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**From:** Sunseri, Matthew (MDA) [matthew.sunseri@state.mn.us]  
**Sent:** 9/6/2018 1:52:14 PM  
**To:** Baris, Reuben [Baris.Reuben@epa.gov]; Kenny, Daniel [Kenny.Dan@epa.gov]  
**Subject:** Minnesota comments on 2019 dicamba registration

Reuben and Dan,

Thank you for the opportunity to provide input regarding dicamba regulations for 2019.

Minnesota received over 250 reports of dicamba damage in 2017. For 2018 the Minnesota Department of Agriculture (MDA) imposed additional cutoff date and temperature restrictions using a Section 24(c) label, which was approved by EPA for 2018.

In 2018, MDA has had 51 reports of dicamba damage.

Even though some farmers were unable to use dicamba during 2018 because of wet weather near June 20th, we attribute much of this reduced number of complaints to the 24(c) labeled restrictions below:

- Do not apply after June 20<sup>th</sup>
- Do not apply if daily high temperature is forecast to be over 85 degrees F.

Compared to states that did not have cutoff dates, Minnesota had very limited complaints of off-site dicamba movement in 2018.

The MDA would prefer that any Minnesota-specific restrictions for 2019 appear on the Section 3 label. If this is not possible our default approach would be to use a 24(c) label to impose any potential restrictions, as we did for the 2018 season. Not having the 24(c) tool available to apply state specific restrictions would be problematic for Minnesota. The MDA is currently analyzing our 2018 complaint information, but a thorough analysis of this data will take some time before our Commissioner will be ready to make any decisions regarding 2019.

If you have any questions regarding our comments or need additional information please contact us.

Thank you,

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