

# UNIVERSITY OF HAWAII AT MĀNOA

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The following comments are being submitted in response to the December 28, 2005 *Federal Register* notice regarding EPA's notice of availability of the risk assessment for the herbicide dicamba. These comments provide information regarding the importance of dicamba in Hawai'i. Specific risks of concern as identified in the *Federal Register* notice are not addressed in these comments.

## A. Golf Courses

Dicamba is an important component of prepackaged herbicides used for broadleaf weed control on golf courses in Hawai'i. It is important to retain dicamba for resistance management of certain weeds.

## B. Seed Corn

Dicamba is important in Hawai'i because there is a large amount of acreage in seed corn production. Since most, if not all, of this corn is breeding stock, it is likely that some level of dicamba tolerance has been incorporated. With the loss of dicamba from corn acreage, new broadleaf herbicides would need to be identified and tested for safety with a wide spectrum of corn breeding lines. This would be an expensive and time consuming process, and it is not certain that a herbicide with similar efficacy would be available.

## C. Sugarcane

Dicamba is selectively used in sugarcane to control broadleaf weeds. It is often used as a replacement for 2,4-D and on some *Desmodium* species not controlled with 2,4-D. Dicamba is often utilized where less atrazine is applied. Dicamba is still very important in controlling weeds in sugarcane.

## D. Asparagus

Dicamba is considered to be an important weed control tool for Hawai'i's asparagus industry.

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