# Response to 2,4-D Revised Risk Assessments and Preliminary Risk Reduction Options: Hawaii

#### To: <u>Rick Melnicoe</u>

Director, Western Integrated Pest Management Center Director, Office of Pesticide Information and Coordination (UC Statewide Pesticide Coordinator) University of California Davis, CA 95616-8588

### Harold Coble

USDA

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Comments in response to: 2,4-Dichlorophenoxyacetic Acid Revised Risk Assessments and Preliminary Risk Reduction Options (Phase 5 of 6-Phase Process); Notice of Availability, Federal Register Notice January 12, 2005 (Volume 70, Number 8) [OPP-2004-0167;FRL-7961-5]

Hawaii's weather is characterized by year-round sunshine and subtropical temperatures and rainfall. These conditions allow for year-round production and year-round weed growth.

2,4-D is used in landscapes, golf courses, sugarcane production, pasture and rangeland and seed corn production.

The regulatory situation for 2,4-D is different in Hawaii compared to other states because 2,4-D products in container volumes larger than 1 quart are Restricted Use Products. This may be a limiting factor to the use of 2,4-D in Hawaii.

Cost considerations are important when 2,4-D is selected. The alternatives tend to be very expensive.

## Turf

2,4-D pre-mixes (2,4-D mixed with other phenoxies and dicamba) are used in turf settings--landscapes and Bermuda golf courses. 2,4-D is most frequently used for spot treatments. Where broadcast applications are necessary, the limit of 2 applications per season could present problems.

Golf course applications of 2,4-D tend to be spot treatments. Other herbicides are available and are used on golf courses. However, golf course operations would be negatively impacted if 2,4-D would not be available as part of the tools available to golf course superintendents.

## **Comments submitted by:**

Dr. Michael Kawate Phone: (808) 956-6008

## Cathy Tarutani

Phone: (808) 956-2004 Department of Plant and Environmental Protection Sciences 3190 Maile Way St John 307 University of Hawaii Honolulu, HI 96822