

**2000 Board Members**

**Chair**

Scott McKinnie  
FarWest Fertilizer

**Vice-Chair**

Marilyn Perkins  
League of Women Voters

**Members**

Don Abbott  
Washington State  
Department of Ecology

Peggy Adams  
Palouse Clearwater  
Development Assoc.

Wally Ewart  
Northwest Horticulture  
Council

Jeffrey Jenkins  
Oregon State University

Matthew Keifer  
University of Washington

Dan Locke  
Washington State Dept. of  
Labor & Industries

Austin Long  
US Food & Drug Admin.

Greg Möller  
University of Idaho

Paul Monahan  
Yakima Valley Farm  
Workers' Clinic

Barbara Morrissey  
Washington State  
Department of Health

Laura Mrachek  
Cascade Analytical, Inc.

Royal Schoen  
Washington State Dept.  
of Agriculture

Craig Smith  
NW Food Processors

David Winckler  
Ironwood Orchard

December 7, 1999

Ms. Terri Joya  
Competitive Research Grants and Awards Management  
USDA/CSREES, Stop 2240  
1400 Independence Ave. SW  
Washington, D.C. 20250-2240

Dear Ms. Joya,

Thank you for the opportunity to provide written comment on the priorities to be addressed in the Request for Proposals (RFP) for the Pesticide Impact Assessment Program (PIAP) through Section 406 of AREERA.

In order to place my comments in context, I first need to introduce myself and the Board I represent. I am the chair of a 17-member Advisory Board for Washington State University's Food and Environmental Quality Laboratory (FEQL). Board members are drawn from a variety of sectors within Washington State, including representatives from: the environmental sector, food processors, marketers, farm labor, four different state agencies involved in agricultural regulations, federal regional pesticide laboratories, privately owned pesticide analytical laboratories, physicians, chemical and fertilizer industry representatives, farm organizations, and consumers. Personnel associated with the FEQL include an analytical chemist, an environmental toxicologist, the Washington State IR-4 state liaison (and also statewide IPM coordinator), the PIAP state liaison representative and their associated staff. The objectives of the FEQL mission statement mirror the activities undertaken there on a daily basis:

- (1) *Conduct pesticide residue studies to protect the environment and maintain safe food production through reregistration and new registrations of biological technologies and agrichemicals vital to continued production of a diversity of crops in Washington;*
- (2) *Find environmentally sound solutions to pest control problems, assess alternative methods of pest control, and aid implementation of best management practices;*

(3) *Provide environmental education and information regarding pest control and food quality to university personnel, government agencies, producers, environmental organizations, business and industry, and consumers.*

Each of these three objectives is critical to FQPA implementation in Washington State. The new CAR and RAMP funds would be appropriate research funds for the FEQL faculty to pursue, and we encourage them to do so. We are greatly concerned however about maintaining the extension component of the PIAP information network previously organized under the 3(d) mandate.

Maintaining basic information collection and dissemination services in Washington State is critical in order for us to keep our state clientele informed of the progress *and requirements* of FQPA implementation. The system currently in place at FEQL's Pesticide Information Center (PIC) works both "top down," disseminating information to affected stakeholders and other interested parties, and "bottom up," responding to a variety of information requests from USDA. Requests from other stakeholders are handled as well.

Under the leadership of the PIAP state liaison, PIC has collected, organized, and made available a wealth of interrelated information key to FQPA implementation in Washington State:

- In order to write a crop profile or a transition strategy, it is necessary to first know which pesticides are registered on a given crop. **A pesticide registration database is maintained at the PIC office.**
- In order to quickly respond to data requests such as proposed use cancellations from OPMP, lists of appropriate state contacts must be maintained. **A database of these names is available in the PIC office.**
- When information comes out at the state or federal level on actual use cancellations, a network must be in place to quickly inform our clientele of the news. Again, under the direction of the PIAP state liaison representative, **PIC maintains a database and a program of notification** for 171 different grower or producer groups, university extension personnel, and state agency personnel, targeted by discipline (entomology, plant pathology, etc.) and crop/site of interest; these primary contacts in turn disseminate information to a host of affected parties.
- The PIAP representative's office also puts out a newsletter. **The monthly *Agrichemical and Environmental News* has proven to be a very effective way to reach our clientele.** The strong and growing subscriber base for this newsletter, built over time, relies on *AENews* for analysis of current pesticide and related environmental issues.

Washington State produces over 250 crops including forestry products. The diversity of agriculture, and its importance to our state's economy can not be overstated. Our growers are progressive and interested in stewardship of our natural resources while at the same time producing safe and economical food for consumption both within the United States and in foreign countries. In order to do this, they depend on

up-to-date information on pesticide regulations. They also expect USDA to collect pesticide usage information that accurately reflects on-farm practices, and provide that information to EPA, in the manner of the crop profiles. In short, growers, industry, and regulators throughout Washington State have come to rely on the comprehensive and effective data collation and distribution that FEQL's PIC provides. To lose these services now, square in the middle of FQPA implementation, would be a great disservice to agriculture. We urge you to consider these facts when writing the RFP; we ask that you include in the RFP such basic services as newsletters, databases, and travel for presentation to grower meetings.

I would be happy to answer any questions you may have. Please feel free to contact me. Again, I thank you for the opportunity to submit comment.

Sincerely,

Scott McKinnie  
Chair, FEQL Advisory Board