WASHINGTON STATE UNIVERSITY
TRI-CITIES

October 29, 2004 Ref: 2004-15-1

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Washington, DC 20460

Attention: Docket OPP-2004-0219

The following comments are being submitted in response to the September 24 Federal Register notice regarding EPA's risk assessment and preliminary risk reduction options for the herbicide chlorsulfuron. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on the use of chlorsulfuron on wheat grown in Idaho, Oregon, Utah, and Washington.

In our region chlorsulfuron is applied once in the spring for post-emergence broadleaf weed control. It is used in conjunction with phenoxy-type herbicides, typically 2,4-D. Very little chlorsulfuron is applied by itself (Glean); most is applied in combination with metsulfuron methyl (Finesse). Chlorsulfuron remains an important herbicide in wheat production although in some areas where plant-back restrictions are an issue, growers have moved to using either tribenuron in combination with thifensulfuron methyl (Harmony Extra) or tribenuron alone (Express) in lieu of chlorsulfuron. Because of these restrictions, chlorsulfuron is only used on land that is planted in a wheat/fallow rotation.

If EPA imposes risk mitigation measures making chlorsulfuron essentially unusable in our region, wheat growers have two options: rely more heavily on phenoxy-type herbicides for broadleaf weed control or substitute other sulfonylurea herbicides for chlorsulfuron. Dr. Joe Yenish, a weed specialist with Washington State University, feels that substitution with other sulfonylurea herbicides would be the more likely option. If the concern raised in the chlorsulfuron risk assessment regarding the risk to endangered plant species is found to be common for all the sulfonylurea herbicides then this promises to become a critical issue for wheat production in our region.

Two of the proposed risk mitigation measures would result in chlorsulfuron becoming unusable or less usable in wheat in the Pacific Northwest: reducing the application rate and disallowing

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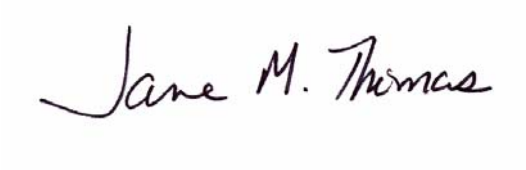
aerial application. Weed scientists and other extension personnel are concerned that if EPA reduces the allowable application rate for use on wheat, chlorsulfuron will become ineffective against broadleaf weeds. Chlorsulfuron is applied by air in our region; if this application method were lost, growers would find it difficult to apply the material using ground equipment. Oregon, Utah, and Washington weed specialists expressed concerns about the timeliness of herbicide applications should growers be forced to make chlorsulfuron applications using ground equipment. These applications must be made in the spring when the ground is often wet. In portions of our region there would likely be significant delays while growers wait for fields to dry enough to allow equipment access in order to make a chlorsulfuron application. Weed specialists are concerned if the chlorsulfuron application is delayed the herbicide will be less effective for the control of some species.

In summary, we are asking that in establishing risk mitigation measures for chlorsulfuron, EPA retain aerial application and retain the current maximum application rate.

Sincerely,



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