National Cotton Council of America

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January 6, 2020

Office of Pesticide Programs
Regulatory Public Docket (7502P)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

RE: Docket ID Number EPA-HQ-OPP-2008-0331

The National Cotton Council (NCC) appreciates the opportunity to comment on the Environmental Protection Agency's (EPA's) "Pesticide Registration Review: Proposed Interim Decisions for Several Pyrethroids; Notice of Availability." The NCC supports the continued registration of these crop protection tools which provide critical crop protection benefits to the cotton industry, as well as many other agricultural uses. The NCC appreciates EPA's thorough review of all crop protection products in compliance with FIFRA and FQPA. The NCC continues to emphasize the importance of multiple modes of action (MOAs) for managing resistant pest populations. The pyrethroids continue to serve a critical role in cotton Integrated Pest Management (IPM) and Integrated Resistance Management (IRM). The many variations between different pyrethroids has allowed state university experts to provide product guidance to producers based on local pest complexes targeted for control. The university data has emphasized circumstances that influence product selection based on field data. The NCC continues to support the need for the multiple pyrethroid products in order to provide the necessary options for the various pest control needs.

The NCC is the central organization of the United States cotton industry. Its members include producers, ginners, cottonseed processors and merchandizers, merchants, cooperatives, warehousers and textile manufacturers. A majority of the industry is concentrated in 17 cotton-producing states stretching from California to Virginia. U.S. cotton producers cultivate between 10 and 14 million acres of cotton with production averaging 12 to 20 million 480-lb bales annually. The downstream manufacturers of cotton apparel and home furnishings are located in virtually every state. Farms and businesses directly involved in the production, distribution and processing of cotton employ more than 125,000 workers and produce direct business revenue of more than $21 billion. Annual cotton production is valued at more than $5.5 billion at the farm gate, the point at which the producer markets the crop. Accounting for the ripple effect of cotton through the broader economy, direct and indirect employment surpasses 280,000 workers with economic activity of almost $75 billion. In addition to the cotton fiber, cottonseed products are used for livestock feed and cottonseed oil is used as an ingredient in food products as well as being a premium cooking oil.

Nozzles and Droplet Size

The NCC recognizes EPA's restrictions on nozzles and droplet size intended for the purpose of avoiding off-site drift. The NCC urges caution regarding unintended consequences that EPA may not have considered, such as: 1) Does the droplet size impact the needed coverage for pest control? and 2) Does

the droplet size impact resistance management? (for instance, inadequate coverage resulting in allowing greater survival of heterozygous individuals).

Vegetative Filter Strips

The NCC urges EPA to revisit the Vegetative Filter Strip requirement in order to clarify language. NCC urges EPA to ensure the concerns leading to the Vegetative Filter Strip requirement are representative of current soil loss data from USDA. The NCC applauds EPA's recognition of conservation tillage and other practices producers have employed for many years in order to preserve their soil. The NCC expresses concerns with the language: "Construct and maintain a vegetative filter strip, according to the width below, of grass or permanent vegetation between the field and nearby down gradient…" The language would seem to suggest native vegetation including shrubs, flowering plants, and trees with their assorted debris should be cleared away in order to "construct" a grass-only filter strip which must be "maintained". "Maintain" would seem to suggest it must be routinely mowed to prevent establishment of other plants and brings into question watering in arid environments.

The NCC urges EPA to recognize many grasses are "weeds" in production fields. Numerous grasses have been identified to be resistant to various herbicide chemistries. Grasses that produce tubers, nuts, or spreads by both above-ground stems known as stolons and below-ground stems called rhizomes have long presented control challenges to crop production. These grasses are not desirable adjacent to crop production fields because they may easily spread into the production field, resulting in greater need for costly herbicide applications. The NCC urges careful consideration of the necessity, benefits and risks of this mitigation measure.

Buffer Zones to Water Bodies

The NCC urges EPA to revisit the ULV (450 feet) and Non-ULV (150) aerial application buffer zones to water bodies restriction. A reality of IPM is the necessity for quick response when needed. The agricultural aviation industry provides a critical service to agricultural production and IPM. Many insect pests are known to be major pests, meaning their population historically exceeds acceptable thresholds on an annual basis and thus requires control measures. Often, these excessive populations occur on large land mass scales. During such times, producers are not able to cover enough acreage with ground equipment in a timely manner and must rely on aerial application to achieve the timely treatment necessary. Excessive buffer zones leave continuous pest sources for reintroduction to the field and therefore additional pest applications will be needed. NCC urges EPA to verify the minimum buffer zone necessary given the consequences of untreated zones.

Thank you for the opportunity to provide these comments.

Sincerely,

Steve Hensley
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National Cotton Council