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To the Arkansas State Plant Board,

Audubon Arkansas, state office of the nonprofit conservation organization National Audubon Society, is firmly AGAINST the 2019 proposed dicamba rule. We urge you to also vote NO to this proposal to extend the dicamba application cut-off date from April 15 to May 21. The scientific evidence does not justify moving this date.

I saw Dr. Jason Norsworthy's presentation at your December 6, 2018, meeting. His research on dicamba's volatility is thorough and compelling. There is no question in my mind that using dicamba on millions of acres of soybean and cotton further into Arkansas's warming spring will dramatically increase the collateral damage to off-target plants. Damage has already been documented to non-resistant crops, honeybee production, nearby trees, and native plants that birds and pollinators depend on.

Audubon believes that working lands can work for birds and people. But the widespread use of dicamba will put birds at risk in our agricultural landscape. In the Delta, Audubon has designated 420,000 acres across 14 sites as Important Bird Areas (IBAs). These public and private lands, including the globally important Cache-Lower White Rivers IBA, provide essential habitat for birds of conservation concern. For example, Pine City Natural Area in Monroe County supports the only population of the endangered Red-cockaded Woodpecker in the Delta. These IBAs also support abundant waterfowl populations that hunters and Arkansas's economy depend on. They support Northern Bobwhite quail populations that Arkansas Game and Fish Commission and Quail Forever are working to restore. Yet they are surrounded by row crops on all sides. In a landscape full of dicamba-resistant soybean and cotton, the build-up of volatile dicamba in the atmosphere could well be enough to damage these state natural areas, wildlife management areas, national wildlife refuges, family farms, and the birds they harbor.

As a member of the Arkansas Monarch Conservation Partnership, Audubon is concerned about the effects of dicamba on Monarch and pollinator populations. Because of steep population declines, the Monarch and several pollinator species have been petitioned to be listed as threatened or endangered under the Endangered Species Act. To help recover these species in Arkansas a number of state and federal agencies, nongovernmental organizations, businesses, landowners and others are working to implement strategies in the Arkansas Monarch and Pollinator Conservation Plan <http://arkansasmonarchs.org/arkansas-monarch-and-pollinator-conservation-plan>. The plan states "Provision of adequate feeding and breeding habitat to provide for the needs of Monarchs and pollinators while they are in Arkansas is the primary concern and overarching goal of this plan. Monarch butterflies and pollinators must be able to complete their life cycles to sustain healthy populations, and can only do this if there is sufficient high-quality habitat available throughout the growing season. **This is important not only for Monarchs and other pollinators, but also for sustaining native vegetation as well as agriculture.**" [emphasis added] A diverse plant and insect community is good for agriculture. Widespread use of dicamba during the growing season is anathema to keeping Monarchs and pollinators off the Endangered Species List.

Bee pollination is vital to our food production systems, and insect pollination in general contributes an estimated \$29.4 billion of added value to the agricultural economy in the United States. In Arkansas, thousands of acres are planted in crops dependent upon or improved by the pollination services of honeybees and native bees. The fact that Coy's Honey Farm, Arkansas's largest beekeeping operation, has to leave the state because dicamba is wiping out redvine and other native plants that the bees depend on is the first warning sign of the threat dicamba poses to native pollinators.

Habitat for birds, pollinators, and other wildlife is also found in the many thousands of wetland reserve easements, conservation buffers, filter strips, and other conservation practices installed on agricultural lands under the Farm Bill. Farmers are under contract with the USDA to maintain these areas so they meet their intended purposes of soil, water, and wildlife conservation. Both the farmers and USDA have invested money in establishing such conservation practices. Tracts are often small, narrow, and immediately adjacent to row crops. They are intertwined with and integral to the agricultural landscape. It will be difficult if not impossible to protect them from dicamba's volatility. Economic and conservation investments, not to mention contractual obligations, are at risk from dicamba.

Audubon has also invested in farmers. We are training select farmers across the state to grow native warm season grasses and pollinator-friendly forbs in row-crop style agriculture in order to exponentially and efficiently increase the supply of local ecotype seeds needed for local prairie restoration and revegetation projects. Native plants are an environmentally friendly cash crop that provide on-farm wildlife benefits. Like most specialty crops, their native plant crop is at risk from dicamba. Our farmers' right to diversify their income and provide for wildlife now and in the future is at risk from dicamba.

Audubon's Plants for Birds initiative encourages homeowners everywhere to landscape with native plants. More native plants means more choices of food and shelter for native birds and other wildlife. For example, over 500 species of Lepidoptera caterpillar feed on oak leaves. A chickadee pair needs upwards of 9,000 caterpillars to feed a single clutch of young. Native plants like oaks are vital for maintaining bird populations in our communities. Dicamba damage has already been documented on oaks and other trees in yards and towns in Arkansas and other states. Increased use of dicamba will result in even more damage to native trees, shrubs, and wildflowers growing in yards and gardens in our rural communities, which will hamper birds' ability to feed their young.

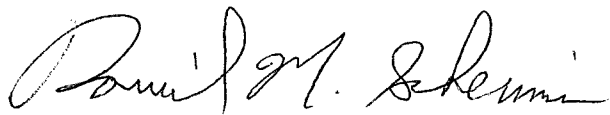
Dicamba is no longer just an agricultural issue, it has the general public's attention now. Audubon has made over 7,000 people aware of dicamba through social media and email. The Freedom to Farm Foundation has reached thousands of Arkansans as well. We and our supporters have written letters to the editor of papers across the state. Though we specifically relate our concern about the use of dicamba beyond April 15, the overwhelming response we receive from readers is that dicamba should be banned completely. It seems that once the public learns about the damage and threat caused by dicamba's volatility, the outcry is they do not want such an herbicide used at all. If you decide to expand the use of dicamba, and there is damage done to public lands, to duck hunting grounds, to street trees, to home gardens, to honeybees, and more, imagine the public outcry to ban dicamba. Imagine the public pressure that will be put on the Governor, on legislators, on mayors, and on state agencies. Audubon is not advocating for a ban at this time. You don't want a ban. The cattle and hay producers who have used dicamba safely for decades don't want a ban. Dicamba is a tool in the tool belt, but it is not the tool to use to treat pigweed, which weed scientists say is certain to evolve resistance in a matter

of years. Imagine the collateral damage done by then. Farmers and non-farmers alike will be left with the long-term effects that may not be corrected in a lifetime.

As the Bird Conservation Director for Audubon Arkansas, I understand the need for herbicides to control weeds in the name of bird habitat protection. So I'm sympathetic to the farmers who use them to protect their crops and our food. But it is time to consider safer and more sustainable alternatives to the weed management challenges facing farmers. There are certainly many techniques for managing weeds that involve much less use of herbicides, and which largely avoid the problems with volatility and weed resistance.

I urge you to follow the science, and to heavily weigh the likely impact to our natural resources as a whole. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, reading "Dan M. Scheiman". The signature is written in a cursive style with a large, prominent initial "D".

Dan Scheiman, Ph.D.

Bird Conservation Director