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U.S. Environmental Protection Agency
EPA Docket Center (EPA/DC), 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

RE: Docket No. EPA-HQ-OPP-2008-0915

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, occupational, and ecological risk assessment of acephate and highlight the role this chemistry provides to the success of a number of Arizona's agricultural crops.

According to Arizona Pest Management Center's data from 2009 through 2017, the two crops where regular use of acephate occurs is in cotton and lettuce. Use in other Arizona crops, including cole crops, beans and peas, is minimal and fluctuates from year to year, likely indicating a "niche use" of acephate to address certain target pests that occur infrequently. While usage of acephate has declined sharply over the past two decades and is generally not a first line of defense in addressing pest problems, it is still an important component of the crop protection tool box.

In cotton acephate has been used to control two primary pests, silverleaf whitefly (*Bemisia tabaci*) and Lygus bug (*Lygus hesperus*). Over the years more selective and reduced-risk insecticides have come on the market replacing the need for acephate. However, there have been some recent situations where the use acephate was necessary. For example, in 2016 sulfoxaflor, one of the two common selective insecticides used to treat Lygus, was not available. Consequently, the use of acephate increased because of the need to rotate insecticides for resistance management. The subsequent approval of a Section 18 Exemption in 2017 for sulfoxaflor restored acephate usage to more standard levels the following year.

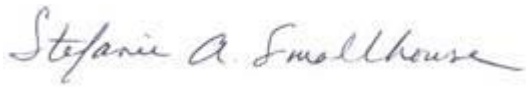
Acephate is also an important tool for situations where farmers need to simultaneously treat late-season infestations of Lygus and whitefly. In these cases, acephate is mixed with pyrethroids to knock-down whitefly adults and Lygus prior to harvest. This is especially important to help reduce the risk of sticky cotton that results from the honeydew residue excreted by adult whiteflies. Contaminated cotton is a significant concern, as it reduces the quality and value of cotton lint. More importantly, a "reputation" as an area producing cotton at high risk for "stickiness" results in broad, regional market penalties in the value of their lint production. Arizona cotton growers have been prevented any such occurrences since 1995.

The other primary use of acephate is to control western flower thrips, the aphid complex and Lygus in head lettuce. Although the use of acephate has been declining in large part due to the availability of new

products, there are still limited alternatives for Lygus and thrips. Insects such as Lygus contribute to plant contamination in lettuce. Because of growth in the fresh-cut and bagged salad products market, preventing insect contamination has become even more important.

Although the number of total acres treated in Arizona is relatively small, the use of acephate as a crop protection tool is still important. Eliminating or restricting its use would result in one less tool available to Arizona farmers. There are times when a particular pest gets out of control or other situations arise where farmers need a product like acephate with broad spectrum control, to significantly reduce the pest population. Additionally, weather can be a key determinant of how severe pest problems will be from year to year. As we experience more extreme weather fluctuations, it is even more important to ensure acephate is available to deal with pest problems effectively and efficiently.

Sincerely,



Stefanie Smallhouse, President
Arizona Farm Bureau Federation