

May 15, 2023

Deb Haaland
Secretary
Department of the Interior
1849 C Street NW
Washington, DC 20240

Dave Applegate
Director
United States Geological Survey
12201 Sunrise Valley Drive
Reston, VA 20192

Re: Restoring the National Pesticide Use Map Database

Dear Secretary Haaland and Director Applegate,

We write to you on behalf of the 123 public health, farmworker, environmental justice, conservation and science-based organizations to express our serious concern that the United States Geological Survey (“USGS”) is adhering to a previous directive that has fundamentally undermined and may ultimately terminate the National Pesticide Use Map database – one of the most vital tools for monitoring pesticide use and estimating water pollution nationwide.

Since 1991, the USGS National Water Quality Assessment (“NAWQA”) has been a key tool in measuring the quality of our Nation’s streams and groundwater, how conditions are changing over time, and how human activities are affecting these vital resources. An extremely important component of NAWQA has always been the National Pesticide Use Map database, which has produced highly sophisticated pesticide use estimates throughout every single watershed in the country.

Pesticide use estimates have been generated for every agricultural pesticide annually since 1992, which have been essential for the design of USGS water-quality studies. In many cases these important data have been used to predict concentrations of pesticides in streams and groundwater, implicate atmospheric transport of pesticides that are detected in air and rain samples far from sites of application, and predict changes in local water quality based on temporal and spatial variations in pesticide use over time.

While the National Pesticide Use Map database has been an invaluable resource to the federal government, perhaps the greatest benefit has been to scientists, state and local public health officials, and environmental health advocates, as it provides vital information and tracks trends that are not available anywhere else. The pesticide use data produced by the USGS have been used in the development of over 500 peer-reviewed scientific papers, including some of the most highly cited and seminal works in the field. It is information vital to understanding water pollution and landscape-level impacts associated with pesticides.

After accumulating valuable data for over 30 years, the National Pesticide Use Map database is now in danger of termination due to continued use of directives from the previous administration that restructured the USGS and devalued important data sources. The Pesticide Use Mapping Project previously provided data for around 540 agricultural pesticides that are used and can contaminate water throughout the country. Beginning in 2019, the Pesticide Use Mapping Project now only follows just over 70 pesticides – an 87% reduction. Furthermore, after a planned update for those 70 pesticides in 2024, there are no definite plans to continue the program or update the database unless action is taken.

We use 1.1 billion pounds of pesticides each year in the United States and total pesticide use in the U.S. is up 47% since 1970. Chemical mixtures of pesticides have never been more prevalent in the environment since pesticide use began in earnest in the 1950s.

We need credible sources of data to be able to study and understand what this widespread pesticide use means to the health of people and the environment. There is not a single data source that can even come close to replacing the USGS National Pesticide Use Map database. Data from the USDA's National Agricultural Statistics Service, for example, is collected intermittently, for a specific subset of crops, in a limited number of states and in a difficult to use format. The USGS pesticide use estimates are the only comprehensive, national sources of information about pesticide levels in the environment. Important work by water quality facilities, agricultural extension offices, farmworker healthcare clinics and countless other services will be compromised by the loss of the Pesticide Use Mapping Project.

We urge the USGS to:

- 1) Provide use estimates for *all* agricultural pesticides by restoring the scope of the program to its pre-2019 level;
- 2) Retroactively calculate estimates for all pesticides that lapsed during the recent program cuts; and
- 3) Continue adding new agricultural pesticides to the database as they gain EPA-approval.

Eliminating this dataset would profoundly undermine our understanding of pesticide pollution nationwide.

Thank you for your consideration of our request,

540WMain Inc (Antiracism education)

ActionAid USA

Agricultural Justice Project

Alabama State Association of Cooperatives

Alianza Nacional de Campesinas, Inc.

American Bird Conservancy

American Parkinson Disease Association
(APDA)

American Sustainable Business Network

Antibiotic Resistance Action Center, the
George Washington University

Asociación Con P de Parkinson
Beyond Pesticides
Beyond Toxics
Boston Area Beekeepers Association
Breast Cancer Action
Breast Cancer Prevention Partners
California Nurses for Environmental Earth & Justice
Californians for Pesticide Reform
Center for Biological Diversity
Center for Environmental Health
Center for Food Safety
Centre County Beekeepers
Clean Production Action
CleanAirNow_EJ
CleanEarth4Kids.org
Collaborative for Health and Environment
Compañeras Campesinas
Conservation Coalition
Consumer Reports
CRLA Foundation
Crown Bees
CT Pesticide Reform
Dietrick Institute for Applied Insect Ecology
Earthjustice
Ecology Center
Endocrine Society
Environment America
Environmental Integrity Project
Environmental Protection Network
Environmental Working Group
Farmworker Association of Florida
Farmworker Justice
Food Animal Concerns Trust
Friends of the Earth
Geiger Farm
Government Information Watch
Green America
Grow Safe: Non-Toxic Missoula
Hawai'i Alliance for Progressive Action (HAPA)
Health Research Institute
Heartland Health Research Alliance
Illinois Stewardship Alliance
IPM Institute of North America
JAIDE Conservation Collective, LLC
Johns Hopkins Center for a Livable Future
Latino Farmers & Ranchers International, Inc.
LEAD for Pollinators, Inc.
Locust Point Community Garden
Malibu Monarch Project
Maryland Pesticide Education Network
Microbes and Social Equity working group
Mission PD
Missouri Coalition for the Environment
Missouri Prairie Foundation
Moms Advocating Sustainability.org

National Co+op Grocers
Natural Resources Defense Council
Naturedigger
Nature's Path Foods
NC Farmworker Advocacy Network
Non Toxic Communities
Northeast Organic Dairy Producers Alliance
Northeast Organic Farming Association of Connecticut
Northeast Organic Farming Association of Massachusetts
Northeast Organic Farming Association of New Hampshire
Northeast Organic Farming Association of Vermont
Northeast Organic Farming Association-Interstate Council
Norwalk River Watershed Association
OCIA International Board of Directors
Ohio Ecological Food and Farm Association
Organic Voices
Parkinson's International Foundation
Parkinson Society British Columbia
Pasa Sustainable Agriculture
People & Pollinators Action Network
Pesticide Action Network North America
Pollinate Minnesota
Pollinator Pathway
Pollinator Pathway Stamford
Pollinator Stewardship Council
Prairie Rivers Network
Prairie Rivers of Iowa Resource Conservation & Development
Prairie State Conservation Coalition
Protect Our Pollinators
Public Employees for Environmental Responsibility
Re:wild Your Campus
Real Food Media
Rincon-Vitova Insectaries
Rural Advancement Fund of the National Sharecroppers Fund
Rural Coalition
Salud Sin Fronteras, Inc.
Seaway Parkinson's Coalition
Seedfolx Farm
Shake It Up Australia Foundation
Shaky Nation
Student Action with Farmworkers
The Land Connection
The Michael J. Fox Foundation for Parkinson's Research
The Vicks Estate, Farm, & Fishery
The Xerces Society for Invertebrate Conservation
Toxic Free NC
Turning Green
U.S. PIRG
UCSF Program on Reproductive Health and the Environment

University of Northern Iowa's Center for
Energy & Environmental Education

Until Justice Data Partners

Valle de Oro NWR EJ Leadership Team

Wild Farm Alliance

Women's Health Consultants

Women's Voices for the Earth

World Animal Protection

World Wildlife Fund-US

YardSmartMarin

Yuvedo Foundation