

Comment Info: =====

General Comment: November 6, 2006

Lance Wormell  
Special Review and Reregistration Division (7508P)  
Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Ave., NW  
Washington, DC 20460-0001

RE: Docket ID number EPA-HQ-OPP-2006-0201

I am the certified golf course superintendent at The Olympic Club in San Francisco, California and also serve on the Board of Directors of the Golf Course Superintendents Association of America (GCSAA). Since 1926, GCSAA has been the leading professional association for the men and women who manage and maintain golf facilities in the United States. From its headquarters in Lawrence, Kan., the association provides education, information and representation to more than 21,000 individual members.

I am requesting that the EPA reconsider its recent decision to cancel registration of the organic arsenical herbicides (MSMA, DSMA, and CMA) in the turfgrass market. In my role as superintendent, I am responsible for providing healthy turf that has minimal weed issues at my golf course. This is necessary in order to meet the demands of my customers (golfers) as my facility is located in a very competitive golf market.

EPA acknowledges there is no direct replacement for the MSMA selective control of broadleaf and grass weeds in golf course turf. However, the agency has developed a proposed list of alternative herbicide treatments using two to three herbicides. EPA has pointed out these proposed alternatives may be cost prohibitive and I wholeheartedly concur with this statement. MSMA is a very affordable and low cost herbicide. The proposed list of alternatives will be cost prohibitive to most facilities and would provide an ineffective means of dealing with tough annual weed growth in turf. Current use restrictions of proposed alternatives are quite problematic.

As the certified golf course superintendent at The Olympic Club, I give high priority to maintenance practices that do not have a negative impact on the environment. Meeting or exceeding the expectations of my customers (golfers), while ensuring golf's compatibility with the natural environment, is fundamental for the financial success of my facility and a high priority for me personally.

I respectfully suggest that EPA consider restricting the use of organic arsenical

herbicides on soil types with the greatest potential for organic arsenical leaching,  
but not ban them from soils with little or no leaching potential.

I ask that the EPA take into consideration my comments when making your final assessment. Removal of MSMA from the market will have a significant financial impact on the golf industry. Thank you for allowing me to express my concerns with this decision and I highly encourage this re-registration decision to be reconsidered.

Sincerely,

Patrick R. Finlen, CGCS

Board of Directors  
Golf Course Superintendents Association of America

Certified Golf Course Superintendent  
The Olympic Club  
San Francisco, California