



December 9, 2024

Attn: Rachel Blatnick
Document Processing Desk (PRD)
Office of Pesticide Programs (7508M)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

Dear Ms. Blatnick

Albaugh LLC is providing this commitment letter to document our commitment to EPA on the following registrations.

ROTAM METHOMYL TECHNICAL	EPA REG. NO. 81598-9
ROTAM METHOMYL 29LV INSECTICIDE	EPA REG. NO. 83100-27
ROTAM METHOMYL 90SP INSECTICIDE	EPA REG. NO. 83100-28

Albaugh LLC intends to agree with and commit to the mitigation measures below developed during the US Fish and Wildlife Service Endangered Species Consultation for Methomyl.

FWS BiOp Mitigation

To address risks to the 71 species that FWS has determined methomyl will cause jeopardy or adverse modification, the following species-specific mitigation measures have been proposed to update The Action and are intended to be implemented in geographically specific pesticide use limitation areas (PULAs) via EPA's Bulletin's Live Platform:

- Species-specific buffers for aerial application ranging from 50-320 feet (from the downwind from the edge of the field/ application site) within the species specific PULA. Buffer distances are consistent with EPA's draft Insecticide Strategy
- Species-specific buffers for ground application ranging from 10-105 feet (from the downwind from the edge of the field/ application site) within the species specific PULA. Buffer distances are consistent with EPA's draft Insecticide Strategy
- Species-specific buffers for air-blast application ranging from 25-160 feet (from the downwind from the edge of the field/ application site) within the species specific PULA. Buffer distances are consistent with EPA's draft Insecticide Strategy
- Species-specific runoff mitigation requirements consistent with EPA's draft Insecticide Strategy for a subset of species (i.e. not all 71 species will require runoff points) within the species specific PULA.
- Species-specific on-field mitigation measures for a subset of species (i.e. not all 71 species will require additional on field mitigation) including use prohibition for some or all use site within the PULA, application restrictions based on bloom for



some use sites within the PULA, and time of day restrictions for some use sites within the PULA. Some of the on field mitigation measures include temporal components (e.g. time of year) that reflect species-specific phenology.

Please contact us if you have any questions.

Yours truly,

A handwritten signature in dark ink, appearing to read "NPE", with a long, sweeping horizontal line extending to the right.

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