



## **Arizona Farm Bureau Federation**

325 S. Higley Rd., Suite 210  
Gilbert, AZ 85296

November 20, 2018

Office of Pesticide Programs  
Regulatory Public Docket  
Environmental Protection Agency  
Docket Center, (2822IT)  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460-0001

Re: EPA-HQ-OPP-2013-0266

To Whom It May Concern:

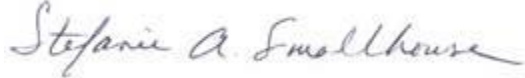
The Arizona Farm Bureau Federation represents farmers and ranchers from all across Arizona. Agriculture contributes \$23.3 billion dollars to the state's economy. A number of our state's farmers and dairymen would be negatively impacted by the Environmental Protection Agency's (EPA) decision to restrict or eliminate the availability of atrazine. We strongly support the continued use of atrazine and urge the agency not to prohibit or restricts its availability and use.

In Arizona atrazine is an important crop protection tool in the production of corn and sorghum. The 2017 National Agriculture Statistic Service State Agriculture Overview reported 65,000 acres of corn last year. Atrazine is an economical product that is used extensively in controlling various weeds. In some cases, alternative products costs three to five times more than atrazine and are not always as effective. Consequently, restricting or eliminating the use of atrazine would increase the costs of production, potentially reduce yields, and harm profitability.

The use and beneficial impact of atrazine is well documented in U.S. agriculture. Atrazine was first registered for use in 1958. Since that time it has been subject to much scrutiny and scientific evaluation. However, in conducting the reevaluation of atrazine, the EPA has strayed from the process of conducting an honest, transparent, open and unbiased review. We understand the agency is disregarding recommendations and counsel from its own 2012 Scientific Advisory Panel (SAP). The results are the draft ecological assessment includes scientifically questionable studies and ignores or discounts rigorous, high quality studies. Additionally, and especially problematic, the draft assessment utilizes modeled, theoretical scenarios, that inflate risks well beyond what are normally seen in actual, real-life situations.

As a member of the American Farm Bureau Federation (AFBF), we support their comments submitted to the above referenced docket. Along with AFBF, we too urge the EPA reassess the draft ecological risk assessment to incorporate the advice of previous SAPs, use legitimate science and evaluate the chemical fairly. Farming is not an easy job, yet there are tools available that help deal with the pests and weeds that can infiltrate and take over a crop. Atrazine is one of those important tools used by Arizona's farmers. Its loss would prove costly.

Sincerely,

A handwritten signature in cursive script that reads "Stefanie A. Smallhouse". The ink is dark and the signature is fluid, with a long, sweeping underline.

Stefanie Smallhouse, President  
Arizona Farm Bureau Federation