



Arizona Farm Bureau Federation

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November 13, 2017

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-2012-0487 and EPA-HQ-2012-0219; Registration Reviews: Draft Human Health and/or Ecological Risk Assessments for Several Pesticides – EPTC and pendimethalin

To Whom It May Concern:

The Arizona Farm Bureau Federation represents farmers and ranchers from across Arizona. Our members produce an array of crops and livestock that contribute over \$23.3 billion of economic impact to the state. Our comments below address the Environmental Protection Agency's (EPA) draft human health and ecological risk assessment of EPTC and pendimethalin, as we believe it does not fully recognize the critical role these chemistries provide to the success of a number of Arizona's agricultural crops.

EPTC and pendimethalin are both preemergent herbicides used to control weeds during the early stages of crop production. Both products are used on vast array of Arizona crops. EPTC is applied to alfalfa, lettuce, fallow or idle land, lettuce, potatoes, and roses. Pendimethalin is used on an even greater number of crops (and acreage) including the aforementioned crops (except roses), wheat, beans, Cole crops, citrus, corn, cotton, melons, onions, sorghum, pecan, sunflower, grass, lemon, guayule, garlic, and artichoke.

Two pest control advisors in central Arizona indicated that pendimethalin use is a foundational practice of weed management programs in cotton, alfalfa, carrots, sweet corn and melon production, among many other crops in the state. "There are a lot of weed control programs in Arizona built around this flexible and efficacious herbicide."

Arizona produces fresh market cantaloupe and watermelons. In 2016, over 20,000 combined acres harvested were valued at over \$98 million.¹ More than half of Arizona's melons are grown using plasticulture, a practice of covering beds with plastic. Because of this practice, broadcast sprays of herbicides are not used and applications that use physical incorporation of herbicide into the soil are not possible. Pendimethalin H2O is sprayed on the shoulders of soil placed over the edges of the plastic, and offers effective weed control in melons. Pendimethalin is the only herbicide available for this use pattern in Arizona.

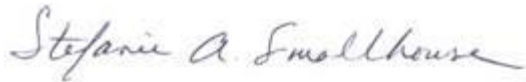
¹ USDA NASS 2017. 2016 State Agricultural Overview: Arizona. United States Department of Agriculture, National Agricultural Statistics Service.

https://www.nass.usda.gov/Quick_Stats/Ag_Overview/stateOverview.php?state=ARIZONA

Weeds are an ever-persistent problem in crop production. If weeds are not managed quickly and effectively, they can choke out a crop by competing for light, nutrients, moisture and serving as a refuge for insects and diseases. Both farmers and pest control advisors acknowledge the importance of using products such as EPTC and pendimethalin to control weeds during the early stages of crop production. They also note the importance of these chemistries in combatting round-up resistant and/or tolerant weeds.

EPTC and pendimethalin are both important crop protection tools 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 human health or the environment. All crops grown in Arizona on which EPTC and pendimethalin are used would be negatively impacted if it were no longer available as a crop protection tool. For those reasons, we urge the EPA to continue to allow their use.

Sincerely,

A handwritten signature in cursive script that reads "Stefanie A. Smallhouse". The ink is dark and the signature is fluid.

Stefanie Smallhouse, President
Arizona Farm Bureau Federation