
Napropamide (Devrinol) Use in Nursery Stock in the the Pacific Northwest

Date: August 23, 2005

To: [Harold D. Coble](#)
Agronomist
USDA/ARS/OA

CC: [Rick Melnicoe](#)
Director, Western Region Integrated Pest Management Center

From: [Jane M. Thomas](#)
Pacific Northwest Coalition Comment Coordinator
Washington State University Tri-Cities

Dear Harold,

Attached (below) please find our comments on the proposed mitigation measures for napropamide. This constitutes the feedback I have received thus far. Should I hear from others I will pass their comments along as well.

Thank you for keeping us in the loop

[Jane M. Thomas](#)
Pacific Northwest Coalition Comment Coordinator
Pesticide Notification Network Coordinator
Pest Management Resource Service
Washington State University Tri-Cities
2710 University Drive
Richland, WA 99352
Phone: (509) 372-7493
Fax: (509) 372-7491

[Letter to Harold D. Coble about Napromide and Nursery Stock \(PDF* 37K\)](#)

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August 24, 2005

Ref: 2005-10-1

Harold D. Coble, Ph.D., Agronomist
USDA/ARS/OA
Office of Pest Management Policy
1730 Varsity Drive, Suite 110
Raleigh, NC 27606

I am contacting you regarding information you sent on August 21 concerning the proposed mitigation measures for napropamide. As you may be aware there is a significant ornamental industry in the Pacific Northwest (PNW). (The nursery industry in Oregon alone accounts for 43,000 acres.) Napropamide use is important in some nursery operations and nurserymen have expressed two concerns about the proposed napropamide mitigation measures. They feel that both the proposal to limit the number of napropamide applications to once per year and the proposal for reducing the application rate on ornamentals from 6 # ai/A to 4 # ai/A will have a negative impact on the PNW nursery industry.

Unlike many other crops, appearance is critical in the nursery industry and there is zero tolerance for plant injury. Nursery stock that is damaged cannot be marketed and thus plant injury from herbicide use is a major concern for nurserymen. Effective weed control is necessary because if weeds are left unchecked they cause plants to be smaller and this will also affect marketability. Napropamide is important to the nursery industry because it has been proven to be safe for use with nursery stock, both for young plants and in plants with new growth. If EPA places additional restrictions on the use of napropamide, either by limiting its use to once per year or by reducing the use rate on ornamentals, nurseries will either increase their use of other herbicides or use more hand labor for weed control. If nurseries rely on increased use of other registered herbicides, likely either oryzalin (Surflan) or pendimethalin (Pendulum), they run the risk of plant injury. If nurseries choose to use hand labor for weeding and hoeing for weed control, the increase in production costs will have a negative impact on the industry.

The following are some specific comments that were received from PNW nurseries in response to the proposed napropamide mitigation measures:

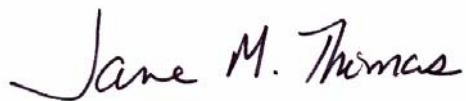
- One nursery stated that certain plants they produce cannot tolerate any of the other registered herbicides. Because napropamide is the only herbicide that can be used, in order to obtain effective weed control, the nursery is required to make two applications of napropamide per year. Limiting napropamide applications to once per year will severely hamper this nursery's ability to control weeds in its stock, unless they utilize more (expensive) hand labor.

- One nursery stated that they had tried using rates close to those proposed and found a significant reduction in weed control. If adequate weed control cannot be obtained with the additional napropamide use restrictions EPA is proposing, nurseries will resort to increasing their reliance on other herbicides and will potentially have to deal with plant injury, or will resort to more hand labor and will incur the associated expense.
- Napropamide must be soil incorporated soon after application, and in PNW nursery industry this is often done with irrigation. One nursery expressed concern that if the use rate is reduced, in order to maximize efficacy, it will become even more critical to immediately access treated areas so that the napropamide can be watered in and this raises concerns about early re-entry into treated areas.

We are asking that EPA reconsider the proposed mitigation measures for napropamide use in nurseries. Specifically we ask that napropamide use in nursery operations **not** be limited to once per year and that the current use rate of 6 # ai/A be retained.

Thank you for providing us this opportunity to comment on the proposed napropamide mitigation measures.

Sincerely,



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