

May 26, 2016

Ms. Susan Lewis  
Dicamba: New Use on Herbicide-Tolerant Cotton and Soybeans  
Environmental Protection Agency  
Mailcode 28221T  
1200 Pennsylvania Ave, NW  
Washington, DC 20460

Regarding Docket No. EPA-HQ-OPP-2016-0187

Dear Sir or Madam:

On behalf of the Kansas soybean farmers, the Kansas Soybean Association (KSA) would like to ask EPA to give U.S. farmers access to the full benefits of new dicamba formulations under review for use on dicamba-tolerant soybeans and cotton.

KSA advocates on behalf of soybean farmers on local, state, national and international issues of importance. Founded in 1973, its advocacy efforts are made possible by farmers' voluntary memberships and industry partners' sponsorships.

Soybeans continue to increase annually in the importance as part of the crop production in Kansas. Better varieties are allowing soybeans to be grown in more areas of the state. Nationally, Kansas ranks 11<sup>th</sup> in production, with an estimated production value of 1,241,000,000 dollars.

Over the past several years, our growers have been facing increased pressure from herbicide-resistant weeds, in particular kochia. Kansas soybean farmers continue to look for additional modes of action in order to battle weed resistance. Now more than ever, it is critical to have access to new tools to fight aggressive weeds in order to minimize yield or crop loss and depreciation of land value.

Dicamba tolerance is a promising new option to maximize yield potential. The dicamba-tolerant soybean systems expand the dicamba weed control window. Our growers will be able to use dicamba in burn down without plant-back restrictions. But they also need the access to the multiple modes of action that would be made possible by use of dicamba with glyphosate in this system to get maximum control of weeds and weed resistance. Tank mixing various modes of action is vital effective weed control.

Dicamba has been used safely for more than 40 years and with the new formulations and application techniques, such as nozzle selection, equipment settings and timing of application depending on environmental conditions, off-site movement can be controlled effectively. The proposed 110 foot buffer around a field is impractical and should at the minimum be changed to a downwind buffer.

We urge EPA to act now to give our farmers full access to these new dicamba formulations.

Thank you for your consideration.

Sincerely,

*Raylen Phelon*

KSA President