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United States Department of Agriculture
Regulatory Analysis and Development, PPD, APHIS, Station 3A-03.8
4700 River Road Unit 118
Riverdale, MD 20737-1238

Determinations of Nonregulated Status for Dicamba-Resistant Soybeans and Cotton Varieties – Draft Environmental Impact Statement

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The Georgia Cotton Commission (GCC) is a producer funded organization representing the cotton producers of Georgia. Georgia is the second largest cotton growing state with a \$1.3 billion farm gate value and a total economic contribution of \$2.5 billion to the economy of Georgia. The Georgia cotton industry also accounts for over 15,000 jobs in our state. Agriculture is the largest industry in Georgia accounting for over 375,000 jobs and has a total economic impact of over \$76 billion to Georgia's economy.

GCC supports the option to deregulate dicamba-resistant soybeans and cotton without restriction as recommended in the draft Environmental Impact Statement (EIS). GCC believes that both MON 87708 soybean and MON 88701 cotton varieties will provide our cotton producers with a much needed new technology to combat palmer amaranth. In Georgia cotton alone, palmer amaranth control is estimated at \$100 million annually.

GCC has been actively engaged in the knowledge transfer process of these new technologies. Both our staff and board members have met with Monsanto representatives and attended educational field days in Georgia over the last two years specifically for these new technologies.

In conclusion, GCC supports the deregulation of MON 87708 soybeans and MON 88701 cotton without restriction as recommended in the draft EIS. Our Georgia cotton producers look forward to the opportunity to have these new dicamba-resistant technologies at their disposal.

Sincerely,

Mike Lucas
Chairman