



College of Science
UtahStateUniversity

Department of Biology
5305 Old Main Hill
Logan, UT 84322
biology.usu.edu
(435) 797-0776

January 16, 2024

Mary Elissa Reaves
Director, Pesticide Re-Evaluation Division
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear Director Reaves,

Utah State University's Extension team, "Utah Pests" is host to the University's expert IPM scientists including entomologists, plant pathologists, and weed specialists with expertise in the use of pesticides in IPM programs that protect both environmental and economic concerns of stakeholders. In coordination with the Western Integrated Pest Management Center, we contribute to EPA comments of pesticide changes on behalf of stakeholders in Utah, Wyoming, Colorado, and Montana. We are writing at this time in response to EPA's Proposed Decisions for Several Pesticides (EPA-HQ-OPP-2011-0840) including Chlorothalonil.

To obtain feedback, we delivered a survey to 102 experts (crop consultants, extension specialists, researchers) and growers in the states listed above, and received 7 responses. The questions asked about their use of Chlorothalonil and how the proposed changes might affect them. Additionally, it asked about their familiarity with Bulletins Live! Two.

The feedback from the survey demonstrated that the majority of acres treated with Chlorothalonil in these states are planted with tree fruit and/or small fruits. The most common crop treated was tart cherry to which the mitigations do not affect and therefore should pose no new restrictions or hardships on those growers. The second most common crop was peach which the proposed decision imposes a 19% decrease in the maximum annual usage compared to the current label usage allowance. Our growers also selected that they grow fruits in the apricot, nectarine, plum, prune, and sweet cherry category. This category had a significant decrease (58%) from current regulations. This may have a negative effect on these growers' abilities to fight diseases, though no participants of the survey expressed specific concern.

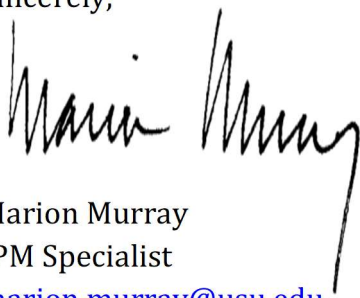
Many respondents (75%) felt that no portion of their crops is grown in vulnerable soil as defined sandy or coarse-textured soils with less than 2% organic matter content and occur where the water table is 30 feet or less from the surface. Thus, these extra rate reductions would not negatively affect their ability to produce crops. A small portion (25%) was unsure what portion of their land would qualify as vulnerable in this case. This points to a possible need for further clarification and/or education about this requirement.

The survey results also revealed the majority of the time (75%) chlorothalonil is not applied within 30ft of a drinking water well. Additionally, 100% of participants are not applying within the specified distances of either fresh or salt water bodies and are not applying when the soil in the area is saturated. In regards to the advisory pollinator stewardship language, this may be a positive addition to the label to promote best management practices to reduce exposure to pollinators. Utah and surrounding states' pollinators are at great risk and 75% of survey respondents marked that they either are applying or are unsure if they are applying chlorothalonil when crops or weeds are in bloom.

And finally, we found that most stakeholders are unfamiliar with Bulletins Live! Two, where 100% had never heard of the web tool. The use of Bulletins Live! Two to set forth geographically-specific use limitations for the protection of threatened and endangered species and their habitat may be theoretically effective, but in reality, we realized that it requires additional educational and training inputs by local educators and attendance time and costs for stakeholders. In our survey 75% of respondent marked that they may be interested in a training for this web tool.

Overall, the survey revealed no extreme concern about the economic consequences of the proposed decision on chlorothalonil, nor did we receive positive support for the changes. Thank you for your attention to this matter.

Sincerely,



Marion Murray
IPM Specialist
marion.murray@usu.edu