



December 6, 2007

Ref: 2007-10-1

Office of Pesticide Programs
Regulatory Public Docket (7502P)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW,
Washington, DC 20460-0001

Re: Docket ID Number EPA-HQ-OPP-2007-1005
Subject: Comments on the Petition to Cancel Chlorpyrifos Registrations

In the October 17 *Federal Register*, EPA announced it was seeking public comment on a petition from the National Resources Defense Council and the Pesticide Action Network North America requesting that EPA cancel all chlorpyrifos registrations.

The nursery and ornamentals industry in Oregon is the state's number one agricultural commodity with sales in 2006 exceeding \$966 million. Chlorpyrifos is important to this industry where it is used in IPM programs. While chlorpyrifos is used to control many pests, the two most important uses that were reported were for garden symphylan control and use on *Malus* species destined for export to Canada for control of apple ermine moth.

The use of chlorpyrifos for garden symphylan control is very important in Oregon's nursery and ornamentals industry. When this pest is not adequately controlled, nurseries experience extensive plant loss and subsequent economic losses. For this use chlorpyrifos is applied in the spring pre-plant and is the insecticide of choice because of its efficacy.

Canada requires that *Malus* species (apple, crabapple) imported from certain areas in Oregon and Washington be treated with either esfenvalerate (Asana) or chlorpyrifos. According to one contact, if the nursery chooses to use esfenvalerate then they must treat all the trees in the field prior to harvesting them as bare root trees for sale. This nursery chooses to use chlorpyrifos because this is a pot-harvest use and they can limit their pesticide use to the small percentage of harvested trees that are destined for Canada.

Other important uses of chlorpyrifos in the nursery and ornamentals industry include the use for the control of borers, root weevils, black vine weevil, and European pine shoot moth. Where chlorpyrifos is used for borer control it is chosen because it remains effective over a longer time period. The life cycles of some boring insects are not yet well understood and when nurseries

rely on other pesticides with shorter residuals, they end up making additional pesticide applications.

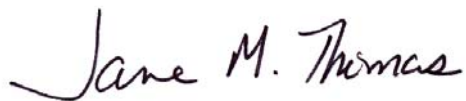
As previously stated, chlorpyrifos is an important tool in nursery IPM programs where it is used in rotation with other insecticides. Along with the pests already mentioned, chlorpyrifos is also used to control thrips, mites, aphids, adelgids, scale, bagworm, budworm, beetles, tussock moth, light brown apple moth, white pine weevil, leaf rollers and leaf tiers.

While I did receive one comment in support of the petition to cancel chlorpyrifos registrations (the commenter believed that adequate alternatives existed), all other comments expressed the need to retain the use of chlorpyrifos in nurseries.

While most of the information I received from the industry was in the form of calls or e-mail, one nursery prepared a letter which I have attached. Also attached is a contact list showing those who submitted comments.

Oregon's nursery and ornamental industry is asking that EPA take into account the importance of chlorpyrifos in IPM programs and that chlorpyrifos use in nurseries be retained.

Sincerely,

A handwritten signature in cursive script that reads "Jane M. Thomas".

Jane M. Thomas
Pacific Northwest Coalition Comment Coordinator
Washington State Pest Management Resource Service
Washington State University Tri-Cities
2710 University Drive
Richland, WA 99354
phone: 509-372-7493 fax: 509-372-7491
e-mail: jmthomas@tricity.wsu.edu

November 27, 2007

RE: Chlorpyrifos Use

I am writing this letter in regards to the petition that has been filed to cancel all uses of chlorpyrifos.

We are a wholesale nursery that grows shade and flowering trees, ornamental container plants and apple rootstock. We presently use chlorpyrifos under that name of Dursban. We have two important uses of this chemical:

- In the spring we apply Dursban to our soil prior to field planting to control symphylans. When Dursban was not incorporated into the soil prior to planting, we experienced a large plant loss resulting in significant economic impact to our business. We are very limited in the chemicals available to use to control this pest that provides the same success as Dursban.
- The other application of importance is a spray for the control of apple ermine moth in our apple rootstocks. This is a required spray application to meet the requirements of Agriculture Canada for the importation of Malus nursery stock--specifically apple nursery stock from parts of Oregon and Washington infested with the apple ermine moth into all of Canada. It is specifically stated in the requirement that we spray with esfenvalerate (Asana XL) or Chlorpyrifos (Dursban 4E) in a second spray applied with dormant oil in the fall to control any possible egg masses. We rotate both of these chemicals to fulfill this requirement.

The loss of Dursban in our spray program could have serious impact in our control of symphylans and Apple Ermine Moth. Please do not cancel ALL uses of chlorpyrifos.

Thank you,
Joe Kelly
Production Manager

Four Mile Nursery
27027 S. Hwy 170
Canby, OR 97013
503-266-9572

Chlorpyrifos: Cancellation Petition
Contact List

Last Name:	First Name:	Organization:	Title:	Work Ph:	Ext.	Email:	Responsible State:
Bagby	Samantha	Oregon Pride Nursery	Plant Protection Technician	(503) 472-9147		orpride@aol.com	Oregon
Batson	Troy	John Holmlund Nursery Valley Farm	Farm Manager			valleyfarm1@msn.com	Oregon
Bottenberg	Clint	Hans Nelson and Sons Nursery	Production Manager			cbottenberg@gmail.com	Oregon
Clark	Steven	Blooming Nursery	Operations Manager	(503) 357-2904		sclark@bloomingnursery.com	Oregon
Doan	Sam	J. Frank Schmidt & Son Co.	Production Horticulturist	(503) 512-3359		samd@jfschmidt.com	Oregon
Dumdi	Ross	Bailey Nursery	Plant Health Department Head	(503) 572-2139		ross.dumdi@baileynursery.com	Oregon
Jarrell	Dave	Perennial Obsessions and Jarrell Nursery Sales	Owner	(503) 868-7441		jarrellnursery@onlinenw.com	Oregon
Kelly	Joe	Four Mile Nursery	Production Manager	(503) 266-9572		cheryl@fourmile.com	Oregon
Lapotin	Ron	Hines Horticulture	Nursery Services Manager	(503) 359-6822	16822	RLapotin@hineshort.com	Oregon
Matlock	John	Northwest Shade Trees LLC	Crop Protection Manager			John@shadetrees.com	Oregon
Matlock	John	Matlock's Conifers LLC	Owner	(971) 235-4126		jmatlock@chft.biz	Oregon
McMahan	Michael	Fisher Farms	Horticulturist	(503) 985-7561		michael@fisherfarms.com	Multiple
Rosetta	Robin	Oregon State University	Extension Horticulturist	(503) 678-1264	33	robin.rosetta@oregonstate.edu	Oregon
Smith	Eric	J. Frank Schmidt & Son Co.	Grower	(503) 663-6798	223	EricS@jfschmidt.com	Oregon
Walden	Cheryl	Four Mile Nursery	Inventory Specialist	(503) 266-9572		cheryl@fourmile.com	Oregon