



February 3, 2022

Steven R. Peterson  
Chemical Review Manager  
Risk Management and Implementation Branch I  
Pesticide Re-evaluation Division  
Office of Pesticide Programs, EPA

RE: EPA questions related to the use of rodenticides

Dear Mr. Peterson,

Please accept the following input on behalf of the Oregon grass seed industry in response to the questions regarding rodenticide use solicited by the OPP-Biological and Economic Analysis Division. The Oregon Seed Council represents Oregon's seed industry including the growers, buyers, marketers and others involved in the specialty seed industry. Oregon's approximate 400,000 acres of grass seed production drives more than \$1 billion in economic activity in Oregon.

Grass seed production fields are routinely challenged with populations of gray-tailed voles (*Microtus canicaudus*) causing crop damage and production losses. These voles have negative impact on all grass types being produced for seed including tall fescue, perennial ryegrass, annual ryegrass, fine fescues, orchardgrass, and bentgrass.

Current control measures include the application of zinc phosphide or tillage which results in the removal and loss of the crop. Grower also promote raptor activity in fields by installing perches and raptor boxes along field perimeters. The preferred method of control is the use of zinc phosphide, which is preferred as a cost-effective method and allows the crop to remain established and productive.

Grass seed growers apply their own zinc phosphide treatments in fields. It is cost prohibitive to hire contractors to treat fields for voles. Growers are certified through the Oregon Department of Agriculture as pesticide applicators. Additionally, it is typical that farms employ certified applicators on staff in addition to the licensed owner/operator grower.

Oregon grass seed is under strict application restrictions and special local need labels issued by the ODA that prevent possible impacts to non-target wildlife. Specifically, migrations of multiple species of Canada goose are closely monitored and zinc phosphide applications are restricted to mitigate risk of injury to the geese. While geese are present, mid-September through April, it is prohibited to broadcast apply zinc phosphide products for vole control. During this timeframe zinc phosphide can only be applied "down the hole." After the migration, May through mid-September, grass seed growers are



allowed to broadcast apply zinc phosphide. These restrictions, SLNs, and mitigation measures have proven to be highly effective at preventing substantial impacts to geese for several years.

These zinc phosphide labels are the only available rodenticide grass seed growers have to combat the continuous vole pressure in their crops. The ability to control vole populations to levels that do not cause economic loss in the fields is extremely difficult under the current regulations. If further regulation was implemented, or possibly the removal of the option, then our growers would be left with no viable option for vole management. The use of zinc phosphide is a critical need to the grass seed production.

Overall, field observations and experience indicate that the baseline level of the vole population has risen in the fields over the last several years. This is supported by the observed and realized damage and seed yield losses. Furthermore, as populations cycle upwards the crop damage and losses have proven to be substantial. In 2020, vole populations were incredibly high and caused production losses ranging from 20-75%. These are significant economic impacts to farms. In addition to seed yield losses, the damage was so extensive in many cases that growers had to take the grass crop out of production after harvest. This leads to substantial economic cost by losing a perennial grass field prematurely and being forced to re-establish another crop. In 2021, production losses from high vole populations were not as widespread but the losses again were in the similar range as 2020. These losses are occurring in the presence of the zinc phosphide treatment strategies that the labels allow.

Growers are extremely frustrated watching crops be destroyed by voles and not have more effective options outside of the limited zinc phosphide. Further regulations that will increase costs to the growers and be unnecessarily burdensome are not helpful in this situation. We are aware of and respect the need to protect people and non-target animals and wildlife. We demonstrate that through our efforts to mitigate risks to the goose populations migrating through and residing in Oregon during the fall and winter months.

On behalf of Oregon grass seed producers, please consider the difficult situation we are facing with voles causing substantial economic impact on farms. We are severely limited in our options to control rodent pests in agriculture fields. Please contact me if you have any questions or need more information regarding the grass seed industry's situation regarding vole control and the use of rodenticides.

Sincerely,

Steve Salisbury

Phone: (503) 551-3747

Email: [steve@pacificagresources.com](mailto:steve@pacificagresources.com)