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

Subject: **Docket ID Number EPA-HQ-OPP-2009-0301**

Comments in Response to *Esfenvalerate Registration Review: Draft Ecological Risk Assessment*

The following comments are being submitted in response to the November 29, 2016 *Federal Register* notice announcing the availability of and seeking public comment on EPA's draft ecological risk assessment for the registration review of esfenvalerate and the May 8, 2017 *Federal Register* notice extending the comment deadline. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on esfenvalerate use in the production of seed crops in Hawai'i.

Growers may apply products that contain esfenvalerate to corn and soybeans to control corn earworm, aphids, Japanese beetles, armyworms, lesser cornstalk borers, planthoppers and thrips. These pyrethroid insecticides are used during the vegetative stages of the crop. For corn earworm control, applications is recommended before corn silking and as needed during pollination stages.

Growers utilize integrated pest management (IPM). The application rate and frequency is dependent on the level of pest pressure or plant injury level based on scouting reports. An example application rate of 0.041 lb/acre, not exceeding four applications per crop cycle, is used to control corn earworm. (A crop cycle is four months. Typically, one crop is planted in a field per year. The field is planted in cover crops or fallow for the period between crops.) Fewer applications are made if pest pressures are below threshold levels. Another example rate is one application per crop cycle of 0.046 lb/acre to control corn earworm, aphids, Japanese beetles and armyworms. Some growers may utilize these products only after all other control options have been exhausted.

Hawai'i's conditions allow at least two crop seasons per calendar year. They also create the potential for multiple generations of certain pests in a single year. When pest pressures are high and the pests are not controlled, some operations have experienced complete crop failure. The inability of growers to use esfenvalerate and other pyrethroids may result in high negative impacts on crop yields and large economic losses and may jeopardize long-term crop sustainability of some operations.

Rotation of pesticides with different modes of action is a foundation for resistance management. In Hawai'i, the effective insecticide chemistries for these crops are limited to the pyrethroids, organophosphates and carbamates. The availability of esfenvalerate and other pyrethroids facilitates the development of effective insecticide resistance management components of grower's IPM programs.

Comments were received from representatives of the seed crop producers.

Comments compiled and submitted by:


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