

January 23, 2018

The Honorable Mike Conaway
Chairman
House Committee on Agriculture
1300 Longworth House Office Building
Washington, DC 20215

The Honorable Colin Peterson
Ranking Member
House Committee on Agriculture
1300 Longworth House Office Building
Washington, DC 20215

Dear Chairman Conaway and Ranking Member Peterson:

On behalf of the undersigned organizations, we urge your support for inclusion of critical regulatory relief legislation, the *Reducing Regulatory Burdens Act* (HR 953), in the 2018 Farm Bill. This vital measure, previously included in the House-passed version of the 2014 Farm Bill, is important for the protection of public health and our national food supply.

The bipartisan legislation, introduced by Congressman Gibbs (R-OH) and adopted by a wide margin in the House of Representatives on May 24, 2017, would provide regulatory relief to our nation's farmers as well as foster the protection of public health and natural resources. As Congressman Gibbs stated upon introduction, "*The bill removes the requirement for NPDES permitting for pesticides already approved by EPA for use under FIFRA, reducing bureaucratic burdens on farmers, ranchers.*"

For almost forty years, the Environmental Protection Agency (EPA) and pesticide applicators, operated exclusively under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). All pesticides are reviewed and regulated for use with strict instructions on the EPA approved product label. A thorough review and accounting of impacts to water quality and aquatic species is part of every EPA review. In fact, the EPA has previously testified before the House Committee on Agriculture as to the adequacy of FIFRA's comprehensive regulatory requirements including protection of aquatic species and drinking water. (February 16, 2011).

However, pesticide users are now subjected to a court created requirement that lawful applications over, to or near "waters of the U.S." require a Clean Water Act (CWA) National Pollutant Discharge Elimination System (NPDES) permit from EPA or delegated states. Requiring these water permits for pesticide applications is redundant and provides no additional environmental benefit. HR 953 clarifies that federal law does not require this redundant permit for already regulated pesticide applications.

Though the additional NPDES permit burden lacks any further environmental benefit under these circumstances, it does impose costs on thousands of small application businesses and farms, as well as the municipal, county, state and federal agencies responsible for protecting natural resources and public health. Further, the permit *exposes* all pesticide users – regardless of permit eligibility – *to the potential liability of CWA-based citizen lawsuits*. Thus, requiring NPDES permits impacts the use of critical pesticides in protecting human health and the food supply from destructive and disease-carrying pests, and in managing invasive weeds, and in preventing damage to forests.

As the House Agriculture Committee considers the 2018 Farm Bill, we urge the inclusion of HR 953, the *Reducing Regulatory Burdens Act*, to address duplicative regulations and provide certainty to impacted natural resources, public health, and our nation's farmers and ranchers.

Sincerely,

CC: Members House Committee on Agriculture
Chairman and Ranking Member House Committee on Transportation and Infrastructure

Agricultural Retailers Association
American Farm Bureau Federation
American Mosquito Control Association
American Soybean Association
Arkansas Agricultural Aviation Association
Associated Executives of Mosquito Control NJ
Association of Equipment Manufacturers
Aquatic Plant Management Society
California Specialty Crops Council
Colorado Agricultural Aviation Association
Council for Producers and Distributors of Agrotechnology
CropLife America
Delaware Mosquito Control Section
Georgia Mosquito Control Association
Golf Course Superintendents Association of America
Idaho Mosquito and Vector Control Association
Illinois Agricultural Aviation Association
Illinois Mosquito & Vector Control Association
Indiana Agricultural Aviation Association
Iowa Agricultural Aviation Association
Kansas Agricultural Aviation Association
Louisiana Agricultural Aviation Association
Louisiana Mosquito Control Association
Minnesota Agricultural Aircraft Association
Mississippi Agricultural Aviation Association
Missouri Agricultural Aviation Association
Montana Mosquito and Vector Control Association
Mosquito & Vector Control Association of CA
National Agricultural Aviation Association
National Alliance of Forest Owners
National Alliance of Independent Crop Consultants
National Association of State Departments of Agriculture (NASDA)
National Corn Growers Association
National Cotton Council
National Council of Farmer Cooperatives
National Onion Association
National Pest Management Association
Nebraska Aviation Trades Association
New Jersey Mosquito Control Association
New Mexico Agricultural Aviation Association
North Carolina Mosquito and Vector Control Association
North Central Weed Science Society
North Dakota Agricultural Aviation Association
Northeast Agricultural Aviation Association
Northeastern Mosquito Control Association
Northeastern Weed Science Society
Northwest Mosquito and Vector Control Association
Ohio Mosquito & Vector Control Association
Oklahoma Agricultural Aviation Association
Oregon Mosquito and Vector Control Association
Pacific Northwest Aerial Applicators Alliance
Pennsylvania Vector Control Association
RISE (Responsible Industry for a Sound Environment)
South Carolina Agricultural Aviation Association
South Dakota Aviation Association
Southern Weed Science Society
Texas Agricultural Aviation Association
Texas Mosquito Control Association
USApple
Utah County Mosquito Abatement
Virginia Pest Management Association
Washington State Potato Commission
Weed Science Society of America
Western Society of Weed Science
Wisconsin Agricultural Aviation Association
Wyoming Mosquito Management Association

Mosquito Abatement Districts

Ada County Mosquito Abatement (ID)
Adams County Mosquito Control (WA)
Alameda County Mosquito Abatement District (CA)
Alamosa Mosquito Control District (CO)
Anastasia Mosquito Control District (FL)
Animas Mosquito Control District (CO)
Antelope Valley Mosquito & Vector Control District (CA)
Ascension Parish Mosquito Control (LA)
Atlantic County Office of Mosquito Control (NJ)
Bannock County Mosquito and Vector Control Assoc. (ID)
Bay County Mosquito Control (MI)
Beach Mosquito Control District (FL)
Bear Lake Mosquito Control, LLC (ID)
Benton County Mosquito Control District, WA (WA)
Bergen County Mosquito Control New Jersey
Box Elder Mosquito Abatement District (UT)
Burney Basin Mosquito Abatement District (CA)
Butte County Mosquito and Vector Control District (CA)
Cache Mosquito Abatement District (UT)
Caddo Parish Mosquito Control (LA)
Calvert County Mosquito Control (MD)
Camano Island Mosquito Control (WA)
Camden County Mosquito Extermination Commission (NJ)
Cameron Parish Mosquito Abatement District (LA)
Canyon County Mosquito Abatement District (ID)
Cascade County Weed & Mosquito Division (MT)
Chambers County Mosquito Control (TX)
Charlotte County Mosquito & Aquatic Weed Control (FL)
Chatham County Mosquito Control (GA)
Churchill County Mosquito, Vector and Noxious Weed Abatement District (NV)
Clark County Mosquito Control District (WA)
Coachella Valley Mosquito & Vector Control District (CA)
Colusa Mosquito Abatement District (CA)
Compton Creek Mosquito Abatement District (CA)
Consolidated Mosquito Abatement District (CA)
Contra Costa Mosquito and Vector Control District (CA)
Cumberland County Mosquito Control Division (NJ)
Curlew Mosquito Control District (WA)
Douglas County Mosquito Abatement District (NV)
East Side Mosquito Abatement District (CA)
Edwards Mosquito Abatement District (ID)
Essex County Mosquito Control (NJ)
Florida Keys Mosquito Control District (FL)
Fort Henry Mosquito Abatement District (ID)
Franklin County Mosquito Control District (WA)
Fresno Mosquito and Vector Control District (CA)
Gainesville Mosquito Control (FL)
Gem County Mosquito Abatement District (ID)
Glenn County Mosquito & Vector Control District (CA)
Gloucester County Mosquito Control (NJ)
Grand River Mosquito Control District (CO)
Grant County Mosquito Control District (NJ)
Hill County Weed & Mosquito District, Montana (MT)
Iberia Parish Mosquito Abatement District (LA)
Indian River Mosquito Control District (FL)
Kings Mosquito Abatement District (CA)
Lee County Mosquito Control District (FL)
Madera County Mosquito & Vector Control District (CA)
Manatee County Mosquito Control District (FL)
Marin/Sonoma Mosquito & Vector Control District (CA)
Mason Valley Mosquito Abatement District (NV)
Master Mosquito Control, LLC (NH)
Merced County Mosquito Abatement District (CA)
Mercer County Mosquito Control (NJ)
Metropolitan Mosquito Control District (MN)

Miami Dade County Mosquito Control (FL)
Michigan Mosquito Control Association (MI)
Middlesex County Mosquito Extermination Comm. (NJ)
Mosquito Control Services, LLC (LA)
Municipal Mosquito (TX)
Napa County Mosquito Abatement District (CA)
Nassau County Mosquito Control Unit (NY)
North Shore Mosquito Abatement District (IL)
Northern Salinas Valley Mosquito Abatement District (CA)
Oauchita Parish Mosquito Abatement District (LA)
Orange County Mosquito & Vector Control District (CA)
Orange County Florida Mosquito Control (FL)
Owens Valley Mosquito Abatement Program (CA)
Pasco County Mosquito Control District (FL)
Pine Grove Mosquito Abatement District (CA)
Placer Mosquito and Vector Control District (CA)
Prince William Mosquito Forest Pest Management (VA)
Sacramento County -Yolo County Mosquito Abatement District (CA)
Saginaw County Mosquito Abatement Commission (MI)
Salt Lake City Mosquito Abatement District (UT)
San Gabriel Valley Mosquito & Vector Control Dist. (CA)
San Joaquin County Mosquito & Vector Control Dist. (CA)
San Mateo County Mosquito & Vector Control Dist. (CA)
Shasta Mosquito and Vector Control District (CA)
South Salt Lake Valley Mosquito Abatement District (UT)
South Walton County Mosquito Control District (FL)
SouthLake Mosquito Abatement District (IL)
Southwest Mosquito Abatement & Control District (UT)
St. Tammany Parish Mosquito Abatement (LA)
Sussex County Office of Mosquito Control (NJ)
Sutter-Yuba Mosquito & Vector Control District (CA)
Tehama County Mosquito & Vector Control District (CA)
Tulare Mosquito Abatement District (CA)
Turlock Mosquito Abatement District (CA)
Uintah Mosquito Abatement District (UT)
Vermilion Parish Mosquito Control (LA)
Warren County Mosquito Extermination Commission (NJ)
Weber Mosquito Abatement District (Ogden, Utah)
West Baton Rouge Mosquito Control (LA)
West Side Mosquito & Vector Control District (CA)
West Umatilla Mosquito Control District (OR)
Yakima County Mosquito Control District (WA)