

UNCOMPAHGRE FIELD OFFICE PESTICIDE USE PROPOSAL

The Pesticide Use Proposal (PUP) is a Bureau of Land Management (BLM) form used to track and approve pesticide use on public lands. The form is designed to provide site-specific information about chemical use on BLM lands as required for development of new environmental analysis and compliance with existing national and field office environmental impact statements or assessments.

Instructions for Pesticide Use Proposal (PUP) Submissions

ITEMS OF THE PUP FORM WHICH ARE HIGHLIGHTED IN YELLOW ARE TO BE COMPLETED BY THE PROPONENT PRIOR TO SUBMISSION.

A PUP package contains the following:

1. Copies of specimen labels of any chemicals and surfactants proposed for use.
2. Safety Data Sheets (SDS) for any chemicals and surfactants proposed for use.
3. A properly and completely filled out proposal including any specific attachments.

One PUP can include multiple chemicals/adjuvants and locations. For efficiency in creating and reviewing a PUP with multiple entries, it is recommended that a spreadsheet be attached.

- **Date**
Enter the date which proposal is submitted to BLM.
- **Proposal Number**
To track each proposal, each BLM office assigns a unique number.
- **EA Number**
Each BLM office keeps an environmental assessment log and is responsible for assigning a unique number.
- **Duration of Proposal**
Uncompahgre Field Office PUPs are valid for up to three years.
- **Location**
Provide specific site (township, range, section, and portion of a section where the application will take place.) If more than one site will be covered by the PUP, list the exact locations and the estimated acreage of each site to be treated on a separate page. A map may also be created depicting treatment locations. If exact locations of treatment areas are unknown, a general description or map is sufficient. However, estimated acreages still must be provided.
- **Originator Information**
Whoever initiates the request to treat on BLM lands and holds standing. For those outside the BLM, it would include those who have been authorized to conduct activities via a permit or agreement. This space is not intended to document an originator's contractor.

I. Application Information (include mixtures and surfactants)

Mixtures of pesticides can be approved if at least one of the labels states that the mixture is compatible and if the mixture, or one of the chemicals in the mixture, is labeled to control the specific pest listed on the proposal.

1. Trade Name(s)

The trade name, also known as the brand name, is listed on the pesticide label.

For example, tebuthiuron is the common name for the herbicide formulation Spike 20P which is commonly used for sagebrush control. "Spike" alone is not the trade name. The manufacturer also makes Spike 80W, Spike 5G, Spike 40P, and Spike Brush Pellets. Provide the information for any surfactants requested as well as for any chemicals.

2. Common Name(s)

Only those active ingredients listed in the Record of Decision as "Herbicides Approved For Use" can be approved by the BLM. While chemical names are not a PUP requirement, common names are required for each PUP. The front section of every label identifies the pesticide's active ingredient.

On the Spike 20P label, tebuthiuron is the common name. It is followed by the chemical name N-[5- (1,1-dimethylethyl)-1,3,4-thidiazol-2-yl]-N,N'-dimethylurea.

The Banvel label lists its active ingredient as "dimethylamine salt of dicamba." The Record of Decision for the Vegetation Treatment Using Herbicides on 17 Western States shortened the common name to "Dicamba."

3. EPA Registration Number

All pesticides are registered with the Environmental Protection Agency (EPA). The registration number is one of the best ways a specific product can be identified. All pesticide labels have an EPA registration number; it is typically listed on the front section of a label. As with most other information on pesticide labels, EPA registration numbers can change. Always include both the old and the most recent labels in your proposal package.

4. Manufacturer(s)

The manufacturer is the company that produces the pesticide. The manufacturer's name is always listed on the front of the pesticide label.

5. Method of Application

There are numerous types of pesticide application equipment, including hand sprayers, small motorized sprayers, generators, foggers, fumigators, dusters, wiper applicators, etc. If you will be using a sprayer attached to a type of aircraft, please state you will be using aircraft, and if it is a fixed wing or rotor.

6. Maximum Rate of Application – As Stated in the EIS.

The maximum rate of pesticide application as identified in the *Vegetation Treatment Using Herbicides on 17 Western States EIS*.

7. Maximum Rate of Application As Stated on the Label

The maximum rate of application refers to the maximum amount of pesticide in measurable amounts (use unit on label) and inactive ingredients that a label states can be used for specific target pest species listed as a pest on the proposal. The maximum amount of active

ingredient is a ratio calculation. When calculating the rates of application, do not round numbers up. Rounding up may result in stating a number on your proposal that exceeds the label or BLM maximum rates, as provided in the *Vegetation Treatment Using Herbicides on 17 Western States EIS*.

Typically, labels have several different species lists with different rates of application.

For example, if a proposal states you will be using EscortXP™ herbicide to control common mullein, the maximum rate of application is one-half ounce per acre. The EscortXP™ label also states that four ounces of product may be used to control Kudzu. But this information is irrelevant for this proposal, since the target species is common mullein.

Another example: if the target species on a proposal to use Banvel™ is bull thistle, the maximum rate of application use unit on label on pasture, rangeland and non-cropland areas is three pints. Bull thistle, a biennial, is in the list of biennials that Banvel™ will control. The maximum amount of product that may be used for biennials on the label is three pints for those that are bolting.

Pounds of Active Ingredient Per Acre

Active ingredient (a.i.) is typically expressed as either pounds per acre (the labeled rate), pounds per gallon (liquid formulations) or as a percentage of active ingredient per pound of a dry formulation. In the ingredients section on a label of a liquid pesticide formulation, there is a statement about how many pounds per gallon of active ingredient may be found in that formulation.

For example, the Banvel™ label states that this product contains four pounds per gallon of active ingredient. If the target species in the proposal to use Banvel™ is bull thistle, and the maximum rate of application use unit is three pints, then the maximum amount of active ingredient per acre is the amount of active ingredient contained in three pints of formulated Banvel™.

Three pints of Banvel™ is equivalent to 0.375 gallons of the formulated product (3 pints ÷ 8 pints per gallon). This amounts to 1.5 pounds of the active ingredient dicamba.

$$0.375 \text{ gallons of Banvel}^{\text{TM}} = \frac{x \text{ pounds of dicamba}}{4 \text{ pound dicamba per gallon}}$$

0.375 gallons times 4 pounds per gallon equals 1.5 pounds of dicamba. Therefore, the maximum rate of application pounds of active ingredient per acre is 1.5 pounds a.i. for control of bull thistle. In other words, three pints of the Banvel™ formula contains 1.5 pounds of the active ingredient dicamba.

For dry formulations, the active ingredient will usually be expressed as a percentage of active ingredient per pound of the product. The Spike 20P™ label does state that the product contains 0.2 pounds of active ingredient per pound, but the EscortXP™ label simply states that, by weight, the active ingredient makes up 60 percent of the product. If you propose to use one-half ounce per acre the maximum amount of active ingredient that may be applied per acre is 0.3 ounces.

$$0.05 \text{ oz. Escort}^{\text{TM}} = \underline{x \text{ pounds metsulfuron-methyl}}$$

60 % a.i. per pound (0.60)

0.50 oz. of formulated Escort™ x0.60 a.i. per pound = 0.3 oz. of metsulfuron-methyl

8. Intended Rate of Application

Pesticide labels state a range of rates including the maximum amount of material that may be applied. Often, depending on the soil type, organic matter, the amount of soil moisture present, air temperature and humidity at the time of application, it is more cost-effective and environmentally sound to use less than that maximum amount of pesticides to control the pest. In this section, state the amount of pesticide you actually intend to apply per acre.

The intended rate of application may not exceed the maximum rates listed in

Vegetation Treatment Using Herbicides on 17 Western States.

9. Application Dates

Up to three application periods may be identified (if known or anticipated). The proponent can either select identical dates if the application is only necessary on a single day or the proponent can select a range of dates which the herbicide is likely to be applied, such as a one or two week window of time. *Selecting January 1 thru Dec. 31 as a date range does not meet with the intent of this information.*

10. Number of Applications

Identify the quantity of applications which are anticipated to occur on an annual basis.

II. Pest (List specific target pest(s) and reason for application.)

When deciding which herbicide to use, it is critical to identify the target pest(s) so that the most useful and cost-effective application may be chosen. Use the standardized common names of plant pest species or their scientific names in this section of the PUP. List the specific reason for this pesticide application. If target pests are not identified, the proposal will not be approved. Pesticides are rigorously tested and their labels list a number of species that the product is known to control. If the specific target pest(s) are not listed on the label, attach documentation from a recent source stating that the product proposed is known to control the specific target species.

For example, if you desire to control the target species of showy milkweed with Banvel™, you will note that the Banvel™ label lists several milkweeds, but now showy milkweed.

Documentation must also be supplied for mixtures if the mixture is not listed on the label as one that controls the specific target pest(s). Chemical companies are also using the standardized names more often now when printing labels.

III. Desired Results of the Application

List the species that define the natural plant community at the site where the chemical is to be applied. If the natural plant community is not what the site is being managed for, also list the key management species, or state that you are managing for bare ground, for fire protection, etc.

IV. Application Site Description

Estimated Acres

Estimate the number of acres to be treated chemically at each specific site. (This will be included on an attached sheet when one PUP covers more than one site.)

General Description

Describe the land uses in the treatment area, the stage of growth of the target pest species, the slope and soil type and other factors that relate to specific information found on the pesticide label.

V. Non-target Vegetation

Since pesticides are not selective at a species level, there will be some loss of species that are considered desirable. Describe the associated and cumulative impacts and mitigations associated with the loss of non-target vegetation on the site of the pesticide application.

For example, some non-native vegetation may be impacted by this product. However, low volume spray techniques from back pack, hand held, or ATV/UTV sprayers will reduce damage to non-target species, along with monitoring of weather for best application practices and reduction of herbicide drift to non-selected vegetation.

VI. Integrated Pest Management Considered in the Overall Project

Vegetation treatment on BLM lands should consider integrated management approach, when possible. The techniques proposed for use in an integrated management program include: preventive actions, biological control such as prescribed burning, cultural control, such as changing grazing time, numbers, or type of grazing animal, manual practices, such as hand pulling or mowing, chemical control, and restoration practices.

For example, herbicide application will be a component of an integrated weed treatment program that includes re-introduction native seed where appropriate, proper management of recreation and grazing activities on public land, cleaning of equipment prior to new construction and maintenance activities, using weed free hay on public land, and a public information and education program relating to weed management. Combining mechanical, chemical cultural and biological techniques will assist in meeting the long term goals on targeted pests within the UFO.

VII. Sensitive Aspects and Precautions

Upon receipt of the PUP with items in yellow filled out completely, the BLM UFO will describe any sensitive areas, including wetlands and riparian areas, endangered, threatened, candidate and sensitive habitat, and distance to the treatment site and list measures to be taken to avoid impact to any sensitive areas.

VIII. Signatures

1. Pesticide Use Proposal's Originator

The requestor's signature, date and name of company.

2. Certified Pesticide Applicator

This is the signature of the person who will oversee the pesticide application on the ground and date. This person must be currently certified by the BLM or must have a current state certification. Identify the applicator's license number, certifying

organization and include a legible copy of the Applicator's License.

3. **BLM Office Weed Coordinator's Signature**

This is the signature of a field office individual who has been assigned the duty of reviewing that office's PUPs and has a current BLM pesticide applicator's certification and date.

4. **Managers Approval**

The Field Manager or acting-manager must sign and date this proposal.

5. **State Weed and Pest Coordinator's Signature**

The State Weed and Pest Coordinator must sign and date this proposal.

6. **Deputy State Director's Approval**

The Deputy State Director or acting representative will sign and date here.

The BLM Uncompahgre Field office will maintain a copy of the approved PUP in the file related to the specific project authorizations and provide the originator a copy of the approved PUP. It is the responsibility of the originator and pesticide applicator to maintain current copies of their approved PUPs and submit subsequent PUPs to BLM when 3 year approval period expires (preferably prior to expiration).