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March 31, 2006

Dr. Kent Smith
USDA
Office of Pest Management Policy
1400 Independence Ave., SW
Room 3871 – South Bldg. Mail Stop 0315
Washington, DC 20250-3191

RE: Botran (DCNA) Proposed Use Changes for Several Crops in California

Dear Kent,

This letter is in response to your March 14, 2006, request for comments on the registrants' proposed use changes for Botran on 12 crops. In your request you forwarded the following narrative and table.

EPA is expected to complete its regulatory review (RED) of the fungicide Botran (DCNA or dicloran) by April of 2006. EPA is in the mitigation phase of their regulatory review. The chart below lists EPA's proposed changes to the Botran label.

Please let me know if any of these changes will cause problems. If so, why, and what would be a suitable compromise? Consider if it would be possible to reduce the REIs by prohibiting some of the high-exposure post-application activities (leaf pulling, thinning, pruning, training/tying, cane turning, tabling of grapes, and hand-harvesting). California has a major share of the usage, but I would appreciate it all the states would review this chart.

Botran is not used on the tree fruits, Christmas trees and conifers in the table.

The proposed maximum rate for celery is too low. The median rate used by celery growers in California is 2.5 lb ai/ac. Botran is applied to 31% of the acres (13,429 acres) and is an essential tool for California celery growers to control pink rot. The only other efficacious treatment for pink rot is fumigation with methyl bromide and/or chloropicrin. The maximum rate should remain at or above 2.5 lb ai/ac.

Crop	Maximum Rate (lb ai/A)		REI in days	
	Now	Proposed	Now	Proposed
Celery	4.0	2.0	0.5	2.0
Lettuce	4.0	2.0	0.5	2.0
Grapes*	3.5	2.0 or less	0.5	At 32 days still is a hazard at 2 lb ai/A
Snap beans	3.0	2.0	0.5	2.0
Apricots, peaches, nectarines, plums, prunes, sweet cherries	4.0	2.0	0.5	7.0**
Christmas trees, conifers	2.0	1.5	0.5	0.5

* Due to the extreme REI required, this use may need to be canceled.

** If 7-day REI is not feasible, may need to prohibit thinning (high exposure activity).

The median application rate for use of botran on lettuce is 0.70 lb ai/ac. Therefore the proposed reduction in the maximum rate should not pose a problem.

The median application rate for table and wine grapes is about 1.0 lb ai/ac. Therefore the proposed reduction in the maximum rate should not pose a problem. However, the proposed REI would eliminate use in grapes in California. The REI must allow for normal cultural practices within a reasonable period of time.

The proposed rate reduction for snap beans should not pose a problem. However, for fresh market crops, a two day REI may pose a problem for crops which need to be picked each day.

All pesticide use data were obtained from the California Department of Pesticide Regulation's Pesticide Use Report database for 2004.

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If you have any further questions, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Rick Melnicoe". The signature is written in a cursive style with a prominent loop at the end of the last name.

Rick Melnicoe
Director, Western IPM Center