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Office of Pest Management Policy
Agricultural Research Service
U.S. Department of Agriculture
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Riverdale, MD 20737-1237

Subject: Dimethoate: Christmas Tree and Woody Ornamental Mitigation Measures

The following information is provided to you from the Western Integrated Pest Management Center regarding your request for input on EPA's proposed mitigation measures for the use of dimethoate on Christmas trees and woody ornamentals. On March 16 you asked for feedback on EPA's proposal to limit dimethoate use on Christmas trees and woody ornamentals to one application per season, to reduce the application rate to 1 # ai/A, and to increase the REI to 24 days for non-arid areas and to 36 days in arid areas. This response reflects grower responses for Idaho, Oregon, and Washington, the major Christmas tree producing states in the Pacific Northwest (PNW).

Dimethoate is used in PNW Christmas tree production for the control of balsam tip borer, eriophyid mites, spider mites, and aphids including wooly aphid, green aphid, and balsam twig aphid. While pymetrozine (Endeavor) and imidacloprid (Admire, Provado, Merit) are alternatives to dimethoate for aphid control, growers prefer to use dimethoate because it is the only product that provides systemic control, it provides good control at relatively low use rates, and it is inexpensive. Pymetrozine (Endeavor), besides being very expensive, will not control mites. Growers have found that the more common insecticides (malathion, carbaryl, and acephate), which would also be relatively inexpensive, are ineffective in controlling balsam twig aphid.

The members of the Pacific Northwest Christmas Tree Association, representing more than 1,000 growers in Oregon and Washington, wish to retain the use of dimethoate on Christmas trees. It is likely that the proposed rate reduction will not be problematic but growers ask that EPA reconsider the proposal to limit use to once per season. At current use rates two applications per season are often needed. With the lower application rate being proposed by EPA, growers feel that retaining two applications per season is critical for adequate pest control.

The proposed REI is totally unacceptable to PNW Christmas tree growers for the following reasons:

- Dimethoate applications are made to Christmas trees in late May or early June when pests first appear. The major worker activity in Christmas tree plantations is tree shearing which occurs in our region between mid-June and July, depending upon the area.
- Growers make spot herbicide applications for weed control in June, again necessitating field access.

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- Crews are busy in the fields cleaning up and clearing out debris in the time prior to the start of tree shearing.
- Some Christmas trees grown in the PNW are irrigated. Irrigated tree farms require worker access for routine irrigation activities.

Christmas tree growers require both a shorter REI than EPA is proposing and the use of two applications of dimethoate per season on Christmas trees. Retaining a practical use pattern for dimethoate on Christmas trees is important for Christmas tree production in the PNW.

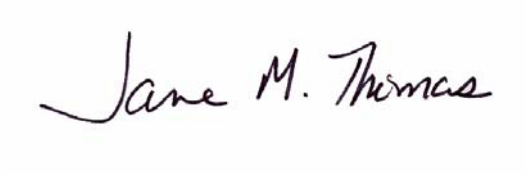
Dimethoate is also being used on woody ornamentals grown in the PNW. Growers report using this insecticide for the control of aphids, mites, birch leaf miner, bronze birch borer, and European pine shoot moth in both container and field-grown nursery stock. Dimethoate use patterns vary depending upon the pest being controlled.

European pine shoot moth presents a serious problem in commercial nurseries because some states (California, Nevada, Montana) have imposed quarantines. One nursery representative with whom I spoke reported the loss of $30,000 in sales to these states because of the European pine shoot moth quarantine. Dimethoate, used at the maximum allowable rate and through the use of multiple applications, has provided adequate control for this pest. Growers have tried using synthetic pyrethroids but these have proven ineffective. EPA's proposed mitigation measures would preclude the use of dimethoate for control of this important pest. For adequate control of European pine shoot moth, growers require both the current application rate and the use of multiple applications.

For those nursery applications where dimethoate is soil applied, the proposed REI is not problematic; however, for all foliar applications, the REI being proposed by EPA will make dimethoate unusable in nursery settings. Growers ask that EPA retain the current 48-hour REI for nursery uses.

I hope you find this information useful. I am also attaching a contact list for your use should you have further questions.

Sincerely,



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Dimethoate: Christmas Tree and Woody Ornamental Mitigation Measures
Contact List

Crop:	Last Name:	First Name:	Organization:	Title:	Work Ph:	Email:	Responsible State:
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Christmas tree plantation	Antonelli	Art	Washington State University	Entomologist	(253) 445-4545	antonell@wsu.edu	Washington
Christmas tree plantation	Grogan	Charlie	Silver Bells Tree Farm	Owner		SBTreeFarm@aol.com	Oregon
Christmas tree plantation	Ostlund	Bryan	Pacific Northwest Christmas Tree Association	Executive Director	(503) 364-2942	bryan@ostlund.com	Multiple
Christmas tree plantation	Poncelet	Janet	UAP Northwest	Territory Manager	(503) 663-0164	janet.poncelet@verdicon.com	Oregon
Christmas tree plantation	Porter	Franki	Wilbur-Ellis	Sales Representative	(800) 275-6920	fporter@wecon.com	Washington
Christmas tree plantation	Steelhammer	Mark	KLM Tree Farm	Owner	(360) 273-7216	klmtreefarm@aol.com	Washington
Christmas tree plantation	Stroda	Kirk	Stroda Bothers Farm	Owner	(541) 847-5414		Oregon
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