

PESTICIDE USE IMPACT ASSESSMENT IN VERMONT

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Vermont's Pesticide Use Impact Assessment (PUIA) was initiated in 1987 with the implementation of Governor Madeline Kunin's Pesticide Policy Statement. In brief, the policy statement called for a greater awareness of pesticides, their potential problems, and methods of reducing the amount of pesticides in use.

Specifically, Governor Kunin halted the use of all pesticides by state agencies and departments until a Pesticide Use Impact Assessment (PUIA) and a Pest Management Plan could be developed for each application. The onus for assessment and plan development was placed on individual users, with regulation and review administered by the Vermont Department of Agriculture.

Unfortunately, the full impact of the Governor's policy statement did not reach the State Tree Nursery until early June 1987, two days prior to application of weed control herbicides.

Two problems required immediate attention.

1) Operation of the Nursery without pesticides during the interim between the prohibition of pesticide application, and the development of a PUIA and Pest Management Plan.

2) Development of an acceptable PUIA and Pest Management Plan.

Fortunately, the first problem was resolved by late June 1987. The Commissioner of Forests, Parks and Recreation, sighting potentials for crop loss, granted a special hardship dispensation that allowed for pesticide application during the period of assessment and plan development. The dispensation was only temporary and by no means eliminated the need for the immediate development of a PUIA and Pest Management Plan.

The development of an acceptable PUIA and Pest Management Plan proved to be a challenging task. Literature search, gathering data, documenting past pesticide activities, garnering advice from noted pesticide experts, contacting chemical companies, etc. occurred at a frenzied pace. By the end of June 1987 a PUIA and Pest Management Plan were forwarded to the Vermont Department of Agriculture for review and approval.

The PUIA and Pest Management Plan included the following criteria.

- 1) Purpose and need for action.
- 2) Management strategies and objectives.
- 3) **Affected environment.**
- 4) **Alternatives**
- 5) **Evaluation of alternatives.**
- 6) Environmental consequences.
- 7) **Risk analysis.**
- 8) Pesticide profiles.
- 9) Contingency plans.
- 10) Pesticide reduction plan.
- 11) Applicator certification and training.
- 12) Administrative requirements and constraints.

In summary, the following observations were noted.

- 1) Regulation of pesticides will increase.
- 2) **It is difficult to access and impact those involved in regulation development.**
- 3) Timing and allowances for plant preparation are given little consideration.
- 4) Accurate records of pesticide use are critical.
- 5) The PUIA often raised more questions than it answered especially relating to environmental and human risk analysis.
- 6) Experts tend to qualify their input.

In conclusion, although the timing was poor, the development of *a* PUIA and Pest Management Plan did enhance the overall Nursery operation. Nursery management became much more aware of the need for monitoring pest, establishing thresholds of acceptable damage, and assessing the impact of pesticides on Nursery personnel and the environment.

As a natural extension of this process, Nursery management will be preparing a pesticide reduction plan with a goal of reducing pesticide use by 20% during the 1989 growing season.