

**Methyl Bromide Critical Use Exemption Process**

**2007 Methyl Bromide Usage Numerical Index (BUNI)**

Date: **1/26/2005**

Average Hectares in the US:

not available

Sector: **ORCHARD REPLANT**

% of Average Hectares Requested:

2007 Amount of Request				1998~2002 Average Use*			Quarantine and Pre-shipment	Regional Hectares**		Research Amount (kgs)
REGION	Kilograms (kgs)	Hectares (ha)	Use Rate (kg/ha)	Kilograms (kgs)	Hectares (ha)	Use Rate (kg/ha)		2003 Area	Requested %	
CA Grape & Tree Fruit League - Stone Fruits	716,449	2,131	336	693,087	2,061	336	0%	not available	1658	
CA Grape & Tree Fruit League - Grapes	165,561	433	382	68,280	201	340	0%			
CA Walnut Commission - Orchard	226,796	809	280	78,252	205	381	0%			
Almond Hullers & Processors Association	206,384	567	364	428,072	1,281	334	0%			
<b>TOTAL OR AVERAGE</b>	<b>1,315,190</b>	<b>3,940</b>	<b>334</b>	<b>1,267,691</b>	<b>3,748</b>	<b>338</b>	<b>0%</b>			

2007 Nomination Options	Subtractions from Requested Amounts (kgs)					Combined Impacts Adjustment (kgs)		MOST LIKELY IMPACT VALUE		
REGION	2007 Request	(-) Double Counting	(-) Growth	(-) Use Rate Adjustment	(-) QPS	HIGH	LOW	Amount (kgs)	Hectares (ha)	Use Rate (kg/ha)
CA Grape & Tree Fruit League - Stone Fruits	716,449	-	23,362	-	-	346,543	242,580	267,531	796	336
CA Grape & Tree Fruit League - Grapes	165,561	-	97,281	-	-	34,140	23,898	26,356	77	340
CA Walnut Commission - Orchard	226,796	-	148,544	-	-	39,126	27,388	30,205	108	280
Almond Hullers & Processors Association	206,384	-	-	-	-	103,192	72,235	79,664	238	334
<b>Nomination Amount</b>	<b>1,315,190</b>	<b>1,315,190</b>	<b>1,046,003</b>	<b>1,046,003</b>	<b>1,046,003</b>	<b>523,002</b>	<b>366,101</b>	<b>403,757</b>	<b>1,219</b>	<b>331</b>
<b>% Reduction from Initial Request</b>	<b>0%</b>	<b>0%</b>	<b>20%</b>	<b>20%</b>	<b>20%</b>	<b>60%</b>	<b>72%</b>	<b>69%</b>	<b>69%</b>	<b>1%</b>

Adjustments to Requested Amounts	Use Rate (kg/ha)		(%) Karst (Telone)		(%) 100 ft Buffer Zones		(%) Key Pest Distribution		Regulatory Issues (%)		Unsuitable Terrain (%)		Unsuitable Soil (%)		Combined Impacts (%)	
	Low	EPA	High	Low	High	Low	High	Low	High	Low	High	Low	High	Low	HIGH	LOW
CA Grape & Tree Fruit League - Stone Fruits	336	336	0	0	0	0	60	35	8	2	0	0	50	35	50%	35%
CA Grape & Tree Fruit League - Grapes	340	340	0	0	0	0	35	35	8	2	0	0	50	35	50%	35%
CA Walnut Commission - Orchard	280	280	0	0	0	0	85	85	8	2	0	0	50	35	50%	35%
Almond Hullers & Processors Association	334	334	0	0	0	0	50	35	8	2	0	0	50	35	50%	35%

Other Considerations	Dichotomous Variables (Y/N)					Other Issues			Economic Analysis				Quality/ Time/ Market Window/ Yield Loss (%)	Marginal Strategy
	Strip Bed Treatment	Currently Use Alternatives?	Research / Transition Plans	Tarps / Deep Injection Used	Pest-free Cert. Requirement	Change from Prior CUE Request (+/-)	Verified Historic MB Use / State	Frequency of Treatment in years	Loss per Hectare (US\$/ha)	Loss per Kilogram of MB (US\$/kg)	Loss as a % of Gross Revenue	Loss as a % of Net Revenue		
CA Grape & Tree Fruit League - Stone Fruits	Y+N	Yes	Yes	Deep	No	0	Yes	1x/20years	Not included as there is no technically feasible alternative.					
CA Grape & Tree Fruit League - Grapes	No	Yes	Yes	Deep	No	0	Yes	1x/20years						
CA Walnut Commission - Orchard	No	Yes	Yes	Deep	No	0	Yes	1x/40years						
Almond Hullers & Processors Association	Y+N	Yes	Yes	Deep	No	+ <sup>3</sup>	Yes	1x/20years						

**Alternatives**

1,3-D may not be suitable due to soil type, pests or township caps

\* Due to the nature of these applications, the historical reported data varies greatly from year to year. Therefore an average of the usage from 1997 through 2001 were used.

1 CA Grape & Tree Fruit League - Stone Fruit requested 8100 acres but only 65% of those acres are fumigated due to strip bed treatment, therefore the acreage was adjusted downward.

2 CA Grape & Tree Fruit League - Stone Fruit reported historical use rates that were grossly underestimated for normal fumigation use. A use rate of 300 pounds ai/acre was multiplied by the reported acreage to reflect a more accurate estimate of methyl bromide used.

3 This applicant only replanted every 20 years, so change from 2002 is not necessarily relevant since replant in 2002 reflects status of market in ~ 1982, which was less than planting in 1970s that are now being replanted.

Conversion Units: 1 Pound = 0.453592 Kilograms 1 Acre = 0.404686 Hectare

Most Likely Impact Value: High 24% Low 76%