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October 23, 2017

Michelle Ramirez
Office of Environmental Health Hazard Assessment
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Sacramento, CA 95812-4010

Re: Hazard Identification Materials for Chlorpyrifos

To Whom It May Concern:

The California Cotton Ginners and Growers Association (CCGGA) appreciates the opportunity to comment on the Office of Environmental Health Hazard Assessment's (OEHHA) "Hazard Identification Materials for Chlorpyrifos".

CCGGA represents over 800 cotton growers of nearly 300,000 acres in California and represents 100% of the cotton ginning industry in the state on regulatory and legislative issues that affect the cotton production industry such as pesticides, safety, water, labor, and air quality issues.

Just a few short years ago our Association in partnership with the University of California's Integrated Pest Management (UCIPM) program evaluated the crop protection tools available for the industry and what alternatives are available for the key cotton pests. Of several pests two in particular were identified to have no or few alternatives to chlorpyrifos for control, whitefly and aphid. Both of these pests are devastating to the cotton industry. In the later part of the season, if proper control is not achieved, high populations of whitefly and aphid infest a field and secrete an excrement "honey dew". This honey dew creates a stickiness to the exposed lint resulting in problems in the spinning and processing down the line. Developing a reputation for stickiness will destroy a region's, such as the San Joaquin Valley's, ability to market high value cotton. UCIPM cited whitefly as Key Pest for chlorpyrifos use. Tank mixes with chlorpyrifos are **required** to control adult whiteflies in addition chlorpyrifos is the **only active ingredient** that has efficacy and plant canopy penetration to manage late season cotton aphid.

The California cotton industry takes great pride in the integrated pest management practices that have been developed in the recent years. However, with fewer and fewer products remaining available the industry simply cannot afford to lose a product that has been found to be **critical** to the pest management system for cotton in California.

Chlorpyrifos' potential listing under Prop 65 would create a significant impact on grower's ability to use this important tool. Our Association stands by the research and sound scientific work that upholds the product's current federal label.

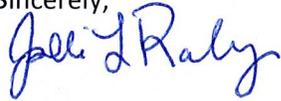
October 23, 2017

Re: Hazard Identification Materials for Chlorpyrifos

Page 2

CCGGA and OEHHA share the same goal of taking every necessary effort to protect human health and the environment. However, our Association feels that the listing of chlorpyrifos under Prop 65 would be a precedent setting move that is not based on the sound, scientific data that is accepted today. We ask that OEHHA take into consideration the damage that would be done to the integrated pest management system in place today if additional restrictions were to be imposed. We appreciate the opportunity to comment on this matter.

Sincerely,



Jodi Raley

Director of Regulatory Affairs