

October 28, 2019

Richard Dumas, Pesticide Re-Evaluation Division (7508P)
Office of Pesticide Programs, Environmental Protection Agency
1200 Pennsylvania Ave. NW.
Washington, DC 20460-0001
telephone number: (703) 308-8015
fax number: (703) 308-8005
email address: dumas.richard@epa.gov.

Docket Number: ID: EPA-HQ-OPP-2014-0779-0016

Comments in response to **Fluazifop butyl, isomers (Case 2285)**; EPA-HQ-OPP-2014-0779
Registration Review; Draft Human Health and/or Ecological Risk Assessments for Several Pesticides.

The following comments are being submitted in response to the September 30, 2019 *Federal Register* notice announcing the availability of and seeking public comment on EPA's draft ecological risk assessment for the registration review of Fluazifop-butyl. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on the use of Fluazifop-p-butyl in the production of Turf grass, ornamentals, coffee and macadamia and grass bioenergy crops, in landscape use, construction and cropping systems in Hawai'i. Fluazifop can be found in **Fusion**, **Fusilade II** and **Fusilade DX**.

Fusion plays an important role in turf and ornamental production, along with cut flowers such as protea. Fusion provides grass weed control in landscape settings where grasses are encroaching on the landscape, such as woody shrubs. This is an important product for landscape construction as it is an excellent alternative to RoundUp. Fusion can also be used for Bermuda grass with mixed Garlon(triclopyr) killing weedy species in Bermuda grass for pre-planting.

Fusilade is used in crops such as coffee and macadamia nut. Fusilade is widely used as a pre-harvest in newly planted orchards. Because, of 13-month pre-harvest intervals, dealing with smaller plants and encroaching weeds without damaging the crop. There is no burn down effect with this perennial grass weed product. There have been no issues regarding REI. Changing the REI would be more helpful for large, commercialized farming systems with crews. Potentially problematic with scheduling issues involving Macadamia and coffee, when 12 hours would be affecting harvesting to the next work day.

Fusilade DX has been used on asparagus, banana, lettuce, macadamia, bulb onion, taro, ginger, turmeric and corm vegetables. This product is important especially for growing culturally important crops such as Taro, bird of Paradise, palms and growing seasonal crops like ginger. There are almost no alternatives to the pre-emergence grassy weed control. This product also has increasing use in Maui. The application rate is at 24 fl.oz./acre. Fusilade on protea works well on selective grasses. Fusilade at the recommended rate works excellent for post emergence grasses. There is no yearly use data for turf or ornamental use, and no annual amount listed. This product may have potential drift affect during roadside maintenance or use on grassy fields.

The label listing “users could determine suitability” is extremely useful for future use patterns. This inclusion on the label allows unlimited use for this product. Turf and ornamental provide use for non-labeled sites through user determined suitability, which would be important for users with future crops that aren’t currently listed. This allows users to determine suitability. The change in REI may have no effect for small scale farmers or landscape/construction crews but may impact large scale macadamia and coffee growers if it interferes with harvest window.

Comments compiled and submitted by:

A handwritten signature in black ink, appearing to read 'NHFerris', written in a cursive style.

Natalie Hein-Ferris
Pacific Island IPM Network Coordinator
Ferris3@hawaii.edu
(763) 913-8575