March 25, 2019

I would like to comment on the proposed ban for Chlorpyrifos. Being a farmer in Oregon with nearly 50 years of farming experience provides me with a broad understanding of the issue. I rarely provide comments, but Chlorpyrifos is an extremely important product for us. Please note that we are involved with both organic and conventional crop production. We consider all other options in the IPM management program that we adhere to, before carefully handling and applying Chlorpyrifos.

Within our operation we apply Chlorpyrifos on 10 or more crops. Many of these crops we have <u>no alternatives</u>. Two examples of these are cabbage and Christmas trees. There are NO substitutes for controlling Cabbage Root Maggot and Symphylans. Without Chlorpyrifos, production of cabbage and other brassica crops would be effectively eliminated from production in our operation. With the cancellation of Thionex several years ago only Chlorpyrifos remained effective against Douglas Fir Twig Weevil. While there are other registered products for Douglas Fir, they do not control this pest. In addition, the alternatives greatly reduce good insect predator populations. When the good predator population is reduced, our experience is that yet more spray applications are needed to control other destructive insect population explosions that these predators would normally control. The Douglas Fir Twig Weevil has become more widespread and aggressive in recent years. Loss of Chlorpyrifos would be especially devastating as we are entering the low inventory phase of the Christmas tree production cycle. Shortages started to appear in the 2017 marketing season and will likely persist for another six plus years. Trees infected with Douglas Fir Twig Weevil quickly become unmarketable. If light infestations prevent exporting. Mexico has a zero tolerance for this pest and they inspect every load at the border.

If an insect pest must be controlled by Chlorpyrifos and there are no alternatives, then we will be forced to drop that crop from production. This would be most disruptive to our crop rotation resulting in other negative consequences for erosion control, soil health, salmon habitat and the promotion of other wildlife. Several crops that we now produce conventionally we are unable to grow organically because they generally require an application of Chlorpyrifos to control an insect pest. We must have replacements available before loosing Chlorpyrifos. Please do not vote to ban Chlorpyrifos, especially before alternatives are available in the marketplace.

Sincerely,

Dennis K. Hopper

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