

August 27, 2018

The Honorable Andrew Wheeler
Acting Administrator
USEPA Headquarters
William Jefferson Clinton Building
1200 Pennsylvania Avenue, N. W.
Mail Code: 1101A
Washington, DC 20460

Re: Dicamba

Dear Acting Administrator Wheeler:

There is a critical need for alternative sites of action to control resistant weeds. The undersigned organizations support the continued registration of the new formulations of dicamba for the control of resistant weeds across the US cotton production belt .

Palmer amaranth (pigweed) and waterhemp populations resistant to five herbicide modes of action (MOAs) and marestail populations resistant to four MOAs are becoming prevalent. In Missouri, a population of Palmer amaranth resistant to six MOAs has been identified. Cotton yield and quality, along with producer income are being significantly reduced and are getting worse as resistant populations spread. Simply put, dependence on one postemergence herbicide to control resistant weeds is short-sighted especially with no new site of action herbicides on the horizon. Current controls are declining in efficacy each year.

Of particular concern, pigweed that is resistant to glyphosate threatens the ability to farm. The fast growth of the plant, the production of about 700,000 seeds per plant, the height and density of the plants in fields without control, the costs and lack of availability of crews to hoe and remove the plants from fields, combined with the overwhelming seedbank already present will overwhelm the small profit margin within cotton production while steadily decreasing yields.

The new dicamba herbicides, applied postemergence, are highly effective in providing the best weed control farmers have seen in years. Control of resistant weed populations preserves yield potential and farmers' income. The highly effective weed control is critical to preserve yield and reduce future weed seed population and the spread of resistant species.

The 2018 production season has shown that these much-needed new herbicides are making a difference by providing clean fields that were once choked out by weeds. A new label and state-specific labels combined with extensive training has resulted in a tremendous decrease in the number of off target complaints which shows that these different technologies can co-exist.

Farmers need effective weed control and dicamba is an important part of the multifaceted solution therefore the undersigned organizations strongly urge you to continue the registration of these critical tools.

Respectfully submitted,

National Cotton Council
Alabama Cotton Commission
Alabama Farmers Federation
Arizona Cotton Growers
Arizona Farm Bureau
California Cotton Ginners and Growers Association
Cotton Producers of Missouri
Delta Council
Georgia Cotton Commission
Georgia Farm Bureau
Kansas Cotton Association
Louisiana Cotton & Grain Association
Louisiana Farm Bureau Federation
Mississippi Farm Bureau Federation
North Carolina Cotton Producers Association
Oklahoma Cotton Council
Plains Cotton Growers, Inc.
Rolling Plains Cotton Growers, Inc.
San Joaquin Valley Quality Cotton Growers Association
South Texas Cotton & Grain Association
Southern Cotton Growers, Inc.
Southern Rolling Plains Cotton Growers Association
St. Lawrence Cotton Growers Association
Texas Farm Bureau
Virginia Cotton Growers Association
Virginia Farm Bureau

Cc: Rick Keigwin
Reuben Baris
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