
From: Jeffrey Gillis
Sent: Monday, April 1, 2019 1:30:40 PM
To: Patterson, Megan L

Subject: Questions regarding approved pesticides for browntail spraying

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Dear Meghan,

From our recent phone conversations and email exchanges, you have confirmed that permethrin is not a permissible insecticide for browntail spraying within 250 feet of water bodies.

I have several questions:

Permethrin, or at least the brand name Astro, used to be allowed and I would like to know if it could once again be considered as an allowable insecticide within the 50'-250' water setback. Several companies, including WellTree, used to use permethrin on select trees with extremely high browntail populations prior to caterpillar emergence or during later stages of caterpillar development which were still defoliating the trees. It was also labeled for use on many fruits and vegetables, which made it acceptable to apply when infested trees included both harvestable fruit trees such as apple, and non fruiting, or non harvestable trees such as oak.

My understanding is that bifenthrin is currently allowed within the 50'-250' setback area. It is also my understanding that bifenthrin labels do not support use on most fruits and vegetables. Lastly, it's always been my understanding that bifenthrin is extremely toxic to many marine organisms.

If my understandings are correct, why is permethrin no longer allowed, but bifenthrin is?

I am interested to know why imidicloprid is listed as an acceptable insecticide to use between the 50'-250' setback area,

or at all. I am confused by this as several of my professional colleagues and I are not aware that imidicloprid is in any way effective in the control of browntail caterpillars.

I am concerned that if the mission of the Board of Pesticides and or the Maine Forest Service is to support judicious and minimal pesticide use, it seems that allowing imidicloprid for browntail use may support the contrary. Additionally, listing imidicloprid as an allowable product could suggest to the greater public that imidicloprid is effective. This in turn could spur much greater use of the readily available product by the public, and needlessly expose the surrounding environment to the pesticide.

I look forward to discussing these questions with you further during the April 19th meeting at 9am in the Deering Building.

Sincerely,

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