The following are notes compiled by Division staff from the meeting held 10/8/13 with regard to the renewal of the Pesticide General Permit. Note that the information below is only reflective of what was discussed and contains no interpretation about the ability to implement the changes suggested below.

The meeting opened with the Director of Environmental Programs at CDPHE presenting the State position regarding the future of the PGP. She was clear that the State supports the removal of this permit from the regulatory framework of the Clean Water Act.

The first topic discussed by the group was dry ditches. The group addressed the following:
- That dry ditches were/are considered waters of the state
- That spot spraying was being done frequently to treat ditch weeds
- That thresholds should be based on acres treated rather than quantity of product used
- That there is confusion where irrigation ditches are concerned and would it be possible to exempt irrigation ditches from the PGP.
    o For example, many irrigation ditches end in fields and do not return water to streams
- That there needs to be clarification of the term "District" – special vs private
- That there are many non-filers and why should one entity comply when the bulk of their counterparts are not, especially in light of the lack of enforcement provisions on the part of the Division
- That the Division should clarify that lateral ditches are not a part of the District (?) – *question mark added by Division staff. Clarify at next meeting*

Division staff suggested that compliance with the PGP, in accordance with the intent of the PGP, would drive a reduction in overall pesticide quantity discharged to water.

The group disagreed with this suggestion pointing out that they are already doing so by following FIFRA labels.

From the mosquito sector:

- What is the long term vision from the State for the PGP?
    o It was suggested that the CO Dept of Agriculture administer the PGP, thereby consolidating the administration and regulation of pesticide use to a single agency.

Overall, the group did not feel that current reporting requirements were overly burdensome but was skeptical of any increased reporting requirements.

From CDA:
- The Colorado Pesticide Applicator's Act is to undergo sunset review this year. The Act expires 6/30/2015

From Aerial applicator sector:
- Mosquito numbers were 2nd lowest this past year
- Some applicators are no longer applying due to liabilities in the PGP
- Spraying overall was down in 2012

From Parks and Wildlife:
- Compliance Certification approach gets thumbs up
- 650 people on pesticide team; creates complexity in reporting (e.g. standardizing how to report)
- Complexity in figuring out reporting w/ contractors (e.g. counties)
- Confusion concerning what constitutes an aquatic application vs terrestrial application
    o Some mentioned designated set-backs from water to determine aquatic vs terrestrial
    o Others are using a 25-ft. buffer and then using discretion

The group agreed that due date for Compliance Certifications should be set for January rather than July, which is the middle of the treatment season.

Some in the group felt that the "Application Method" should be removed from the Compliance Certification

The group expressed frustration that they had difficulty getting support from decision makers that needed to sign the Compliance Certification. This was noticed by Division staff in the process of collecting Compliance Certifications. Many were submitted late due to difficulty obtaining the proper signatures. In talking with some decision makers that were required to sign, Division staff noted that many were hesitant to sign for liability reasons. On numerous occasions, staff noted that decision makers didn't know what they were signing. This seemed to apply to local governments most often.

Some in the group indicated that the PDMP template was useful to the creation of the plan but that it focuses on a single application at a single point in time.