



April 23, 2003

US Environmental Protection Agency  
OPP Public Regulatory Docket  
Docket ID Number OPP-2003-0008

To Whom It May Concern:

The Pacific Northwest Coalition of the USDA Western Region Integrated Pest Management Center, representing the states of Alaska, Idaho, Montana, Oregon, Utah, and Washington, supports the petition for the extension of the tolerance for vinclozolin on succulent beans that was announced in the March 26, 2003, Federal Register.

In our region vinclozolin (Ronilan) is very important in the production of snap beans in Oregon. Currently Oregon ranks second in the nation in snap bean production, producing a crop with a farm gate value of more than \$22 million annually. In 2002, Oregon produced 14% of the processed succulent beans in the United States on approximately 19,000 acres.

Vinclozolin is used for the control of *Sclerotinia sclerotorum* (white mold) and *Botrytis cinerea* (gray mold). Because the vast majority of Oregon's snap bean production occurs in the Willamette Valley, a cool wet area of the state conducive to *Sclerotinia*, nearly 100% of Oregon's bean acreage is treated with vinclozolin annually. Vinclozolin is used extensively because it has proven to be very effective in controlling both white mold and gray mold. When these diseases are not adequately controlled, an entire bean crop might be rejected. At processing plants, snap beans are rejected if the harvested crop contains more than 2% infected beans.

While there has been some effort to register alternative fungicides for use on snap beans (fluazinam, BAS 510) these registrations are not yet in place. Also, researchers believe that the field data gathered thus far has not been adequate to assure that the proposed replacement fungicides will prove as efficacious as vinclozolin.

Because of the need for a control for white mold and gray mold on Oregon snap beans, and based on the research and registration status of alternative chemicals, we support the proposal to extend the tolerance for vinclozolin on succulent beans.

Thank you for the opportunity to submit comments on this proposed tolerance extension.

Sincerely,

A handwritten signature in black ink that reads "Jane M. Thomas". The signature is written in a cursive, flowing style.

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