Comment Info: ==========

General Comment:What follows are my comments. I am an employee of Texas A&M University; however,
the University has neither asked me to officially comment, nor asked me not to comment, therefore these comments should be considered from me based on my professional experience regarding this matter and not as an official representation of my employer.
RE: Comments: Direct your comments to docket ID number EPA-HQ-OPP-2006-0801.
Comments must be received on or before November 13, 2006.
Contact: Christina Scheltema, Special Review and Reregistration Division
(7508P), Office of Pesticide Programs, Environmental Protection Agency,
1200 Pennsylvania Ave., NW., Washington, DC 20460-0001; telephone number: (703) 308-8000; fax number: (703) 308-7070; e-mail address: scheltema.christina@epa.gov

Dear Dr. Scheltema; Carbaryl is the material of choice for the management (IPM) of pecan weevil, Curculio caryae (Horn), Coleoptera:Curculionidae, (a late-season autochthonous obligatory nut-feeder) on pecan in Texas where pecan weevil occurs (about 60% of pecan acreage). We have developed monitoring tools to 1) anticipate when the crop is at risk, 2) verify that adults are present in damaging numbers, 3) verify that the crop is susceptible to damage and 4) to implement spraying and retreatment, if needed, based on economic thresholds. Alternatives to carbaryl have not been as effective for two reasons: 1) Alternatives do not kill the weevils as well under field conditions and 2), alternatives have shorter residual activity so that more treatments are needed. Elimination of carbaryl as a management option will reduce our abilities to manage this pest, increase costs to the producer and increase the number of sprays applied to the crop. Alternatives like pyrethroids also are known to adversely disrupt natural enemy/secondary pest (aphids, mites and leafminers) interactions, which would require further insecticide management. Our current pecan IPM program in Texas has drastically reduced insecticide treatment by targeting pests for insecticide treatment only when damaging numbers are imminent. Producer adoption of this program has been very good. This program is documented in Harris et al (1998)--Harris, M. K., B. Ree, J. N. Cooper, J. Jackman, J. Young, R. Lacewell and A. Knutson. 1998. Economic impact of pecan integrated pest management implementation in Texas. J. Econ. Entomol. 91: 1011-1020--, and an update by Ree et al (2006) is in review and available by request. The insecticide program on pecan in Texas results in prophylactic coverage occurring for less than 10% of the 240 day growing season, with the remaining period consisting of a reliance on natural enemies, weather that is adversely affecting potential pests, resistance of the host, etc. to achieve management of pests.

Carbaryl targets primarily pecan weevil and no suitable alternatives are currently available for pecan weevil control; loss of this material would disrupt the Pecan IPM program in Texas, increase costs to the producer and increase the pesticide load in the environment in Texas. I urge you to examine this carefully before rendering a decision and to

conserve the use of this material for pecan weevil in Texas.

marvin harris
Professor of Entomology
Texas A&M University