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Environmental Protection Agency
1200 Pennsylvania Ave. NW
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Re: EPA-HQ-OPP-2010-0940, EPA's Registration Review for oryzalin

The following comments provide information from the Pacific Northwest to support EPA's registration review for oryzalin. These comments are being submitted on behalf of the Western IPM Center.

In Oregon, oryzalin is used mainly in perennial landscape, nursery, and fruit crops such as blueberries. Another important use is in commercial bulb production in Washington. It is considered very safe on a wide range of crop plants (low phytotoxicity), and this makes it preferable to other options. However, the product is considered expensive relative to other options, so it does not get used often in lower value crops.

Oryzalin fills a niche for preemergence grass and broadleaf control, and is an important tool for the establishment phase (first year) of a crop. For blueberries, caneberries, and hazelnuts, this is a particularly important tool for the establishment phase. The most closely related herbicide to oryzalin in caneberry and blueberry is pendimethalin, which is no longer available for these crops. Indaziflam could fit its niche at later timings, when crops are three years old or more, but not during establishment.

Because oryzalin poses risks to both aquatic life and terrestrial wildlife, these risks need to be adequately mitigated, with usage only as needed, for it to be compatible with IPM programs.

Respectfully,

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Katie Murray is the Western IPM Center's Information Network Coordinator for the Pacific Northwest. Katie has expertise in agricultural stakeholder engagement and assessment methods related to understanding pesticide usage and pesticide compatibility with IPM.

The IPPC is the hub for Oregon's statewide IPM program, and the main IPM resource in Oregon for farmers, researchers, and extension agents. The expertise represented in the IPPC is highly interdisciplinary and includes toxicology, entomology, horticulture, adult education, public health, and anthropology, all with an IPM focus. Within the IPPC, we have a collective expertise in understanding the use of pesticides within IPM programs with a goal of protecting the economic, environmental and human health interests of our stakeholders.

To compile comments, input is actively solicited from stakeholders throughout the Pacific Northwest in an effort to convey use patterns, benefits, potential impacts, and the availability and efficacy of alternatives. These comments largely reflect agricultural stakeholder feedback and do not imply endorsement by Oregon State University or the Western IPM Center.