

December 18, 2024

Attn: Ms. Rachel Blatnick, Chemical Review Manager (RMIB II)
US Environmental Protection Agency
Office of Pesticide Programs
Pesticide Re-evaluation Division

Dear Ms. Blatnick,

RE: Methomyl: Endangered Species Biological Opinion Label Mitigation

We, SINON USA, Inc., the basic registrant for the current EPA-registered end-use products CORRIDA 29 SL (EPA Reg. No. 82557-2) and CORRIDA 90 WSP Insecticide (EPA Reg. No. 82557-3) containing the active ingredient methomyl, hereby agrees to the following additional label mitigation proposed by the Agency as a result of consultations with the US Fish and Wildlife Service (FWS) based on FWS' approach to the Endangered Species based Biological Opinion (BiOp) for methomyl label mitigation:

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:

- 1. 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*
- 2. 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*
- 3. 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*
- 4. 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.*
- 5. 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.*

If additional information is needed concerning this matter, please contact me at my email address kc.lin@us.sino.com or you can contact our authorized agent S. K. (Tim) Theodorakis, Wagner Regulatory Associates (a SynTech Research Group company) at tim.theodorakis@syntechresearch.com.

Best Regards,



K. C. Lin
Vice-President
Sinon USA Inc.