

**PNW Comment Coordinator
FY09 Annual Report
July 1, 2008 to June 30, 2009**

Since September 2002 the Pacific Northwest (PNW) Workgroup (Alaska, Idaho, Montana, Oregon, Utah, and Washington) of the Western Integrated Pest Management Center (WIPMC) has been submitting responses to USDA and EPA information requests. The WIPMC funds the PNW Comment Coordinator, a half-time position, to gather the requested information on behalf of the PNW Workgroup, oversee information review, and submit comment packages, typically to either USDA or EPA.

This report summarizes the activities of the PNW Comment Coordinator for FY09 (July 1, 2008 through June 30, 2009). While the FY09 comment projects are summarized here, note that background information on the program, individual information requests, and all previously submitted PNW comment packages are posted on WSU's Washington State Pest Management Resource Service (WSPRS) web page at: <http://wsprs.wsu.edu/USDAEPAInfo.html>.

FY09 ACTIVITY SUMMARY

The following is a summary of the activities of the PNW Comment Coordinator for the past year and provides a status report on a total of eight projects (three comment projects and five special projects). The comment projects below are presented in order by project number and hence fall in chronological order.

Project Name	Malathion 11: Use Pattern Trees for Pulp
Project Number	2009-3
Crops	trees grown for pulp
Start Date	4/2/09
End Date	4/3/09
Purpose	Cheminova asked if the use pattern registered for Christmas trees is acceptable for use on trees grown for pulp: non-ULV@3.2 #ai/A or ULV@0.9375 with a max of 2 applications per year and a 12-hour REI.
Comment Summary	Boise Cascade confirmed that the rate proposed for Christmas trees was acceptable for use on trees grown for pulp.
Results	N/A

Project Name	2,4-D: NRDC Petition
Project Number	2009-2
Crops	various crops
Start Date	1/6/09
End Date	2/16/09
Purpose	NRDC has petitioned EPA to revoke all tolerances and cancel all registrations for 2,4-D. NRDC claims that the Agency did not consider the full spectrum of potential human health effects associated with 2,4-D in connection with EPA's reassessment of the existing 2,4-D tolerances, and EPA's environmental risk assessment including: <ol style="list-style-type: none"> 1. Information on the endocrine disrupting effects of 2,4-D. 2. Information on the neurotoxicity related to 2,4-D exposure. 3. Information that products containing 2,4-D are mutagenic. 4. Data showing that dermal absorption of 2,4-D is enhanced by alcohol consumption, sunscreen, and DEET which EPA's exposure assessment failed to include. 5. Information about adverse developmental effects at doses below those included in EPA's risk assessment for exposure of infants to 2,4- D in breast milk.
Comment Summary	Neither toxicologist at Oregon State University or at Washington State University felt that there was significant new toxicological information that would warrant EPA taking action on 2,4-D tolerances and registrations.
Results	EPA is in the process of reviewing comments received on this petition. The review will likely take a year to complete.

Project Name	Sulfometuron Methyl: Extension of Comment Period
Project Number	2009-1
Crops	Forest
Start Date	1/6/09
End Date	1/6/09
Purpose	The due date for comments on the sulfometuron methyl Reregistration Eligibility Decision Document (RED) was January 12, 2009. On behalf of the Oregon forestry industry Janet Fults has requested that we ask for an extension of the comment period.
Comment Summary	Because of having to deal with damage from severe winter storms, members of Oregon's forestry industry request an extension to the comment deadline for the sulfometuron methyl RED so that they can more accurately assess the impact of the proposed buffer zones.
Results	The comment extension was not granted; however, EPA did formally (notice published on regulations.gov on 1/15/09) agree to receive and consider late comments.

In addition to preparing responses for the information requests listed above, the PNW Comment Coordinator also worked on the following special projects for the Western IPM Center over the past fiscal year:

- Listed and checked the status of all Regulatory priorities called out in Pest Management Strategic Plans (PMSP) submitted by the Western IPM Center. The project commenced in early May 2008 and was completed 8/28/08.
- Compiled a spreadsheet showing all the grants issued by the Western IPM Center since 2004 and listing progress and final report submission dates. Tracking these reports will be an ongoing project. The initial phase of this work was completed 2/10/09; however, as stated, work on this project continues.

- Summarized the comment packages submitted by the Western IPM Center, FY03 to date. This project was completed 1/27/09.
- Completed a report on sources of Endangered Species information (focusing on GIS mapping) and for crop mapping for the 13 Western States represented by the Western IPM Center.
- In support of Ronda Hirnyck and Joe DeFrancesco's efforts to write an article about PMSPs for the *Journal of Extension*, prepared a summary of all the Regulatory, Research, and Educational priorities specified in five PNW PMSPs. Completed 6/10/09.