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Sent: Friday, January 28, 2011 5:00 PM
To: Jachetta, John
Cc: Jill Schroeder
Subject: Thoughts on WSSA Liaison Position

Hi John. I appreciate the invitation to provide some input on the continued liaison project. As before, I continue to value the relationship and the resources that this position has offered me and my staff. I consider it a continued success for many reasons, some of which I will try to enumerate for you here.

Of course, I think that a large part of the success must be attributed to the WSSA liaison herself, Jill Schroeder, as she has been very committed to the goals of the project and very diligent in the pursuit of results. Jill has a perfect understanding of both the "do's" and the "do not's" that are associated with the position, and participates in a way that is always helpful while carefully observing the necessary limitations. She is an outstanding self-starter, making it her business to become involved in matters of high importance without the need for any nudging on our part whatsoever. She has gained a very good understanding of our operations in a very short time, and is able to recognize the areas where her expertise is the most useful. As time goes by, the advantages of having Jill continues to increase. I once again applaud the decision that allowed us to have Jill as our liaison during this period.

One aspect that continues to be a huge payoff is the understanding of current cultural practices that Jill continues to develop with myself and my colleagues. Since the mitigation techniques we employ may directly affect cultural practices, they could in turn directly affect the viability of the use itself. It is often difficult to fully understand today's agricultural practices when our access to this information may be limited and/or outdated. The reality that Jill brings to the table often results in new or different solutions to address a risk, and emphasis has been placed to think creatively in risk management decisions to incorporate this new knowledge. The goal has always been to mitigate risks while still allowing the most flexibility in the registered use, and I believe that this knowledge has impacted recent new chemical and new use decisions in a very positive manner. I can think of several specific examples of this, but will not go into detail here. (To reiterate from previous discussions, Jill does not offer advice on or propose any specific decisions or direction, but rather provides us with reliable information with which we are able to make better, more informed decisions).

Related to this is the information Jill regularly supplies regarding changing grower needs and the significance of changing technology. Providing a link between EPA and the growers is very helpful in prioritizing our workplan. The significance of changing technology is still something that she and I are working on, but it is my belief that the Agency's assumptions on risks associated with workers and non-target organisms may not reflect current technology. As technology advances, application becomes more precise and controlled, limiting unintended exposures to an increasing degree. If we are able to consider improved application technology, I think that the level of risk that is assumed may potentially lessen, or possibly provide reduced mitigation when certain equipment is used. This is still a work in progress, but there is great potential, and Jill is a wonderful resource in this endeavor.

The educational opportunities that Jill has arranged and provided have afforded additional benefits in these areas as well. A presentation on nozzle technology, dealing with advances that are being developed and the advantages in limiting pesticide exposure that they promise, is perfectly directed at the possibility of revising exposure estimates some day. Jill's own presentation regarding the challenges and pressures experienced in growing minor crops, such as peppers in New Mexico, continue to reassert the need for special considerations in certain areas of agriculture. Another presentation that Jill arranged provided outstanding information to

help determine the current scope of the weed resistance problem in the U.S. These events are widely attended and very well received by EPA scientists and risk managers.

Speaking of weed resistance, Jill has been an outstanding resource in connection with our newly formed resistance management workgroup. As I'm sure you are aware, this workgroup has been initiated to address the growing concerns regarding resistance to pesticides that are being experienced with herbicides, insecticides, and fungicides. This workgroup is working to solicit collaboration from multiple stakeholders, and Jill's contacts and expertise are invaluable in this regard. With Jill's involvement (especially in recognizing and approaching expert individuals and groups in this area, and in her ability to communicate with a diverse group), I am confident that such collaboration will be formed and lead to the development of a program that will focus on the big picture, suggest appropriate measures, and minimize controversy to the extent feasible.

Jill has been part of, and in some cases responsible for, very important field trips to address highly pertinent issues. A very notable example is the work that she did to put together a unique trip to New Mexico, providing EPA personnel from both Office of Pesticide Programs and Office of Water a rare opportunity to experience challenges by the growers in person. This trip studied pesticide applications in less visible fields, such as rangelands and minor use crops, and provided insight on the needs, requirements, and challenges. A very important aspect of the trip involved the study of irrigation and riparian issues, and the need for control of aquatic weeds to allow agriculture to exist in areas such as southern New Mexico. As EPA's OPP and OW continue to collaborate on the NPDES requirements, these trips allow information and knowledge that may not otherwise be readily apparent, and contributes to a better understanding of the situation before the relevant decisions are made. In addition, this trip provided additional state regulatory and university contacts representing expertise in a variety of fields.

As Jill's familiarity with OPP increases, so does her effectiveness in working with EPA colleagues. Due to the success of the program, additional liaisons are being piloted to address insecticide and fungicide issues. Jill has been an extraordinary help in introducing these individuals to the Program. Since the daily pace in OPP can (and will) prevent us from spending as much time as we would like to educate people new to or unfamiliar with the Program, Jill has taken it on herself to help them acclimate to the OPP environment. This provides them with an enormous head start, by far surpassing what Jill herself was offered in the way of an introduction when she was new. I find this resource particularly advantageous. Not only does Jill teach at a very appropriate level (being familiar with the challenges of learning it all herself), but we have the task handled without any expense on our part. Anecdotally, Meredith Laws, who is currently acting chief of the Herbicide Branch, has remarked on several occasions how Jill's introductory talk with her on herbicides made a huge impact on her understanding of basic weed science.

These are the most immediate thoughts that come to my mind, and I hope that they are helpful. I continue to be encouraged at the growth and the potential of the liaison position, and am grateful that I have continued access to a colleague as remarkable as Jill. Again, I reiterate my strongest support for the WSSA liaison position.

I'd be happy to discuss these and/or additional thoughts further if you'd like.

Sincerely,
Dan

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