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May 7, 2010

Via: [www.reginfo.gov/public/do/PRAMain](http://www.reginfo.gov/public/do/PRAMain) .

[https://www.reginfo.gov/public/do/PRA/icrPublicCommentRequest?ref\\_nbr=202003-0535-001](https://www.reginfo.gov/public/do/PRA/icrPublicCommentRequest?ref_nbr=202003-0535-001)

Ruth Brown

Departmental Information Collection Clearance Officer

Federal Register Number: 2020-07220

**Re: OMB Control Number: 0535-0218; *Agricultural Resource Management and Chemical Use Surveys—Substantive Change***

The National Cotton Council (NCC) is the central organization of the United States cotton industry. Its members include producers, ginner, cottonseed processors and merchandizers, merchants, cooperatives, warehousemen 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.

Using the Agricultural Resource Management Survey (ARMS) and the Vegetable Chemical Use Survey, NASS collects environmental data which includes cropping practices, fertilizer applications, pesticide usage for weeds, insects, fungus, mold, etc., and the use of various pest management practices. The additional questions that will be added to the questionnaires that were not in the original approval will address topics such as seed treatments, GPS enabled equipment, nutrient

management, crop insurance, environmental regulations, organic production practices, etc.

The U.S. cotton industry is heavily invested in all of the above topics excepting organic production, which is a smaller part of overall production. We feel that the chemical use survey is a necessity and is of particular use in providing real world use data to compare with models that often overestimate the amount of applied pesticides. We support the survey as well as the expansion through additional questions.

Thank you for this opportunity to provide comments supporting this important issue.

Respectfully submitted,

A handwritten signature in black ink that reads "Steve Hensley". The signature is written in a cursive style with a large, sweeping initial "S".

Steve Hensley  
Senior Scientist, Regulatory and Environmental Issues