



August 31, 2020

U.S. Environmental Protection Agency
EPA Docket Center (EPA/DC), 28221T
1300 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Re: Petition to Revoke Tolerances: Neonicotinoid,
EPA Docket ID: EPA-HQ-OPP-2020-0306

To Whom It May Concern:

The Arizona Pest Management Center is host to the University of Arizona's expert IPM scientists including Ph.D. entomologists, weed scientists and plant pathologists with expertise in the strategic tactical use of pesticides within IPM programs that protect economic, environmental and human health interests of stakeholders and the society at large. In coordination with the Western Integrated Pest Management Center, we contribute to federal comments on issues of pest management importance to stakeholders throughout the desert southwest including Arizona, New Mexico, Nevada, Colorado and the southeast desert regions of California.

We have reviewed the National Resources Defense Council's (NRDC) Petition to Revoke All Neonicotinoid Tolerances and Comments Regarding Dietary Exposure. While we cannot comment directly on concerns expressed in NRDC's petition regarding the EPA's risk analyses, we can state that the sudden revocation of all tolerances across neonicotinoid active ingredients would have devastating short-term consequences for growers of crops as diverse as citrus, lettuces, melons, field crops, and many other crops, not to mention turf and ornamental uses. We have previously commented on some of the critically important use patterns in Southwest desert agriculture, the benefits of use, and some of the risk mitigation measures implemented by our growers. We wish to incorporate these previous comments, which the Arizona Pest Management Center (APMC) has submitted on behalf of stakeholders throughout the Desert Southwest, into any discussion that impacts tolerances and available uses of the neonicotinoids.

Specifically, by this letter, we wish to incorporate the following comments, which reside in several different Dockets as indicated, into the newly established Docket, EPA-HQ-OPP-2020-0306, wherein the EPA will respond to the NRDC petition. (Please note: recent comments

submitted to EPA on Dinotefuran, Imidacloprid and Thiamethoxam could not be located online within these dockets on the beta.regulations.gov website; links provided for these comments are to the Arizona Pest Management Center website.)

Prior Comments, incorporated by reference:

- Dinotefuran: Response to EPA Proposed Interim Decision for Arizona and the Desert Southwest. University of Arizona, Arizona Pest Management Center. May 4 2020. Docket ID: **EPA-HQ-OPP-2011-0920**. https://acis.cals.arizona.edu/docs/default-source/ipm-assessment-documents/arid-swpmc-info-requests/dinotefuran_comments_apmc_5-4-20_vf.pdf
- Imidacloprid: Response to EPA Proposed Interim Decision for Arizona and the Desert Southwest. University of Arizona, Arizona Pest Management Center. May 4 2020. Docket ID: **EPA-HQ-OPP-2008-0844**. https://acis.cals.arizona.edu/docs/default-source/ipm-assessment-documents/arid-swpmc-info-requests/imidacloprid_comments_apmc_5-4-20_vf.pdf
- Thiamethoxam: Response to EPA Proposed Interim Decision for Arizona and the Desert Southwest. University of Arizona, Arizona Pest Management Center. May 4 2020. Docket ID: **EPA-HQ-OPP-2011-0581**. https://acis.cals.arizona.edu/docs/default-source/ipm-assessment-documents/arid-swpmc-info-requests/thiamethoxam_comments_apmc_5-4-20_vf.pdf
- Neonicotinoid Use in Cotton: Response to EPA Proposed Interim Decisions for Arizona. University of Arizona, Arizona Pest Management Center. May 4 2020. Docket ID:
EPA-HQ-OPP-2012-0329 - Acetamaprid
EPA-HQ-OPP-2011-0865 - Clothianidin
EPA-HQ-OPP-2011-0920 - Dinotefuran
EPA-HQ-OPP-2008-0844 - Imidacloprid
EPA-HQ-OPP-2011-0581 - Thiamethoxam
<https://beta.regulations.gov/document/EPA-HQ-OPP-2011-0581-0597>
- Neonicotinoid Insecticide Use and Pollinator Protection in Several Crops and Recreational Turf in Arizona and New Mexico. University of Arizona, Arizona Pest Management Center. Jul 24 2017. Docket ID: **EPA-HQ-OPP-2011-0920-0100**. <https://beta.regulations.gov/document/EPA-HQ-OPP-2011-0920-0100>
- Imidacloprid. University of Arizona, Arizona Pest Management Center. Nov 13 2017. EPA Docket ID: **EPA-HQ-OPP-2008-0844-1255**. <https://beta.regulations.gov/document/EPA-HQ-OPP-2008-0844-1255>
- Imidacloprid Use in Arizona Citrus. University of Arizona, Arizona Pest Management Center. April 14 2016. Docket ID: **EPA-HQ-OPP-2008-0844-0891**. <https://beta.regulations.gov/document/EPA-HQ-OPP-2008-0844-0891>

In addition, we stand in support of comments submitted to some of these same dockets by the Arizona Farm Bureau Federation, which represents the interests of Arizona growers.

Thank you for your consideration. Please feel free to contact us with any questions.

Sincerely,

Two handwritten signatures in blue ink. The first signature on the left is 'Al Fournier' and the second signature on the right is 'Peter C. Ellsworth'.

Dr. Al Fournier and Dr. Peter C. Ellsworth
Arizona Pest Management Center
University of Arizona
Maricopa Agricultural Center
37860 West Smith-Enke Rd.
Maricopa, AZ 85138