



TRIBAL PESTICIDE PROGRAM COUNCIL

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June 23, 2017

Mr. Scott Pruitt, Administrator
United States Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, N. W.
Mail Code: 1101A
Washington, DC 20460
pruitt.scott@epa.gov

RE: EPA Strategic Plan

Dear Administrator Pruitt:

We are writing to follow-up to the Tribal Pesticide Program Council's (TPPC) previous request to you for EPA's next strategic plan to include a strategic objective for a modest increase in the number of Tribal pesticide programs. As we previously indicated, only about 90 of the 566 federally-recognized Tribes are covered by pesticide cooperative agreements, thereby creating a large pesticide regulatory gap in Indian Country. Therefore, we would like to respectfully request that the following strategic objective be considered for inclusion in the FY 2019-2023 strategic plan that is currently being developed by EPA:

“By 2023, 50 percent of Indian country will be served by a pesticide management program to ensure that pesticide activities on Tribal lands comply with applicable FIFRA requirements (2017 baseline: 15 percent of 566 Tribes).” To support fulfillment of this strategic objective, following are relevant examples of activities that EPA could undertake:

- A. Allocate appropriate resources to support additional FIFRA (OPP/OECA) cooperative agreements for Tribes;
- B. Allocate appropriate resources to support establishment of inter-agency agreements with Indian Health Service to support delivery of pesticide program services to Tribes; and,
- C. Work with the EPA American Indian Environmental Office (AIEO) to promote and facilitate completion of Tribal pesticide use assessments (utilizing general assistance program [GAP] funds and other resources).

We think that a goal of 50% pesticide program coverage for Tribes is modest, reasonable, and achievable, especially when considering that 100% of the states are covered by pesticide regulatory programs, even including very small states such as Rhode Island and Delaware.

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Please note the TPPC has also developed some other draft strategic objectives that we would like EPA to consider for inclusion in the FY 2019-2023 EPA Strategic Plan and we have included these as an attachment.

Thank you for considering our request, and in closing we would like to reiterate the importance of pesticide regulatory programs in Indian Country, especially as related to Tribal agricultural programs that are major economic engines for many Tribes and provide a source of food, revenue, and jobs for Tribal communities. As in the case with the states, Tribes are inherently reliant upon pesticide regulatory programs to provide regulatory certainty to producers, and to ensure that the food supply that is produced meets consumer and distributor food safety and security expectations. If you have any questions of the TPPC, please feel free to contact the TPPC via e-mail at fcorey@micmac-nsn.gov. We look forward to your response to our request.

Sincerely,



Fred Corey
TPPC Chair

cc: Wendy Cleland-Hamnett, Acting Assistant Administrator, OSCPP
Lawrence Starfield, Acting Assistant Administrator, OECA
David Bloom, Acting Assistant Administrator, OCFO
Rick Kegwin, Acting Office Director, OPP
David Hindin, Office Director, OC
Vivian Daub, Office Director, OCFO

Enc: TPPC Strategic Objectives for FY 2019-2023 EPA Strategic Plan

TPPC Strategic Objectives for FY 2019-2023 EPA Strategic Plan

1. Expand Tribal Pesticide Program Capacity

By 2023, 50 percent of Indian country will be served by a pesticide management program to ensure that pesticide activities on Tribal lands comply with applicable FIFRA requirements (2017 baseline: 15 percent of 566 Tribes).

- A. Allocate appropriate resources to support additional FIFRA (OPP\OECA) cooperative agreements for Tribes.
- B. Allocate appropriate resources to support establishment of inter-agency agreements with Indian Health Service to support delivery of pesticide program services to Tribes.
- C. Work with the EPA American Indian Environmental Office (AIEO) to promote and facilitate completion of Tribal pesticide use assessments (utilizing general assistance program [GAP] funds and other resources).
- D. Develop a national Tribal pesticide applicator training system rather than relying upon individual state programs.

2. Pollinator Protection

By 2023, 50 percent of Indian country will adopt and implement pollinator protection best management plans and other activities to protect native pollinator biodiversity upon which Tribal plants used for food, medicinal, and spiritual purposes depend (2017 baseline: 0 percent of 566 Tribes).

- A. Allocate appropriate resources to assist with the development of Tribal pollinator BMPs.
- B. Create a BMP resource library and showcase Tribal BMP approaches as a resource for other Tribes.
- C. Foster inter-agency cooperative agreements with other federal natural resource agencies to facilitate implementation of Tribal pollinator BMPs.
- D. To conduct pollinator surveys and habitat assessments; Integrate Pollinator Protection Plans into natural resource and forestry management plans.

3. Integrated Pest Management (IPM) in Public Housing

By 2023, reduce by 30 percent the number of moderate to severe pesticide exposure incidents in children through the development and implementation of an IPM initiative for public and Indian housing (2017 baseline: the total number of confirmed and likely pesticide exposures to children according to data by the Poison Control Centers' National Poison Data System).

- A. Foster inter-agency cooperative agreements with other federal agencies (HUD, USDA) to develop and deliver IPM training to public housing entities.
- B. Allocate appropriate resources to develop and implement a public housing IMP public education campaign to inform and stimulate public interest in home IPM.
- C. Provide training to hoteliers, group homes, housing programs.

4. Risk Assessment

By 2023, develop 12 regional biogeographical modules that enable EPA to factor unique Tribal pesticide exposure scenarios into all appropriate pesticide reviews (2017 baseline: 0 biogeographical modules).

- A. Compile existing Tribal exposure information (water quality standards, fish consumption rates, previously developed Tribal exposure scenarios) into a handbook that can be immediately utilized by EPA modelers and risk assessors.
- B. Identify geographic Tribal exposure gaps and allocate appropriate resources to support the collection of regional Tribal exposure information.
- C. Evaluate exposures from agriculture runoff into drinking water supply, local food supply chain.

5. Tribal Capacity Building

By 2023, increase Tribal technical expertise by strengthening environmental personnel capabilities.

- A. Provide training and education opportunities for school-aged children to enhance interest in environmental sciences and natural resources.
- B. Provide paid internship opportunities for high-school aged youth in Tribal environmental and natural resource offices to encourage post-secondary education in the environmental and natural resource fields.
- C. Maintain program support or increase funding levels.