

**RE: Dicamba risk assessment**

Lightle, Danielle M &lt;Danielle.Lightle@oregonstate.edu&gt;

Wed 10/5/2022 3:01 PM

To: Arnold, Elyssa - OCE, Washington, DC &lt;Elyssa.Arnold@usda.gov&gt;

Cc: Matt Enrico Baur &lt;mebaur@ucanr.edu&gt;

Hi Elyssa,

I touched base with a few contacts from the grass grown for seed industry, and here is a summary of the information they provided:

- Some example trade names of dicamba products currently being sold by fieldmen for grass grown for seed uses are: Sterling Blue, Rifle, Strut, and Latigo. Some of these are straight dicamba products, others are premix (Latigo is 2,4-D and dicamba)
- The rates you provided in that table below are much higher than the industry currently applies. None of the currently used products that industry folks mentioned even have a label for 2lbs ae/ac per application
- The general consensus is that the straight dicamba products (4lbs dicamba/gallon) are never applied at more than 1pt/ac and usually lower than that – at rates that amount to 0.45 to 0.5 lbs ae/ac
- Of products that are 4lbs dicamba/gallon, typical use rates might be 8-10 oz/ac in the fall, and 4-6 oz/ac in the spring. Spring rates are lower because of the sensitivity of winegrape, and there is a fair amount of winegrape/grass seed acreage in proximity to each other in the northern Willamette Valley.
- Dicamba use in the grass seed industry has been declining for the last 6 years, once winegrape sensitivity became known as a problem. There are other broadleaf alternatives that are available and work for the industry
- Almost all applications of dicamba in grass seed are ground applications. One estimate came in at around 95% of applications by ground. Any aerial applications to grass grown for seed would occur in the southern Willamette Valley.

Please let me know if you have other questions on grass seed uses.

Dani

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**From:** Arnold, Elyssa - OCE, Washington, DC <Elyssa.Arnold@usda.gov>
**Sent:** Thursday, September 22, 2022 7:30 AM**To:** Matt Enrico Baur <mebaur@ucanr.edu>; Lightle, Danielle M <Danielle.Lightle@oregonstate.edu>; ljesse@iastate.edu; jess@cns.msu.edu**Subject:** Dicamba risk assessment

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Hi Matt, Dani, Lynnae, and Laura,

I am working on OPMP's review of the ecological risk assessment for the registration review of dicamba (<https://www.regulations.gov/docket/EPA-HQ-OPP-2016-0223>). The assessment includes uses on pasture/rangeland, hay, and grass grown for seed, all of which are labeled at the highest single application rate for dicamba of 2 lb a.e./Acre. I'm wondering if you have any thoughts or additional characterization for these uses, which are the risk drivers for terrestrial animals and plants due to the rate, or if you can point me to any other contacts for this. I copied the non-ag use table below for your reference. Note that this is just the risk assessment stage, and the PID with proposed mitigation is still many months away. The risk assessment comments are due by 10/17.

Thanks,  
Elyssa

Use	Max Single App Rate (lb ae/A)	Number of Applications	Max Annual App Rate (lb ae/A)	Minimum Retreatment Interval (days)	Aerial/Ground Application	Application Timing	Comments
Fallow/Idle/Conservation Reserve	1.0	NS (2)	2.0	NS	Both	Pre-plant, post-harvest	
Commercial/industrial lawns	0.07	NS (2)	0.15	30	Ground		Granular
Forest trees	1.0	NS (1)	1.0	NA	Both		

Golf course	1.0	NS (1)	1.0	NA	Both		
Grass forage/fodder/hay	1.0	NS (1)	1.0	NA	Both		
Hay	2.0	NS (1)	2.0	NA	Both		
Grass grown for seed	1.0	NS (2)	2.0	NS	Both		
Grass grown for seed	2.0	NS (1)	2.0	NA	Ground	Post-harvest	
Pasture, rangeland	1.94	1	1.94	NA	Both		
Residential (outdoor premises, ornamentals, paved areas)	0.1	2	0.2	30	Ground		Granular
Rights of way, fences, hedgerows	1.95	NS (1)	1.95	NA	Both		
Parks, sod farms, recreational lawns	1.0	NS (2)	2.0	30	Both		

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