

Public comments submitted to docket - EPA-HQ-OPP-2014-0167-0044

August 5, 2020

Elissa Reaves, Acting Director
Pesticide Re-Evaluation Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460-0001

Re: Pesticide Registration Review: Proposed Interim Decisions for Several Pesticides

Dear Acting Director Reaves,

This joint letter is from the Washington State Department of Agriculture (WSDA) and the Oregon Department of Agriculture (ODA) to the U.S. Environmental Protection Agency (EPA) in response to EPA's request for comments regarding the Clopyralid Proposed Interim Registration Review Decision Case Number 7212 (Document ID EPA-HQ-OPP-2014-0167-0046).

Both WSDA and ODA are state lead agencies (SLA) and have delegated authority from the EPA to implement Federal Insecticide Fungicide and Rodenticide Act (FIFRA) programs in their respective states. Both agencies also have considerable experience addressing issues caused by the carryover of clopyralid and other persistent "residual" herbicides.

The following bulleted list summarizes our comments on the clopyralid proposed interim decision, and Attachment 1 (beginning on page 3) includes more detailed comments including our agencies' extensive experience with clopyralid.

- EPA should discuss bioassays of finished compost in its final decision and include clear guidance and standard protocols for bioassays.
- Consideration should be given to the additional risk and burden that other agricultural sectors, such as organic producers, face when dealing with potentially contaminated compost.
- ODA and WSDA support the proposed expanded prohibited use sites, proposed adoption of label language to reduce the potential for compost contamination, and proposed notification and recordkeeping requirements. Our detailed comments in Attachment 1 suggest some language changes to the proposed notification requirements.
- We agree with the elements proposed in the education and stewardship plan and recommend adding information about plant-back restrictions and sensitive crop types. We also request information on how EPA and the registrants plan to share and distribute educational materials.
- We agree that it is useful to include a pictogram on labels, but find the proposed new pictogram confusing and suggest ways to improve it.
- We support the proposed added language regarding spray drift management.
- WSDA and ODA suggest adding language regarding risks to non-target organisms.
- We support the proposed language regarding herbicide resistance management.
- We also request that EPA require registrants to generate data on how best to facilitate breakdown of clopyralid in compost.

- EPA stated that no revision to the established tolerances or the residue definition is necessary. In contrast, we believe that EPA should review the label restrictions associated with grass hay and grass pastures, particularly those associated with grazing or hay harvest, and any preharvest intervals; and also evaluate whether the current tolerances for "grass, forage" and "grass, hay" which are both 500 ppm, are adequately conservative and take into account clopyralid's persistence and activity at very low levels.

WSDA and ODA appreciate that EPA is taking action to reduce the likelihood that contamination from clopyralid will cause unreasonable effects to humans, the environment, and the health and wellbeing of other sectors of the agricultural economy. We feel that the PID for clopyralid represents a significant step towards minimizing future issues with clopyralid carryover. WSDA and ODA would like to thank EPA for the opportunity to comment on the Clopyralid Proposed Interim Registration Review Decision Case Number 7212 (Document ID EPA-HQ-OPP-2014-0167-0046) and we hope that the comments we have provided are useful.

Sincerely,



Gary Bahr, Senior Scientist
Natural Resources Assessment Section Manager
Washington State Department of Agriculture
P.O. Box 42560
1111 Washington ST SE Olympia, WA 98504
(360) 902-1936
Gary.Bahr@agr.wa.gov



Toby Primbs, Ph.D.
Pesticides Compliance Program Manager
Oregon Department of Agriculture
Natural Resource Policy Area
635 Capitol Street NE
Salem, Oregon 97301
Tprimbs@oda.state.or.us

Pc:

Kelly McLain, Policy Advisor, Directors Office, WSDA
Stephanie Page, Director of Natural Resources Program Area, ODA
Rose Kachadoorian, Pesticides Program Manager, ODA
Robin Schoen-Nessa, Assistant Director, Pesticide Management Division, WSDA
Tim W. Schultz, Acting Compliance Program Manager, Pesticide Management Division, WSDA
George Tuttle, Toxicologist, Directors Office, WSDA
Victor Mason, Administrator, Division of Agricultural Resources, Idaho Department of Agriculture
Bob Blankenburg, Solid Waste & Pesticide Programs Manager, Alaska Department of Environmental Conservation

See Attachment 1

Attachment 1. Current and historical clopyralid issues in Washington and Oregon, and more detailed comments on the clopyralid proposed interim decision

Current and Historical Clopyralid Issues in Washington State:

- In 1987 several pesticide products containing the active ingredient clopyralid were registered for use on various crops, pasture, and rangeland. Clopyralid has proven to be a useful and popular herbicide in pastures, rangeland, cereal grain production, and non-crop uses. Clopyralid phytotoxicity in non-target crops were initially observed in potatoes grown in Washington State in 1989 after the product Curtail (a.i. clopyralid) had been applied to wheat the prior year. Curtail had been initially labeled with a 12-month plant-back restriction, but residue carryover to a crop rotation of potatoes affected plants and deformed tubers in several Central Washington fields. The plant-back restriction on the label were then increased to 18-months, which appears to have been effective.
- In the Mid-1990's, "Confront" herbicide, containing clopyralid, was registered for use on lawns. Some homeowners experienced symptoms on susceptible plants after spreading clippings onto gardens. Susceptible tree species such as linden, crimson king maple, and honey locust also showed symptoms of clopyralid damage if turf areas adjacent to those trees were treated. In 1999, several greenhouse locations in Spokane, WA began experiencing issues. Several complaints were investigated and compost contaminated with clopyralid was suspected/determined to have caused the damage in those instances.
- In the spring of 2000 there were a number of greenhouse and garden complaints received by WSDA in the Spokane, WA area. One greenhouse reported damage to 700 tomato plants planted into straight compost. Symptoms observed included, a fiddle neck appearance at growing points and distorted leaves. Clopyralid was detected in the compost and plant foliage. It was learned that widespread use of clopyralid on lawns was a common practice, and the City of Spokane had started a curbside vegetation collection with lawn debris going to a large-scale city-owned compost facility. Sample analysis and bioassays found the clopyralid was not degrading during the composting process. Clopyralid is active on sensitive plants at levels in the low ppb when compost is used as planting medium. Symptoms were observed below available laboratory detection abilities. During this same time many other cities in Washington were creating or contracting for composting of curbside collected vegetation to help reach a mandate to recycle 50% of solid wastes generated.
- In November of 2001 WSDA convened a technical advisory committee for recommendations. Representation included: Composters (municipal/private), Organic Farming, Lawn Care Applicators, Golf Course Maintenance, Wheat Growers, Hay Growers, Forest Industry, Other Special Interest (Lobbyist), WSU Extension/Research, Dow AgroSciences, Regulatory Agencies. Emergency Rules restricting clopyralid use went into effect in March 2002 and permanent rules effective June 2002 (WAC 16-228-1235 & 12371).
 - Washington administrative code (WAC) 16-228-1235¹, *Who can sell pesticides containing the active ingredient clopyralid?* requires that, "(2) Pesticides containing clopyralid and labeled for uses on sites/crops in addition to cereal grains, grass used for hay, lawns and turf including golf courses may be sold by licensed dealers to noncertified applicators if the noncertified applicator signs the sales invoice or sales slip

¹ <https://apps.leg.wa.gov/WAC/default.aspx?cite=16-228-12352>

indicating that the pesticide will not be applied to cereal grains, grass used for hay, lawns and turf including golf courses.”

- Under WAC 16-228-12371², “(1) When labeled for use on lawns and turf including golf courses, pesticides containing the active ingredient clopyralid may be applied on golf courses if no grass clippings, leaves or other vegetation are removed from the site and placed in composting facilities that provide product to the public. (2) Before applying pesticides containing the active ingredient clopyralid on a golf course, the commercial applicator must give written notification to the appropriate grounds keeping personnel that no grass clippings, leaves or other vegetation may be removed from the site and placed in composting facilities that provide product to the public.”
- The rules prohibit the use of clopyralid containing products on all residential, commercial, playfield, park, cemetery, and turf sites and still allows use on golf courses as long as clippings do not leave site. The rules also made clopyralid a restricted use pesticide in Washington when labeled for sale and use on cereal grain, grass used for hay, lawns and turf including golf courses. Composters were advised to know who their vendors are for feedstock material and identify their sources of incoming feedstock(s) that go into the finished compost to help prevent contamination. Composters were also advised to do bioassays on feedstock and finished compost.
- Between 2001 and 2003 WSDA sampled compost manufacturing facilities across Washington State as part of a clopyralid residue testing program. It was noted that with the WSDA rules in place along with education of applicators and compost facilities, there was a notable reduction in detections between 2001 and 2003. The 2002 WSDA clopyralid rule seemed to be effective in reducing the occurrence of clopyralid from most compost, however due to the clopyralid in compost detections, the City of Spokane had to close their compost facility and claimed a multi-million-dollar loss. They settled with Dow in 2012.
- In 2004 the Woodland Park Zoo, Seattle, WA had to cancel their popular, annual “Zoo Doo” compost event as it was found to have been contaminated with clopyralid. The zoo quickly arranged to have only clopyralid free timothy hay grown and delivered for animal consumption and clopyralid free straw delivered for bedding.
- Then in 2009 WSDA first noted a newer chemistry, aminopyralid, was possibly causing compost problems in hoop houses with newly planted tomatoes, beans, peppers and other sensitive crops in Whatcom and Clark County. Between 2009 and 2010, WSDA found aminopyralid and clopyralid detections in samples submitted from dairy manure, compost, and feed materials from Whatcom County locations. At least 26 complaints were investigated with many more people also saying they had symptoms in their garden plants. Four of the complaints were in King and Kitsap Counties.
- In July and August of 2016 WSDA found compost containing 37 ppb clopyralid caused symptoms in a large garden. This compost was traced back to a large compost facility processing municipal solid waste and some agricultural materials.
- Just recently in June 2020, a Walla Walla, WA composting facility receiving manure from dairy locations in the Yakima Valley has found clopyralid detections in its finished compost.

² <https://apps.leg.wa.gov/WAC/default.aspx?cite=16-228-12371>

Although most urban sources of clopyralid have been significantly reduced by WSDA's clopyralid rules and labeling precautions on herbicide products containing clopyralid have helped to warn against the use of treated crop materials in compost, residual residues are still detected regularly in compost due to properly made applications to targeted crops at labeled rates and timing. This is because there still exists a significant disconnect with information sharing between the applicator, the land owner/manager, and the composter, that ultimately effects both the finished compost and end user.

Current and Historical Clopyralid Issues in Oregon:

- In 2003, ODA issued a rule prohibiting clopyralid use outside of a few specific types of sites. A task force at that time had reported that grass clippings were found to be the source of problem. On sites where clopyralid use is allowable, grass clippings or other material from a treated site are prohibited for use in compost. The limitations on pesticide products containing clopyralid are listed in OAR 603-057-0378³: (1) Any application or use of a pesticide product known to contain the active ingredient clopyralid to a location other than an agricultural, forest, right-of way, golf course or cemetery site is prohibited. (2) For the application or use of a pesticide product containing clopyralid on a site allowed under (1) above, all applicable label instructions must be followed. Providing grass clippings or other materials from a treated site for use in compost is prohibited. Failure to comply with these rules and label restrictions may result in one or more of the following actions: civil penalty, license revocation, license suspension or refusal to issue or renew the license or certification of an applicant, licensee or certificate holder in accordance with ORS 634.322(4).
- In spring of 2014, a potting soil mix (blend of multiple ingredients) was found to be contaminated with clopyralid. The potting soil company who had produced the mix had utilized a horse manure as one of the components in their blend. The horse manure was determined to be the source of the clopyralid. The horses had grazed on a field that had been treated with a clopyralid product.
- In 2017, Japanese Ministry of Agriculture requested the suppliers of hay in the United States (Oregon), Canada, and Australia, to refrain from applying clopyralid on product shipped to Japan, regardless the established maximum residue level established by Japan. The Oregon industry agreed to issue guidance to industry members to not use Clopyralid.

Currently in 2020 there are several Non-agricultural Use Follow-up Investigations in Oregon regarding clopyralid contaminated compost:

- In May of 2020 ODA initiated Non-agricultural Use Follow-up Investigation #200408. Laboratory analysis from a gardener's plant sample that was collected by ODA confirmed the presence of clopyralid. Samples from their soil/compost supplier did not come back with measurable clopyralid. ODA is currently looking at any other potential inputs brought onto the customer's property by the customer that could have potentially lead to the measurable level of clopyralid in the gardener's plant sample.
- In May of 2020 ODA also initiated Non-agricultural Use Follow-up Investigation #200405 after reports of suspected pesticide contaminated soil/compost was delivered to homes. Laboratory analysis from the customers' soil and plant samples, plus soil/compost samples from their distributor, confirmed the presence of clopyralid. ODA is currently working with the suppliers of this

³ <https://www.oregon.gov/oda/programs/Pesticides/Documents/2020/PesticideAdvisory062620.pdf>

soil/compost distributor to identify the source of contamination. This is an ongoing investigation, but to date two ingredients that are especially being looked at are a cow manure source that appears to have come from a third-party manure broker who had sourced the material from a feedlot operation and the second ingredient appears to be mushroom compost.

- In June of 2020 ODA initiated Non-agricultural Use Follow-up Investigation #200481. Laboratory analysis from both the newly identified soil/compost distributor and customers have shown clopyralid in mushroom compost.
- Additional reports with similar concerns have been submitted to ODA since June 2020 and ODA is also looking into these concerns.

General Comments from WSDA and ODA regarding the Clopyralid Proposed Interim Decision:

Clopyralid persistence in manure and compost is an issue for both Oregon and Washington. Compost trials using bioassays show that moderate to severe damage of sensitive plants can occur at clopyralid concentrations in soil of less than 10 ppb; this damage can occur at levels lower than the analytical quantification limit abilities of most state and commercial labs. Thus present laboratory ability to measure clopyralid and similar active ingredients at trace levels (<10 ppb) in complicated matrices like manure and plant tissue is limited and insufficient. In addition, laboratory prices are likely to be costly and there is no program to reimburse that cost.

Bioassays were not discussed in the Proposed Interim Decision (PID), however conducting bioassays⁴ is currently the most effective way to avoid the potential for phytotoxicity to sensitive plants and crops from the use of the compost containing residual herbicides. Bioassays can help determine if compost has the potential to damage crops due to the presence of residual herbicides or other unrelated reasons. Although it should be noted while bioassays can assess the potential of herbicide presence at bioactive concentrations below 10 ppb, they will not be able to identify the specific herbicide (e.g. clopyralid, aminopyralid, picloram, etc.).

Some compost companies have opted to start utilizing bioassays on a more frequent basis with an analytical testing program on a less frequent basis (due to the analytical testing cost and lack of quantification limit at lower bioactive concentrations) for evaluating finished compost at composting facilities. There is a need for EPA to develop clear guidance and standard protocols for bioassays as their use is expected to continue to be relied upon heavily to mitigate potential phytotoxicity from herbicide carryover. It seems appropriate that EPA should work both internally and externally to develop the necessary guidance for the successful standardization of bioassays including the interpretation of their results and potentially collection of data for future analysis and consideration to determine if label changes are effective.

Disproportionate Burden:

The use of clopyralid has benefitted some sectors of the agricultural economy, however its use has been detrimental to other sectors. The potentially detrimental impacts of clopyralid contaminated compost and manure on other sectors of the agricultural economy, including organic production has not been addressed in the PID. The states of Oregon and Washington both have significant amounts of organic

⁴ https://s3.wp.wsu.edu/uploads/sites/411/2014/12/PDF_Clopyralid_Bioassay.pdf

production and the contamination and carryover of clopyralid in compost can create a disproportionate burden on producers of organic compost and producers of organic crops.

Organic farms cannot use synthetic fertilizers and therefore rely heavily on manure and composted materials to meet plant nutrient needs, much of which comes from conventional farms. If animals are fed crops which were treated with clopyralid, and that information is not disclosed, it is very possible that an organic producer could unknowingly receive a load of clopyralid contaminated manure. As a consequence, a farm's organic certification could be invalidated, and result in very significant financial loss. Financial losses potentially include the loss of one or more years crop yield if fields or orchards are damaged, costs associated with loss of organic certification, and the costs associated with non-organic status transition due to not being able to use the organic marketing label.

Because of those potential risks, there is a disproportionate burden placed on producers of organic compost and producers of organic crops. They pay for laboratory analysis and bioassays to assure that crops will not be damaged and jeopardize their organic certification. Currently all costs are borne by the producers of organic compost and producers of organic crops, and not the registrants, applicators, and the providers of animal feed that benefit from the use of clopyralid.

The EPA does not regulate organic production but the EPA does regulate pesticides under FIFRA and it seems appropriate that they should take into consideration the additional risk and burden that other agricultural sectors such as organic producers face in dealing with compost that could be contaminated with clopyralid and other residual herbicides.

WSDA and ODA request that EPA:

- Develop clear guidance and standard protocols for bioassays,
- Require for the registrants to generate data on how to best facilitate the breakdown of clopyralid in compost, due to the potential of accidental introductions of contaminated base components, and
- Address the disproportional costs borne by the non-users of clopyralid.

Comments Regarding Section 3. Measures to Address Potential Compost Contamination

a. Expansion of Residential Turf Prohibition: WSDA and ODA support EPA's proposal to expand the current residential lawns/turf prohibition to include school grounds.

b. Compost Prohibition, Notification, and Recordkeeping: WSDA and ODA support EPA's proposal to adopt label language to reduce the potential for clopyralid contamination of compost by requiring that applicators notify property owners/operators in writing, due to the fact that property owners/operators deserve to be notified about the potential risks associated with using treated plant material, that clopyralid is a persistent herbicide, and that plant material and manure potentially containing clopyralid is not allowed to be used in compost, mulch, or mushroom spawn.

WSDA and ODA agree that notification should include the name of the applicator, the date of application, the area(s) treated, the name and EPA registration number of the product applied, information on the persistence of clopyralid, and information on the composting prohibition. The notification should also instruct owners/operators not to use treated plant materials or manure from animals that have grazed on treated forage for compost, mulch, or mushroom spawn.

WSDA and ODA support EPA's proposal to require recordkeeping where applicators must retain a record describing how the property owner/operator was notified.

WSDA and ODA support EPA's proposal to require the following information be retained as part of the recordkeeping requirement: name of the applicator, date(s) of application, information on the area(s) treated, the EPA registration number of the product applied, a copy of the written notification provided to the property owner/operator, and the date that notification of the property owner/operator occurred.

EPA's proposed language for the proposed composting prohibition, notification, and recordkeeping requirement to include:

"This product is persistent and may be present in plant materials for months after application. Do not use, or allow to be used, treated plant material or manure from animals that have grazed or consumed forage from treated areas for compost, mulch, or mushroom spawn."

We suggest the following changes would improve the clarity and enforceability of this statement:

"This product is persistent and may be present in plant materials for months **to years** after application. Plant materials or manure from animals that have grazed in treated areas or consumed **plant materials treated with this product are strictly prohibited** from use in compost, mulch, or mushroom spawn. **Applicators must document that they have advised property owners and land managers of this prohibition**".

WSDA and ODA do not support EPA's proposal to require a holding time for treated plant material that may be used in compost or an extended pre-harvest interval (PHI) for grains and feed that may be consumed by livestock in lieu of a composting prohibition at this time due to our understanding of the persistent nature of clopyralid in compost and manure. Clopyralid breaks down slowly during the composting process, especially when temperatures are not adequately high. Clopyralid will eventually break down, however the exact time of breakdown may vary greatly depending upon the environmental conditions and the initial amount. Washington State University extension researchers have found that compost piles containing clopyralid in trace amounts between 1-10 ppb are sufficient to damage sensitive plant species several years after the compost was finished and cured. Depending on the specific situation some field reports indicate that breakdown can take as long as three to four years. This would quickly result in stockpiles of contaminated compost and manure, which is not an option for composters in most states, or the materials would need to be transported off site and applied to a field where non-sensitive crops are grown, such as wheat or corn which is costly and may still result in a backlog of unused manure.

Based on the experience of our two agencies and the experience of composting facilities in our two states, we have observed that a holding time of several years or more could be required to give treated materials, manure, and compost the appropriate amount of time to degrade under typical conditions. We do not believe that a holding time on the order of several years would reflect a feasible requirement or even be possible to enforce. A composting prohibition is a better option than a holding time for treated plant material or an extended PHI. A composting prohibition would create less confusion, create less of a regulatory burden for producers, and be far less likely to result in stockpiles of contaminated compost and manure.

c. Education and Stewardship Plans: WSDA and ODA appreciate EPA's proposal to require that educational materials on clopyralid be developed by the registrant to reinforce the importance for applicators to communicate with landowners and land managers on ways to prevent clopyralid from entering compost. We agree that the three elements EPA has proposed to be part of the educational materials are appropriate and believe that those elements: "(1) the persistence of clopyralid and information on how long it may last in compostable materials and manure, (2) how property owners/operators should treat materials treated with clopyralid on their property, and (3) any compost/manure label restrictions." be included in the information that is provided by the pesticide applicator to property owners/operators.

As many applications are commercially applied we also recommend that an additional element should include information regarding plant-back restrictions and sensitive crop types as property owners/operators may not be the actual applicators, and therefore may not read the label themselves.

We are also pleased to see that EPA is aware of the additional need to develop educational materials for landowners/operators, composting facilities, and end users of compost and manure that include organic producers and gardeners regarding the unique challenges of managing chemicals like clopyralid. We agree that these educational materials should be developed with input and participation from EPA and stakeholders that include SLAs, university extension, and industry associations with representation from organic producers that have past experience with this topic. Past experience in Washington and Oregon suggests that educational materials have been very effective in reducing clopyralid contamination however we have also observed that there is a need to periodically reinforce outreach and education efforts.

WSDA and ODA would like to see a formal commitment from EPA and the registrants to share, a) how they plan to distributed materials to applicators and non-applicators, b) a timeframe for developing materials, c) how frequently materials will be updated with any new information to reflect label or other regulatory changes, and d) how registrants plan to coordinate efforts with other clopyralid registrants.

d. Revision of Compost Pictogram: We agree that it is useful for EPA to include a pictogram on labels and we agree with EPA that the current pictogram could be improved. Although the revised pictogram that EPA is proposing in the PID may appear to be less complex, it is still confusing and provides both different information and less information than the current version and may actually create more confusion than the current pictogram even though it appears less complex. The current pictogram actually provides a better list of treated sites than is listed in the revised pictogram; for example the list of treated sites should also include cereal grains which are currently not listed on the current pictogram. The revised pictogram lists "rights of way, non-crop, or natural areas" however it is unlikely that considerable levels of clopyralid contamination would be coming from those sources and ending up in compost as they are generally not a primary source for composting feedstock. Rights of way, non-crop, or natural areas could be included in the list but should not replace the list of use sites that are on the current pictogram as clopyralid contamination is predominantly coming from applications to rangeland, pasture, hayfield, wheat, corn, and CRP as the current pictogram more or less depicts. While we agree that the pictogram should clearly communicate that manure and plant material exposed to clopyralid should not be composted, we also think that there is value in retaining that part of the pictogram showing fields where manure and plant material can be applied (rangeland, pasture, hayfield, wheat, corn, CRP) and fields where manure and plant material can't be applied (sensitive crops: potato, beans, etc.) as the current pictogram illustrates. Because any plant material that is treated with clopyralid (effectively all use sites) could find its way into compost directly or indirectly through animal manure, it

may be more helpful to simplify the pictogram by illustrating that any plant material (all use sites) treated with clopyralid should not be composted and that manure from animals fed with plant material treated with clopyralid also should not be composted. We suggest that EPA includes a pictogram on labels but does not replace the current pictogram with the revised pictogram that is presented in the PID.

Furthermore the current and revised pictograms actually serve to highlight the need for high quality educational materials and a notification requirement as proposed by EPA in this PID. Again, this is because although some version of the pictogram should appear on all labels, applicators may not be the individuals responsible for composting the manure from animals that consumed treated material and may not be the individuals responsible for composting the waste bedding or other treated plant material.

Comments Regarding Section 4. Spray Drift Management

WSDA and ODA are in favor of EPA adding the following language to the label regarding spray drift management, "For ground and aerial applications, select nozzle and pressure that deliver medium or coarser droplets as indicated in nozzle manufacturers' catalogues and in accordance with American Society of Agricultural & Biological Engineers Standard 572.1 (ASABE S572.1)."

Comments Regarding Section 5. Non-target Organism Advisory

WSDA and ODA are in favor of EPA adding the following language to the label regarding potential risks to non-target organisms, "NON-TARGET ORGANISM ADVISORY: This product is toxic to plants and may adversely impact the forage and habitat of non-target organisms, including pollinators, in areas adjacent to the treated site. Protect the forage and habitat of non-target organisms by following label directions intended to minimize spray drift."

Comments Regarding Section 6. Proposed Water Advisories

WSDA and ODA are in favor of EPA adding the proposed label language regarding protection of surface water and groundwater based on the fate and transport properties of clopyralid.

Comments Regarding Section 7. Herbicide Resistance Management

WSDA and ODA are in favor of EPA adding the proposed label language regarding herbicide resistant management as herbicide resistant weeds in agriculture are a widespread problem and of significant concern.