approved Minimum Requirements Decision Guide (MRDG) that supports the proposed pesticide use and application methods over other available treatment methods.
 - d. Have been disclosed and discussed if necessary with interested publics prior to PUP submission to Regional Forester for approval.
 - e. Are consistent with decisions made in associated National Environmental Policy Act (NEPA) documents.
- 2. PUPs for RNAs
 - a. Are supported by documentation that describes the pest problem, the treatment plan including time frames necessary to address the pest problem adequately, the methods

¹ As a chemical toxicant, sodium cyanide (chemical formula, NaCN) can be lethal to both target and non-target terrestrial vertebrates (including birds) that consume treated baits (EPA. 1994. R.E.D. FACTS: sodium cyanide. EPA-738-F-94-016). Secondary poisoning may also occur if predators or scavengers consume pest animals that have been poisoned with sodium cyanide. To minimize chances for poisoning non-target species, EPA registration for sodium cyanide restricts its use to a spring-loaded ejector device (M-44), which can only be used by certified personnel to control wild canids.

to be used, and the timing and duration of pesticide applications for the duration of the project.

- b. Are site specific, including maps of proposed treatment areas.
- c. Have been coordinated with USFS Research & Development prior to submission of the PUP package to Regional Forester for approval. The Forest Supervisor should send a letter and the unapproved PUP to the Research Station Director requesting review and concurrence in a return letter. The Research Station Director's concurrence will be forwarded to the Regional Pesticide Coordinator as part of the PUP package submitted to the Regional Forester.
- d. Are consistent with decisions made in associated NEPA documents.
- 3. PUPs for sodium cyanide
 - a. Are consistent with the most recent Memorandum of Understanding (MOU) between USDA Animal and Plant Health Inspection Service – Wildlife Services (APHIS-WS) and the USFS, which outlines the cooperative approach to animal damage management on NFS lands (FSM 2650.1). Both agencies have joint responsibility for limiting damage caused by wildlife.
 - b. Reflect the outcome of annual coordination between staff of the relevant national forest and USDA APHIS-WS.
 - c. Are consistent with decisions made in associated NEPA documents compiled by APHIS-WS.

To request approval for one of the three non-delegable pesticide activities (wilderness, RNAs, and sodium cyanide), the Forest Supervisor should send a PUP package to the Regional Forester, which should consist of (1) a request letter (including a cc to the Regional Pesticide Coordinator), (2) a PUP form completed except for required signatures from the Regional

Forester and Regional reviewing staff, and (3) any necessary supporting documentation (maps, MRDGs, concurrence letter from the Research Station Director for RNAs, pesticide labels, etc.). The Forest Supervisor should ensure that the PUP package is submitted to the Regional Forester by a minimum of 60 days prior to proposed pesticide application.

District rangers are responsible for coordinating the preparation of PUPs for all proposed uses of pesticides within their district, including uses by licensees, permittees, grantees, States, and other Federal agencies (FSM 2150.47). However, the Forest Supervisor customarily has the responsibility for coordinating PUP preparation when multiple ranger districts are involved. When a particular PUP involves more than one forest, each forest is individually responsible for preparing PUPs pertaining to its lands unless the Regional Forester designates a lead forest to prepare a comprehensive PUP for all affected forests.

PUPs generally are completed by USFS personnel, although PUPs may be filled out by external agencies or organizations when they have the expertise and are responsible for conducting pesticide activities on NFS lands or other USFS-administered areas. Examples include PUPs filled out by USDA APHIS-WS for predator control and PUPs completed by utilities for vegetation management in utility corridors. The PUP form must be filled out with pertinent information except for blocks containing the review and approval signatures, which will be signed at the appropriate level of USFS delegated authority. Requests to the line officer with delegated authority for approval of any PUP should be made through a letter that includes the PUP as an attachment together with supporting information such as pesticide labels, maps, material safety data sheets (MSDSs) or Safety Data Sheets, etc.

PUPs must be reviewed by the Regional Pesticide Coordinator unless otherwise delegated to the forest or district level (FSM 2151.2). When pesticide-use authority has been delegated, all PUPs must be reviewed by appropriate district and forest pesticide coordinators (FSM 2151.2). The signature of the Regional Pesticide Coordinator or else a licensed pesticide coordinator at the relevant district or forest level is required on the PUP form before final approval (FSM R3 Suppl. 2155.2 - Certification). As appropriate, signatures by specialists in affected programs such as wildlife biologists or wilderness program managers may also be required before final approval. Required reviewers must sign the PUP before it can be approved by a line officer with delegated signing authority.

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Completed PUPs must be kept in agency project files (FSM 2151.2). The file code category of **2150 – Pesticide Use, Management and Training** must always be included in official USFS correspondence for the PUP along with any other pertinent file codes (up to three total) (FSH 6209.12). Unless substantive changes are warranted in a PUP or it is otherwise terminated, a properly completed and approved PUP may remain in effect for the duration of the project as long as the pesticide application activities described in the PUP remain consistent with pesticide product registration and label information and a valid NEPA document (FSM R3 Suppl. 2151.2). Substantive changes in the use of pesticides include, but are not limited to,

- 1. Adding or removing grazing allotments or other locations where vertebrate pesticides are used,
- 2. Changes in the type or application methodology of pesticides,
- 3. Change in supporting documents used for NEPA compliance,
- 4. New information on areas occupied by Federally listed species, and
- 5. Alterations in land use where exposure to the public or pets is probable.

Pesticide use on NFS lands or other USFS-administered areas may involve multi-year projects to protect natural resources; therefore, PUPs need not be renewed annually unless substantive changes take place. It is the responsibility of each pesticide applicator to ensure that PUP information is current for their projects (FSM 2151.2). It is also the responsibility of USFS personnel involved with any pesticide-use activity to ensure that USFS pesticide-use policies are followed in all agreements involving NFS lands (FSM 2151).

Delegation for pesticide activities – Under FSM 2150, all PUPs for pesticide applications on NFS lands must be approved or disapproved by the Regional Forester or otherwise by a delegated representative. However, the Regional Forester cannot delegate PUP approval authority to other line officers for projects pertaining to wilderness areas, research natural areas, or sodium cyanide (FSM 2150.44). Apart from these three specific pesticide uses, forest supervisors in Region 3 are delegated under FSM R3 Suppl. 2150.47 to approve all other uses of any EPA-registered pesticide that is in compliance with NEPA analyses and applicable regulations or laws at the Federal, State, or local level. However, relevant State and local laws pertaining to the use of pesticides will be followed only when they are not in conflict with USFS management authorities and objectives (FSM 2150.3).

In addition to other types of pesticides (herbicides, insecticides, etc.), forest supervisors may approve vertebrate pesticides and their delivery devices such as predacides (except sodium cyanide), avicides, rodenticides, and piscicides. To retain this delegated approval authority, forest supervisors must maintain expertise at the forest level (FSM R3 Suppl. 2150.47). In Region 3, forest supervisors are required to appoint a Forest Pesticide Coordinator who is responsible for coordinating pesticide uses and providing advice and assistance to line officers (FSM R3 Suppl. 2150.47). The Forest Pesticide Coordinator must be trained and certified by a State pesticide licensing agency (FSM R3 Suppl. 2150.47). Further information on Regional requirements for pesticide training and certification can be found in the *Plan for Pesticide Training and Certification in Region 3* (available at https://www.fs.usda.gov/detail/r3/forest-grasslandhealth/invasivespecies/?cid=stelprd3833403).

The Forest Pesticide Coordinator's certification in specific pesticide-use categories (Agricultural Pest, Aquatic, Forestry, Rights-of-Way, etc.) will determine what pesticides may be approved by the Forest Supervisor (FSM R3 Suppl. 2150.47). For example, a PUP for a piscicide (e.g., rotenone) cannot be approved by a Forest Supervisor unless the pesticide license of the Forest Pesticide Coordinator shows certification in the Aquatic pesticide-use category. However, State pesticide licenses do not have a pesticide-use category specific for terrestrial vertebrates; therefore, the general category of Agriculture Pest may be used to indicate certification.

Under FSM R3 Suppl. 2150.47, forest supervisors are authorized to delegate approval authority to district rangers for pesticide uses not specifically excluded in FSM 2150.47. The Forest Supervisor should place a letter in the official correspondence database to delegate authority to a particular District Ranger, and the Regional Pesticide Coordinator should be notified through a cc in the letter or by email once approval authority has been delegated. To retain approval authority, a District Ranger must maintain expertise at the district level by designating a District Pesticide Coordinator who has been trained and certified (licensed) by a State pesticide licensing agency (FSM R3 Suppl. 2150.47). This person's certification in specific pesticide-use categories will determine what pesticides may be approved by the District Ranger.

NEPA compliance – Management activities on NFS lands or other USFS-administered areas such as pesticide applications may not be undertaken unless documentation for a project is in compliance with the National Environmental Policy Act (NEPA) (FSM 1950). Pesticides cannot

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be applied on NFS lands or other areas managed by the USFS without (1) a signed decision based on NEPA compliance and environmental review, and (2) a completed and reviewed PUP on file at the respective USFS office (FSM 2151.2). The signed decision allowing pesticide activity must be one of the following:

- 1. Decision Memo (DM) for a Categorical Exclusion (CE)
- Decision Notice (DN) based on a Finding of No Significant Impact (FONSI) for an Environmental Assessment (EA)
- 3. Record of Decision (ROD) for an Environmental Impact Statement (EIS)

An EIS normally must be prepared to approve aerial application of a chemical pesticide applied on an operational basis (FSH 1909.15, Chapter 20). However, aerial projects covered under an emergency exemption (40 CFR Part 166) or an experimental use permit (40 CFR Part 172) do not require an EIS for approval. Also, approval for aerial application of a biopesticide (as classified by EPA) may only require preparation of an EA rather than an EIS (FSH 1909.15, Chapter 20).

Pesticide risk assessments are used in NEPA documents to quantitatively evaluate the probability (i.e., risk) that use of a particular pesticide might pose harm to humans or other species in the environment. The USFS Forest Health Protection program has prepared a number of Human Health and Ecological Risk Assessments (HERAs) for management activities involving pesticides, which may be accessed at http://www.fs.fed.us/foresthealth/pesticide/risk.shtml. The Regional Pesticide Coordinator should be consulted before using any alternative pesticide risk assessment in a NEPA document other than those found on the USFS website.

PUPs completed for pesticide activities must be supported by a NEPA-compliance document in terms of target species and proposed pesticide use. For example, an EA or EIS specific for noxious/invasive weeds may not be used to develop a PUP for a native weed species unless the targeted native weed species was also part of the environmental analysis. To allow use of pesticides not originally included in an existing NEPA document but are still within its scope, a supplemental information report (SIR) may be used. The SIR reviews new information or changed conditions for NFS lands or other USFS-administered areas and determines whether new application technologies have the same or similar impacts as compared to environmental

analyses and effects evaluated in existing NEPA documents. If addition of a new pesticide is consistent with previous environmental analysis, the SIR may be used in lieu of revising or supplementing the existing NEPA document and issuing a new decision. Once the SIR process is completed, a memo should be added to the correspondence database together with the SIR as an attachment. The memo and SIR should also be added as part of any official file that contains the original NEPA-compliance documents.

Pesticide record-keeping and reporting – FSM 2154 requires that records of all USFS pesticide-use activities must be maintained through USFS national databases of record such as FACTS (Forest Activity Tracking System) or TESP-IS (Threatened, Endangered, Sensitive Plants, and Invasive Species). FACTS is the database of record for <u>all</u> USFS pesticide activities whereas the latter database is used principally to report pesticide treatments that involve invasive species. When pesticide-use activities are conducted by non-USFS personnel (e.g., APHIS-WS) on NFS lands or other USFS-administered areas, the USFS project coordinator overseeing those activities must ensure that all related pesticide-use information for the project is recorded in the appropriate national database (FSM 2154).

Monitoring results for pesticide treatments must be recorded in the appropriate USFS database of record (FSM 2152.1). FSM 2152.1 also requires USFS units to conduct post-application evaluations for projects involving pesticides. Although not explicitly stated in USFS regulations, post-application reports made by external agencies or organizations conducting pesticide activities on NFS lands or other USFS-administered areas may suffice for a post-application evaluation in some cases.

REGIONAL PROTOCOLS FOR PESTICIDE USE

In addition to meeting the USFS Requirements for Pesticide Approval above, one of the two protocols outlined below should also be followed when agencies or organizations external to the USFS are involved in the PUP approval process. The Vertebrate Predacide Protocol on this page should be used by USFS and APHIS-WS (or a responsible State agency) for the specific use of predacides and other pesticides used to control animal damage. The General Protocol for Approving Pesticides found on page 17 should be followed by USFS and other external agencies or organizations for approval of non-predatory types of vertebrate pesticides (piscicides, avicides, rodenticides, etc.) and for all other kinds of pesticides (herbicides, insecticides, etc.).

A. Vertebrate Predacide Protocol

Management activities allowed on NFS lands to control animal damage caused by predators include the use of EPA-registered products such as sodium cyanide (used in M-44s), sodium nitrate (gas cartridges), and sodium fluoroacetate (Compound 1080 livestock protection collars). Regional foresters are responsible for reviewing and approving all PUPs for animal damage management on NFS lands (FSM 2650.42). This authority may be re-delegated to forest supervisors or district rangers, except that only regional foresters may approve PUPs for animal damage management in wilderness. To control predators in wilderness areas, regional foresters may approve PUPs for use of Compound 1080 livestock protection collars; however, poison baits or sodium cyanide ejector devices (M-44s) may not be used within wilderness (FSM 2323.33c).

APHIS-USFS MOU – In addition to national or Regional USFS directives listed above, USFS approval for use of predacides on NFS lands is based in part on the MOU of 2017 between APHIS-WS and USFS.² Under this MOU, APHIS-WS is responsible for evaluating Wildlife Damage Management (WDM) needs and developing/updating WDM work plans in cooperation

² Memorandum of Understanding between USDA Animal & Plant Health Inspection Service, Wildlife Services and the USDA, Forest Service National Forest System (FS Agreement No. 17-SU-11132422-231)

with USFS. WDM refers to actions taken by APHIS-WS to manage indigenous and feral vertebrates causing resource damage on NFS lands. Such actions include

- Minimizing livestock losses due to predation by coyotes, mountain lions, and other predators;
- 2. Managing wildlife diseases;
- 3. Managing invasive species like feral hogs; and
- 4. Protecting other wildlife, plants, and habitat from damage as requested by the USFS and/or State or Federal wildlife management agencies.

APHIS-WS is also responsible under the MOU for (1) NEPA compliance for activities involving wildlife damage, invasive species, and wildlife disease management on NFS lands; and (2) coordination with USFS and appropriate State and local agencies and tribes in completing the NEPA process for such activities. APHIS-WS is required to notify USFS about WDM requests prior to the execution of WDM activities and also to inform USFS about the results of WDM activities in a timely manner. An annual report, by State, is to be provided by APHIS-WS to USFS summarizing the results of all WDM activities on NFS lands.

For its part, USFS is committed to cooperate with APHIS-WS in the development and timely review of annual WDM plans governing APHIS-WS activities, including PUPs. USFS is also required to involve APHIS-WS in the amendment or revision of forest plans that may impact WDM activities. Both USFS and APHIS-WS are responsible for interagency coordination in analyzing the effects of WDM activities by APHIS-WS on NFS lands and resources before a decision in compliance with NEPA can be signed. The agency responsible for implementation of a specific project is also responsible for completion of analysis and documentation for NEPA.

Coordination of interagency meetings – In compliance with FSM 2650.42 and the APHIS-USFS MOU of 2017, regional foresters (or their designated representatives) are responsible for meeting with State or regional representatives, such as the APHIS Regional Director, as needed to coordinate animal damage management operations. Forest supervisors are also responsible for meeting with APHIS and other agencies where proposed predator control is needed to ensure coordination of USFS resources or activities on NFS lands (FSM 2650.43). Although FSM 2650 does not require meetings at the ranger district level when predator control is proposed by APHIS or other agencies, district personnel are responsible for preparing or coordinating all proposals for pesticide uses on the district (FSH 2109.14). District personnel from affected districts should therefore be part of the review and approval process.

Protocol for predacide use – Use of predacides on NFS lands in Region 3 must adhere to APHIS-WS directives and **USFS Requirements for Pesticide Approval** as shown above. The following protocol should also be used by USFS and APHIS-WS (or responsible State agencies) to coordinate approval of predacides and other pesticides used to control animal damage.

- A. APHIS-WS and USFS will-
 - 1. Meet at least annually at a Regional level (preferably in February or March) either physically in a meeting room or by teleconference to discuss program issues and resolve any potential difficulties or conflicts. It is agreed that APHIS-WS will initiate and coordinate all such meetings with the USFS Regional Pesticide Coordinator, the Regional Wildlife Program Leader, and other Regional staff as necessary. WDM activities across Region 3 from the previous year will be evaluated during the meeting, and the WDM activities will be adjusted to achieve desired results. Agency contacts listed in the appendix of this document will also be updated as necessary.

B. APHIS-WS will-

 Arrange for annual or more frequent meetings between APHIS-WS districts and individual national forests in Region 3 where predacides are currently in use or proposed for use. These forest-level coordination meetings should include APHIS-WS district personnel, the Forest Pesticide Coordinator, and forest or district-level staff as necessary, especially district staff from affected ranger districts. All existing or newly submitted PUPs should be reviewed at the annual meeting along with any necessary review of pertinent NEPA documents. The meetings should take place in November-December to provide adequate time for review by USFS for the upcoming field season. In addition, APHIS-WS may also arrange for local "Work Plan" meetings, which will include USFS and other agencies such as BLM, State agencies

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(e.g., land office, game and fish, agriculture, and health), and others where appropriate.

- 2. Prepare all new PUP forms necessary for use of predacides and submit them together with any supportive information such as pesticide labels, maps, and MSDSs or Safety Data Sheets to the Forest Pesticide Coordinator by about October 1 of each year. Scale and scope of the PUP will be mutually agreed upon between the USFS and APHIS-WS prior to submission of the PUP to the Forest Supervisor. If any substantive changes are warranted, the PUP should be rewritten and re-submitted for approval. A letter will be sent by APHIS-WS to the Forest Supervisor and to district rangers on affected districts when a PUP is to be terminated.
- 3. Arrange for follow-up meetings with affected USFS districts subsequent to the forestlevel meeting to discuss WMD work planning and other issues.
- 4. Notify the Forest Pesticide Coordinator and relevant USFS districts prior to execution of WDM activities and inform the Coordinator and districts about the results of WDM activities in a timely manner, including specific information on pesticide usage such as date of application, application rate, area applied, etc.
- Provide a copy of the annual report summarizing results of all WDM activities on NFS lands to the Forest Pesticide Coordinator on each forest where predacides were used and to the Regional Pesticide Coordinator.
- C. USFS will-
 - 1. Arrange for USFS staff on national forests to meet at least annually with counterpart personnel from APHIS-WS to
 - a. Review and discuss current WDM work plans and activities on affected USFS districts as necessary,

- b. Establish schedules for processing necessary paperwork, and
- c. Discuss any special treatment requirements for areas such as environmentally sensitive areas.
- 2. Process a PUP submitted by APHIS-WS as follows:
 - a. For PUPs that do <u>not</u> involve non-delegable pesticide uses (wilderness, research natural areas, or sodium cyanide), the PUP will be reviewed and approved (or disapproved) by the Forest Supervisor within four weeks after the submission date and returned to APHIS-WS. The Forest Supervisor will approve the PUP after appropriate review by the Forest Pesticide Coordinator (or a designated representative at the district level) who has a valid pesticide license and has been properly trained. In the event that such personnel are unavailable, the submitted PUP and supporting material (pesticide labels, maps, MSDSs, etc.) will be sent by the Forest Supervisor in a written request to the Regional Forester for approval. PUPs will be approved indefinitely unless the annual review conducted by APHIS-WS and USFS personnel indicates that specific conditions of a PUP are no longer valid and that the PUP needs to be revised or terminated.
 - b. For PUPs that involve non-delegable pesticide uses (wilderness, research natural areas, or sodium cyanide), the Forest Supervisor will forward the PUP and supporting material (pesticide labels, maps, MSDSs, etc.) together with a letter to the Regional Forester and a cc to the Regional Pesticide Coordinator for review and approval (or disapproval). The PUP will be reviewed by the Regional Pesticide Coordinator, Regional Wildlife Program Leader, and other Regional staff as necessary. A letter together with an approved PUP will be sent by the Regional Forester to the Forest Supervisor which can then be sent to APHIS-WS. Sufficient time (at least 3-4 weeks) should be allowed by the Forest Supervisor and APHIS-WS for approval of a PUP by the Regional Forester due to the additional time needed for review and approval.

- 3. Ensure that pesticide use as reported by APHIS-WS or other agencies conducting treatments with predacides on NFS lands is properly reported in the FACTS and TESP-IS databases. The latter database should be used solely for treatment of invasive species. Forest pesticide coordinators are responsible for ensuring that treatments with predacides on their forest are recorded in the appropriate national database.
- 4. Maintain a project file (electronic or paper) wherein official correspondence, PUPs, and annual WDM reports provided by APHIS-WS may be kept. The file code 2150 Pesticide Use, Management and Training must always be included in official USFS correspondence for PUPs along with any other pertinent file codes. Valid APHIS-WS documents necessary for NEPA compliance should be retained in the file. USFS project coordinators are responsible for ensuring that project files are maintained in the appropriate unit office.
- 5. Notify APHIS-WS when any current amendment or revision of forest plans may impact WDM activities, particularly through pesticide approvals.

B. General Protocol for Approving Pesticides

Use of pesticides on NFS lands or other USFS-administered areas in Region 3 must follow the **USFS Requirements for Pesticide Approval** section above. In addition, the protocol outlined below should be followed by USFS and external agencies (e.g., State game and fish agencies) or organizations (utility companies, oil and gas companies, etc.) to approve non-predatory vertebrate pesticides (piscicides, avicides, rodenticides, etc.) and all other types of pesticides (herbicides, insecticides, fungicides, etc.).

- A. External agencies or organizations will-
 - 1. Arrange for physical meetings or teleconferences as needed with individual national forests in Region 3 where pesticide use is being proposed. These coordination conferences should be initiated at the district level if only one district will be involved with the proposed pesticide activity; otherwise, coordination conferences should be undertaken at the Forest Supervisor's level when more than one district will be affected. The Regional Forester's office in Albuquerque should be contacted if more than one forest will be involved. Coordination conferences should include personnel from the external agency or organization and pertinent USFS staff (pesticide coordinators, NEPA specialists, special use administrators, etc.) at the district, forest, or Regional levels as appropriate. Scheduling for the conferences should provide adequate time for review by USFS before implementation of the planned project. All existing and newly submitted PUPs should be reviewed during the course of the coordination conferences along with any necessary review of pertinent documents necessary for NEPA compliance. Special use authorizations allowing the external agency or organization to operate on NFS lands or other areas administered by the USFS should also be reviewed to ensure that the type of pesticide use proposed has been authorized. If not, the authorization should be amended or a new application should be submitted by the permittee.

- 2. If qualified, prepare all new PUP forms necessary for use of any proposed pesticide and submit the forms together with any supportive information such as pesticide labels, maps, and MSDSs or Safety Data Sheets to the forest or district pesticide coordinator as appropriate. Scale and scope of the PUP will be mutually agreed upon between the USFS and agency or organization prior to submission of the PUP to the delegated line officer. If any substantive changes are warranted, the PUP should be rewritten and re-submitted for approval. A letter should be sent by the responsible agency or organization to the Forest Supervisor and to district rangers on affected districts when a PUP is to be terminated.
- 3. Arrange for follow-up meetings as necessary with affected USFS districts subsequent to the initial meeting to discuss work plans and other issues.
- Provide an annual report that summarizes all pesticide activities on NFS lands or other USFS-administered areas to the Forest Pesticide Coordinator on each forest where pesticides were used.
- B. USFS will-
 - Arrange for USFS staff on national forests to meet as necessary with external agencies or organizations to establish schedules for processing necessary paperwork and discuss any special treatment requirements for areas such as environmentally sensitive areas. This includes reviewing current or proposed special use authorizations that allow the external agency or organization to operate on NFS lands or other USFS-administered areas.
 - Prepare all new PUPs when an external agency or organization is not qualified to complete the form. This includes providing any needed supportive information such as pesticide labels, maps, and MSDSs or Safety Data Sheets.
 - Process a completed PUP submitted or requested by an external agency or organization as follows:

- a. For PUPs that do <u>not</u> involve non-delegable pesticide uses (wilderness, research natural areas, or sodium cyanide), the PUP will be reviewed and approved (or disapproved) by the delegated line officer within four weeks after the submission date and returned to the external agency or organization. The line officer will approve the PUP after appropriate review by a forest or district pesticide coordinator who has a valid pesticide license and has been properly trained. In the event that such personnel are unavailable, the submitted PUP and supporting material (pesticide labels, maps, MSDSs, etc.) will be sent by the Forest Supervisor with a written request to the Regional Forester for approval. PUPs will be approved indefinitely unless review conducted by USFS personnel or the external agency or organization indicates that specific conditions of a PUP are no longer valid and that the PUP needs to be revised or terminated.
- b. For PUPs that involve non-delegable pesticide uses (wilderness, research natural areas, or sodium cyanide), the Forest Supervisor will forward the PUP and supporting material (pesticide labels, maps, MSDSs, etc.) together with a letter to the Regional Forester and a cc to the Regional Pesticide Coordinator for review and approval (or disapproval). The PUP will be reviewed by the Regional Pesticide Coordinator and other Regional staff as necessary. A letter together with an approved PUP will be sent by the Regional Forester to the Forest Supervisor which can then be forwarded to the external agency or organization. Sufficient time (at least 3-4 weeks) should be allowed by the Forest Supervisor and the external agency or organization for approval of a PUP by the Regional Forester due to the additional time needed for review and approval.
- 4. Ensure that pesticide use as reported by the external agency or organization conducting pesticide treatments on NFS lands or other USFS-administered areas is properly reported in the FACTS and TESP-IS databases. Forest pesticide coordinators are responsible for ensuring that treatments with pesticides on their forest are recorded in the appropriate national database. If pesticide applications are

specific to invasive weed management, pesticide treatments need only be recorded by data entry into TESP-IS. The pesticide-use activity will be simultaneously captured in both TESP-IS and FACTS.

5. Maintain a project file (electronic or paper) wherein official correspondence, PUPs, and reports provided by the external agency or organization may be kept. The file code 2150 – Pesticide Use, Management and Training must always be included in official USFS correspondence for PUPs along with any other applicable file codes. Valid NEPA documents pertinent to the pesticide activity should be retained in the file or at least be readily available. USFS project coordinators are responsible for ensuring that project files are maintained in the appropriate unit office.

APPENDIX

A. Principal Agency Contacts

USFS Regional Office Contacts

Regional Pesticide Coordinator

Allen White Forest Health Protection 333 Broadway Blvd, SE Albuquerque, NM 87102 505-842-3280 allen.white@usda.gov

USFS National Forest Contacts

Apache-Sitgreaves NFs

David Evans

30 South Chiricahua Drive Springerville, AZ 85938 928-333-6309 david.a.evans@usda.gov

Cibola NF

Donald Serrano

2113 Osuna Road NE Albuquerque, NM 87113 505-842-3900 donald.serrano@usda.gov

Regional Wildlife Program Leader Leslie Hay Wildlife, Fish & Rare Plants 333 Broadway Blvd, SE Albuquerque, NM 87102 505-842-3268

leslie.hay@usda.gov

Carson NF

vacant 15160 State Road 75/PO Box 68 Penasco, NM 87553-0068 575-587-2255

Coconino NF

Kit MacDonald 800 South 6th Str. Williams, AZ 86046-2899 928-527-3451 christopher.macdonald@usda.gov

Coronado NF

Christina Pearson

5700 North Sabino Canyon Rd Tucson, AZ 85701 520-749-8700 christina.pearson@usda.gov

Kaibab NF

Micah Kiesow

800 South 6th Str. Williams, AZ 86046-2899 928-635-8354 micah.kiesow@usda.gov

Prescott NF

Francisco Anaya

735 N. Hwy 89 Chino Valley, AZ 86323 928-777-2240 francisco.anaya@usda.gov

Tonto NF

Ryan Nicholas

2324 East McDowell Rd Phoenix, AZ 85006-2496 602-225-5386 ryan.nicholas@usda.gov

Gila NF

Mike Head

3005 East Camino del Bosque Silver City, NM 88061 575-388-8422 michael.head@usda.gov

Lincoln NF

Jasper Colcord 3463 Las Palomas Rd. Alamogordo, NM 88310 575-434-7301 jasper.colcord@usda.gov

Santa Fe NF

Christine Bishop 11 Forest Lane Santa Fe, NM 87508 505-438-5441 christine.bishop@usda.gov

APHIS-WS Contacts

State Director, AZ

Dave Bergman

8836 North 23rd Ave, Suite 2Phoenix, AZ 85021602-870-2081david.1.bergman@aphis.usda.gov

State Director, OK

Scott Alls

2800 N. Lincoln Blvd Oklahoma City, OK 73105 405-521-4039 scott.a.alls@usda.gov

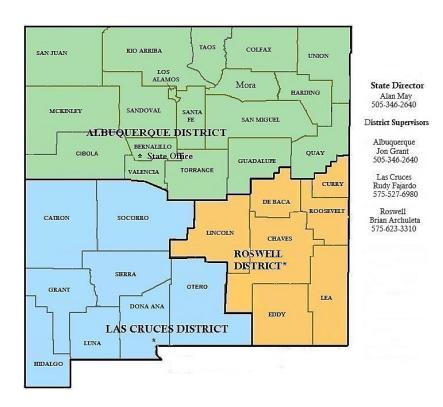
State Director, NM

Rob Gosnell 8441 Washington St, NE Albuquerque, NM 87113 505-346-2640 robert.j.gosnell@usda.gov

State Director, TX

Mike Bodenchuk P.O. Box 690170 San Antonio, TX 78249 210-472-5451 michael.j.bodenchuk@aphis.usda.gov

B. APHIS-WS Districts in New Mexico



C. Sample PUP Form

Pesticide-Use Proposal						
CTD .	(Reference FSM 2150)	FS-2100-0002 (REV.06/2018) OMB 0596-0241 Exp. 12/2018				
To complete this form, see instructions for Form FS-2100-0002, Pesticide-Use Proposal						
Agency / Cooperator* Contact Name, Phone Number and e-mail*						
Region* F	orest/District*	Date Submitted*				
How would you like to be informed of the c						
 OBJECTIVE a) Project name and/or identifier b) Specific target pests(s) c) Purpose 						
 2) PECSTICIDE PRODUCT(S) a) Trade name b) Formulation as purchased c) Restricted-use Pesticide(yes/no) d) EPA registration number e) Common name of chemical(s) f) AI, AE, IU, or PIB expressed as % or concentration 						
3) TYPE OF APPLICATION a) Method b) Equipment						
 4) FIELD APPLICATION INFORMATION a) Formulation of material to be applied b) Planned application rate c) Dilution rate d) Dilutent e) Pounds of AI or AE per acre(or other applicable rate) f) Other pesticides being applied to proposed treatment site(s) 						
 5) TREATMENT AREA DESCRIPTION a) Targeted treatment area b) State and County c) Site Description d) Estimate of acres(or other unit) to be treated e) Number of applications f) Month(s) and year(s) of application 						

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 6) SENSITIVE AREAS a) Special designated area (if applicable) b) Areas to be avoided c) Areas to be treated with caution 7) PROJECT IMPLIEMENTATION a) Trained/certified personnel to be used b) Personal safety c) State and local coordination d) Best management practices e) Monitoring f) Additional project information 			
		ubmit by Email	
8. REVIEWER SIGNATURE(S)	For Official Use Only		
a) Pesticide Use Coordinator		Date	
b) Other reviewer(s)			
(as necessary)		Date	
c) Approval		Data	
(signature of approving official)		Date	
Burden Statement According to the Papenwork Reduction Act of 1995, an ager	cy may not conduct or sponsor, and a person is not requin	ed to respond to a collection of information unless it displays a valid OMB contro	
the time for reviewing instructions, searching existing data s	purces, gathering and maintaining the data needed, and \propto	this information collection is estimated to average 2 hours per response includir ompleting and reviewing the collection of information. ace, color, national origin, gender, religion, age, disability, political beliefs, sexu:	
	ises apply to all programs) Persons with disabilities who r	ace, color, national ongin, gender, religion, age, disability, political beliefs, sexu require alternative means for communication of program information (Braille, larg	
To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, 1400 Independence Avenue, SW, Washington, DC 20250-9410 or call (800) 795-3272 (voice) or (202) 720-6382 (TDD). USDA is an equal opportunity provider and employer.			
ile Code: 2100 For technical questions and Section 508 accommodation, please contact <u>fseforms@fs.fed.us</u> Page 2 of 2			

D. Instructions for Form FS-2100-2, Pesticide-Use Proposal



Instructions for Form FS-2100-2, Pesticide-Use Proposal

(Reference FSM 2150)

FS-2100-0002-I (REV.06/18/2018)

AGENCY INFORMATION Provide requested information. How would you like to be informed of the decision on your proposal? Please check one option. **OBJECTIVE** (Block 1) a) Project name and/or identifier - Include the local project name and/or identifying name such as the name of the relevant NEPA compliance document and date of decision. [Note -Environmental analyses (EA's and/or EIS's) may be cited within the Pesticide-Use Proposal for additional information.] b) Specific target pest(s) - Identify target pest(s) by the common and scientific name. Also identify the life cycle stage for animals (adult, larva, etc.) or stage of growth for plants (pre-emergent, seedling, sapling, etc.) at the time of application. A table may be attached to list information for multiple targets. c) Purpose - State exact purpose of pesticide use. PESTICIDE PRODUCT(S) (Block 2) a) Trade name - State the trade name(s) exactly as shown on container (e.g., Roundup Ultra, Tordon 22k, Sevin SL). b) Formulation as purchased - State the formulation (liquid, dust, granule, pellet, emulsion, bait, solution (ready-to-use without dilution), gas, flakes, packets, etc.) of each pesticide product as purchased. c) Restricted-use pesticide (yes/no) - Specify whether the pesticide is a restricted-use pesticide or not. d) EPA registration number - State the EPA registration number from the pesticide label. e) Common name of chemical(s) - State the common name (glyphosate, picloram, carbaryl, etc.) of active ingredient(s) as given on the pesticide label. When more than one pesticide active ingredient will be used during treatment of a single pest, list active ingredients separately by placing the word "and" between them to indicate the different pesticide names (e.g., aminopyralid and 2, 4-D). When alternative materials are proposed for the application, use the word 'or' in listing the names. f) AI, AE, IU, or PIB expressed as % or concentration - State the percentage (%) or concentration (lb/gal, oz/oz, etc.) of any active ingredient (AI), acid equivalent (AE), international units (IU), or polyhedral inclusion bodies (PIB) as shown on the pesticide label. For herbicides, report as acid equivalent rather than active ingredient when available. IU may be expressed as billion international units/gal for bacteria, and PIB may be expressed as billion polyhedral inclusion bodies/ oz for viruses, as appropriate. **TYPE OF APPLICATION** (Block 3) a) Method - Indicate the specific method of application to be used (aerial, ground, aquatic, etc.). b) Equipment - Indicate the specific type of equipment to be used such as backpack sprayer, helicopter, fixed-wing aircraft, mist blower, hydraulic sprayer, injector, packets, etc. FIELD APPLICATION INFORMATION (Block 4) a) Formulation of material to be applied - Indicate the pesticide material to be applied in the field (spray liquid, pellets, granules, dust, bait, gas, flakes, packets, etc.).

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b) Planned application rate - Indicate the amount of liquid or dry material to be applied on a per unit area basis (gal/ acre, lbs/acre, oz/1,000 ft², etc.). In general, calibration of liquid sprayers requires determination of the application rate in gallons per acre (GPA).

c) Dilution rate - Indicate the pesticide concentration to be applied in the field as the amount of concentrate to be mixed with a specified amount of diluent (e.g., 1 qt. Tordon 22K/25 gallons of total mix).

d) Diluent - Identify the material (water, oil, talc, etc.) that will be used to reduce the concentration of a pesticide formulation at the time of application.

e) Pounds of AI or AE per acre (or other applicable rate) - State the pounds of active ingredient (AI) or acid equivalent (AE) (specify which) to be applied on a per acre basis, unless some other unit is indicated on the label. If reporting acreage is not appropriate, indicate units used. If a pesticide for trees or brush is to be applied by aircraft or mist blower, express as pounds of AI or AE per acre. For outdoor spot applications, the rate of application should also be expressed in pounds of AI or AE per acre. For pesticide treatment of individual trees, the application rate for AI or AE is described as number of trees and rate per tree (or an equivalent measure).

Indoor applications of residual sprays may be expressed as gallons per 1,000 square feet (at whatever percent AI in the prepared spray) or simply as pounds AI per 1,000 square feet. For spraying pesticide on most indoor surfaces to the point of runoff, assume the rate to be 1 gallon of formulation per 1,000 square feet. If a dust is being used, express as ounces or pounds of AI in prepared dust per M (1,000) square feet. The AI rate of application for fumigants or indoor aerosols is expressed as pounds AI per M (1,000) cubic feet. Rodent baits should be given as ounces or pounds of AI in the prepared bait per bait station.

The rate of application of AI for pesticide treatments in water may be expressed in parts per million (ppm) or parts per billion (ppb). Specify whether ppm or ppb is by weight or volume.

f) Other pesticides being applied to proposed treatment site(s) - Indicate other pesticides currently being applied or will be applied to the same site(s) proposed for treatment within the same year (e.g., ongoing carbaryl treatment of trees in the same campground where invasive plants will be treated; pesticides applied under other Pesticide-Use Proposals within the same treatment area).

TREATMENT AREA DESCRIPTION (Block 5)

a) Targeted treatment area - Specify area(s) to be treated (wilderness area, stretch of river, grazing allotment, etc.).

b) State and county - Indicate State(s), county(ies), and any other geographic jurisdictions involved with the area(s) to be treated.

c) Site description - Provide information on the type of area (rangeland, tree nursery, etc.) to be treated and any specific parts or portions of the area that will be treated such as ditch banks, rights-of-way, etc. When applicable, specify whether the pesticide will be applied directly to water or near the water's edge (e.g., riparian area). State the distance to nearest surface water (lakes, streams, etc.) or wetland. Where applicable, indicate the general slope of the treated area(s). For aquatic applications, indicate water quality (hardness and pH) of treated water body if available or applicable.

d) Estimate of acres (or other unit) to be treated - Provide an estimate for acres to be treated, unless other units are otherwise applicable. When projects require repeat applications, estimate only those acres to be treated in the first application.

e) Number of applications - For projects that will require repeat applications within the same area, provide an estimate of the number of treatments that will be used per season.

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f) Month(s) and year(s) of application - Indicate the month(s) and year(s) that applications are planned. If necessary, provide general season of treatment (e.g., spring, summer, or fall) or an estimate of the range of years for treatment (e.g., 2011 through 2019).

SENSITIVE AREAS (Block 6)

a) Special designated area (if applicable) - Identify any wilderness area, Research Natural Area (RNA), botanical area, or other similar designated area that is in proximity to areas to be treated. Describe specific precautionary measures that will be taken to protect identified special designated area (e.g., no pesticide application with mechanical ground equipment inside wilderness area).

b) Areas to be avoided - Identify specific areas to be protected from direct application, drift, or runoff (waterbodies, private property, T&E species habitat, etc.). Describe specific precautionary measures that will be taken to avoid presence of pesticide in identified area (e.g., no application within 100 feet of stream).

c) Areas to be treated with caution - Identify sensitive areas (riparian areas, areas with a shallow water table, T&E species habitat, etc.) that require special precautions during treatment to avoid undue impacts or contamination. Describe specific precautionary measures that will be taken to protect identified area (e.g., use of pesticides with an aquatic label in riparian areas).

PROJECT IMPLEMENTATION (Block 7)

a) Trained/certified personnel to be used - Provide information regarding personnel who will be performing the actual pesticide work. Applicators and personnel serving as supervisors must be trained in the proper application of pesticides. Personnel handling or applying a restricted-use pesticide must be State or Federally certified for restricted-use pesticide operations.

b) Personal safety - State any restricted entry interval (REI) required by the pesticide label following application. If additional personal protection equipment other than what is on the label is proposed, please describe.

c) State and local coordination - Indicate any coordination at the State or local level that will be made for the project.

d) Best management practices - Describe or reference the best management practices that will be followed for pesticide application such as lowest effective application rate, equipment calibration, field scouting/monitoring before pesticide application, buffer zones, and weather restrictions (wind speed limit, inversion avoidance, etc.).

e) Monitoring - Describe monitoring required for treatment effectiveness and any other monitoring that will be conducted.

f) Additional project information - Describe other information pertinent to the project that is not addressed in sections above (e.g., information as to whether the project will be conducted by force account or through a contract).

SUBMISSION

Please contact the U.S. Forest Service Region/Area Pesticide Use Coordinator in advance to inform him/her of the method in which the form will be submitted (in person or by courier, via e-mail, or via U.S. Postal Service).

The following website has the List of Pesticide Use Coordinators by Region/Area:

https://www.fs.fed.us/foresthealth/contact-us/pesticide-contact-us.shtml

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REVIEWER(S) (Block 8)

a) Pesticide use coordinator - A pesticide use coordinator's signature at the district, forest, or regional level (as appropriate) is required before final approval.

b) Other reviewers (as necessary) - Include any necessary signature(s) of specialists in pertinent programs such as biologists, entomologists, agronomists, wilderness program managers, or Research Natural Area (RNA) program managers that are required before final approval.

APPROVAL (signature of approving official) (Block 9)

Signature of approving line officer with delegated signing authority

Burden Statement

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0596-0241. The time required to complete this information collection is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, gender, religion, age, disability, political beliefs, sexual orientation, and marital or family status. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at 202-720-2600 (voice and TDD). To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, 1400 Independence Avenue, SW, Washington, DC 20250-9410 or call (800) 795-3272 (voice) or (202) 720-6382 (TDD). USDA is an equal opportunity provider and employer.

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E. Example of a Completed Form FS-2100-2, Pesticide-Use Proposal

USDA Forest Service

EXAMPLE

FS-2100-2

(v12-2015) OMB 0596-0241 Exp. 12/2018

	PESTICIDE-USE PROPOSAL (Reference FSM 2150)					
To complete this form, see Instructions for Form FS-2100-2, Pesticide-Use Proposal						
AGENCY/ COOPERATOR	CONTACT NAME, PHONE NUMBER, and E-MAIL	REGION	FOREST/ DISTRICT	DATE SUBMITTED		
USDA Forest Service	Smokey Bear, (555) 555- 5555, sbear@fs.fed.us	R7	Canoe NF/ Big Lake RD	1/20/18		
How would you like to be in your proposal?	formed of the decision on	Please choose c		_ <u>X</u> Both		
 OBJECTIVE Project name and/or ider Specific target pest(s) Purpose 		b) Mountain	ampground Bark Beet Pine Beetle (<i>Dendroci</i> of successful beetle a	tonus ponderosae)		
 2) PESTICIDE PRODUCT(a) Trade name b) Formulation as purchase c) Restricted-use pesticide d) EPA registration numbe e) Common name of chem. f) AI, AE, IU, or PIB expression 	ed (yes/no) r ical(s) essed as % or	 a) Sevin XLR b) Liquid c) No d) 264-333 e) Carbaryl f) 4 lbs a.i. po 				
3) TYPE OF APPLICATIOa) Methodb) Equipment		a) Ground-ba b) High-press	sed ure hydraulic sprayer			
 4) FIELD APPLICATION I a) Formulation of material b) Planned application rate c) Dilution rate d) Diluent e) Pounds of AI or AE per applicable rate) f) Other pesticides being applications and the state 	to be applied acre (or other		r 50 square feet of bar /100 gallons or 5 oz/1 per tree			
 5) TREATMENT AREA DESCRIPTION a) Targeted treatment area b) State and county c) Site description d) Estimate of acres (or other unit) to be treated e) Number of applications f) Month(s) and year(s) of application 		 a) Pre-designated high value trees in campground, unless they have current evidence of bark beetle attack b) Montana, Missoula County c) Campground within a ponderosa pine-dominated forest, level ground, Cold Creek (perennial) flows along north end of campground. d) 100 trees e) 1 f) May 2014 				
6) SENSITIVE AREASa) Special designated areab) Areas to be avoidedc) Areas to be treated with	caution	c) Cover with faucets, to	ilets. Remove plastic	uffer es, barbeques, firepits, once residues have dried. its 45 and 46 with plastic as		
7) PROJECT IMPLEMENTATIONa) Trained/certified personnel to be usedb) Personal safety		 a) Certified applicators only b) In addition to label-required PPE, applicators will also wear chemical-resistant outerwear, chemical-resistant boots. REI is 12 hours. 				

USDA Forest Service	EXAMPLE	FS-2100-2		
		(v12-2015) OMB 0596-0241 Exp. 12/2018		
 c) State and local coordination d) Best management practices e) Monitoring f) Additional project information 	c) d) e) f)	 county after application. d) Stream buffer along Cold Creek, 200 feet e) Water sensitive spray cards will be deployed during spray application to delimit the area of drift in stream buffer. Operations will be suspended if drift reaches spray cards and at that point an evaluation will be made until conditions to spray are in the parameters set for this project. 		
	Ear Official 1	Una Orahi		
8) REVIEWER(S) SIGNATURE(S)	For Official U	Use Only		
a) Pesticide use coordinator /W. Owl, R7 Pesticide-Use Coordinator		ator Date: 1/23/18		
b) Other reviewer(s) (as necessary) /J.	Beaver, R7 Big Lake Distr	rict Ranger Date: 1/23/18		
9) APPROVAL (signature of approving official) /A. Campfire, R7 Regional Forester Date: 1/23/18				

Burden Statement

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