Farm Bureau Federation
325 S. Higley Rd, Suite 210
Gilbert, AZ 85296

April 14, 2016

U.S. Environmental Protection Agency
EPA Docket Center (EPA/DC), 28221T
1300 Pennsylvania Avenue, NW
Washington, DC 20460-0001

RE: Docket No. EPA-HQ-OPP-2008-0844

Dear Sir or Madam:

As a general farm organization, the Arizona Farm Bureau represents farmers, ranchers, and beekeepers. We recognize the fundamental importance of bees to crop production, as some of our major crops rely on bees for pollination. We appreciate the opportunity to file comments in response to the EPA's notice of availability of the draft pollinator-only ecological risk assessment for the registration review of imidacloprid.

Imidacloprid is used in the production of a number of crops in Arizona including cotton, citrus, leafy vegetables, Cole crops, melons, and seed crops. A recent study conducted by the University of Arizona found that imidacloprid is applied as soil systemic on more than 85% of the lettuce acres in Arizona to control both whiteflies and aphids.[1] The primary growing area for leafy vegetables is Yuma, Arizona, which is also known as the "Winter Lettuce Capital of the U.S.," producing over 90% of the nation's winter supply. According to John Palumbo, Research Scientist and Extension Specialist at the University of Arizona, there are other alternatives to imidacloprid, but they are not as effective and much more expensive to use.[2] Additionally he notes that if growers were to lose the use of imidacloprid on lettuce and Cole crops the cost of production would increase significantly. Growers would be forced to rely on multiple foliage spray applications and the use of pyrethroids, organophosphate, and carbamates.

The use of imidacloprid is also critical in the movement of citrus nursery stock. Because of the Asian Citrus Psyllid found in certain parts of Arizona, citrus nursery stock within the quarantine areas are treated with imidacloprid prior to out-of-state shipment.

---

[1] Palumbo, John C., "2015 Insecticide Usage on Arizona Lettuce," UA VegIPM Update, Vol. 6, No. 12, June 10, 2015, http://ag.arizona.edu/crop/vegetables/advisories/docs/061015_Insecticide_Usage_Summary_in_Lettuce_2015.pdf

[2] Curriculum Vita, John C. Palumbo, Ph. D., Department of Entomology, Yuma Agricultural Center, University of Arizona, http://ag.arizona.edu/aes/yac/images/Facultystaff/pdfcvs/cvpalumbo.pdf

As a grassroots organization that represents beekeepers and commercial honey producers, we understand the ongoing concern regarding bee health. We, like the American Farm Bureau Federation, support efforts to assist that sector of agriculture in meeting those challenges.[3] This includes increased research into the causes of honey bee declines and support of state managed pollinator protection plans (MP3s). The MP3s bring stakeholders together to work on the pollinator issues while representing the mutual interest of both growers and beekeepers. In Arizona the process of developing a Managed Pollinator Protection Plan process is currently underway.

Imidacloprid is an important tool for many growers in our state and we do not believe that this product, which has been used for many years poses, an unreasonable risk to health or the environment. All crops grown in Arizona on which imidacloprid is used would be negatively impacted if it were no longer available as a crop protection tool. Furthermore, farmers and beekeepers in Arizona have a long history of working together to minimize the exposure of pesticides to bees. For those reasons we urge the EPA to continue to allow its use.

Sincerely,

Kevin Rogers, President
Arizona Farm Bureau Federation

[3] See comments submitted to the docket by the American Farm Bureau Federation.