



Arizona Farm Bureau Federation

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June 7, 2019

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

RE: EPA-HQ-OPP-2013-0661; Registration Reviews: Draft Human Health and/or Ecological Risk Assessments for Several Pesticides – 2-4, DB

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 2-4, DB, and highlight the critical role this chemistry provides to the success of alfalfa production in Arizona.

Arizona is extremely productive and unique when it comes to alfalfa production. According to USDA data from 2018, there were 260,000 acres of alfalfa harvested that produced 2.15 million tons valued at \$451 million. Arizona growers have the highest alfalfa yields in the nation with 8.4 tons per acre on average, compared to about 6.4 tons per acre in California. The national average is 3.4 tons per acre.¹

Addressing weeds in alfalfa production is important for a number of reasons: (1) weeds compete for essential elements like water and nutrients; (2) if left unchecked, can reduce yields; and (3) can negatively impact forage quality. There are cultural practices that help to reduce weed growth, however the use of herbicides is an integral element in a weed management system. Over the last 50 years 2-4, DB, a postemergence herbicide used to control broadleaved weeds and has played an important role in managing weed growth in alfalfa and has been effective in controlling Londonrocket, Common Lambsquarter, Nettleleaf Goosefoot, Pigweed, and Sunflower.

Although 2-4, DB is an older chemistry, the need for its use and availability is still critical today. Weed control challenges continue to arise, such as resistance, and no single herbicide controls all weeds. To

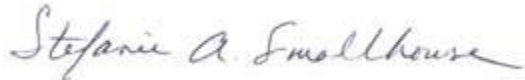
¹ Blake, Cary. "Alfalfa: High cutworm damage, gains made in TRR control in Arizona." *Western Farm Press*, August 17, 2016. Available online at: <http://www.westernfarmpress.com/alfalfa/alfalfa-high-cutworm-damage-gains-made-trr-control-arizona>, Accessed June 5, 2019.

that end, 2,4-DB has been an important product to use in combination and rotation or in tank mixtures with other products to help address and prevent resistance. 2,4-DB is typically applied in a tank mixture with other herbicides (e.g., imazamox or imazethapyr) on most young alfalfa stands, and is used for winter weed control on established stands, when needed. 2,4-DB is particularly effective in managing species of weeds with resistances to other herbicides. Based on input from licensed pest control advisors in Western and Central Arizona (Yuma, La Paz, Pinal and Maricopa Counties), 2,4-DB provides effective control of sow thistle, milkweed, lambsquarter, yellow rocket, pigweed (*Palmer Amaranth*), malva, and various mustards which are showing increasing resistances to other herbicides. This makes it a critical cornerstone of the weed management program in alfalfa statewide.

Furthermore, the prospects of new herbicide products in the near future is not likely, as the development process for new chemistries is expensive and protracted. To insure adequate weed control and crop protection is not disrupted, it is important that farmers and pest control advisors continue to have access to 2-4, DB.

We believe 2,4-DB should remain a viable weed control option. Given the narrow options for effective weed control, the continued use of 2,4 as a crop protection tool is critically important to maintain the productivity and profitability of Arizona's alfalfa farmers. We strongly encourage the EPA to consider the safe track record and the economic importance of 2,4-DB to Arizona's farmers as it conducts its human health and ecological risk assessment.

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