



North Willamette Research & Extension Center  
Oregon State University  
15210 NE Miley Rd  
Aurora, Oregon 97002

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

November 1, 2021

RE: Pesticide Registration Review: Proposed Interim Decisions for Several Pesticides, Piperonyl Butoxide  
EPA Docket ID: EPA-HQ-OPP-2010-0498-0035

The following comments are submitted regarding the Proposed Interim Decision of the active ingredient piperonyl butoxide (PBO). These comments are being submitted on behalf of the Western IPM Center to provide stakeholder input on the impact of the proposed labeling changes in the Proposed Interim Decision on mosquito and vector control operations in the Pacific Northwest.

Regarding the release height of aerial ULV mosquito adulticide applications, the optimal application of aerial mosquito adulticide via a fixed-wing aircraft is at a release height of 100 to 200 feet above the ground. Applications above 200 feet reduces efficiency because it reduces the number of droplets in the target area. This is especially true with applications in an arid environment such as eastern Washington and eastern Oregon. Additionally, aloft winds differ vastly from ground winds. The accuracy of the application is dramatically improved the closer to the ground that the application occurs.

Regarding the proposed label language: "Do not apply by fixed wing aircraft or rotary aircraft at a release height less than 200 feet (61m) above the ground or canopy, unless specifically approved by the state or tribe based on public health needs." This language raised concerns about negatively impacting public health through delays in application resulting from the requirement for additional approvals. Multiple agencies already permit and license districts to perform aerial operations; for example, in Washington, this includes the Federal Aviation Administration, US Bureau of Reclamation, Washington Department of Fish and Wildlife, and Washington Department of Ecology.

Thank you for the opportunity to comment. Please feel free to contact us with additional questions about PBO usage in the Pacific Northwest for vector control.

Respectfully,



Dani Lightle, Ph.D.  
Assistant Professor of Practice  
Center for Pesticide Registration Research  
North Willamette Research and Extension Center  
Oregon State University  
15210 NE Miley Rd, Aurora, OR 97002  
Email: [danielle.lightle@oregonstate.edu](mailto:danielle.lightle@oregonstate.edu)

*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 expert testimony from stakeholders, including research and extension experts as well as farmers and commodity groups. The comments do not imply endorsement by Oregon State University or the Western IPM Center.*