

June 24, 2020

Lauren Weissenborn and Sergio Santiago
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460-001

RE: Boscalid Case Number 7039 and Pyraclostrobin Case Number 7034 (EPA-HQ-OPP-2014-0199 and EPA-HQ-OPP-2014-0051)

About us

The Western IPM Center works with stakeholders in the public and private sectors in the West to promote the development and adoption of IPM to solve pest problems. We gather information from the IPM network to provide federal agencies with information to assist the decision-making process. Our network includes comment coordinators in the Pacific Northwest, the arid southwest, the intermountain west, and the pacific island territories and Hawaii. Comments reflect the principles of IPM.

The Center comment only covers table grape production in California.

California continues to rank as the top table grape production state in the U.S. Table-type grape acreage in California in 2018 totaled 130,000 acres with 121,000 bearing and 9,000 non-bearing. There are currently more than 80 varieties grown in California (CDFA California Grape Acreage Report 2019) with the most commonly planted varieties including Flame Seedless, Crimson Seedless, Red Globe, Scarlet Royal, and Sugarone.

Specific questions posed (in bold) in the document and responses to the questions for table grapes in California.

What techniques and equipment are used for girdling and turning? Are there new technologies or equipment that could reduce worker exposure during turning and girdling relative to older technologies and equipment?

Gabriel Torres (Viticulture Advisor for Southern San Joaquin Valley) was not aware of new technologies for girdling. There is grower interest in developing a mechanical system for it, but a product is not currently available in the market.

How prevalent is the adoption and use of Y-trellises or other aspect of table grape production that reduce dependence on girdling and turning?

Girdling is cultivar dependent and grower dependent. Table grape scenario is changing fast and one of the decisions to plant one cultivar or another is how much labor is involved. Y trellis system is prevalent on table grape production in the San Joaquin Valley.

What is the relative acreage of table grape varieties that depend on turning and girdling and varieties that do not?

Not addressed

When are workers performing girdling and turning relative to when fungicides (in this case, boscalid) are applied?

Growers strictly follow the label and don't perform any activity that requires contact with the canopy during the REI.

What other important activities in vineyards would be impacted by a 22-day REI, or REIs of duration between five days and 22 days?

Leafing, pest and diseases scouting, research, harvest estimates, water potential analysis, and leaf sampling for nutrient analysis.

Are there activities other than turning and girdling that have similar potential for worker contact with treated foliage?

None

How much time is spent performing girdling and turning during the course of the year (i.e., days per year) and are these activities that a worker would be likely to engage in for a full workday?

A fieldworker can do between 0.8 and 1 acre a day, table grape blocks normally are 40 acres.

Multiple fungicides may be applied to grapes to treat various diseases during the course of the year. To forestall fungicide resistance, growers are encouraged to use different chemistries in rotation. Is there a way to sequence the applications of the different fungicides so that the fungicide applied directly before girdling and turning take place is one for which the calculated REI[1] would generally be shorter? For example, the fungicides X, Y, and Z are used in rotation. The REIs are 22 days, 10 days, and 5 days, respectively. Is it feasible that the application sequence can be adjusted so that fungicide Z is the last fungicide that is applied prior to the time when girdling and turning are needed?

A 22 day re-entry interval (REI) will put too much pressure on the growers. Table grape production requires field workers in the field frequently. The use of boscalid is preferred because its double action against botrytis and powdery mildew. A big win from the fungicide rotation part is to have an extra tool for controlling powdery mildew resistance. However, from the botrytis side, resistance has been widely documented. Growers need to take this in account depending of which pathogen are they targeting.

A 22 REI will force growers to put the product at the very back list of resources available. FRAC 7 fungicide are critical for powdery mildew management in grapes.

Sincerely,

Matthew Baur, Acting Director
530-750-1270
mebaur@ucanr.edu