

To the Arkansas State Plant Board:

I am the Bird Conservation Director for Audubon Arkansas, state office the National Audubon Society. I have a doctorate in natural resources from Purdue University and have devoted my career to the study and protection of birds and their habitats. On behalf of Audubon and our 600,000 members nationwide who are passionate about protecting birds, I am writing to strongly urge you to reject Huntington Tyler Hydrick's request for rulemaking. Please keep all of the state-level restrictions that reduce off-target damage and protect all sectors of agriculture and the public.

This petition must be rejected on the fact that there has been no research to support Mr. Hydrick's claims nor any change to existing regulations. The Arkansas Pesticide Use and Applications Act and Rules section 20-20-206(a)(2) reads "In issuing regulations, the State Plant Board shall give consideration to pertinent research findings and recommendations of other agencies of this state, the federal government, or other reliable sources." Further, in the Arkansas Pesticide Control Act and Regulations, Regulation No. 7 says, "Research conducted by scientists from universities within the state will be the primary source of expertise to allow the Board to determine if the data is scientifically sound and relevant to the growing and cropping conditions in the state of Arkansas." As I will cite below, research from the University of Arkansas and elsewhere supports even tighter restrictions to prevent off-target impacts.

Herein I am going to counter the false statements and unsubstantiated claims Mr. Hydrick makes in his request.

I.f. All states, other than Arkansas, have adhered to the federal label with no need for additional restrictions to the federal accepted labels.

This is patently false. There were five other states with special restrictions in 2020:

- **Illinois**—June 20, last day to apply, June 21 prohibition begins. Also imposed an 85 degree F maximum application day temperature along with additional prohibitions around residential and natural areas. <https://www2.illinois.gov/sites/agr/Pesticides/Pages/Dicamba.aspx>
- **Indiana**--June 20, last day to apply, June 21 prohibition begins. <https://www.oisc.purdue.edu/pesticide/dicamba.html>
- **Minnesota**—June 20, last day to apply, June 21 prohibition begins. <https://www.mda.state.mn.us/dicamba>
- **North Dakota**--June 30, last day to apply, July 1 prohibition begins. <https://www.nd.gov/ndda/news/news-release-north-dakota-specific-label-announced-dicamba>
- **South Dakota**--June 30, last day to apply, July 1 prohibition begins.

Illinois, Indiana, and North Dakota have announced similar restrictions for 2021. The Indiana Pesticide Review Board recently classified dicamba as a Highly Volatile Herbicide, thus prohibiting the sale, distribution, or use of it without written permission from the Office of Indiana State Chemist.

In addition, land grant universities have offered these recommendations:

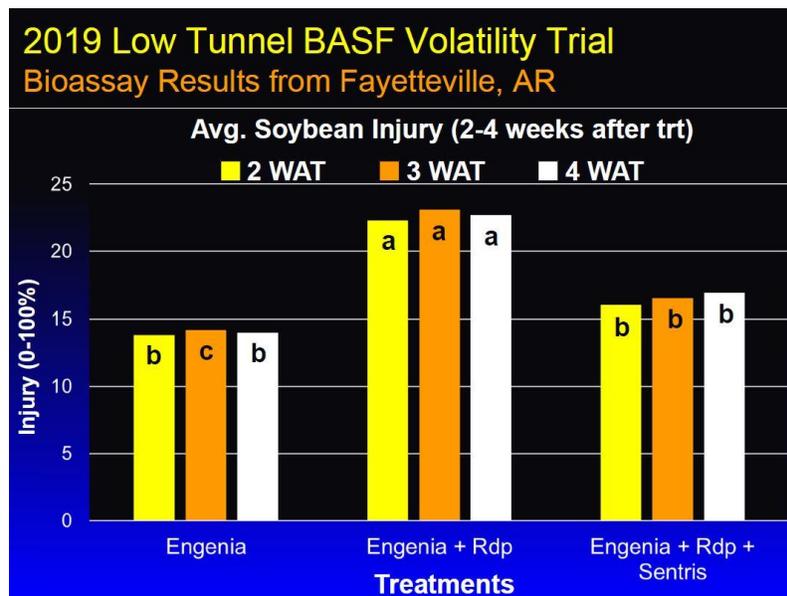
- IL, IN, OH--80 degree F maximum application temperature
- IA—Pre-emergence use only
- ND--No dicamba applications after June 20

- TN—only apply if the expected high temperature of the day is less than 85°F or before June 15, whichever is more restrictive.

It is important to note that the recommended soybean planting time-frame in Arkansas is a month earlier than in those more northern states. Thus their late June cutoffs are equivalent to our May 25 cutoff.

I.h. The main goal of the new dicamba formulations was to reduce this change of state. Although they do not eliminate volatility, reduction in volatility has been shown across other states, the products claim they will. It should be noted that dicamba is not the only herbicide to volatilize.

On December 2, 2020, Dr. Norsworthy presented volatility reducing agent (VRA) research to the Board. He tested Engenia + Roundup + Sentris (the only VRA approved by the EPA at the time). He found that although Sentris reduced volatility, the resulting volatility level was still a bit higher than Engenia alone, as shown in the graph below. Thus at best a VRA is only effective when Roundup is in the tank mix. Under current regulations, which Audubon urges you to maintain, glyphosate is not permitted in the tank mix.



Because dicamba alone has caused documented off-target damage to crops, yards, natural areas and more, the new EPA requirement of adding a VRA to the mix does NOT justify removing state-level restrictions in favor of the full federal label. It should be noted that after Dr. Norsworthy’s presentation on this and other research findings in December, the Board voted to maintain restrictions on dicamba. At the March 3, 2021, meeting Dr. Norsworthy was not invited to speak on the science after Mr. Hydrick’s presentation.

At the December 2 meeting Dr. Norsworthy also presented that air sampling at the Keiser research station found dicamba in the air on 32 of 39 days of sampling in June and July. Only for a few days after a rain was dicamba not detected. I repeat, **dicamba was regularly in the air at detectable levels!** What more proof do you need of volatility and atmospheric loading? What effect is all this dicamba in the air having on human health? What about the other herbicides that volatilize?

Multiple independent weed scientists continue to warn that dicamba is volatile. There is zero peer reviewed science showing that the Xtend Technology or any of the products used in the technology are not volatile. Any claims that the humidome studies performed in Monsanto's environmentally controlled lab test mimic field conditions are absurd. The widespread spraying of dicamba across millions of acres and multiple states has been an uncontrolled experiment revealing the problems with dicamba's chemistry.

Claims that EPA has tested this technology is nonsense as the EPA was only taking the Registrant's (Monsanto's) data as proof the product is safe. The same registrant that ironically named the first product XtendiMax with "Vaporgrip" tells everyone they knew the product vaporized and thought a catchy marketing phrase would suffice as data. The same registrant that for five years has said their product is not causing the damage has now admitted their product requires a VRA. There are reports that the registration was wrought with political pressure to approve; more on that below.

If Monsanto/Bayer actually has a product that performs as promised, why have they not had field trials in multiple states and counties proving the lack of volatility? Instead they have argued with and attempted to discredit every university scientist that has performed field trials with their product.

The registrants have continued to claim the herbicide itself is not dangerous when applied correctly. The federal label describes all the conditions and restrictions on application, with more added each year in an attempt to deal with dicamba's volatility. Such tight restrictions provide few days of ideal conditions for spraying, forcing applicators to spray against the label. When they do, all the blame falls on the applicators for misusing the product and not the manufacturers for releasing a product that is rarely safe to use in the field.

I.i. Physical drift is a concern of not just dicamba, but every pesticide used.

Physical drift of dicamba and other herbicides is very much a concern, and every effort should be made to prevent drift of any volatile herbicide. The EPA's label restrictions on dicamba attempt to deal with drift during application. However, Audubon's primary concern with dicamba is volatility. Dr. Norsworthy has repeatedly presented his findings and the findings of other weed scientists on dicamba's volatility. Their science is clear that volatility occurs hours to days after application and cannot be controlled by the applicator. As stated above, so far there is no evidence that a VRA reduces volatility of dicamba alone. When dicamba is sprayed across millions of acres during warm temperatures, volatility leads to atmospheric loading and widespread damage to off-target plants. A whole field of dicamba-sensitive soybeans showing cupping from end to end is a sure sign of dicamba's volatility.

I.j. The movement of pesticides in a temperature inversion ... should not be confused with volatility. These two phenomena are similar in their appearance when an inversion disperses over a wide area.

This is a confusing statement. A temperature inversion moves gaseous dicamba across a wide area BECAUSE dicamba is volatile. If dicamba were not volatile, it would not be moved by a temperature inversion. Volatile dicamba can move with or without a temperature inversion.

When Dr. Norsworthy presented to the Board on December 3, 2019, he reported dicamba was detected at its highest concentration from 0.5 to 8 hours after application into stable air. The cause of the high level of dicamba detected was believed to be a combination of suspended particles in the inversion and

volatilization into the inversion. When dicamba was applied during unstable conditions, its detection was greater when applied during stable conditions for the sampling periods of 8 to 16, 16 to 24, and 24 to 48, and 48 to 72 hours after application. A high level of volatilization when applied during unstable conditions resulted in persistent detection of the herbicide over time. From May 9 to July 31, there was a temperature inversion every day at Keiser, with the exception of one day in June. Similarly, there were five or fewer days at Crawfordsville and Marianna when an inversion failed to occur. On some days, especially at Keiser, weak inversions seemed to persist throughout most of the day. At Keiser, daily inversions formed on average at 5:12 PM, 4:08 PM, and 4:39 PM for the months of May, June, and July, respectively. Based on these results and observations regarding spray applications, it appears likely that some spraying, regardless of pesticide, is occurring during times of the day when inversions are present or beginning to form.

Bish et al. (2019)¹ at the University of Missouri state “Some of the most problematic regions for dicamba injury in 2017 and 2018 were in the Missouri Bootheel, northeast Arkansas, and western Tennessee. These areas typically have much lower wind speeds relative to other areas, and this region is prone to inversions during the growing season. It is possible that the stable atmosphere in these regions would allow herbicides, including dicamba, to remain concentrated in the air and unable to disperse. These regions typically have higher rates of annual herbicide usage compared to other regions. The combinations of stable atmosphere with high use rates may explain much of the observed “landscape” effects of dicamba damage.” Furthermore, they show a map of the U.S. depicting days with wind speeds above 8.9 mph. The Missouri Bootheel, northeast Arkansas, and western Tennessee region generally have fewer than 10 days in a typical growing season when wind speeds exceed 8.9 mph.

The frequent presence of temperature inversions makes dicamba highly likely to move off the field of application.

I.k. The EPA has restricted the use of dicamba after June 30 and July 30 in soybean and cotton, respectively.

In this case, following the EPA’s restrictions does NOT mean following best available science. Politics interfered with the science.

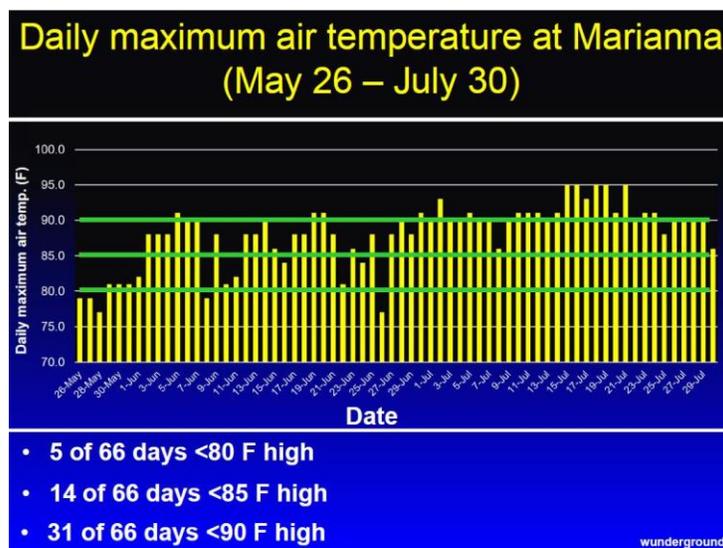
In 2018, the Democrat-Gazette reported that EPA administrators ignored their own scientists’ recommendations and cut back no-spray buffers from 443 feet to 57 feet for endangered species. On March 10, 2021, Michal Freedhoff, Acting Assistant Administrator of the EPA Office of Chemical Safety and Pollution Prevention (OCSPP), sent an email acknowledging that under the previous administration “political interference sometimes compromised the integrity of our science.”² Further, she stated “in 2018, OCSPP senior leadership directed career staff to: (1) rely on a limited data set of plant effects endpoints; (2) discount specific studies (some with more robust data) used in assessing potential risks and benefits; and (3) discount scientific information on negative impacts. This interference contributed to a court’s vacating registrations based on these and other deficiencies, which in turn impacted growers’ ability to use this product.” **The 2020 registration decision was also made under the previous administration so it stands to reason that politics played a role then too.** The 2020 registration of the same products was made a mere four months after the court-ordered vacatur, just six days before

¹ Bish, Farrell, Lerch, and Bradley. 2019. Dicamba Losses to Air after Applications to Soybean under Stable and Nonstable Atmospheric Conditions. Journal of Environmental Quality.

² <https://www.dtnpf.com/agriculture/web/ag/crops/article/2021/03/12/epa-ignored-science-past-dicamba-new>

Election Day and without any public notice or comment. It is hard to believe that the EPA addressed the judge's orders in that short time-frame. This was a rushed decision ahead of a possible change in administration, with a five-year registration clearly aimed at binding the hands of the next administration. Notably, the EPA is now rejecting states' requests to use a 24(c) special local needs label to move the spray date even further into the growing season.

The science is clear from multiple independent weed scientists that the new formulations of dicamba are volatile even days after application. Bish et al. (2019) could detect it 72 hours (SIX DAYS) after application. They concluded "dicamba formulations might best be used in the early stages of the growing season, to control weeds prior to soybean planting instead of controlling weeds once the crops are established. This would limit the number of sensitive crops and plants actively growing at the time of applications." Dr. Norsworthy reiterated this to the Board on December 2, 2020, stating that dicamba should be used as a pre-emergent or early post-emergent. He also presented data on how frequently daily highs were above 80 degrees after May 25 in 2020:



In the EPA's December 3, 2020, presentation to states on the latest dicamba label changes, they stated "Mandatory cutoff dates reduce the potential for applications when temperature can result in volatility."³ In their *Memorandum Supporting Decision to Approve Registration for the Uses of Dicamba on Dicamba Tolerant Cotton and Soybean*, the EPA admits on page 14 that "because the dates are the same in all 34 states and the meteorological data vary across these geographies, the magnitude of the protective certainty of cut-off dates is not uniform across the 34 states." Perhaps in Minnesota there are not too many 80+ degree days before June 30, but that is not the case in Arkansas. **The EPA did not intend for the June 30 cutoff to be applied uniformly across the country when the date-temperature relationship is clearly not uniform, and because high temperatures play a large role in volatility.**

Year after year the manufacturers and the EPA have had to impose tighter and tighter restrictions in an effort to prevent off-target impacts. It hasn't worked yet. And now we are all supposed to believe that the June 30 soybean and July 30 cotton cutoffs are going to work in Arkansas. The EPA may be taking a wait-and-see approach to this new restriction, but you don't have to. The science is clear. The Plant

³ <https://aapco.org/2015/07/02/dicamba>

Board can continue to be proactive and follow the best available science in addressing this dicamba dilemma by maintaining current state-level restrictions.

I.I. Some herbicides, like dicamba, have very distinct damage that may show up on unintended vegetation; however, this damage in most cases is nothing more than superficial due to the significantly less than lethal rate that has dispersed over the distance traveled. These rates are typically so small that it is impossible to replicate the amount in small-plot research. In almost all cases, the injured plants will return to normal growth habits that never hinder their ability to reproductively produce at a level that is not different than if the injury never occurred.

Another patently false statement. Assuming Mr. Hydrick is referring solely to soybeans, the science is clear that yield loss does occur.⁴ The University of Nebraska found it is related to growth stage at time of exposure, level of exposure, and environmental conditions after exposure.^{5,6} This table shows average yield and percent yield losses after researchers applied 1/10 of the labeled Engenia rate at different growth stages:

Growth stage at application	Average yield	Average yield loss
Check (no dicamba)	59 bushels per acre	0%
Early vegetative (V2)	24 bushels per acre	59%
Late vegetative/early flowering (V7/R1)	3 bushels per acre	95%
Full flowering (R2)	19 bushels per acre	68%

Even very small concentrations of dicamba (1/1000 of the labeled rate) at V2 reduced yields by an average of three bushels per acre.

On December 3, 2019, Dr. Norsworthy presented to the Plant Board data from Dr. Dan Reynolds, Mississippi State University, showing soybean grain yield losses of 10% following exposure to a 1/1024 rate of dicamba, with even a one-time exposure costing a grower \$70.72/acre in lost yield. Further, multistate research evaluating the impact of multiple dicamba exposures to soybean revealed a yield loss of approximately 33% following three exposures of dicamba at 1/200 rate.

Bayer knows dicamba causes yield loss in soybeans. That is why they are offering a \$400M settlement to affected producers and making documenting yield loss a requirement for participation.⁷

Dr. Norsworthy also said to you on December 3 that although it is true that soybean plants exposed in early spring during vegetative growth have the greatest potential for recovery without yield loss, **the impact of a one-time annual exposure or multiple exposures on perennial species is unknown**, as stated by the EPA in fall of 2018. More on this below.

⁴ <https://www.farmprogress.com/crops/10-things-university-research-teaches-us-about-dicamba>

⁵ <https://cropwatch.unl.edu/2018/research-impact-dicamba-drift-non-dicamba-tolerant-soybeans>

⁶ <https://cropwatch.unl.edu/2019/effects-dicamba-micro-rates-yields-non-dicamba-soybeans>

⁷ <https://www.dicambasoybeansettlement.com/Home/Faq#faq7>

Similarly, the LSU AgCenter found that sweet potato yield was significantly reduced at both the 1/10 and 1/33 rates of dicamba.⁸ Despite Mr. Hydrick's claims, studies have found low doses of dicamba cause yield loss on watermelons,⁹ cantaloupes and cucumbers,¹⁰ grapes and tomatoes,¹¹ and more.¹²

What Mr. Hydrick also fails to recognize is that simply detecting dicamba residue in crops could result in revocation of organic certification and destruction of the crop for organic and specialty crop producers. Symptoms don't have to be present, and more is at stake than mere yield loss. If a surprise inspection reveals dicamba residues, it would mean the inability of the producer to meet their contracts with local restaurants, grocery stores, or other buyers; or may prevent delivery of the product to those who pre-purchase products from the farm. It then takes three years to regain organic certification. Monetary losses for the farmer could be significant. The Plant Board's job is to protect these farmers from adverse impacts.

I.m. Buffer zones have been placed on dicamba products ... These buffer zones are in place to protect non-target areas from damage that would be considered lethal or excessively damaging. ... The use of pH buffers raises the pH to acceptable levels that keep products where they are intended.

Buffers are in place to protect against drift. They do not prevent exposure through volatility. Volatile dicamba can move for miles in all directions. That is why entire fields of dicamba-sensitive soybeans show cupping from end to end, not just for a few hundred feet from one direction. I took the following photos in Phillips Co. on July 2, 2020. The left are dicamba-sensitive beans. Through binoculars I could see the entire field stretching into the distance was cupping. Immediately behind me was a field that must have been Xtend soybeans because they showed no symptoms.



⁸ <https://www.lsuagcenter.com/profiles/lbenedict/articles/page1616076776554>

⁹ <https://www.cambridge.org/core/journals/weed-technology/article/effects-of-lowdose-applications-of-24d-and-dicamba-on-watermelon/6758AA00D740EC7BF2537BFC1591E91D>

¹⁰ <https://www.cambridge.org/core/journals/weed-technology/article/effects-of-lowdose-applications-of-24d-and-dicamba-on-cucumber-and-cantaloupe/34BD57C3DB122CC3131D0CCB032F1301>

¹¹ <https://cropwatch.unl.edu/2018/sensitivity-grape-and-tomato-micro-rates-dicamba-based-herbicides>

¹² <https://www.dtnpf.com/agriculture/web/ag/crops/article/2017/04/04/crops-sensitive-dicamba-2-4-d>

In 2019 and 2020 Audubon led a community science project to document dicamba symptoms on native plants on public lands.¹³ As I presented to the Board on December 2, 2020, Audubon staff and trained volunteers made 363 observations of apparent dicamba symptomology on a variety of plants across 20 eastern Arkansas counties. Plant species impacted, which included sycamore, oak, pawpaw, redbud, and trumpetvine, were growing on public lands such as university research farms, wildlife management areas, city parks, cemeteries, and many county and state roads. A case in point is Chalk Bluff Natural Area, a 55-acre state preserve in Clay Co. on the St. Francis River. I observed that every oak, every elm, every redbud, and many other species showed leaf cupping. Symptomatic trees and vines were observed along the entrance road, in the parking lot, and in the interior all along a hiking trail, including at river overlooks. Pasture and forest border this natural area, but cotton is grown as close as a mile away, and throughout the region. Cupping soybeans were observed a mile away and scattered across Clay Co. I also observed symptoms on multiple plants at the Blytheville Public Library. Being in the heart of town did not protect this site, just like a one-mile buffer didn't protect the Keiser research station. Northeast Arkansas and the Missouri Bootheel region are areas of high dicamba use. Similar stories come from Illinois, Iowa, Indiana, Kansas, Missouri, Nebraska, North Dakota and South Dakota.¹⁴

As stated above, the pH buffers approved for use have not demonstrably reduced dicamba's volatility and will not keep dicamba in the field of application when sprayed during temperatures that cause volatility.

I.n. ... This strategy puts pressure on the LibertyLink system to maintain an unattainable level of control year after year. Once widespread glufosinate resistance in [sic] confirmed, there will be no other POST control methods available outside of dicamba and 2,4-D in soybeans and cotton.

Herbicide-resistant crop systems, in general, are particularly potent promoters of weed resistance. They encourage excessive reliance on the associated herbicide, as well as spraying later in the season when weeds are larger – both factors that accelerate resistance evolution. And their deployment in vast monocultures ensures that resistant weeds will emerge across huge areas. This explains why the vast majority of glyphosate-resistant weeds have arisen only since the widespread introduction of glyphosate-resistant (Roundup Ready) crop systems. Ironically, the need to control these same herbicide-resistant weeds resulting from the first generation of GMOs has now become the overriding pretext for introduction of the Xtend system. **After just two seasons of limited use of the Xtend system, agronomists were already reporting weed populations that appeared to be evolving resistance to dicamba as well.**¹⁵

The EPA states there are dicamba resistant weeds. "Yes, increased use of dicamba products for use on DT crops on millions of acres of cotton and soybean has created more selection pressure and has led to the selection of dicamba-resistant Palmer amaranth biotypes in Kansas and Tennessee. This rapid selection of an herbicide-resistant biotype was expected based on early research conducted at the University of Arkansas, which selected for dicamba-resistant biotypes in greenhouse studies and found it to develop within three generations."¹⁶

¹³ Audubon's report is available at <http://ar.audubon.org/dicamba>

¹⁴ <https://thecounter.org/dicamba-damaging-trees-across-midwest-and-south/>

¹⁵ <https://www.dtnpf.com/agriculture/web/ag/crops/article/2020/07/27/dicamba-resistant-palmer-amaranth>

¹⁶ <https://www.epa.gov/ingredients-used-pesticide-products/dicamba-2020-registration-decision-frequently-asked-questions>

There is an alternative to the herbicide-resistant crop system. **Regenerative agriculture** is a conservation approach to farming systems. It focuses on topsoil regeneration, increasing biodiversity, improving the water cycle, enhancing ecosystem services, supporting bio-sequestration, increasing resilience to climate change, and strengthening the vitality of farm soil.¹⁷ You can find these practices at work in Arkansas.^{18,19,20} Cover cropping has been shown to control pigweed. Cover crops planted after harvest are burned down in the spring, then rolled into the ground to create a thick mat that denies pigweed sunlight. Then the actual crop is sown using no-till, direct seeding. The Arkansas Soil Health Alliance is a non-profit that educates farmers on regenerative agriculture. These practices offer environmental and economic benefits for farmers.

Integrated Pest Management (IPM) is a sustainable, science-based, decision-making process that combines biological, cultural, physical, and chemical tools to identify, manage and reduce risk from pests and pest management tools and strategies in a way that minimizes overall economic, health and environmental risks.²¹ Applying pesticides on a routine basis, regardless of need, is not IPM. Applications of pesticides are always the last resort in an IPM program. Walmart just announced their new Pollinator Initiative.²² They cite science that says pollinators, and consequently food production, are at risk from factors like intensive agricultural management and pesticide use. They pledge to source all of their fresh produce from growers certified to be using IPM. Arkansas producers need to be protected from chemical trespass so they can take advantage of this opportunity from an Arkansas-based company.

II.a. It is only fair that Arkansas growers paying a premium for the seed technology receive a premium herbicide to control the State’s most troublesome pest.

Bayer says their Xtend soybeans have “high-yielding performance.” At a past Plant Board meeting Monsanto’s Government Affairs Manager Rachel Hurley stated that Xtend beans still add value for farmers even without spraying dicamba because of increased yield bred into the technology. Even farmers who feel forced to plant Xtend crops in self-defense can reap this benefit.

II.c. Since release in 2017, we have been able to observe reduced complaints where applications were made within the rules and observe surrounding states each year.

In Arkansas, the number of complaints has NOT declined, it has remained relatively steady even as the number of total complaints has grown. From the Plant Board’s Monthly Dicamba Case Status Update Summary:

Year	Total case files	Total alleged dicamba case files	dicamba/total
2018	465	200	43%
2019	462	210	45%
2020	514	217	42%

¹⁷ <https://regenerationinternational.org/why-regenerative-agriculture>

¹⁸ <https://www.heifer.org/blog/regenerative-agriculture-is-transforming-heifer-ranch-into-the-garden-of-eden.html>

¹⁹ <https://farmersfootprint.us/adam-chappell>

²⁰ <http://irsustainabilitysummit.com> – go to time 1:24:50 for a video about the Chappell farm

²¹ <https://ipminstitute.org/what-is-integrated-pest-management/>

²² <https://agcouncil.net/news/walmart-announces-new-pollinator-initiatives/>

The number of misuse complaints due to damage to private property the Plant Board receives is itself an under-representation of the extent of dicamba's off-target impacts, limited by the number of inspectors proactively investigating and number of citizens willing to file a complaint. Certainly the number of complaints due to soybean and cotton damage will decline as the acreage of GMO crops increases, making it **an inadequate metric for assessing dicamba's off-target impacts**. Monitoring and tissue sampling of native and ornamental vegetation will help reveal the true extent of damage that dicamba can cause to the landscape and to bird habitat. This needs to be part of the Plant Board's protocol and deliberation for volatile herbicides like dicamba, if not all herbicides.

A 2020 survey by Association of American Pesticide Control Officials sent to state departments of agriculture about dicamba incidents is revealing.²³ In response to questions about the number of incidents and number of acres affected, the Michigan Department of Agriculture and Rural Development responded "we are hearing that there is A LOT more damage that is not being reported. We are considering a process for reporting damage without making an official complaint in order to get a better understanding of how large this issue is." The Nebraska Department of Agriculture said "inspectors, crop advisors, applicators and university crop specialists agree that the degree of soybean leaf cupping was as bad or worse than in any of the last four years, however, growers are not reporting claims because of a lack of response from registrants or the regulatory agencies." Few states actually knew how many acres of sensitive soybean and cotton were impacted.

Another indicator of the problem with dicamba is that volatility cannot be traced back to its source. This means impacted people don't know which of their neighbors to turn to for good-faith compensation or correction. It emboldens farmers to spray with impunity. From the Plant Board's Monthly Dicamba Case Status Update Summary:

Year	# Case files dicamba ID as causing symptoms	# Case files resulting in violation	# Case files resulting in no violation	No violation/dicamba caused
2018	166	63	136	82%
2019	158	70	135	85%
2020	78	3	59	75%

It should be noted that there are more 2019 and 2020 case files still under review (for 2020, 155 out of 217 (71%) were still pending as of February 28, 2021). These high percentages demonstrate the enforcement problem with dicamba. The Plant Board doesn't compensate landowners, even in those instances where a violation is found. Permitting dicamba to be sprayed further into the growing season will only exacerbate this problem. Whether sprayed legally or not, dicamba will cause off-target damage. **If the cutoff date is pushed back, the number of violations will decline while extent of off-target damage will rise, even if the number of complaints does not.** You have to ask yourselves, how much is acceptable?

²³ <https://aapco.org/2015/07/02/dicamba>

II.d. It comes without argument that dicamba has been placed on its own pedestal Dicamba is one of the few pesticides in Arkansas with mountains of enhanced restrictions. Dicamba is the only herbicide to have its own task force created to regular it within the Arkansas State Plant Board.... Dicamba has received an unfair and biased ruling within the Arkansas State Plant Board.

This statement is false. The Dicamba Task Force was established by the Governor Asa Hutchinson, not the Plant Board, in response to over 1,000 dicamba complaints in 2017. According to task force transcripts, the registrants stated how few field trials were performed on this product and how they attempted to build a data set from laboratory experiments to mimic field conditions for the registration. Further, **Dr. Jeff Birk, Regulatory Manager for BASF essentially said there is no safe distance downwind for susceptible vegetation!** “So if you are trying to avoid all visual response, best thing to do is do not apply if you’ve got neighboring conventional soybeans downwind.... The safe downwind distance, so, it’s simple, if you’ve got sensitive species downwind and you are concerned about them, don’t spray. Wait until the wind shifts another direction and then come back and finish up that direction of the field. Its additional work, but it’s the proven thing to do.”

The dicamba task force recommended that there be additional testing prior to any full label approval. All the additional testing done by Dr. Norsworthy and other weed scientists point to restricting dicamba’s use to early in the season.

There are other herbicides that have had task forces. In 2006, the Plant Board established task forces for glyphosate and 2,4-D following years of complaints about drift.²⁴ Increased regulations were proposed for both chemicals. There were public comment periods and hearings. There was even discussion on raising the cap on fines.

Dicamba is not on its own pedestal. If the argument is that other herbicides cause just as much off-target damage as dicamba, then this begs the question of why aren’t there tighter restrictions and higher fines for other chemicals. Why is chemical trespass acceptable at all?

II.e. One such argument for the ban on dicamba has come from members outside the Agricultural community. Let me be frank in saying, I have never seen a tree, bird, or bee colony killed by dicamba. Behind the Mississippi River levee in Tennessee, we have successfully applied dicamba since 2017 with zero tree fatalities. This argument lacks teeth and should not be considered by the Arkansas State Plant Board. These peoples [sic] are only here to see the destruction of Arkansas agriculture...

Yet again, the science is contrary to Mr. Hydrick’s claim. For proof that dicamba kills trees look no further than the \$15M awarded to Bader Farms for the loss of peach trees.²⁵ Read the pesticide misuse complaints submitted by Arkansas homeowners who report damage to their trees, flowers, and vegetables. In case after case, Plant Board inspectors observe damage they say is consistent with dicamba. Yet inspectors can’t find where the dicamba came from. When a homeowner’s complaint is closed with no violator identified, why should the homeowner bother reporting damage to their perennial plants again the next year? Plants will die over time without any record of it in the case files. Mr. Hydrick has “never seen a tree die from dicamba” because it likely takes years of repeated exposure.

²⁴ <https://www.farmprogress.com/proposed-regulations-target-arkansas-24-d-and-glyphosate-drift>

²⁵ https://www.stltoday.com/business/local/jury-awards-265-million-to-bader-farms-in-lawsuit-against-bayer-basf/article_0115e1ba-4dbd-5414-9426-662b46e467d6.html

University of Missouri scientists studied the influence of “driftable fractions” of XtendiMax on ornamental, fruit, and nut trees, as well as on vegetables and flowers.²⁶ Even at rates as low as 1/300 some species are sensitive enough to show visible symptoms on leaves weeks after spraying. They were even able to measure a decrease in tree trunk diameter growth. The graphic below is just one example from their presentation. The pepper on the right was exposed to 1/10 the application rate; it sure looks dead to me.

Influence of Xtendimax on Pepper

1/300th



1/100th



1/10th



*photos taken 21 days after application

Mizzou
weed
science

From North Dakota to Missouri, experts have reported damage to trees and other native plants on public lands.²⁷ As I stated above, Audubon led a survey for dicamba symptoms in 2019 and 2020. The photo on the right I took on July 1, 2020, is of an oak showing severe plant growth regulator herbicide symptoms at the Lick Creek access to Delta Heritage Trail State Park, Phillips Co. A volunteer observed symptoms there in 2019. Will caterpillars feed on such leaves? How many years can a tree withstand exposure before dying? Across the street was a soybean field where I observed recently sprayed pigweed.

I did not collect tissue samples. Even if I had, by the time symptoms are visible, it may already be too late to detect dicamba. On December 20, 2020, Dr. Norsworthy presented his peach tree trial results to the Board. He



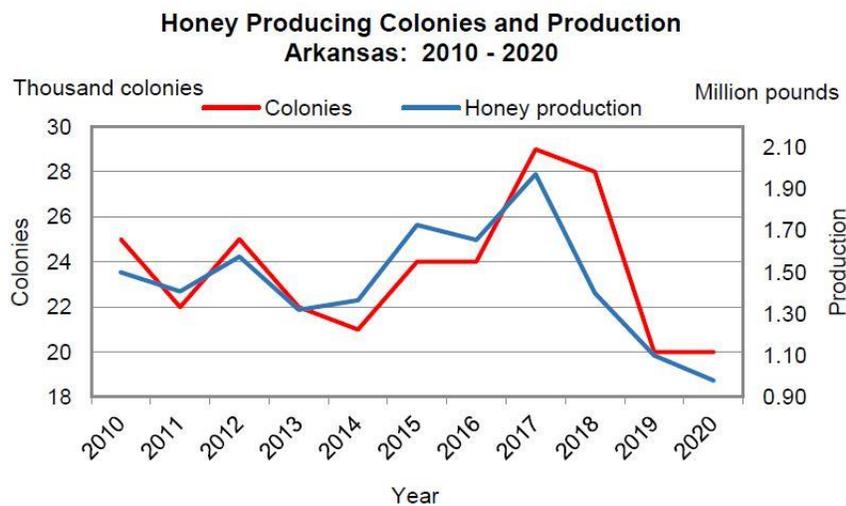
²⁶ Presentations available at <https://weedsience.missouri.edu/dicamba.cfm>

²⁷ <https://investigatamidwest.org/2020/06/16/weve-got-it-everywhere-dicamba-damaging-trees-across-midwest-and-south/>

found that even two weeks after spraying plants, which is generally how long it takes for plants to show symptoms, dicamba was detected in few samples. He noted the **“inability to find dicamba or its metabolites does not mean absence of exposure to the herbicide.”** Similarly, Dr. John Ball of South Dakota State University, led a project collecting leaf samples from trees in North Dakota, South Dakota, Nebraska, Kansas, Missouri, Illinois and Indiana.²⁸ He found that symptomatic leaves had low dicamba residues. However, leaves collected early in the spray season, before symptoms appeared, had higher herbicide concentrations. This points to the challenge of how to monitor dicamba’s presence in nature if one can’t tell which leaves have been recently exposed.

Widespread spraying of dicamba over the tops of crops has been going on for four years. In that time there has been little tracking of tree health. To truly answer the question of whether dicamba reduces reproductive output and ultimately kills trees after multiple exposures, we need long-term experimental spray trials. **As with other aspects of dicamba, the EPA was too quick to approve its use before thorough environmental investigations could be done.**

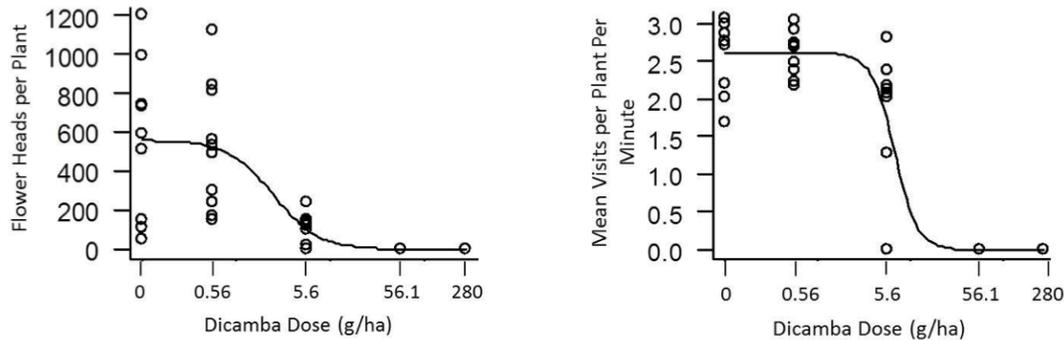
As for birds and bees, Audubon is not claiming dicamba kills them directly. The concern is that a decline in plant health will ultimately cause shifts in plant communities that threaten wildlife.²⁹ The increased use of dicamba during the middle of the growing season threatens a wide array of flowering broadleaf plants that provide food and shelter for bees and other beneficial insects. This graph from the USDA National Agricultural Statistics Service (released March 18, 2021) shows that the number of honeybee colonies and honey production in Arkansas were on the rise until 2017, the year over-the-top dicamba spraying began. This was followed by a steep decline. Note that honey production has declined more steeply than the number of colonies, and that even though the number of colonies did not change between 2019 and 2020, honey production continued to decline.



²⁸ <https://www.youtube.com/watch?v=ZdxeoX2QobY>

²⁹ Knuffman, L., Erndt-Pitcher, K., May, E. 2020. Drifting Toward Disaster: How Dicamba Herbicides are Harming Cultivated and Wild Landscapes. Washington, D.C.: National Wildlife Federation; Champaign, IL: Prairie Rivers Network; Portland, OR: Xerces Society for Invertebrate Conservation.

Dr. Dave Mortensen, while at the Plant Sciences Department at Penn State, examined the effects of dicamba on pollinators.³⁰ He applied sublethal, drift-level rates of dicamba to alfalfa and common boneset, then evaluated plant flowering and floral visitation by pollinators. He found that dicamba doses simulating particle drift ($\approx 1\%$ of the field application rate) delayed onset of flowering and reduced the number of flowers of each plant species. Further, plants affected by particle drift rates were visited less often by pollinators.



When he modeled the landscape scale impacts he found that at drift level doses the floral and pollinator resource provisioning capacity of the landscape was reduced by approximately 20% in Midwestern counties with greater than 50% corn and soybean, and exceeded 40% when field edges were exposed to label doses.

Similarly for birds, dicamba injury to native plants potentially reduces the availability of seeds, fruits, nectar, and invertebrates that birds depend on in our agricultural landscape. For example, caterpillars feeding on host plants treated with sublethal drift-level doses of dicamba had reduced larval and pupal biomass, potentially due to alterations in plant nutritional content.³¹ Fewer caterpillars on herbicide-affected plants could have cascading impacts up the food chain; insectivorous birds might not be able to find enough insects to feed their young.

In their report *Drifting Toward Disaster: How Dicamba Herbicides are Harming Cultivated and Wild Landscapes*¹⁷, the National Wildlife Federation and partners sum up the unknown effects:

“To what degree are invertebrate and seed food resources being shifted or eliminated due to changes in plant health, distribution, palatability, and nutrient content? What are the exposure rates and frequencies of birds to these herbicides via food and water resources or inhalation? How are invertebrates, birds, and other wildlife responding to changes in habitat and food? To what degree are the plant food and habitat resources in or entering aquatic systems contaminated with plant growth regulator herbicides? What is the environmental loading of dicamba in water resources and aquatic ecosystems? How does this impact the emergence of insects with an aquatic life stage—a critical food resource for numerous wildlife, including migratory birds?”

³⁰ Bohnenblust, E.W., A.D. Vaudo, J.F. Egan, D.A. Mortensen, and J.F. Tooker. 2016. Effects of the herbicide dicamba on nontarget plants and pollinator visitation. *Environmental Toxicology and Chemistry, Journal of Pest Science*, 35(1): pp 144-151.

³¹ Bohnenblust, E.W., J.F. Egan, D.A. Mortensen, and J.F. Tooker. 2013. Direct and Indirect Effects of the Synthetic Auxin Herbicide Dicamba on Two Lepidopteran Species. *Environmental Entomology* 42(3): pp. 586-594.

Finally, I want to address Mr. Hydrick's last sentence, "these peoples [sic] are only here to see the destruction of Arkansas agriculture..." This is an unfortunate and polarizing perception of Audubon, and of every farmer, homeowner, scientist, and organization that takes issue with dicamba. It is short-sighted for members of the agricultural community to use such divisive language just because we don't agree with them on this one issue. On the contrary, the National Audubon Society works with farmers across the country to improve working lands for birds and people. It is a pillar of our strategic plan.³² Audubon Arkansas provides technical and financial assistance to farmers across the state to grow native warm season grasses and pollinator-friendly wildflowers in rowcrop style agricultural production.³³ We work alongside these farmers to produce the seed needed to restore prairie habitat for birds. Locally produced, local ecotype seeds are an environmentally friendly, climate change resistant cash crop that also provides soil, water, and wildlife benefits on the farm. **Dicamba is a direct threat to our farmers' seed crop and Audubon's conservation investment on working lands.**

Let me be frank in saying some members of the agricultural community have gone too far. For example, see case file CF20-0212. A farmer submitted a complaint on June 18 that his soybeans were damaged. By the time an inspector talked with him on June 23 he stated **he had received threats and did not want to go any farther with his complaint.** He's not the only farmer to withdraw a complaint.

Inspector Narrative Report

On 6/24/2020, I met Mr. [REDACTED] at his farm shop and obtained a DP-4 Statement form from him stating that he wanted to withdraw his complaint filed with the ADA Pesticide Section. Mr. [REDACTED] called me on 6/23/2020 and explained to me that he had received threats and did not want to go any farther with his complaint. I called [REDACTED] and told him what was going on with this Case File and after discussing it with me I was told to let Mr. [REDACTED] discontinue the investigation if he wanted to do so.

I know of farmers who are unwilling to submit public comments on this very issue due to peer pressure and the fear of social stigmatization or retribution if they speak out. **Sadly, the social fabric of the farming community has been damaged by dicamba.**

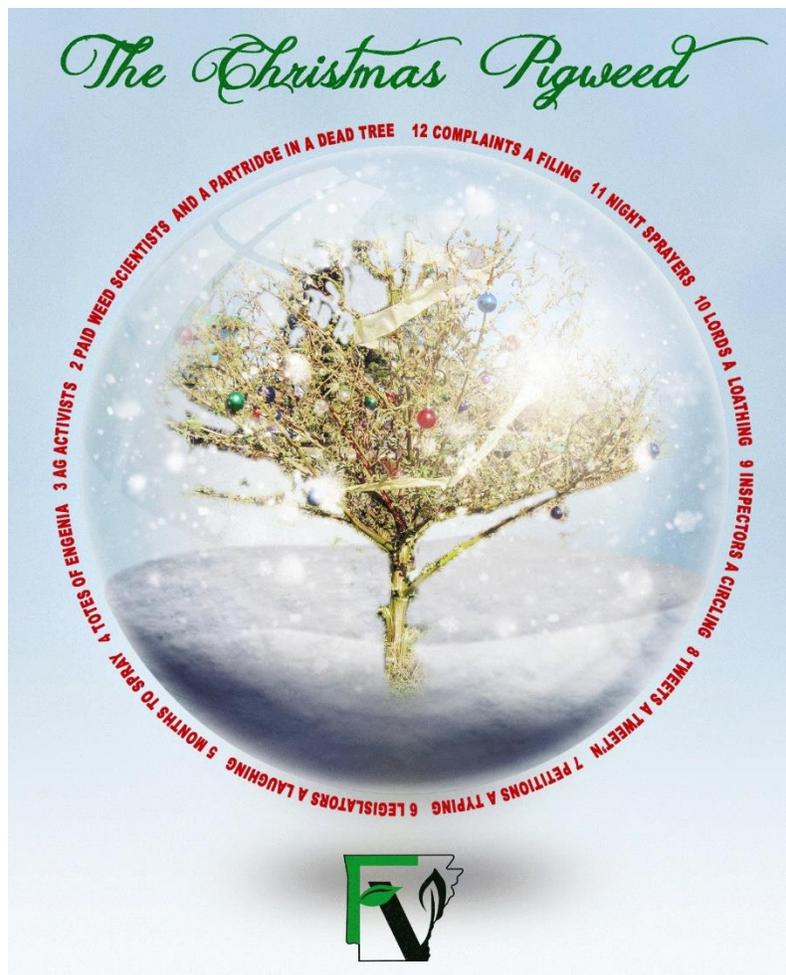
³² <http://strategicplan.audubon.org/working-lands>

³³ <http://ar.audubon.org/native>

Some social pressure and bullying are done in full public view, for example, these threatening signs:



On December 23, 2020, this image was emailed to me by FarmVoice. I never subscribed to their list.



Last but not least, one of your own members had two tractors vandalized and hay bales burned because of his stance on dicamba.³⁴ Do not reward this illegal behavior by giving in to their demands. **Let science, not social or political pressure, guide your decision.**

³⁴ <https://www.arkansasonline.com/news/2020/sep/25/state-official-victim-of-vandals/>

The Arkansas Pesticide Control Act and Regulations, section 2-16-402 states that it is “necessary to provide for regulations of pesticides” because “it is essential to the public health and welfare that they be regulated to prevent adverse effects on human life and the environment,” and because pesticides “may cause unreasonable adverse effects on the environment.” The evidence is clear that more regulations are needed on dicamba in order to serve the purpose of the law.

Mr. Hydrick’s statements do not stand up to the science. He provides no data or evidence. I urge you to reject this petition based on false statements and unsubstantiated claims. Further, I call for a public hearing.

Thank you for your consideration.

Sincerely,

Dan Scheiman, Ph.D.
Bird Conservation Director
Audubon Arkansas

P.S. Attached are 204 public comments compiled by Audubon from Delta farmers and homeowners, as well as other concerned citizens across the state who are also AGAINST the proposal.

To The Arkansas State Plant Board:

Please reconsider and follow the university science on dicamba to save our sensitive trees and plants from the misuse of the farmer that is spraying dicamba and will not follow the restrictions on the label. DICAMBA is not the only solution to pig weed problems. As a specialty crop farmer (we harvest pecans) who has submitted a pesticide misuse complaint related to dicamba damage to the plant board: we can't believe that you voted 8-7 to accept this 3rd party request to undo all the restrictions that was put in place in 2017. We need the 1-mile or more buffer protection. We need the May 25th cutoff date on spraying We need the prohibition on mixing Roundup in the tank with dicamba. Please reconsider.

Sincerely,

Joe Smith

West Helena, AR 72390

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. The yard service in my neighborhood sprayed a mixture of dicamba in violation of current limits, and it killed ALL my tomato plants. \$50 and a season's production, without remedy. School children near farms, a common situation in Arkansas, should not be exposed to dicamba spray during school sessions, either. Further, I request a public hearing on the matter.

Sincerely,

Robin Kuykendall

Jonesboro, AR 72401

To The Arkansas State Plant Board:

In 2020 I lost 4 peach, 2 apple trees and 9 blackberry from dicamba. Please don't allow Bayer Chemical to ruin Arkansas. No pollen, no bees, no food.

Sincerely,

Raymond Murphy

Caraway, AR 72419

To The Arkansas State Plant Board:

My 35 acre Pecan Farm is located at 2979 New Hope Rd., Tyronza, Ar. It is boarded on all sides by cotton, corn, and bean crops. Every year it experiences 'Drift' of small droplets of pesticides onto my property from surrounding farms. I have never used pesticides on my farm. Season before last, I was told by a neighbor that he even saw the airplane fly and drop what ever the plane was spraying on their croup, onto my pecan farm. The season before that, I was showing my farm to Mr. Clyde (cotton) Eason, A board member of yours, and both he and I observe damage to my pecan trees from 'Drift' of pesticides applied from the surrounding farms. I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Winsley Durand

Peoria, IL 61604

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. I support restrictions on dicamba use due to its negative impact on wildlife and the environment. I'm really tired of it damaging my fruit trees, vegetables and flowers.

Sincerely,

Beth Schaffhauser

Marvell, AR 72366

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

It killed our garden, harmed our shrubs in our yard and neighbors. We've also had to cut down two very large pine trees. Pines in the neighborhood are dying all around us. In our travels throughout Mississippi County and adjoining counties also have huge pine trees.

Sincerely,

Billy and Shirley Middleton

Gosnell, AR 72315

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. I received damage to my trees, shrubs and flowers in 2020. I did file a complaint with the plant board. If this product is not regulated, ever tree an shrub in my yard will die. Not to mention the trees on the Dale Bumpers White River Refuge. Politics an money are involved in this ruling, big chemical companies such as the one that makes dicamba has a lot of political power. The original regulation on this product were bad enough, but the rules that they are pushing for now are devastating to trees an wildlife.

Sincerely,

Amy Singleton

Holly Grove, AR 72069

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. Enough is enough! It is time to consider the long term harm these chemicals are doing to our state! I lost a large garden area of tomatoes, beans and other vegetables last year because of the chemical moving from where it was applied over to our land.

Sincerely,

John Clower

Mc Gehee, AR 71654

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. Since I am losing my CRP to dicamba and Roundup more responsible rules would be helpful. Since dicamba drifts up to 15 miles I do not think asking for a 1-mile buffer is too much. For those of us paying the price this new ruling is quite distressing.

Sincerely,

Bland Currie

Wilmot, AR 71676

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. I actually lost a soybean crop due to a neighbors use of Dicamba! I am very much against the use of any chemical like it.

Sincerely,

Linda Smith

Perryville, AR 72126

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. I'm a beekeeper and I don't want them to die from any 'accidental drifting' of Dicamba. Thank you.

Sincerely,

Dawn Custer

Roland, AR 72135

To The Arkansas State Plant Board:

We all are responsible for our impact on the environment, its future, and the future of our own species, but policy makers have a disproportionate amount of power and impact over our health and home. You as policy makers have the power to help ensure the right steps are taken to protect us from ourselves. Please consider the wisdom behind restricting use of known toxic materials in favor of available, reduced impact alternatives. We are no longer in an age where we only have the worst chemicals available to us for use, and it is unethical and immoral to continue to use them solely for financial or political gain. And I believe Arkansans are better than that. With that said, please note that I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Rachel Furman

North Little Rock, AR 72117

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. My brother's family home is surrounded by farmland and they have been adversely affected by dicamba. It's too dangerous to be widely used - please restrict its use.

Sincerely,

Mary Ryan

Little Rock, AR 72223

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. The recent food shortages in grocery stores during the pandemic have proven that it is important to be able to raise our own gardens to provide food for our families. It is well known & has been proven repeatedly that Dicamba will drift for miles & damage sensitive plants & trees causing damage to their leaves & fruit. It also damages farmers sensitive row crops causing a loss of income. Please do not allow a few farmers to spray this volatile chemical & cause the rest of the to lose our food & income that we need to provide for our families.

Sincerely,

Kerin Hawkins

Leachville, AR 72438

To The Arkansas State Plant Board:

I support restrictions on dicamba use in order to protect public and private lands, and the wildlife they harbor. I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. It seems that political power struggles are having a negative impact on our climate and environment. We need a long term focus that considers both the needs of the farmer and the environment. How can we help create win-win situations, instead of us-them scenarios?

Sincerely,

Kimberly Harper

Little Rock, AR 72211

To The Arkansas State Plant Board:

I support restrictions on dicamba use to protect public and private lands, including the wildlife. I worry about farmers especially who grow crops for people like me to eat. I depend almost exclusively on vegetables grown by a farmer who lives about 20 miles away from me. If dicamba is carried onto his crops by the wind I lose and the many people who buy vegetables from this family in this area lose, not to mention this farmer's losses. Research done by the University of Arkansas (OUR University) indicates the cutoff date for use of dicamba should be moved back to April - even earlier than the May 25 cutoff. Please don't undo the current safeguards. The University's research also indicates the new formulation is too volatile to be used in the late spring and summertime in Arkansas. It is time we listened to science. Please. I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Kathleen Hudson

Mountain Home, AR 72653

To The Arkansas State Plant Board:

In May, 2020, a report was presented to the National Institute of Health documenting dicamba as a human carcinogen. The individuals impacted by the drift from dicamba spray could be your constituent, or even a family member of yours. <https://biologicaldiversity.org/w/news/press-releases/national-institutes-health-study-links-dicamba-increased-cancer-risks-2020-05-04/> I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Robin McClea

Little Rock, AR 72223

To The Arkansas State Plant Board:

I remember well what I learned about the conversations that took place concerning dicamba at plant board meetings, one in particular. In my mind, if these rules are revoked, it will be because big money has at last wrested control of the plant board. I am not sure, of course. The company that produces dicamba may have made some changes that make those rules unnecessary, but I am unaware of that. What so impressed me particularly at one of the board meetings was the level of input, discussion, and real thought given to what would be the best solution for all concerned, recognizing that there was not a perfect answer. Please give great consideration to a solution that would be best for all. I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Phyllis McKuin

Morrilton, AR 72110

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. I have personally seen the damage to ANHC's Railroad Prairie Natural Area from Dicamba.

Sincerely,

Larry Price

Russellville, AR 72802

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. Because of the volatility of dicamba, it is too dangerous to all spraying during warm weather, and it will lead to widespread off-target damage to home gardens, adjacent farms, woodlands, and public parks. Since I was raised on a farm, I recognize the needs of agriculture, but I feel that regulations should be in place to balance use of agrochemicals and limit unwanted environmental effects. EPA studies clearly demonstrate the negative effects of dicamba.

Sincerely,

David Parham

Little Rock, AR 72211

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. The field behind my home is a prime example why the cut/off date should be pushed back to April. I can always tell when the spraying has begun. The spraying affects my garden, my grass, my trees. I am even afraid to get in the pool! We need the bees for pollination, we need the birds to eat the insects. Please keep Arkansas as The Natural State.!!!! Sincerely, Sharon Roberson

Sincerely,

Sharon Roberson

Wooster, AR 72181

To The Arkansas State Plant Board:

I am against the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Many studies have shown this stuff gets everywhere and kills lots of things for little benefit when there are other options. I don't think it should be used at all until proven safe, but I guess keeping the current dates is a solid compromise if farmers really think they need it. Greater buffers would likely help too; it gets everywhere and really is toxic enough that only a targeted approach should be allowed. The fact is this chemical is not ready for widespread adoption, but the big ag chemical folks are pushing it hard. That doesn't mean it is right for Arkansas.

Sincerely,

Brandon Rush

Springdale, AR 72764

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. Dicamba is not a stable enough compound for prolonged use on our crop fields. The volatility of the compound leads to unintended targets being harmed by the use of this herbicide. Other means of control need to be focused on, or at the very least better chemicals should be used. Companies need to make a product that is less harmful or more safe to use in specific areas without the risk of harming public areas.

Sincerely,

Anthony Aloï

Jacksonville, AR 72076

To The Arkansas State Plant Board:

To the Arkansas Plant Board: I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. I understand that Dicamba, even the new formulation, is volatile and that volatility is increased as heat increases. Volatility is also increased by the addition of roundup when spraying. I am concerned that spraying will adversely affect birds and pollinators because unprotected farm crops, native plants, home landscaping, University research stations, and wildlife management areas are all negatively impacted by Dicamba. In my opinion, allowing later spraying of Dicamba is totally unethical. This law purposely allows one citizen to intentionally harm others.

Sincerely,

Cathy Ross

Rogers, AR 72756

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. Dicamba has been associated with increased risk of cancer, specifically non-Hodgkins lymphomas in men. It is known to drift. Do not loosen any current restrictions.

Sincerely,

Sue Jenkerson

Batesville, AR 72501

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. I am AGAINST destroying the environment, and poisoning animals and humans. Please STOP IT!

Sincerely,

Tami Lamb

Jacksonville, AR 72076

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. I am reminded continually of the destruction of DDT until banned. So much harm. We can do better with crops for people and animals.

Sincerely,

Jonna Hussey

Fayetteville, AR 72701

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. We have suffered loss of garden produce and landscape shrubbery because of chemicals being used within close proximity of our home. The hazards these products pose should be the primary consideration of all those who make decisions about their use. I am afraid that the bottom line for everyone these days seems to be the quest for what is easy and where the money is. Human lives and welfare should always come before profit!

Sincerely,

Waverland Watson

Watson, AR 71674

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. There is no responsible reason Dicamba should still be marketed. American ingenuity is able to come up with comparable solutions and safe products for our plants and wildlife. Please hear us.

Sincerely,

Barbara Wilson

Clarksville, AR 72830

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. There is one of the largest red oak tree in my yard which is dying from dicamba.

Sincerely,

Barbara Belew

Lexa, AR 72355

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. I think it is insane that you guys are allowing farmers to damage other people's property--what the hell are you thinking?

Sincerely,

Robert Day

Bentonville, AR 72713

To The Arkansas State Plant Board:

STOP CHEMICAL TRESPASS!! I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter!

Sincerely,

Gail Rasberry

Bay, AR 72411

To The Arkansas State Plant Board:

I am joining with other concerned citizens in making the following statement: I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. Thank you for your consideration of my concerns.

Sincerely,

Rachel Engebrecht

Morrilton, AR 72110

To The Arkansas State Plant Board:

This product needs more regulatory oversight. I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Naomi Fletcher

Little Rock, AR 72204

To The Arkansas State Plant Board:

I am opposed to relaxing the regulations on the use of Dicamba. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. There has been documented evidence of the damage done by Dicamba and many personal comments. This is a chemical that has caused damage to non targeted crops and plants and a public hearing is needed. Thank you.

Sincerely,

Karen Gulley

Little Rock, AR 72212

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. I support restrictions on dicamba use so that we can protect public and private lands, and the wildlife on them. Science shows that dicamba is too volatile to allow spraying over the top of crops during warm weather. Additionally, Audubon Arkansas's study revealed that dicamba's off-target impact to plants is widespread in both geographic scope and number of plant species afflicted. Regulations should balance the needs of agriculture and the environment, especially where it's been proven that it cannot be controlled. The EPA has revealed that politics over-ruled the science when registering dicamba. Follow the science.

Sincerely,

April Ambrose

North Little Rock, AR 72116

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. It is time for us to stop poisoning our environments before we do any more irreparable damage.

Sincerely,

Lissa Morrison

Fayetteville, AR 72703

To The Arkansas State Plant Board:

The Plant Board needs to keep the 25th cutoff, and 1 mile buffer zone for dicamba sensitive crops. I find it very disheartening that such an extension is being proposed considering all the evidence Dicamba does to off-target plants and the considerable geographic scope it encompasses.

Sincerely,

Tom Utley

Little Rock, AR 72205

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. Please research and respect the science showing how important it is to restrict use of Dicamba in order to protect and preserve our environment. We must find a balance between the needs of agriculture and environment.

Sincerely,

Lynne Clifton

Little Rock, AR 72207

To The Arkansas State Plant Board:

Follow the science! Science shows that dicamba is too volatile to allow spraying over the top of crops during warm weather. I support restrictions on dicamba use in order to protect public and private lands, and the wildlife they harbor. Just follow the science!

Sincerely,

Julie Furlow

Ogden, AR 71853

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. I own property in Ashley County and we will not have a tree left in our area if this practice is allowed to continue.

Sincerely,

Gladys Whitney

Little Rock, AR 72202

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. Please, stop working for corporations. The PEOPLE in Arkansas deserve to be protected. These chemicals poison All of US. No amount of money is worth lives. There are too many chemicals being used that make the CORPORATIONS RICHER. ARKANSAS DESERVES BETTER THAN YOU WORKING TO PROVIDE MORE WEALTH FOR CHEMICAL COMPANIES.

Sincerely,

Jayne Bloesch

Searcy, AR 72143

To The Arkansas State Plant Board:

The Arkansas Plant Board worked with farmers and other members of the public to establish a sound standard regarding Dicamba spraying. Please do not weaken that standard now.

Sincerely,

Mara Leveritt

Little Rock, AR 72207

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, one-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. Dicamba is a disaster for farmers and growers who are trying to preserve their crops and their livelihoods. It is harmful to wildlife. It is not containable and should not be allowed to be sprayed anywhere near agricultural or garden sites. Follow the science! Dicamba is not safe. Its use should not be encouraged or extended.

Sincerely,

Nancy Baxter

North Little Rock, AR 72116

To The Arkansas State Plant Board:

I am an Arkansas Christian hunter, angler, birder & paddler who believes that my God requires me to protect creation. I therefore have to be against the third-party rule-making request to adopt the full federal label. Arkansas needs to keep all of the current state-level restrictions. That should include the May 25 cutoff, the 1-mile buffer for dicamba-sensitive crops & preventing glyphosate in the tank mix. The Arkansas outdoor community deserves a public hearing on the matter.

Sincerely,

Barry Bennett

Fayetteville, AR 72701

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. I support the restrictions on Dicamba.

Sincerely,

Gary Doublin

Hot Springs Village, AR 71909

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Yannik Dwyer

Fayetteville, AR 72701

To The Arkansas State Plant Board:

I am a beekeeper and glyphosate reduces bee ability to navigate and may decrease nerve function. The EPA has revealed that politics over-ruled the science when registering dicamba. Follow the science. Strengthen all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Jo Elsken

Fort Smith, AR 72903

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.
PLEASE DON'T POISON OUR STATE

Sincerely,

Rachel Freeman

Newark, AR 72562

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. I support restrictions on dicamba to protect public and private land flora and fauna. Please consider thoughtfully the magnitude of this decision on our planet.

Sincerely,

Mary Gocio

Fayetteville, AR 72701

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. Accepting the EPA findings that politics overruled the science when allowing the use of dicamba should speak quite loudly towards heavy restrictions regarding the use of this product. Recent findings regarding chemical damage to the reproductive process of mammals, including humans, should be a factor in considering the overall value in the use of these formulations. Our future may well depend on judicious use of our chemicals.

Sincerely,

Hans Heaney

Jerusalem, AR 72080

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. I support restrictions on dicamba use in order to protect public and private lands, and the wildlife they harbor. Science shows that dicamba is too volatile to allow spraying over the top of crops during warm weather. Keep dicamba restrictions in place.

Sincerely,

Kim Hillis

Little Rock, AR 72207

To The Arkansas State Plant Board:

I am an Arkansan by birth & love Arkansas, where family live & work! I am most solidly AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions, including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. You know those chemicals are carcinogens, right? Those are deadly in exposure for humans & domestic & wild animals! Further, I request that you all hold a series of public hearings in the state on the matter. Find out what Arkansans in general have to say on these vital matters! That is, if you have not done so already! Please! Listen to those in the state! Be very careful to act in the citizens' & voters' best interests, not chemical company lobbyists! Just saying! Go, Red Wolves! Go, Razorbacks! Roll Tide!

Sincerely,

Jean Langford

Huntsville, AL 35803

To The Arkansas State Plant Board:

I support restrictions on dicamba use in order to protect public and private lands. Public and private land owners have the right to protect their land from toxic pesticides. Studies have revealed that dicamba's off-target impact to plants is widespread in both geographic scope and number of plant species afflicted. Politics have promoted the use of this pesticide not science. I ask you to use science when making decisions not money and politics. I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. Sincerely, Ken Leonard Bentonville, Arkansas

Sincerely,

Ken Leonard

Bentonville, AR 72712

To The Arkansas State Plant Board:

There has been little evidence that the new formulation is less invasive. We have seen consistent violations showing poor stewardship by those who currently use it, so why should we allow them to spray outside of the existing restricted time period I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Gregory Mack

Fayetteville, AR 72703

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter Just stop using it all together.

Sincerely,

Maryanne Morrow

North Little Rock, AR 72124

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. Please follow the science and not your political influencers. We MUST protect our environment!!

Sincerely,

Kristi Peterson

Rogers, AR 72758

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. Ban it!!!!

Sincerely,

Betty L Scott

Batesville, AR 72501

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. Science has shown that dicamba is too volatile to allow spraying over crops in warm weather. Restrictions on dicamba use is vital to protect public and private lands, and all our Arkansas wildlife. This is one of the important environmental issues that must be addressed appropriately in our state!

Sincerely,

Mary Waldo

Little Rock, AR 72210

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. Nobody should be able spray something that affects their neighbors property. That is only common sense.

Sincerely,

Robert Brewer

Fayetteville, AR 72701

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. As a leukemia patient who has been exposed to dicamba I can attest to its toxic effects.

Sincerely,

Lane Bryant

West Fork, AR 72774

To The Arkansas State Plant Board:

Glyphosate is a known carcinogenic and researchers at the National Institutes of Health have found that use of the pesticide dicamba can increase the risk of developing numerous cancers, including liver and intrahepatic bile duct cancers, acute and chronic lymphocytic leukemia, and mantle cell lymphoma. THEREFORE, I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. Thank you.

Sincerely,

Thomas Caldwell

Marble Falls, AR 72648

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. PLEASE STOP POISONING US AND OUR PLANET. How do you look at your kids knowing what you're doing?

Sincerely,

Peri Doubleday

Little Rock, AR 72207

To The Arkansas State Plant Board:

I am very concerned about the use of Dicamba, and the adverse effects it has on the plants and wildlife as it drifts over the landscape. We call Arkansas the Natural State because of our pride in the flora that grows here. I am solidly AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Laird Duran

Russellville, AR 72801

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. I support restrictions on dicamba use in order to protect public and private lands, and the wildlife they harbor. Audubon Arkansas's study revealed that dicamba's off-target impact to plants is widespread in both geographic scope and number of plant species afflicted.

Sincerely,

Lisa Ellis

Springdale, AR 72762

To The Arkansas State Plant Board:

Science shows that dicamba is too volatile to allow spraying over the top of crops during warm weather. I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Tracy Fortuny

Rogers, AR 72758

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. We need to protect public and private land and the wildlife that live in them. We must balance the needs of agriculture with the overall health of the environment. These decisions should be science based, not political maneuvers. Science has shown that dicamba spreads too far and should not be sprayed during hot weather. Arkansas is supposed to be 'the Natural State'. Please don't let private interests ruin it. Spraying dicamba after May 25 will affect natural areas surrounding the crops and result in damage to the ecosystem.

Sincerely,

Jeri Garcia

Hot Springs Village, AR 71909

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. Dicamba spreads to areas where it was not intended to be and is bad news for native plants and animals that feed on them, particularly at warmer temperatures. Leave the restrictions in place. Please.

Sincerely,

Anne Holcomb

Little Rock, AR 72205

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. I support restrictions on dicamba use in order to protect public and private lands, and the wildlife they harbor. Science shows that dicamba is too volatile to allow spraying over the top of crops during warm weather. I understand the Audubon Arkansas's study revealed that dicamba's off-target impact to plants is widespread in both geographic scope and number of plant species afflicted. Regulations should balance the needs of agriculture and the environment. The EPA has revealed that politics over-ruled the science when registering dicamba. Follow the science. If your property has been directly affected by dicamba, tell them about it.

Sincerely,

Vicki Jett

Little Rock, AR 72227

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. Dicamba drift is deadly to many beneficial crops, grasses and trees. It's use should be avoided in most cases.

Sincerely,

Kathrine Jones

Pottsville, AR 72858

To The Arkansas State Plant Board:

I'm shocked that you would consider these changes after the detrimental experiences with the uses of Dicamba. I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Lynn Larson

Eureka Springs, AR 72632

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. I support the restrictions on dicamba use.

Sincerely,

Virginia McClure

Benton, AR 72019

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. Besides, this is another dangerous chemical foisted upon unsuspected public, organic farmers and Arkansas wildlife, benefiting corporate America at the expense of the rest of us!

Sincerely,

Dr. James McCollum

Emerson, AR 71740

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. When airborne toxins drift over land unintentionally, I see it as criminal trespassing. Those of us who work hard to keep harmful chemicals out of our environments expect our governmental officials to keep the health and welfare of all Arkansans to be their work. Biodiversity is a long-range sustainability issue. Please rank soundly researched and corroborated scientific data above the politics of greed.

Sincerely,

Jane McGregor

Russellville, AR 72801

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Bill Morley

Maumelle, AR 72113

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. We love Arkansas, the natural state, and we want to protect its health and beauty for generations to come. The science is clear that this herbicide is dangerous and therefore we need to control its use. We need regulations that guarantees the health & wealth of state for generations not policies that sell all that away for a corporations short term profits.

Sincerely,

Jonathan Perrodin

Springdale, AR 72764

To The Arkansas State Plant Board:

Please, please, please keep the dicamba restrictions in place. We must not sacrifice our wildlife, natural resources, and health for huge profits for some and overproduction!

Sincerely,

A Port

Fayetteville, AR 72701

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. Personally, I don't understand why a change is even being considered given the negative impact of Dicamba in our environment. Certainly, we are able to come up with better options than this.

Sincerely,

Brenda Scheffler

Little Rock, AR 72205

To The Arkansas State Plant Board:

As someone who is working very hard to create a native landscape around my home, I oppose the rule change that will allow dicamba spraying through July 30. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. This product is going to hurt the many plants and wildlife I am trying to help. Please do not extend the dicamba spraying through July 30.

Sincerely,

Theresa Stasiw

Springdale, AR 72764

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. Keep the restrictions in place!

Sincerely,

Danny and Linda Steele

Bryant, AR 72022

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. You have allowed too many bad things in Big Ag. Go to regenerative ag and help stop climate change, quit killing the soil bacteria and mycorrhizae with all your synthetic/fossil fuel based poisons and fertilizers, quit tilling and the erosion will stop, you're killing dolphins in the Gulf with the excess that farmers think they have to use since with GMO's they think the more put on the better they will grow---there is no Green Revolution---you have caused the majority of chronic diseases with cheap commodities and processed foods. Dicamba is just one more of the many bad things you have foisted on the world.

Sincerely,

Lolly Tindol

Pettigrew, AR 72752

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter. This is really important and I hope you will take this sound advice.

Sincerely,

Jacqueline Walker

Little Rock, AR 72227

To The Arkansas State Plant Board:

Growing up in the Delta I am fully aware of the importance pesticides and herbicides play in ensuring healthy crops. Dicamba is a different beast. I have both seen damage from dicamba as well as read articles describing how easily dicamba drifts. There are better options for our local farmers. Needless to say I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Jennifer West

Alexander, AR 72002

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Sherry Adams

Rogers, AR 72758

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Elizabeth Alderman

Hot Springs National Park, AR 71913

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Janet Badeaux

Maumelle, AR 72113

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Judy Bash

Little Rock, AR 72211

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Daniel Beadle

Little Rock, AR 72207

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Melissa Bird

Pine Bluff, AR 71603

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Luanne Blaylock

Maumelle, AR 72113

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Tracy Brophy

Bentonville, AR 72712

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Carolyn Brown

Conway, AR 72034

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Tamzen Bryant

Springdale, AR 72764

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Julie Camp

Mountain Home, AR 72653

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Sherry Clements

Cabot, AR 72023

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Rebecca Coleman

Bryant, AR 72022

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Rel Corbin

Little Rock, AR 72204

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Rebecca Corley

Jasper, AR 72642

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Paul Crossman

North Little Rock, AR 72118

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Harry Lyle Darby

Jonesboro, AR 72401

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Penny Davis

Cabot, AR 72023

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Frits Druff

Mountain Home, AR 72653

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Carol Dyer

Hot Springs Village, AR 71909

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Rebekah Evans

Jonesboro, AR 72404

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Gene Ford

Rogers, AR 72758

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Ed French

Hot Springs National Park, AR 71913

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Judith Frindik

Maumelle, AR 72113

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Cassie Gill

Cabot, AR 72023

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Maxine Haley

Shirley, AR 72153

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Don Hamilton

Little Rock, AR 72227

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Sheena Hare

Conway, AR 72032

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Bradley Harris

Fort Smith, AR 72908

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Larry Hedrick

Hot Springs National Park, AR 71913

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Daniel Henry

Benton, AR 72019

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Karen Hicks

Hot Springs Village, AR 71909

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Steve Holst

Fayetteville, AR 72703

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Heather Hudgens

Fayetteville, AR 72764

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Charles James

Little Rock, AR 72202

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Brandon Johnson

Jonesboro, AR 72401

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

William Jones

Conway, AR 72034

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Ron Kew

Hot Springs, AR 71913

To The Arkansas State Plant Board:

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Sincerely,

Denise Klinger

Bella Vista, AR 72715

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Mary Koscielniak

Hot Springs Village, AR 71909

To The Arkansas State Plant Board:

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Sincerely,

Ralph Kunz

Bella Vista, AR 72715

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Nan Lawler

Fayetteville, AR 72701

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Stephanie Lusk

North Little Rock, AR 72116

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Karen Mahoney

Maumelle, AR 72113

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Ben Martin

Fayetteville, AR 72703

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Fred McLane

Fayetteville, AR 72701

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Ann Mesrobian

Fayetteville, AR 72701

To The Arkansas State Plant Board:

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Sincerely,

Al Notter

Little Rock, AR 72212

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Ginger Paquin

Rogers, AR 72758

To The Arkansas State Plant Board:

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Sincerely,

Simon Politzer

Fayetteville, AR 72703

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Sincerely,

Paula Price-kumar

Little Rock, AR 72206

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Penney Prickett

Jacksonville, AR 72076

To The Arkansas State Plant Board:

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Sincerely,

Tina Pryor

Ward, AR 72176

To The Arkansas State Plant Board:

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Sincerely,

Lynn R

Fort Smith, AR 72903

To The Arkansas State Plant Board:

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Sincerely,

William Ragar

Hot Springs, AR 71901

To The Arkansas State Plant Board:

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Sincerely,

Roxann Riedel

Kingston, AR 72742

To The Arkansas State Plant Board:

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Sincerely,

Lance Runion

Little Rock, AR 72205

To The Arkansas State Plant Board:

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Sincerely,

Keith Runion

Little Rock, AR 72205

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Sincerely,

Ada Ryan

Bentonville, AR 72713

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Lynn Schaefer

Conway, AR 72034

To The Arkansas State Plant Board:

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Sincerely,

Bennie Scott

Flippin, AR 72634

To The Arkansas State Plant Board:

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Sincerely,

Gloria Springer

Little Rock, AR 72206

To The Arkansas State Plant Board:

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Sincerely,

David Thomas

Batesville, AR 72501

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Kelly Wall

Cabot, AR 72023

To The Arkansas State Plant Board:

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Sincerely,

Gary Welchman

Little Rock, AR 72211

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Cara Wilsey

Hot Springs National Park, AR 71901

To The Arkansas State Plant Board:

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Sincerely,

Shir Lee Wilson

Hot Springs Village, AR 71909

To The Arkansas State Plant Board:

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Sincerely,

Donna Wolz

Paragould, AR 72450

To The Arkansas State Plant Board:

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Sincerely,

Dorothy J Zabecki

Hot Springs Village, AR 71909

To The Arkansas State Plant Board:

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Sincerely,

Thomas M Allen

Bella Vista, AR 72715

To The Arkansas State Plant Board:

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Sincerely,

Brad Bailey

Fayetteville, AR 72703

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Dave Bitner

Austin, AR 72007

To The Arkansas State Plant Board:

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Sincerely,

Leesa Boon

Mountain View, AR 72560

To The Arkansas State Plant Board:

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Sincerely,

Mitzi Cole

Pearcy, AR 71964

To The Arkansas State Plant Board:

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Sincerely,

Kevin Conaty

Amity, AR 71921

To The Arkansas State Plant Board:

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Sincerely,

Mary Anne Daves

Dardanelle, AR 72834

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Sincerely,

Michele Dematti

Little Rock, AR 72211

To The Arkansas State Plant Board:

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Sincerely,

Pam Euper

Fort Smith, AR 72903

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Sincerely,

Sybil English Evans

Bald Knob, AR 72010

To The Arkansas State Plant Board:

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Sincerely,

Fred Goldthorpe

Mayflower, AR 72106

To The Arkansas State Plant Board:

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Sincerely,

Kayla Gomance

Bismarck, AR 71929

To The Arkansas State Plant Board:

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Sincerely,

Ahren Hebert-Wilson

Little Rock, AR 72207

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Deborah Houston

Fort Smith, AR 72916

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Sincerely,

Susan Jenkins

Fayetteville, AR 72703

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Sincerely,

William King

Elkins, AR 72727

To The Arkansas State Plant Board:

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Sincerely,

Melinda Kinnaird

Hot Springs, AR 71913

To The Arkansas State Plant Board:

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Sincerely,

Timothy LaMange

North Little Rock, AR 72118

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Tom and Jean Leslie

Harrison, AR 72601

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Sincerely,

Joseph Long

Jonesboro, AR 72404

To The Arkansas State Plant Board:

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Sincerely,

Carolyn Minson

Hot Springs Village, AR 71909

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Sincerely,

Karen Mueller

Fayetteville, AR 72701

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Sincerely,

Katherine Murdock

Greenland, AR 72737

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Sincerely,

Julianne Odum

Farmington, AR 72730

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Sincerely,

Christine Perry

Greenbrier, AR 72058

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Sincerely,

John Ray

Fayetteville, AR 72701

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Sincerely,

James Richardson

Bella Vista, AR 72715

To The Arkansas State Plant Board:

I am AGAINST the third-party rule-making request to adopt the full federal label. Please maintain all of the current state-level restrictions including the May 25 cutoff, 1-mile buffers for dicamba-sensitive crops, and preventing glyphosate in the tank mix. Further, I request a public hearing on the matter.

Sincerely,

Donna Simpson

Jonesboro, AR 72405

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John Sutherland

White Hall, AR 71602

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Sincerely,

Brian Teeter

Little Rock, AR 72207

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Linda Vanblaricom

Little Rock, AR 72205

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Sincerely,

Jenny Wiedower

Little Rock, AR 72205

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Sincerely,

Christine Wilson

Conway, AR 72034

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Lynell Withers

Russellville, AR 72802

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Renee DeJarnatte

Poplar Grove, AR 72374

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Dylan Edgell

Russellville, AR 72802

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Michael Green

Bella Vista, AR 72715

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Nancy Hartney

Fayetteville, AR 72701

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Monica Mabry

Conway, AR 72034

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Frances Currie

New Orleans, LA 70118

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Marcia Ingram

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Rusty Leewright

Austin, AR 72007

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Patty McLean

Conway, AR 72032

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Elisabeth Olsson

Little Rock, AR 72205

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Sara Wittenberg

Centerton, AR 72719

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Amy Chandler

England, AR 72046

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Diane Phillips

Perry, AR 72125

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Katherine Strause

Little Rock, AR 72205

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Linda Padgett

Rogers, AR 72758

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Molly Smith

Little Rock, AR 72207

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Jessica Davis

Cabot, AR 72023

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It will be shocking and embarrassing if the Arkansas Plant Board ignores science and risks damage to public and private land simply to cave in to corporate special interests. The issue of Dicamba use past the May 25 cutoff date was settled. It is frustrating that this topic has come up again.

Sincerely,

Jack Stewart

Jasper, AR 72641