



December 12, 2002

Laura Parsons
Methyl Parathion Chemical Review Manager
US Environmental Protection Agency
7508C USEPA Headquarters, Ariel Rios Building
1200 Pennsylvania Avenue, N. W.
Washington, DC 20460

Below is the response from Oregon, Washington, Idaho, Utah, and Alaska regarding methyl parathion uses on specific crops in our five-state region. Note that Tom Jahns reported that no methyl parathion is used in Alaska. Also attached please find a letter of response from the USA Dry Pea & Lentil Council.

ALFALFA: We are requesting that methyl parathion use on alfalfa be retained. As a specific example, methyl parathion is not used on all alfalfa grown in Utah; however, it is used when there are serious problems with blue aphids. Alternative products are less effective than methyl parathion. Utah growers typically use other chemicals throughout the year for aphid control but invariably resort to a final "clean up" application of methyl parathion. Because alfalfa production practices are similar in all the semi-arid areas of our 5-state region, we are requesting that this use be retained.

BARLEY: Methyl parathion is used by Oregon and Washington barley growers both to control grasshoppers and as an aphicide. In these states methyl parathion is used particularly in cases where there is a large infestation of English grain aphid close to harvest. Because of the difference in PHIs between methyl parathion and the alternatives, methyl parathion is the product of choice in this situation. Indeed, barley growers have few alternatives: barley is losing disulfoton (Di-Syston) and the registration of lambda-cyhalothrin (Warrior) that had been expected has not yet been granted. Methyl parathion is not used frequently nor is it used on many acres. In Idaho it is estimated that 0.5% to 1% of the crop is treated with methyl parathion. Oregon and Washington barley growers would like to retain the use of methyl parathion as one of their insect control alternatives.

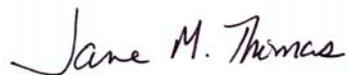
CANOLA: Idaho has requested that methyl parathion use be retained on canola. Methyl parathion is used for the control of cabbage seedpod weevil on Idaho's fall-seeded canola. Methyl parathion use is critical in the production of the fall-seeded crop (as opposed to the spring-seeded crop), because of the longer bloom period. If growers use bifenthrin (Capture) in

place of methyl parathion, they must make at least two applications rather than one of methyl parathion. Bifenthrin doesn't weather as well as methyl parathion and has a shorter residual. Currently methyl parathion is being used every year. Canola contacts in Washington and Oregon did not feel that methyl parathion use was critical; however, this appears to be due to the longer bloom period experienced in Idaho with the fall-seeded canola crop.

ONION: Methyl parathion is critical to onion production in Utah, Oregon, Washington, and Idaho. The major pests at issue are Western flower thrip and onion thrip. While alternative chemicals are available for thrip control, the problem lies in insect resistance management. Thrips have a propensity to develop resistance to a chemical within a short amount of time (as little as two years). In order to control thrips, multiple applications must be made each growing season and this enhances the development of resistance. It is critical that onion growers have alternative chemicals available. Retaining methyl parathion use on onions provides growers with one more alternative chemical for thrip control.

In dry bean, cabbage, hops, lentil, oats, dry pea, potato, and rye production, methyl parathion use is not regarded as critical in this five-state region.

Sincerely,

A handwritten signature in cursive script that reads "Jane M. Thomas".

Jane M. Thomas
Pacific Northwest Coalition Comment Coordinator
Pesticide Notification Network Coordinator
Pest Management Resource Service
Washington State University Tri-Cities
2710 University Drive
Richland, WA 99352
phone: 509-372-7493 fax: 509-372-7491
e-mail: jmthomas@tricity.wsu.edu

Contact List

Crop	First Name	Last Name	State	Organization	Work Phone
Alfalfa	Lyle	Holmgren	Utah	Utah State University	(435) 587-3239
Alfalfa	Steve	Westover	Utah	Steve Regan Co.	(801) 268-4500
Alfalfa	John	Kugler	Washington	Washington State University	(509) 754-2011
Alfalfa	Tim	Woodward	Washington	Washington State University	(509) 545-3511
Barley	Kelly	Olsen	Idaho	Idaho Barley Commission	(208) 334-2090
Canola	Joe	Anderson	Idaho	Grower	(208) 875-0686
Canola	Joe	McCaffrey	Idaho	University of Idaho	(208) 885-7548
Canola	Mary	Corp	Oregon	Oregon State University	(541) 278-5403
Canola	Dave	Bragg	Washington	Washington State University	(509) 843-3701
Onion	Brad	Geary	Idaho	University of Idaho	(208) 722-6701
Onion	Lynn	Jensen	Oregon	Oregon State University	(541) 881-1417
Onion	Bob	McReynolds	Oregon	Oregon State University	(503) 678-1264
Onion	Ben	Simko	Oregon	Oregon State University	(541) 881-1417
Onion	Diane	Alston	Utah	Utah State University	(435) 797-2516
Onion	Charles	Black	Utah	Grower	(801) 544-2189
Onion	Lyle	Holmgren	Utah	Utah State University	(435) 587-3239
Onion	Jim	Nokes	Utah	J&J Nursery & Garden Center	(801) 544-1211
n/a - Western Region Pest Management Center State Liaisons	Tom	Jahns	Alaska	University of Alaska	(907) 262-5824
	Ronda	Hirnyck	Idaho	University of Idaho	(208) 364-4046
	Jeff	Jenkins	Oregon	Oregon State University	(541) 737-5993
	Howard	Deer	Utah	Utah State University	(435) 797-1602
	Catherine	Daniels	Washington	Washington State University	(509) 372-7495



USA DRY PEA & LENTIL COUNCIL

December 2, 2002

Jane M. Thomas
Pesticide Notification Network Coordinator
Pesticide Information Center
Washington State University Tri-Cities
2710 University Drive
Richland, WA 99352

Dear Jane,

The USADPLC represents the dry pea, lentil and chickpea growers, processors, and exporters of Washington, Idaho, North Dakota and Montana. A brief survey of our membership found very little use of Methyl parathion on our crops. Usage in the previous five years has significantly decreased due to damage to pollinators and other friendly insects. Alternative strategies are being used instead.

The USADPLC is hesitant to reduce an already limited variety of products to control our insect pests. However, Dave Bragg, WSU Extension Agronomist, reports the pyrethroid products available are softer technology and better for beneficial insects. We feel with the availability of alternatives, there is no reason to insist on this product. Our uses are minimal and elimination of the use would not be significant.

Thank you for your help in consolidating the comments.

Regards,

Tim McGreevy
Executive Director