

May 29, 2009



Katherine Smith, Acting Deputy Under Secretary Research, Education, and Extension Office U.S. Department of Agriculture 3858 South Building 1400 Independence Ave., S.W. Washington, D.C. 20250

Dear Dr. Smith,

The Arizona Pest Management Center (*http://cals.arizona.edu/apmc/*) is the umbrella organization for integrated pest management (IPM) research and outreach at the University of Arizona. We are writing to endorse the comments that the Regional Integrated Pest Management Center directors provided on the roadmap for USDA research, education, and extension. In addition, we would like to respond specifically to question #6 from your call for public comment.

6. What else might USDA do to improve coordination of science; enhance USDA's ability to identify issues and prioritize investments; and elevate its role in science implementation and coordination?

We believe that the role of other agencies and especially the U.S. Environmental Protection Agency (EPA) and its collaboration with USDA with respect to pesticide use and support of integrated pest management research, outreach and implementation needs to be clarified as part of the new roadmap. Specifically, EPA currently interacts with USDA in requesting and coordinating stakeholder input on questions of pesticide use. They have also played a key role in supporting implementation of IPM in non-agricultural settings such as schools, childcare facilities and other sensitive and urban environments. While these non-agricultural IPM programs may be seen by some as beyond the purview of USDA, they are complimentary to USDA grant programs that focus on agriculture and address a critical need. USDA and EPA have worked collaboratively on these issues in the past and we suggest that there would be some benefit to both agencies and stakeholders in formalizing an agreement that clarifies the complimentary roles of the agencies.

Thank you for the opportunity to provide this comment.

Sincerely,

Peter Ellsworth IPM Specialist & State IPM Coordinator Director, Arizona Pest Management Center

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cc: Colin Kaltenbach, Jim Christenson, Ed Martin, Bruce Tabashnik Carrie Koplinka-Loehr and John Ayers, Northeastern IPM Center Rick Melnicoe, Linda Herbst, and Tom Holtzer, Western IPM Center Susan Ratcliffe, Lynnae Jess, and Larry Olsen, North Central IPM Center Jim VanKirk and Steve Toth, Southern Region IPM Center