



Sustainable Gardening: Outdoor Learning Environments for Texas Schools

Tips to remember before starting a school garden program

In 1991, the Texas Legislature passed a law requiring pests in and around school buildings to be managed using integrated pest management (IPM). This law was one of the first laws in the U.S. requiring schools to implement IPM as part of their maintenance programs. In 2007, the Legislature updated the laws defining regulatory guidelines more definitively. These regulations were further amended on January 16, 2023 (48 TexReg 129).

Under these IPM program guidelines, the school district must have an IPM policy statement, a designated IPM Coordinator, and follow strict instructions when applying any pesticide. Only licensed pesticide applicators can make any type of pesticide application. This includes products deemed organic. In addition to having a licensed pesticide applicator, any applications made outdoors on school grounds require posted signs placed in the area at the time of treatment. Signs must remain in place for 4 hours after the treatment has been completed.

The Extension Agent and Lead Teacher (or school employee responsible for the garden) should contact the school district's IPM Coordinator. You can contact the Superintendent's office, the Maintenance Department, or the Texas Department of Agriculture (TDA) to find out who your Coordinator is.

Contact information for TDA is (866)918-4481 or spcs@TexasAgriculture.gov.

Meetings with the IPM Coordinator should include the following:

Discussion of a suitable site for the garden/outdoor learning environment.

- ▶ Because a school garden is not a 1-year commitment, your responsibility to this project should be explained to the Coordinator, the Maintenance Department, and the district.
- ▶ Build your knowledge of school building plans. Are you placing the learning environment in a location that will be a portable building site the following year?
- ▶ Think water, sun, shade, bus schedules, etc. Where you place your garden is the most important step in your process.
 - Ask the Coordinator the following:
 - » Products used for fire ants – Are there any pesticide label restrictions on planting certain types of plants? Fire ants are a common pest in Texas. Since most food crops do not allow for fast-acting products, planning a spring and a fall treatment using an insect growth regulator should be considered when planning the garden.
 - » Products used to control weeds – When was the last application? Are there any restrictions on what and when to plant?
 - » Think cost – Most school districts do not have a budget to prepare a garden area. Be willing to ask for help to find resources.
 - » Visit with the IPM Coordinator about design plans. Plans should be easy to implement and not conflict with current IPM practices.

Teacher training

Work with an AgriLife Extension Agent, IPM Coordinator, or another trainer on learning how to document any type of pesticide application. Pesticides include everything but fertilizer; if you mean to kill a bug or a weed, it is considered a pesticide.

- ▶ Keeping detailed records (see the *Intent to Apply* document).
Note: Before doing any pesticide treatments at your campus, please remember to talk to the IPM Coordinator.
 - Date, time, and location where treatments are applied;
 - Name of pesticide used and EPA Reg. # (even if you do not use a chemical, keeping track of what you do in the garden is a good idea);
 - Total amount of product used (lbs, gals, oz, etc.);
 - Device used and total number of devices (bird netting to keep birds out, copper bands to keep slugs out, etc.);
 - Mixing rate (if the product is to be mixed with water or another surfactant);
 - The purpose of using a treatment; and
 - The individual who made the application.
- ▶ Reporting pest problems.
 - Discussion for IPM Coordinator – How does your district want to handle this?
- ▶ Posting signs in the area prior to pesticide application and working to keep students away from the area.
 - Discussion for IPM Coordinator – Who will be responsible for this? (Yourself, the teacher, the principal, the head custodian, or the IPM Coordinator?)
- ▶ Review of the School Garden IPM Plan.
- ▶ Consider implementing a program such as the Junior Master Gardener *Learn, Grow, Eat & Go!* curriculum.
- ▶ For additional training for school district personnel, check out the online course *IPM for School Gardens 101* by Texas A&M AgriLife.

Pesticide supplies and applications

The state of Texas is very specific about who can apply pesticides on school and child care campuses. Only licensed pesticide applicators with the *TDA* can make these applications. While volunteers are not permitted to apply pesticides, they can help maintain the area in other ways, such as through landscaping, repairs, and supporting the overall beautification of the campus (see the *Volunteer Form* document).

Only EPA-registered products can be used on school property (no home remedies).

Detailed application use records must be kept and filed with the school district's IPM Coordinator (see the *Instructions for Completing Pest Control Use Records* Excel document).

Prior to doing any outdoor pesticide application, the area shall be posted notifying people that the area has been treated and must remain undisturbed for 4 hours (for "Caution" signal-worded products, per the pesticide label) or 8 hours (for "Warning" or "Danger" signal-worded products, per the pesticide label). This restriction mostly applies to students, but all visitors to the garden should not disturb that area after any type of pest management chemical control action, allowing time for the product to work.

Products can be purchased by community groups, parent-teacher associations, and others; however, items purchased at local retailers for pest control in and around the garden must be applied by a licensed applicator. Chemicals are stored with the IPM Coordinator so they are out of reach of children.