



Forest Service
U.S. DEPARTMENT OF AGRICULTURE



Forest Health Protection

**Forest Service Pesticide Impact
Assessment Program**

**Proposal Instructions and
Program Guidelines**

Program Objectives, Priorities, and Project Eligibility

The Forest Service Pesticide Impact Assessment Program (FS-PIAP) is administered at the national level and funds are provided by the USDA Forest Service Forest Health Protection.

Projects submitted to this Program must contribute to the Forest Health Protection (FHP) mission: To protect and improve the health of America's rural, wildland, and urban forests - i.e. *must address forest insects, forest pathogens and diseases, and invasive plants.*

National FS-PIAP Program Objective:

The objective of FS-PIAP is to improve knowledge of the benefits and risks of pesticides registered by US-EPA for use in field-based applications supporting forestry and related programs of USFS and cooperators.

National Priorities:

Priorities are set by the FHP Pesticide Use Coordinators. FS-PIAP proposals that address national priorities will receive a higher ranking. FS-PIAP national program priorities are:

- ✓ Advancement in proper use of pesticides (efficacy, efficiency, safety, training, etc.), because it is Forest Service policy to base actual and recommended uses of pesticides on analysis of effectiveness, specificity, environmental impacts, economic efficiency, and human exposure.
- ✓ Proposals that address the efficacy and benefits of new uses of pesticides being considered for management of invasive and native forest pest insects, diseases, and plants
- ✓ Environmental toxicity, fate; soil mobility and uptake/metabolism, with emphasis on priority pesticides in conjunction with adjuvants. Species of interest include amphibians, salmonids, and invertebrates including hymenopteran pollinators. Effects on "soil health" fauna, flora, and processes. Effectiveness of Best Management Practices to prevent contamination of surface waters as a result of off-site movement in herbicide application: runoff, sediment transport, and drift.

Proposal Requirements and Eligibility:

- ✓ Must address the FHP program mission
- ✓ Must be submitted through the appropriate FS-PIAP Regional Representative
- ✓ Must have an FHP sponsor who is **directly involved** in the project proposal, development, and implementation.
- ✓ The **FHP sponsor must agree to sponsor the project PRIOR to proposal submission**
- ✓ Funding information and directions are found on the Forest Health Protection Special Project Program Funding Information webpage.

Note: Projects for biological control of invasive forest pests is covered under another Program! Those proposals should be submitted to Biological Control for Invasive Forest Pests (BCIFP) Program through the BCIFP Regional Representatives.

Submitting New Proposals and Progress Reports

This Program is specifically for closing data gaps that exist for forestry use pesticides that enhance the effectiveness of FHP Programs and program operations. Do not submit proposals that would use FS-PIAP funds exclusively for routine surveys or basic technical assistance.

To avoid potential duplication of planned or ongoing work, and to identify avenues for building on current work and potential cooperation, we encourage you to discuss your ideas with members of your local FHP staff and your Regional FS-PIAP Representative (see below). A maximum of 3 proposals may be elevated by each Region for National consideration.

Due Dates:

- ✓ There is one request for proposals, annually. New proposals are submitted to the national program by the Regional FS-PIAP Coordinators – so you must work with them. **The deadline to submit New Project Proposals, Progress, and Final Reports to Regional Representatives is October 20, 2023.**
- ✓ **Regional Representatives will submit nationally elevated New Project Proposals along with Progress and Final Reports to the National Program Manager by December 1, 2023.**

Note: The federal fiscal year runs from October 1 to September 30. For example, Fiscal Year 2023 (FY 2023) starts October 1, 2022 and ends September 30, 2023.

Required Forms:

Use the New Project Proposal, Progress, and Final Report forms available on the [FHP Grants webpage](#).

- ✓ Please use the FY24 fillable “**New Proposal Form**” for submitting a new proposal.
 - Projects will only be accepted if they meet the definition of FS-PIAP
 - **The budget** should show a thorough explanation of all costs and contributions (including non-federal match or leveraged funds) from the cooperators. A 50:50 match may be required but in certain circumstances and on a case-by-case basis, match may be reduced or waived by the Deputy Chief for State and Private Forestry. **Match is waived for tribes and underserved communities.**
- ✓ For **Continuing Projects** funded in prior years, whether or not you are requesting funding in the current year, please submit an FS-PIAP Progress Report form. Use the FY24 fillable “Progress Report” form for submitting a Progress Report. Continuing projects with requests for funding will be evaluated for appropriate performance.
- ✓ For **Completed Projects ending by September 30** of the current year, please submit a FS-PIAP Final Report form. Use the FY24 fillable “Final Report” form for submitting a Final Report. If the project is closed but products are pending, please fill out and submit a Progress Report form in lieu of the Final Report form.
- ✓ **NEW: In addition to the Final Report form, please submit a 1-page project summary** (template available on the [FHP Grants webpage](#)).

NOTE: portions of these forms may become available to the public on the FHP Grants website. Please consider spelling, punctuation, verbiage, etc. accordingly.

Evaluation Criteria for New Projects and for Continued Funding

New Project proposals are evaluated by a panel of experts that specialize in a wide range of forest health issues. Please present information in a clear and concise manner and use terminology that can be understood by a general audience.

New Project Proposals will be submitted using the online fillable PDF form available at ([FHP Grants webpage](#)). For best results, please use [Adobe Acrobat Reader DC](#) when filling out the forms on either PC or Mac machines.

New Project will be evaluated using the following criteria:

- 1) **Importance** – Does the proposed project addresses current FS-PIAP national program priorities?
- 2) **Technical merit** – Does the proposed project have a strong foundational basis and technically sound approach?
- 3) **Results** – Is the proposed project likely to produce results which will be implemented/applied by FHP personnel and partners?
- 4) **Technology Transfer** – Is the proposed project supported with sound Technology Transfer after completion?
- 5) **Stakeholder and end user involvement** – Does the proposed project demonstrate support and need by stakeholders/end users from project initiation to the dissemination or distribution of information following project completion?
- 6) **Finance and Economic efficiency** – Are the proposed project costs reasonable and fully documented?

Note: The following changes have been made regarding travel to meetings/conferences:

- Travel to meetings/conferences will not be paid in year one of a proposal unless that project is scheduled to end in one year. The maximum amount is \$2,500.
- A maximum of \$2500 per year in travel is allowed in the 2nd and 3rd year for multi-year projects or \$5000(\$7500?) for the life of the project.
- Travel funds cannot be used by Forest Service personnel.

Criteria for Continuing Project Funding and Continuing Projects:

1. Is the Project on track?
2. Are there proposed changes to the original project, and if so, are they reasonable/justified?
3. Is the progress report complete? Does it track information about the project activities by year (not just the activities for the most recent year)?
4. Does the most recent annual progress report clearly describe what techniques, technologies, or methods are working or not working?
5. Is the project within budget? Are proposed changes to the project reasonable?
6. Were completed supporting documents provided?
7. Was FS-PIAP acknowledged in any interim publications or reports?

Note: In all communications of **project results**, the FS-PIAP **shall specifically be credited** for cooperation and support (e.g. this project was funded by the USDA Forest Service, Forest Health Protection, Forest Service Pesticide Impact Assessment Program)

Enclosure #1 - Human Subject Certification

Note: Human Subject Certification is only required if the project proposes to study human exposure to pesticide. If study will not study human exposure to pesticide, please so note in proposal.

Assurance is given that any activity involving human subjects to be conducted under the proposed project will be carried out in accordance with applicable Department of Health, Education, and Welfare rules and regulations, and that our Institutional Review Board, constituted and operating in conformity with applicable Department of Health, Education, and Welfare rules and regulations, has, or will have, reviewed and approved the protocol prior to commencing the activity involving human subjects. Any such activity has been coordinated with the U.S. Environmental Protection Agency Human Study Review Panel.

Name of Institution:

Signature & Title of Authorized Official:

Date:

Enclosure #2 “Good Laboratory Practices”

FSH 4090.13,10 [excerpts]

FSH 4090.13 - GOOD LABORATORY PRACTICES HANDBOOK WO AMENDMENT 4090.13-93-1

CHAPTER 10 - COMPLIANCE WITH GOOD LABORATORY PRACTICES

11 - APPLICABILITY OF GOOD LABORATORY PRACTICES. (Sec. 01, ex. 01; 40 CFR 160.1, 160.10, and 160.135). Good Laboratory Practices (GLPs) specify how to collect, store, and present data to regulatory agencies in a standardized manner that allows effective auditing and evaluation. Good Laboratory Practices do not regulate the experimental design of a study or address issues of worker safety. For direction on worker safety, see:

1. The Health and Safety Code Handbook, FSH 6709.11;
2. Section 55.21 of this Handbook for direction on writing safety-related Standard Operating Procedures;
3. Other related documents, such as Station or Regional Safety Plans.

11.1 - Types of Studies Requiring Good Laboratory Practices. Any Forest Service study on pesticides that is performed with the intention of submitting the data to the requisite federal agency in support of a research or marketing permit, must be conducted under Good Laboratory Practice (GLP) standards as described in 40 CFR Part 160. This includes research on microbial pesticides used for biological control, and pesticide-related laboratory and field studies concerned with any of the following:

1. Health Effects
2. Environmental Effects
3. Chemical Fate
4. Chemical and Physical Properties
5. Residue Chemistry
6. Epidemiology

11.2 - Types of Studies Not Requiring Good Laboratory Practices.

11.21 - Studies Not Submitted to the U.S. Environmental Protection Agency. Pesticide related studies that are not intended to be submitted to the U.S. Environmental Protection Agency (EPA) do not need to be conducted under Good Laboratory Practice (GLP) standards. A disclaimer should be added to the study plans or to the project record stating:

This study/project involves the use of pesticides, but the findings are not intended to be submitted to the U.S. Environmental Protection Agency in support of a research or marketing permit. This research is therefore not covered by the Federal Insecticide, Fungicide, and Rodenticide Act Good Laboratory Practices regulations. The results of such a study may not be accepted by the EPA if the study is submitted to EPA at a later date.

11.22 - Development of New Pesticides and Testing Procedures. The initial phases of research, including pesticide development and establishment of testing methodology, do not fall under Good Laboratory Practices (GLPs). Such basic exploratory studies are not subject to GLP regulations unless the data generated during the study would be submitted to the U.S. Environmental Protection Agency in support of a research or marketing permit.

11.23 - Efficacy Tests. Most efficacy tests, which comprise the bulk of Forest Service pesticide studies, are designed to compare a number of registered chemicals to determine which ones are best for a given forest management situation. Efficacy testing does not currently require Good Laboratory Practice (GLP) compliance if the study is not intended for submission to the U.S. Environmental Protection Agency (EPA). However, efficacy tests must conform to GLP standards if test results are to be submitted to the EPA in support of registration or re-registration. If a study is eventually submitted to the EPA, a compliance statement must be included, even if GLPs were not required or followed when the study was conducted (sec. 12.2).

11.3 - Types of Studies That Allow More Relaxed Good Laboratory Practice Standards. Certain types of studies can be conducted using more relaxed Good Laboratory

Practice standards (sec. 01, ex. 01; 40 CFR 160.135; and 40 CFR 792.232) when studies involve:

1. Physical and chemical characterizations of a compound
2. Pest management alternatives with pesticide-like materials or techniques. These include the use of pest baits parasites, and predators; the monitoring of traps or trap crops; and the release of sterile male pests.

12 - ASPECTS OF COMPLIANCE.

12.1 - Applicability. (Sec. 01, ex. 01; 40 CFR 160.10). Conduct all studies under Good Laboratory Practices (GLPs) that are intended for submission to the U.S. Environmental Protection Agency (EPA) in support of research or marketing permits. Ensure that any study, or portion of a study, intended for submission to the EPA that is performed under contract by independent consulting laboratories, contractors, or grantees is conducted in compliance with GLP standards.

12.2 - Statement of Compliance. (Sec. 01, ex. 01; 40 CFR 160.12). Include one of the following statements of compliance with each study submitted to the U.S. Environmental Protection Agency (EPA):

1. The study was conducted in accordance with Good Laboratory Practice (GLP) regulations with no deviations from the protocol.
2. The study was conducted in accordance with GLP regulations, but with deviations. Describe in detail all of the differences between the practices used in the study and those required by the GLP regulations.
3. The person was not a sponsor, did not conduct the study, and does not know whether the study was conducted in compliance with GLP regulations. Such a submission may result in rejection of the study.

The applicant, the sponsor, and the Study Director are each responsible for signing the compliance statement. Signing a statement of compliance must be taken very seriously. The EPA officials can prosecute anyone under Title 18, United States Code, Section 1001 for knowingly and willfully falsifying information in the compliance statement (sec. 12.4).

12.3 - Inspections. (Sec. 01, ex. 01; 40 CFR 160.15). Allow authorized representatives of the U.S. Environmental Protection Agency (EPA) to inspect field unit facilities (sec. 93). These inspections are conducted to determine whether Good Laboratory Practices and other Federal Insecticide, Fungicide, and Rodenticide Act regulations are being properly followed and that data are available to support the study.

Allow inspectors access to the facility and to all records and materials required to be maintained for the study (sec. 72); otherwise, the EPA may not consider the data reliable for purposes of supporting an application for a research or marketing permit. Refusing an EPA inspection can invalidate a study and may result in cancellation, suspension, or modification of a research or marketing permit (sec. 93.1).

12.4 - Effects of Noncompliance. (Sec. 01, ex. 01; 40 CFR 160.17). The U.S. Environmental Protection Agency (EPA) may invalidate or refuse to consider any study submitted to them that does not follow Good Laboratory Practice (GLP) regulations. The deliberate falsification of data, records, and reports, or the refusal to maintain or submit required records can lead to the imposition of civil penalties or criminal prosecution. In addition, the applicant, sponsor, and Study Director who fraudulently sign the compliance statement can be civilly liable. To avoid penalties, accurately and completely list all non-GLP portions of a study in the compliance statement. Penalties are not assessed for submitting non-GLP studies to the EPA; but penalties can be assessed for affirming that studies follow GLP regulations when they do not.

Enclosure #3 - USDA-Forest Service FS-PIAP Regional Coordinators

Regions 1 and 4

Carol Bell Randall
USDA Forest Service
POB 159, 173 Commerce Drive
Smelterville, ID 83868-0159
Phone: 208-783-2107 FAX: 208-783-2154

Region 2

Dan Tekiela
USDA Forest Service, Region 2
617 Cole Boulevard,
Building 17
Lakewood, CO 80401
Phone: 303-275-5463 FAX: 303-275-5754

Region 3

Janet Nickerman
USDA Forest Service
701 N. Santa Anita Ave.
Arcadia, CA 91006
Phone: 626-353-8439

Region 5

Stacey Clark
USDA Forest Service
1323 Club Drive
Vallejo, CA 94592
Phone: 707-562-8916, Fax: 707-562-9054

Region 6

Vacant
USDA Forest Service
P.O. Box 3623
Portland, OR 97208-3623
Phone: 503-808-2915 Fax: 503-808-2339

Region 8

Vacant
USDA Forest Service
1720 Peachtree St. NW
Atlanta, GA 30309
Phone: 706-318-7497, Fax: 404-347-1880

Region 9

John Kyhl
USDA Forest Service
State and Private Forestry, Forest Health Protection
1992 Folwell Avenue
St. Paul, MN 55108
Phone: 651-649-5265 Fax: (651) 649-5238

Region10

Joni Johnson
USDA Forest Service
648 Mission St, Federal Building
Ketchikan, AK 99901
Phone: (907) 772-5926