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University

Specialty Crop Protection Program

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U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington DC 20460-0001

February 14, 2023

RE: Pesticide Registration Review: Proposed Interim Decision for Carbaryl
EPA Docket ID: EPA-HQ-OPP-2010-0230

To Whom it May Concern,

Thank you for the opportunity to comment on the Proposed Interim Decision for carbaryl. I am writing on behalf of the Western IPM Center to share feedback from agricultural producers in the Pacific northwest. Carbaryl is labeled on a wide variety of crops in the Pacific northwest, but three of the predominant uses are in apple for blossom thinning, cherry for spotted wing drosophila control, and cranberry for cranberry tipworm. This comment focuses on the drift mitigations proposed for salmonid protection.

Bulletins Live! Two (BLT) label language clarity: requirements for airblast sprayers

The BLT restrictions for salmonids present growers with a 'choose-your-own adventure' template that presents assorted mitigations depending on application type and application rate. While surveying growers about BLT for comments submitted to EPA about the Endangered Species Workplan Update, some respondents indicated that they felt that the language on the Endangered Species Protection Bulletins was too confusing or not written with the applicator in mind. To reduce applicator confusion, please consider adding language under the airblast section of the salmonid mitigations to the effect of:

For airblast applications only: For application rates greater than 1 lb AI/A, apply one runoff reduction measure from Runoff Reduction Options List A or two from List B above AND apply one drift reduction measure from the list below.

Allowable mitigations for salmonid protections

I surveyed growers on whether the soil erosion and surface water runoff mitigations presented in the Endangered Species Workplan update and had responses from thirty growers. No grower responded that they were unable to implement any of the practices. However, there were several respondents who felt it was only feasible to implement one or two of the fifteen mitigations on their operation. For this reason, it is important that EPA allow as broad a list of mitigations for salmonid protection as possible. The practices growers most frequently reported being currently implemented on their operations are cover cropping, reduced tillage, field borders, vegetative/grassed ditch banks, mulching, and riparian buffer zones. At least 25% of respondents indicated that the following mitigations could be implemented: vegetative filter strips, vegetative barriers, mulching, field borders, cover crops, reduced tillage, and grassed waterways. We request that EPA pull more broadly from the picklist presented in the Endangered Species Workplan Update so that growers may be able to meet their pest control needs while staying in compliance with endangered species protections.

Mitigation definitions

Growers have indicated a need for definitions of each mitigation that is clearly written and easily accessed. One suggestion is to create a website with definitions, diagrams, photos, recommended plant species for vegetative strips, etc. for growers to reference, and that could be directly linked to from the Endangered Species Protection Bulletin.

In the carbaryl PID specifically, growers are unclear on the differences between a retention pond (Runoff Reduction List A, Option 2) and a water control structure at edge of field (Runoff Reduction List B, Option 3). The water retention pond in List A is defined in the Endangered Species Workplan update; but there is no corresponding definition for a water control structure (List B) in that document. Please consider adding definitions or clarifications to reduce confusion.

Thank you for the opportunity to comment. Please feel free to contact me with additional questions.

Respectfully,



Dani Lightle, Ph.D.

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To compile comments, input is actively solicited from stakeholders throughout the Pacific Northwest in an effort to convey use patterns, benefits, potential impacts, and the availability and efficacy of alternatives. These comments largely reflect expert testimony from stakeholders, including research and

extension experts as well as farmers and commodity groups. The comments do not imply endorsement by Oregon State University or the Western IPM Center.