



August 11, 2008

Mr. Thomas R. Pokonosky
20100 Minnetonka Blvd.
Deephaven, MN 55331

Dear Mr. Pokonosky,

Our apologies for the late response to your letter. I do not recall seeing your letter until now.

With regard to the proposed DNR rule changes:

1. There are no technical reasons for the reduction in treatment area. In fact, reducing the treatment area to these small sizes makes it very difficult to obtain effective control of the target plants due to "edge effect" and water dilution.
2. There are no toxicological or environmental fate reasons for the reduction in treatment area. Reward has undergone full reviews during its re-registration process at US EPA to address any potential concerns.
3. The rule change does allow a "proposed method selective for invasive aquatic plants". All herbicides are selective in their activity and control although references are made to some products being "non-selective". Selectivity is based on a variety of factors including use rate, site placement, timing, and the potential of some plants to "defend" themselves from herbicides. In this case, Reward does not control all plants in the water body. There are desirable species which remain virtually unaffected by an application of Reward. Also, some other desirable plants have the ability to recover quickly from an application of Reward, making them "tolerant" to an application.

Often, the concern raised by various state DNR's and other regulatory agencies is their concern over suitable habitat for the fisheries. Syngenta fully support valid aquatic plant management and habitat renovation which supports fisheries. We are not aware of any peer reviewed data which supports the MN DNR's assertion that "50%" is the ideal condition. We recommend that control methods and products be selected by the local plant manager and not by general regulations which attempt to make "one size fit all". We do not support any management plan which would result in the total removal of vegetation from the littoral zone. Reward treatments do not result in the complete denuding of the littoral zone and the removal of harborage for fisheries. This is a complete misconception of proper plant management.

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We would be glad to discuss any of these proposed changes with the State personnel if requested (by the State). Without their desire to review the technical merits of such proposals, we are not able to address any concerns raised by these agencies.

If I can be of service, please let me know. My cell phone number is 361-215-0551 or email at jim.petta@syngenta.com

Kind regards,


Jim Petta
Technical Manager

JP:jrp