

February 8, 2013

Office of Pesticide Programs
Regulatory Public Docket
Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460-0001

RE: Docket ID Number EPA-HQ-OPP-2010-0889

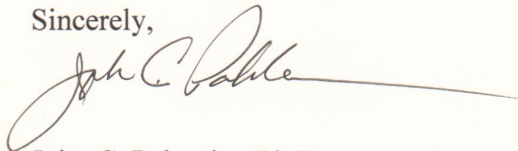
To whom it may concern:

As a Professor of Entomology and Extension Specialist with the University of Arizona, I have had the opportunity to extensively evaluate the insecticidal activity of sulfoxaflor against a number of key insect pests on leafy vegetables and cucurbits over the past 4 years. I originally submitted a letter of support for sulfoxaflor in Feb of 2011, but would like to offer further support for the registration with a few additional comments that emphasize the importance of this new active ingredient in vegetable cropping system. Based on my research experiences, as well as my understanding of the proposed label and the compounds toxicological profile, sulfoxaflor will provide an excellent alternative to many of the older, broadly-toxic insecticide products presently available to western vegetable growers.

I can't stress enough the importance of the flexibility in application of sulfoxaflor (Closer) allowed by the proposed label for use in leafy vegetables and cucurbits. Given the pest pressure found on many vegetable crops, and the associated expectations for produce quality, it is very important that growers have the ability to apply the product throughout the course of the crop season, and particularly when crops are blooming. This has become especially important against pests such as whiteflies and aphids where the recent loss of endosulfan has limited the growers options for effective pest management. Additionally, the broad range of rates allowed on the label will be extremely important because of the differences in toxicity of sulfoxaflor against our key pests. For instance, effective control of most aphid species can be achieved at low use rates, while, comparable control of *Bemisia* whiteflies often requires considerably high use rates. Maintaining this flexible rate structure will be critical if we expect to replace the older, "less IPM friendly" products with newer active ingredients like sulfoxaflor.

In closing, I strongly believe that without the availability of new insecticide alternatives for control of aphids and whiteflies, economic production of leafy vegetables and melons in Arizona and California may not be sustainable in the future. An active ingredient such as sulfoxaflor is an excellent candidate to replace many of the older compounds presently used due to its insecticidal activity against key pests and its fit in our existing IPM programs. If you have any questions concerning my comments please feel free to contact me. Thank you.

Sincerely,



John C. Palumbo, Ph.D.
Professor and Extension Specialist

