



November 13, 2017

U.S. Environmental Protection Agency
EPA Docket Center (EPA/DC), 28221T
1300 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Re: Imidacloprid, EPA Docket ID: EPA-HQ-OPP-2008-0844

To Whom It May Concern:

The Arizona Pest Management Center is host to the University of Arizona's expert IPM scientists including Ph.D. entomologists, weed scientists and plant pathologists with expertise in the strategic tactical use of pesticides within IPM programs that protect economic, environmental and human health interests of stakeholders and the society at large. In coordination with the Western Integrated Pest Management Center, we contribute to federal comments on issues of pest management importance to stakeholders throughout the desert southwest including Arizona, New Mexico, Nevada, Colorado and the southeast desert regions of California.

At this time, we wish to bring to your attention our previous comments on uses of imidacloprid and other neonicotinoid insecticides, available at our website, and which should be part of the previous record of comments at EPA.

Neonicotinoid Insecticide Use and Pollinator Protection in Several Crops and Recreational Turf in Arizona and New Mexico, 2017. EPA Docket no. EPA-HQ-OPP-2008-0844.
https://cals.arizona.edu/apmc/docs/Neonicotinoids_July-2017_vf.pdf

Imidacloprid Use in Arizona Citrus, 2016. EPA Docket no. EPA-HQ-OPP-2008-0844, Comment number EPA-HQ-OPP-2008-0844-0891
https://cals.arizona.edu/apmc/docs/Imidacloprid-Use-In-Arizona-Citrus_4-14-16.pdf

Imidacloprid Use in Arizona Cotton, 2009. EPA Docket no. EPA-HQ-OPP-2008-0844.
https://cals.arizona.edu/apmc/docs/09NCC_Imidacloprid_In_Cotton.pdf

We would also like to point out that there are many other important crop uses of imidacloprid throughout our region, not the least of which includes lettuce and other leafy green vegetable

production. We have contributed to and support comments also submitted to this docket by the Arizona Farm Bureau.

Please feel free to contact us with any questions.

Sincerely,

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