

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

Mosquito Abatement Districts

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