

Message

From: Thostenson, Andrew [andrew.thostenson@ndsu.edu]
Sent: 7/23/2018 6:52:02 PM
To: Baris, Reuben [Baris.Reuben@epa.gov]
Subject: RE: Contemplating 2019 Without Dicamba--Yes, by all means

You are most welcome to share with your people.

I hope it is useful and constructive. That is why I wrote it.

Cheers,

A

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"...with firmness in the right, as God gives us to see
the right, let us strive on to finish the work we are in..."
Quotation from Abraham Lincoln

From: Baris, Reuben <Baris.Reuben@epa.gov>
Sent: Monday, July 23, 2018 1:47 PM
To: Thostenson, Andrew <andrew.thostenson@ndsu.edu>
Subject: RE: Contemplating 2019 Without Dicamba

Hi Andrew.
I appreciate the context and your comments.
As long as you are ok with it, I will be sharing your comments internally. I think your voice is an important one.
Thank you.
Reuben

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From: Thostenson, Andrew [<mailto:andrew.thostenson@ndsu.edu>]
Sent: Monday, July 23, 2018 2:30 PM
To: Baris, Reuben <Baris.Reuben@epa.gov>
Subject: Contemplating 2019 Without Dicamba

What we now know, in 2018, is that minimizing the off target movement of dicamba to a reasonable level is NOT possible.

If you take 2017, off the board, and only look at what has happened in 2018, I think this level of movement is completely unacceptable.

In ND it is still too early to tell if we will have fewer acres impacted because of the additional restrictions we put into place, but already, our complaints are surpassing 2017.

MN may well be able to claim that they tamed this problem, with a meaningful cutoff date. However, in places like AR, that had an effective ban in place since early May, they still have had way too much damage.

In case you have not seen them, three articles are must read on this issue:

Obviously the Mizzou July 15 report:

<https://ipm.missouri.edu/ipcm/2018/7/july-15-Dicamba-injury-update-different-year-same-questions/>

The next is from DTN regarding off-target movement to non-ag sites:

<https://www.dtnpf.com/agriculture/web/ag/news/crops/article/2018/07/20/dicamba-moves-beyond-bean-fields-eye>

The final is from Tennessee:

<http://news.utcrops.com/2018/07/dicamba-in-tennessee-year-3/>

Steckel's comment is the most devastating: "What also points to the training not working well is how marked up by dicamba many trees appear in and around fields planted to Xtend. The most publicized of these are located at the Reelfoot Lake area and those trees do look bad. Unfortunately, so do many trees near soybean and cotton fields across Tennessee. Indeed I have been called to look at trees in some home owner yards that I could describe with only one word: "Embarrassing".

What I have observed in ND, thus far, has confirmed for me that this technology cannot be used without accepting widespread damage to sensitive plants. On a personal level, my friend from church, that I mentioned to you last fall, who farms NW of Fargo, has over 800 acres damage this year. That is roughly three times the acreage impacted in 2017.

I think it is time to start discussions about what 2019 looks like WITHOUT dicamba sprayed over the top in soybeans and cotton. Even if you do not register these products (or radically restrict them) my guess is that 60% of the seed stock in this country is going to be planted to dicamba tolerant strains. This means that one could have millions of acres of illegal applications made next year. After 2016, 2017, and now 2018, the year 2019 could be terrible for this country.

I am sure you all have contemplated some of these scenarios, but it seems to me those conversations need to start taking place, especially with EPA's State partners.

You have my best as you and your colleagues grapple with this very difficult problem,

Andrew

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