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October 28, 2020

Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, NW
Washington, DC 20460

Re: Comments on the Proposed Interim Registration Review Decision for metolachlor and s-metolachlor; Docket ID EPA-HQ-OPP-2014-0772

To Whom it May Concern:

The Illinois Corn Growers Association (ICGA) is pleased to submit comments in support of the reregistration of metolachlor and s-metolachlor.

ICGA represents the interests of nearly 4,000 corn farmer members in Illinois. These members rely on ICGA to protect their right to use every available tool on their family farms to grow food, feed, and fuel for the world. Metolachlor is a valuable tool Illinois farmers have been using for more than 20 years to control problematic grasses and broadleaf weeds.

Metolachlor provides residual activity important for controlling weeds on Illinois farms beyond the immediate impacts of application. It is also an essential herbicide for farmers managing herbicide resistant weeds. Few weeds have demonstrated resistance to metolachlor to date and farmers will need continued access to this product as an important component of herbicide plans for years to come.

EPA itself acknowledges in the PID that metolachlor is an important pesticide for multiple crops, including corn, and is used annually on approximately 30 percent of all corn acres. EPA also acknowledges a very long and safe history of metolachlor use on family farms. For these acknowledgements, and for the commitment to work with agricultural stakeholders on availability of pest management, ICGA is grateful.

Thank you for the opportunity to submit comment in support of the reregistration of metolachlor and s-metolachlor.

Sincerely,

A handwritten signature in blue ink that reads "William L. Leigh". The signature is fluid and cursive, written over a light blue horizontal line.

William L. Leigh
President