



Arizona Farm Bureau Federation

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

August 12, 2019

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

RE: EPA-HQ-OPP-2011-0176; Registration Reviews: Draft Human Health and/or Ecological Risk Assessments for Several Pesticides – Flumioxazin

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 Flumioxazin and highlight the critical role this chemistry provides to the success of crops such as alfalfa and cotton.

Arizona is extremely productive and unique when it comes to alfalfa and cotton 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 Of the state's 15 counties, cotton is grown in 9 and continues to be an important agricultural commodity. Arizona cotton yields are consistently twice the national average and contributes \$400 to \$500 million annually to the state's economy.

Addressing weeds in agricultural production is important for a number of reasons. Weeds compete for essential elements like water and nutrients, and if left unchecked, weed populations can reduce yields. In the case of alfalfa, weeds can negatively impact forage quality. While cultural practices help to reduce weed growth, the use of herbicides is an integral element in an effective weed management system. Flumioxazin is primarily used for winter weed control in fall or early winter in established alfalfa stands and targets winter broadleaf weeds such as shepherd's purse, London rocket, red sorrel, and common

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.

groundsel. Although less common, Flumioxazin is used as a pre-emergent in the spring and is highly effective against weeds such as common purslane, horse purslane, and pigweed.

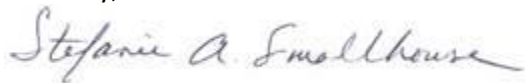
Flumioxazin is also a valuable and efficacious tool for weed control in cotton. It is particularly effective for management of problematic weeds such as morning glory and ground cherry. It offers effective contact and residual control. It is applied in cotton at layby as a post-directed application, and helps to sustain good weed management well beyond that stage. A recent shift in production practices in eastern Pinal County, Arizona, which has resulted in an increase in flatbed cotton production, has increased the importance and use of flumioxazin. While other herbicide modes of action are used in cotton, flumioxazin's effective range of control and residual activity make it very important to our cotton growers. It is also an important component in rotation strategies for resistance management.

Flumioxazin was first registered in 2003 and 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 that end, Flumioxazin has been an important product to use in combination and rotation or in tank mixtures with other products to help address and prevent resistance. This makes it a critical cornerstone of the weed management program in alfalfa and cotton 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 Flumioxazin.

We believe Flumioxazin should remain a viable weed control option. Given the narrow options for effective weed control, the continued use of Flumioxazin as a crop protection tool is critically important to maintain the productivity and profitability of Arizona's alfalfa and cotton farmers. We strongly encourage the EPA to consider the safe track record and the economic importance of Flumioxazin 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, with a clear loop at the end of the last name.

Stefanie Smallhouse, President
Arizona Farm Bureau Federation