



September 13, 2019

Jacqueline E. Mosby,  
Director Field and External Affairs Division  
USEPA Headquarters  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue, N. W.  
Mail Code: 7506P  
Washington, DC 20460

RE: Pesticides of Interest National Tracking System (POINTS)

Thank you for the opportunity to discuss the funding of the POINTS "database" on August 15, 2019. The Pesticides of Interest National Tracking System (POINTS) was developed to track state-generated water quality data. AAPCO considers the concept of having a national tracking system or database identifying state Pesticides of Interest and Pesticides of Concern, as well as other water quality related information, of significant value. POINTS has been the mechanism to report state water quality data to EPA, and is an effort initiated by State Lead Agencies (SLAs) that took years to develop.

It is recognized that the current aging database at Washington State University (WSU) is not being maintained, and also needs to be improved upon. AAPCO commends EPA Region 10 for their willingness to provide interim maintenance funding to WSU. This funding is highly needed and appreciated by SLAs.

The question of how to fund maintenance and the possible development of a new database was discussed by the AAPCO Board of Directors. A decision was made that EPA providing funding to the State FIFRA Issues, Research and Evaluation Group (SFIREG) is not feasible, and is beyond the scope of this AAPCO standing committee. However, it would be beneficial to discuss other options.

The AAPCO BOD also discussed that the water quality program is a required part of the national program guidance and is a funded component of the state cooperative agreements. With the current emphasis on this program, EPA needs to demonstrate its prioritization of the pesticide in water program. EPA bears the responsibility for the prioritization and maintenance of grant required activities.

Future

We all have the mutual goal of protecting water quality, as one of the means to protect human and aquatic health. Many states collect high quality data on pesticide levels and frequencies in ground and/or surface water. It is critical for EPA to know what each state considers a POI and a POC, and why; in addition, states often have practical ideas on mitigation measures which will increase water quality. These data and other information will help inform EPA when assessing the need and possible types of risk mitigation measures.

If POINTS has not been an easily useable mechanism for EPA staff engaged in pesticide reevaluation related activities to qualitatively utilize, what mechanism would be useful? As co-regulators, we want to open up this conversation and work together on achieving our common goal. The AAPCO BOD and its various committees, particularly the SFIREG-EQI Working Committee, is committed to working with EPA and developing solutions.

We look forward to working with EPA. Please do not hesitate to contact the AAPCO BOD; the Chair of SFIREG, Liza Fleeson Trossbach; or the Chair of EQI, Gary Bahr. This is a very important issue for the states.

Sincerely,



Rose Kachadoorian  
AAPCO President  
Pesticides Program Manager,  
Registration, Licensing and Certification Natural Resource Policy Area  
Oregon Department of Agriculture  
635 Capitol Street NE, Salem, Oregon 97301 Phone: (503) 986-4651  
[Email: rkachadoorian@oda.state.or.us](mailto:rkachadoorian@oda.state.or.us)

cc: AAPCO Board of Directors  
SFIREG Chair  
EQI Chair