

March 15, 2011

Members of House Committee on Transportation & Infrastructure
U.S. House of Representatives
Washington, DC 20515

Dear Member of House Committee on Transportation & Infrastructure:

The undersigned organizations urge you to **support HR 872, the Reducing Regulatory Burdens Act**, at this Wednesday's business meeting of the House Committee on Transportation and Infrastructure. Based on a court ruling in the *National Cotton Council v. EPA* (6th Cir. 2009) case, the Environmental Protection Agency (EPA) and delegated states are required to establish permit programs under the Federal Clean Water Act for aquatic pesticide applications. HR 872 is a bipartisan bill aimed at reducing the regulatory burden and duplication posed by this court mandate.

Pesticides play an important role in protecting the nation's food supply, public health, natural resources, infrastructure and green spaces. They are used not only to protect crops from destructive pests, but also to manage mosquitoes and other disease carrying pests, invasive weeds and animals that can choke our waterways, impede power generation and damage our forests and recreation areas.

Since the inception of the Clean Water Act in 1972, water quality concerns from pesticide applications have been addressed during the registration and labeling process under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). Imposing a national pollutant discharge elimination system (NPDES) permit *in addition* to FIFRA regulation will not provide any identifiable additional environmental benefits.

The proposed permit means further unfunded mandates on already struggling governments, and it creates additional red tape, squeezing existing resources and threatening added legal liabilities. The permit's complex compliance requirements will impose tremendous new burdens on thousands of small businesses, farms, communities, counties and state and federal agencies legally responsible for pest control, and expose them to legal jeopardy through citizen suits over paperwork violations. It could jeopardize jobs, the economy and human health protections across America as regulators and permittees struggle to implement and comply with these permits. So, we urge Congress to pass HR 872 into law before the permits become final this year.

We respectfully ask that you join Transportation & Infrastructure Chairman John Mica (R-FL) and Subcommittee Chair Bob Gibbs (R-OH), as well as Agriculture Committee Chairman Frank Lucas (R-OK), Ranking Member Collin Peterson (D-MN), Subcommittee Chair Jean Schmidt (R-OH), and Ranking Member Joe Baca (D-CA) in supporting this bipartisan bill.

Sincerely,

**Agricultural Alliance of North Carolina
Agribusiness Association of Iowa
Agribusiness Association of Kentucky
Agribusiness Council of Indiana
Agricultural Retailers Association
American Chemistry Council - Biocides Panel
American Farm Bureau Federation
American Mosquito Control Association
American Nursery and Landscape Association
American Soybean Association
Alabama Agribusiness Council
Alabama Vegetation Management Society Inc.
Aquatic Ecosystem Restoration Foundation
Aquatic Plant Management Society
Arizona Crop Protection Association
California Dried Plum Board
California Grape & Tree Fruit League
Chemical Producers & Distributors Association
Commercial Flowers Growers of Wisconsin
Consumer Specialty Products Association
Cranberry Institute
CropLife America
Crop Protection Association of North Carolina
Delta Council (MS)
DuPont Crop Protection
DuPont Professional Products
Far West Agribusiness Association
Florida Aquatic Plant Management Society
Florida Fruit & Vegetable Association
Florida Vegetation Management Association
Gardens Beautiful Centers (WI)
Georgia Agribusiness Council
Georgia Urban Agriculture Council
Golf Course Superintendents Association of America
Gowan Group
Growmark
Hop Growers of America
Hop Growers of Washington
Illinois Fertilizer & Chemical Association
Kansas Agribusiness Retailers Association
Land O'Lakes
Lawns of Wisconsin Network
Michigan Agri-Business Association
Michigan Aquatic Managers Association
Midwest Aquatic Plant Management Society
Midsouth Aquatic Plant Management Society
Minnesota Agricultural Aircraft Association
Minnesota Agri-Growth Council**

**Minnesota Crop Production Retailers
Minnesota Pest Information & Education
Mississippi Vegetation Management Association
Missouri Agribusiness Association
Montana Agricultural Business Association
Mosquito & Vector Control Association of California
National Agricultural Aviation Association
National Alliance of Forest Owners
National Alliance of Independent Crop Consultants
National Association of State Departments of Agriculture
National Association of Wheat Growers
National Corn Growers Association
National Cotton Council
National Council of Farmer Cooperatives
National Farmers Union
National Pest Management Association
National Potato Council
National Roadside Vegetation Management Association Inc
New Jersey Green Industry Council
North Carolina State Grange
North Carolina Agribusiness Council Inc.
North Central Weed Science Society
Northeast Aquatic Plant Management Society
Northeastern Weed Science Society
Oklahoma Agribusiness Retailers Association
Oregon Association of Nurseries
Oregonians for Food & Shelter
Professional Landcare Network
RISE (Responsible Industry for a Sound Environment)
Rocky Mountain Agribusiness Association
Schertz Aerial Services
Society of American Florists
South Carolina Aquatic Plant Management Society
South Carolina Fertilizer & Agrichemical Association
South Dakota Agri-business Association
Southern Crop Production Association
Southern Weed Science Society
Syngenta
Texas Agricultural Industries Association
Texas Aquatic Plant Management Society
Texas Vegetation Management Association
USA Rice Federation
US Apple Association**

US Hop Industry Plant Protection Committee
Valent U.S.A
Vegetation Management Association of Kentucky
Virginia Agribusiness Council
Washington Friends of Farms & Forests
Washington Hop Commission
Washington State Potato Commission
Weed Science Society of America
Western Aquatic Plant Management Society
Western Growers Association
Western Plant Health Association
Western Society of Weed Science

Wild Blueberry Commission
Wisconsin Agribusiness Council
Wisconsin Christmas Tree Producers Association
Wisconsin Crop Protection Association
Wisconsin Landscape Contractors Association
Wisconsin Nursery Association
Wisconsin Potato & Vegetable Growers Association
Wisconsin Sod Producers Association
Wyoming Ag-Business Association