



COLLEGE OF AGRICULTURAL AND
ENVIRONMENTAL SCIENCES
AGRICULTURAL EXPERIMENT STATION
TELEPHONE: (530) 754-8378 / 752-7010
FAX: (530) 754-8379

WESTERN REGION PEST MANAGEMENT CENTER
DEPARTMENT OF ENVIRONMENTAL TOXICOLOGY
ONE SHIELDS AVENUE
DAVIS, CALIFORNIA 95616-8588
<http://www.wrpmc.ucdavis.edu>

March 16, 2006

Mr. Wilfred Burr
USDA
Office of Pest Management Policy
1400 Independence Ave., SW
Room 3871 – South Bldg. Mail Stop 0315
Washington, DC 20250-3191

RE: Permethrin Use Changes for Several Crops in California

Dear Wilfred,

This letter is in response to your March 9, 2006, request for comments on the registrants' proposed use changes for Permethrin on 37 crops. In your request you forwarded the following statement from Jacqueline Guerry at EPA, "The permethrin registrants have proposed a number of reductions in application rates and number of applications. I am forwarding their e-mail and attached proposal for review. Chris Davis from FMC has contacted IR-4 and asked them to contact their stakeholders to see if these proposed reductions are acceptable. The IR-4 point of contact is Keith Dorschner." Further Ms. Guerry attached a statement from Jim Wagner: "Attached is an updated spreadsheet of proposed use rates and intervals for permethrin crops. Both United Phosphorous and FMC are in agreement on all of the proposed rates per application, retreatment intervals and maximum seasonal rates shown in the table."

I will respond crop by crop for crops grown in California.

Alfalfa: Proposed changes are acceptable.

Almonds: Proposed changes should not have an adverse effect. The median use rate in 2004 was 0.2 lb ai/ac.

Hazelnuts are not grown in California.

Pistachios: Proposed maximum use rate is slightly below the median use rate. Request that the maximum use rate be 0.3 lb ai/ac.

Walnuts: Proposed changes should not have an adverse effect. The median use rate in 2004 was 0.25 lb ai/ac.

Apples: Proposed changes should not have an adverse effect. There were only two applications of Permethrin to apples in 2004.

Pears: Proposed changes should have no adverse effect. No use reported on pears in 2004.

Cherries: Proposed maximum use rate is slightly below the median use rate. Request that the maximum use rate be 0.2 lb ai/ac.

Peaches/Nectarines: Proposed changes should not have an adverse effect.

Artichokes: Proposed maximum use rate is slightly below the median use rate. Request that the maximum use rate be 0.3 lb ai/ac.

Asparagus: Proposed changes are acceptable.

Avocados: Proposed changes are acceptable.

Broccoli: Encourage UPI to seek to increase the rate to 0.2. However, the proposed changes should have no adverse effect.

Brussels sprouts: Encourage UPI to seek to increase the rate to 0.2. However, the proposed changes should have no adverse effect.

Cabbage: Proposed changes acceptable.

Cauliflower: Encourage UPI to seek to increase the rate to 0.2. However, the proposed changes should have no adverse effect.

Cantaloupes: Proposed changes acceptable.

Cucumbers: Proposed changes acceptable.

Pumpkins: Proposed maximum use rate is slightly below the median use rate. Request that the maximum use rate be 0.2 lb ai/ac.

Squash: Proposed maximum use rate is slightly below the median use rate. Request that the maximum use rate be 0.2 lb ai/ac.

Watermelons: Proposed maximum use rate is slightly below the median use rate. Request that the maximum use rate be 0.2 lb ai/ac.

Eggplant: Proposed changes acceptable.

Peppers: Proposed change acceptable for fruiting peppers. However, for spice peppers the rate should be 0.25 lb ai/ac.

Tomatoes: Proposed changes acceptable.

Celery: Proposed changes acceptable.

Spinach: Proposed changes acceptable.

Collards: Proposed changes acceptable.

Greens, turnip: Proposed changes acceptable.

Corn: Proposed changes acceptable.

Corn, sweet: Proposed maximum use rate is slightly below the median use rate. Request that the maximum use rate be 0.2 lb ai/ac.

Garlic: Proposed changes should not have an adverse effect. There was only one application of Permethrin to garlic in 2004.

Onions: Proposed changes acceptable.

Horseradish: Proposed changes should not have an adverse effect. No reported use in 2004.

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Papaya: Proposed changes should not have an adverse effect. No reported use in 2004.

Potatoes: Proposed changes acceptable.

Soybeans: Not a major crop in CA. However, the median application rate in 2004 for three applications of Permethrin was 0.2 lb ai/ac. Request maximum rate of 0.2 lb ai/ac.

All data were obtained from the California Department of Pesticide Regulation's Pesticide Use Report database.

If you have any further questions, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Rick Melnicoe". The signature is written in a cursive style with a prominent loop at the end of the last name.

Rick Melnicoe
Director, Western IPM Center