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MĀNOA

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Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Ave. NW.  
Washington, DC 20460-0001

Subject: **Docket ID Number EPA-HQ-OPP-2012-0330**

Comments in Response to *2,4-D Registration Review: Draft Ecological Risk Assessment*

The following comments are being submitted in response to the May 25, 2017 *Federal Register* notice announcing the availability of and seeking public comment on EPA's draft ecological risk assessment for the registration review of 2,4-D. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on the use of 2,4-D in the production of sugarcane and grass bioenergy crops, in fallow fields and non-crop sites in Hawai'i.

**Sugarcane, grass bioenergy crops, and non-crop sites, including uncultivated areas of agricultural operations.** 2,4-D is used to control ivy gourd (*Coccinia grandis*), morning glory (*Ipomoea obscura*), maile pilau (*Paederia foetida*), honohono (*Commelina diffusa*), cheese weed (*Malva parviflora*), castor bean (*Ricinus communis*), purple nutsedge (*Cyperus rotundus*) and other weeds in these grassy crops. Glyphosate does not effectively control ivy gourd, morning glory, maile pilau, honohono, and cheese weed. Dicamba may be an alternative to 2,4-D. However, dicamba is more expensive than 2,4-D, therefore 2,4-D is more cost effective than dicamba. Triclopyr is effective for use in noncrop sites, but is more expensive than 2,4-D. Another alternative may be hand weeding, which is not cost effective. If weeds cannot be effectively controlled at a reasonable cost, crops such as sugarcane and bioenergy crops will not be grown.

2,4-D is used to control morning glory, golden crownbeard (*Verbesina encelioides*), Spanish needle (*Bidens pilosa*), Flora's paint brush (*Emilia fosbergii*), Russian thistle (*Salsola kali*), mallow (*Malva* spp.), spiny amaranth (*Amaranthus spinosus*) and other *Amaranthus* spp., purslane (*Portulaca oleracea*) and other weeds in **fallow fields**. There are not many alternative herbicide options available and licensed for use in Hawai'i. 2,4-D is important for weed managers so that they have different modes of action herbicides to effectively control weeds.

Comments expressed that, while they are inexpensive and effective for the control of many important weeds in Hawai'i, there is also concern about the possibility of drift when 2,4-D products are used.

2,4-D products have unpleasant odors. More important is the possibility of damage to non-target plants at properties that are nearby the site of application. Suggestions were provided to address issues associated with potential drift of 2,4-D products:

- 1) Use of 2,4-D should be prohibited within a 0.25 mile radius of a school or public area.
- 2) Manufacturers should incorporate an adjuvant to reduce drift.
- 3) Add an explanation to the product labels that 2,4-D is in a class of growth regulators known as auxins that are active in the ppm range and used to control broad leaves not grasses.

Comments were received from representatives of the sugarcane, bioenergy and seed production industries and staff of the College of Tropical Agriculture and Human Resources of the University of Hawai'i at Mānoa.

Comments complied and submitted by:



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