

The AAPCO ESA Workgroup has been meeting with USEPA on the proposed Interim Ecological Measures (IEM) that they are considering adding to agricultural pesticides, including such measures as vegetative filter strips, use of conservation tillage, field terracing/ contour buffer strips, cover cropping, etc. These IEMs are detailed in the ESA Workplan Update published on November 16, 2022, and summarized in the **AAPCO ESA Workgroup Summary – EPA Request for Comments on “Appendix to ESA Workplan Update”**, provided to AAPCO members on January 20, 2023 (attached).

As a result of recent discussions with the USEPA the AAPCO ESA Workgroup is compiling information to inform future decision-making regarding the application of the IEMs to the pesticide registration process. Specifically, the compilation will include information on current IEMs/conservation practices at the state or county level if it is available. Examples of practices or situations that may be unique to a state, portion of a state, or a cropping system are of particular interest.

The information being requested in this document is intended to be provided to USEPA to address questions about current conservation practices, and if available, their impact(s) related to pesticide risk mitigation. Much of the information may be available from the NRCS and Soil Conservation Districts, or from Water Quality programs in individual states. Any effort to obtain this data or provide contacts or links to this information will be useful and appreciated. This information could affect the language that ultimately is placed on pesticide labels and thus directly impact SLA programs.

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1. The USEPA is interested in the extent of implementation of soil and water conservation practices. Please provide contacts and/or website links for:
 - State level NRCS tracking of implementation of soil and water conservation practices.
 - Any programs run at the state level that assist in implementation of these practices.
 - Any programs that are run by county level or other sub-divisions of state government that assist in implementation of these practices.
 2. If there are easily accessed statistics on extent of implementation of these practices, or which practices are most widely implemented, at a state level, please provide a link to that information.
 3. Does your state have any incentives for implementation of soil and water conservation practices other than those available through the NRCS?
 4. Is there information available on which soil and water conservation practices are used on small acreage farms or specialty crops?
 5. Is the NRCS practice “Pest Management Conservation System – code 595” being used or implemented in your state? (<https://www.nrcs.usda.gov/resources/guides-and-instructions/pest-management-conservation-system-ac-595-conservation-practice>) Who would be the best contact for information about the extent of use of this practice?
 6. The USEPA is interested in how producers are educated about these practices. Please provide a contact or weblink for extension service efforts to educate producers about soil and water conservation practices.

7. Do crop consultants or other private experts assist producers in the selection and implementation of soil and water conservation measures? If so, what certifications are needed so that these individuals can provide these services?
8. Do you have any state level information on the effectiveness of soil and water conservation measures for reducing soil erosion or surface water run-off that are being implemented?
9. Does your state have any information on the effectiveness of practices that reduce off site movement of pesticides from soil movement or surface water run-off?
10. Does your state regulate or monitor offsite movement of nutrients or pesticides from tile drains in agricultural operations? If so, is there information on this program and how effective it is in reducing or preventing offsite movement?
11. Does your state have any requirements for prevention of off-site movement of pesticides through drift or run-off other than those established on pesticide labels? If so, please provide a link to that information.
12. Does your state have a weather information system that can be used by crop producers to schedule pesticide treatments (e.g., fungicide applications) or to predict rainfall events for the management of nutrient loss? If so, please provide a link to information about this system.

Please note that even partial responses with links to existing state conservation programs are helpful.

Submit your responses to: Steve Dwinell <Steve.Dwinell@vermont.gov> by June 28th.