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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-2011-0745**

Comments in Response to *Proposed Interim Registration Review Decision for 22 Sulfonylurea Herbicides*

The following comments are being submitted in response to the July 14, 2016 *Federal Register* notice regarding EPA's proposed interim registration review decision for the sulfonylurea herbicides. These comments are being submitted on behalf of the Western Integrated Pest Management Center and provide input on the use of **chlorsulfuron**, **foramsulfuron**, **halosulfuron-methyl**, **iodosulfuron-methyl-sodium**, **metsulfuron-methyl**, **sulfosulfuron**, **thiencarbazone-methyl**, **sulfentrazone** and **trifloxysulfuron-sodium** on turf and landscapes and pasture and rangeland in Hawai'i.

While acceptance of sulfonylurea (SU) herbicides has been generally slow in Hawai'i, they have become more widely accepted and usage in the turf and landscape market has increased over the last few years. The unavailability of triazine, and phenoxy herbicides and the classification of other herbicides as restricted use pesticides have resulted in a lack of alternatives for the turf (including golf courses) and landscape industry, contributing to their increasing use of the more expensive SUs. However, SUs have been found to be very effective and selective in the plant species that are controlled while showing little injury to the turf. They are particularly effective in controlling certain grassy weeds in turf. The SUs used by the turf and landscape industry in Hawaii include foramsulfuron, halosulfuron-methyl, sulfosulfuron and trifloxysulfuron-sodium. Thiencarbazone-methyl, iodosulfuron-methyl-sodium, sulfentrazone, and metsulfuron-methyl are also used, but in products which contain multiple active ingredients. Iodosulfuron-methyl-sodium is a product which contains an ingredient (dicamba) which is not one of the SUs.)

There is some use of SUs in range and pasture applications in Hawai'i. They are often added to other herbicides (phenoxyes and pyridines) to provide more effective control of noxious brush species such as gorse and blackberries while minimizing injury to valuable pasture grasses. The SUs have been shown to be helpful in recovering pastures infested with gorse. The SUs used on pasture and rangeland include chlorsulfuron and metsulfuron-methyl.

Comments were provided by a representative of a chemical vendor in Hawai'i.

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