

**New York State Office of Parks, Recreation
and Historic Preservation**

**POLICY ON PESTICIDE REDUCTION
IN STATE PARKS AND HISTORIC SITES**

Introduction

The mission of the New York State Office of Parks, Recreation and Historic Preservation (OPRHP) is “to provide safe and enjoyable recreational and interpretive opportunities for all New York State residents and visitors and to be responsible stewards of our valuable natural, historic and cultural resources.” An important component of keeping employees, visitors, and natural resources safe is the long-term control of unwanted pests within State Parks and Historic sites.

However, the use of pesticides can cause potential environmental and human health risks, even when pesticides are used in compliance with regulatory requirements and manufacturer recommendations. Pesticides have been implicated in negative effects on human health, particularly children and sensitive individuals, as well as mortality to non-target plants and animals and the decline of various bird species.

Purpose

As part of the agency’s sustainability initiative and our commitment to protecting the health of agency staff, the public, and ecological resources, OPRHP will promote environmentally sensitive pest management by minimizing the use of pesticides in New York State Parks and Historic Sites. Our goal is to eliminate pesticide uses wherever possible. In special instances where pesticide use is required, we will limit our use to least toxic alternatives.

Policy

All agency facilities and operations, including concessions and other contracted services, will eliminate or minimize the use of pesticides through Integrated Pest Management (IPM) principles in the design and maintenance of buildings, grounds, landscapes, and water bodies under OPRHP’s jurisdiction. As used in this policy, “pesticides” means pesticides, insecticides, herbicides, fungicides, rodenticides, and any other chemicals or substances intended to prevent or eradicate unwanted pests or weeds.

Integrated Pest Management is a comprehensive approach to reduce or eliminate pests from buildings or the natural environment while enhancing health and safety. IPM is a decision making process or program for long term pest suppression or elimination. The process is based on detailed surveillance (and periodic re-inspection) and data interpretation to estimate the nature of the pest population in a given area. This monitoring allows accurate decisions to be made regarding when and where interventions are needed, the type of interventions selected, and the

method of application and implementation. Interventions in an IPM program must extend beyond the application of pesticides to predominantly include structural and procedural modifications that establish physical barriers to pests, and reduce the food, water, and harborage available to them.

Executive Order 4 (EO4), adopted in April 2008, establishes general state policy as well as specific guidance to minimize pesticide use by state agencies. Under EO4, specifications have been adopted by the Interagency Committee on Green Procurement and Sustainability regarding *Turf and Ornamental Management* and *Pest Management*. This policy is based on these specifications. However, OPRHP will go beyond the requirements outlined in the EO4 specifications by eliminating pesticide use to the maximum extent possible. Through the use of IPM, OPRHP will manage pests using mechanical, sanitary, cultural, or biological means with the use of chemicals to control pests as a last resort. Integrated Pest Management Services are currently available on New York State Contract (OGS/PSG Group 71010). OPRHP will adhere to these contract specifications along with guidance outlined in this policy.

As referenced in the EO4 *Turf and Ornamental Management* specification, adopted on February 10, 2009, OPRHP will strive to adhere to the land care specifications and practices prepared by the Northeast Organic Farmers Association: *NOFA Standards for Organic Land Care. NOFA Organic Landcare Committee, March 2008*, available in the Sustainability Section on OPRHP's Intranet.

Management of Pests in Buildings, Turf and Ornamental Plantings

This section of the policy covers pest management: a) within buildings and structures; b) on lawns, turf, grounds, trees, shrubs, flowers, and ornamental plantings; and c) on parking lots, walkways, and other impervious surfaces.

1. OPRHP shall manage pests through mechanical, sanitary, cultural, or biological means to the maximum extent practicable, recognizing that such methods may result in greater pest or weed populations than are achievable by the use of chemicals. Our goal is to eliminate pesticide uses in facilities and grounds wherever possible.
2. In those limited instances when mechanical, sanitary, cultural, or biological means of pest management have been exhausted and are not sufficient to achieve adequate pest control and/or it is found that that chemical means of pest management are necessary as a temporary measure, or to transition to non-chemical practices, OPRHP will only use pesticides that meet one of the following criteria. Use will be limited to:
 - Pesticides classified by the United States Environmental Protection Agency (EPA) as an exempt material under federal regulations due to their low toxicity (Section 40 CFR Part 152.25).¹

¹ For a list of pesticide active and inert ingredients that qualify go to:
http://www.epa.gov/opppbd1/biopesticides/regtools/25b_list.htm#activeingredients

- Pesticides used for the purpose of rodent control in tamper-resistant bait stations or placed directly into rodent burrows or other areas inaccessible to children, pets, or wildlife;
 - Any biopesticide registered by the EPA;
 - Anti-microbials² which are pesticides that: (i) disinfect, sanitize, reduce, or mitigate growth or development of microbiological organisms; or (ii) protect inanimate objects, industrial processes or systems, surfaces, water, or other chemical substances from contamination, fouling, or deterioration caused by bacteria, viruses, fungi, protozoa, algae, or slime; or
 - Boric acid and disodium octaborate tetrahydrate, silica gels, diatomaceous earth, and other non-volatile insecticidal gels and baits.
3. Pesticide foggers shall not be used under any circumstances, and no pesticides formulated as dusts or sprays shall be used in any concession or food area. Any exception for the use of foggers, sprays, or dusts in non-food areas must meet the criteria under section 2 above, with specific approval from OPRHP Environmental Management Bureau based on a written explanation from agency personnel or the hired contractor as to why less hazardous approach or products are not sufficient.
 4. Carbamate and organophosphate insecticides shall not be used.
 5. All pesticide applications by OPRHP staff and contractors shall be applied in compliance with all applicable state and federal laws, regulations, and requirements. This includes the use of appropriately certified applicators, prior notification, and posting requirements. The agency will maintain an ongoing training program on the proper storage, handling, and application of pesticides.

Policy Exceptions

Although the agency's goal is to eliminate pesticide use wherever possible, this policy recognizes that there are circumstances where pesticide use is required at State Park and Historic Site facilities. In such instances, the agency will utilize the lowest toxicity, least persistent product available. Circumstances in which OPRHP may use pesticides include:

1. Imminent Health & Safety Threats. OPRHP will use pesticides where necessary to abate imminent threats to human health or safety, such as potential human disease outbreaks. Pesticides may also be used to address threats such as bees, wasps, deer ticks, and poison ivy in situations where immediate action is required (e.g. where the situation does not allow for non-toxic alternatives).

² Anti-microbial pesticides and anti-microbial products as defined by the Federal Insecticide Fungicide and Rodenticide Act in 7 U.S.C. § 136 (mm).

2. Golf Courses and Arboretums. The agency will continue to utilize pesticides to maintain golf courses and arboretums. IPM practices will be utilized to the maximum extent possible.
3. Utility and Transportation Right-of-Ways. Pesticides are allowed in instances where mechanical treatments are not sufficient to maintain right-of-ways.
4. Invasive Species Control. Pesticides may be used to control invasive plant or animal species, including forest pests and pathogens, that pose a significant threat to important natural or recreational resources and that cannot be controlled through non-chemical means.

Additional exceptions, beyond the four general categories listed above, will be considered based on:

- a description of the pest problem;
- rationale for chemical control with the proposed product;
- a description of how the product will be used;
- legal requirements;
- public and employee health and safety considerations;
- preservation of landscape assets; and
- an evaluation of all feasible alternatives including non-chemical and no action alternatives (the safety, health, and environmental impacts of the alternatives also will be evaluated).

Requests for One-Time-Only Exceptions will be reviewed and approved by the facility manager and the Environmental Management Bureau.

In the case of requests for exceptions, the facility manager and the Environmental Management Bureau will meet, as necessary, to evaluate and approve or deny exceptions.

This policy is effective immediately.

Dated: April 22, 2009



Carol Ash
Commissioner