Response to Effect of Proposed Mancozeb Mitigation Measures in California

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To: Rich Michell, Ph.D.
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From: Rick Melnicoe
WIPMC Director

Subject: Response to Effect of Proposed Mancozeb Mitigation Measures in California

Dear Rich,

I just got off the phone with Jeff Dolan, who is the field manager for DiMare Company and the Chairman of the Board of Directors for the California Tomato Commission. Jeff met with many EPA people last week during the California Minor Crops Council Ag tour. He provided the following information regarding the use of mancozeb on fresh market tomatoes.

Mancozeb is used for control of late blight and bacterial speck of fresh market tomatoes. Mancozeb is a critical chemical for both these diseases. There are few chemicals available for late blight and mancozeb provides a needed rotational material to combat resistance development. Jeff would have lost several hundred acres of tomatoes this year due to bacterial blight, if he had not been able to use mancozeb.

Late blight treatments can occur from March through November, depending on weather. Bacterial blight applications are usually in the spring.

A five day REI is too long. Forty-eight hours is the maximum that is practical. Irrigations occur every three days when temperatures are hot as is common all summer long in the Sacramento-San Joaquin Valleys.

Mature green tomatoes are generally harvested one time, although some fields may be picked twice. Therefore a PHI of five days for mature green is acceptable. However, vine ripened tomatoes are picked every few days over a three month or so period. A PHI of five days is too long.

Irrigators wear long pants and boots. There are two common types of irrigation: Drip and siphon. Drip irrigators may have to inspect the lines for leaks occasionally in the field and make necessary repairs. There may be some foliar contact, especially as the plant mature. Siphon irrigators have minimal contact, except when making furrow dams for better water management. These dams are generally constructed early in the growing season, with minimal contact to foliage.

Please feel free to contact me if you need further information.

Regards,
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