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April 30, 2022

California Department of Pesticide Regulation
Pesticide Regulation Branch
1001 I Street, P.O. Box 4015
Sacramento, CA 95812
Attn: Mr. John Inouye

**RE: Application to renew a Special Local Need 24(c) Pesticide Registration for MOCAP EC Nematicide-Insecticide**
**(EPA Reg. No. 5481-9041; SLN # CA-12009)**

Dear Mr. Inouye,

I am writing in support of AMVAC Chemical Corporation's submission for the renewal of a Special Local Need 24(c) registration of Mocap EC nematicide-insecticide in Del Norte County in California. This letter represents my personal views and experiences and not those of the University of California. It is critical for our Easter Lily growers to renew this Special Local Need as soon as possible, as the yearly planting of Easter lilies will begin shortly. This is truly a local need, as Del Norte is the only county in California where Easter lilies are grown commercially in the field.

Plant parasitic nematodes represent a statewide chronic problem for growers, and the root-lesion nematode/Easter lily crop combination represents one of the most serious nematode problems we face in California. Through the grower supported Easter Lily Research Foundation, the Easter Lily growers have more than a 30-year history of supporting research on reduced-risk programs for management of lesion nematode, *Pratylenchus penetrans*, on this crop. In recognition of these efforts, in 2014, the Easter Lily Research Foundation received an IPM Innovator Award from the California Department of Pesticide Regulation for "Leadership and creativity in advancing the use of reduced-risk programs for pest management in the Easter lily industry" (https://www.cdpr.ca.gov/docs/pestmgt/ipminov/awards/14awards.htm#easterlily)

As a UC Cooperative Extension Specialist in nematology, I personally have a 20+ year history of conducting field trials for management of lesion nematode on Easter lilies. In these trials, we have evaluated numerous chemical and biological alternatives, and demonstrated the continuing need for a treatment that uses a preplant fumigant treatment in combination with an at planting in furrow application of organophosphate nematicides. The current grower treatment that uses a fumigant followed by a combination of Mocap plus Thimet has shown

consistently positive results and is more effective than using either organophosphate alone. Therefore, it is very important to keep Mocap EC registered and available to the growers, and I strongly support the renewal of the Special Local Need registration of Mocap EC for nematode control on Field Grown Lilies.

In case more information is needed, please don't hesitate to contact me.

Sincerely,

Becky B. Westerdahl

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