



## Arizona Farm Bureau Federation

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Gilbert, AZ 85296

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-2010-0751; Registration Review: Draft Human Health and/or Ecological Risk Assessment for Several Pesticides: Methomyl

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. With regard to the Environmental Protection Agency's registration review, our comments below highlight the critical role that methomyl provides to the success of a number of Arizona's agricultural crops.

Methomyl is used on many of Arizona's crops including leafy vegetables (i.e. lettuce/leafy greens), cole crops, onions, Bermuda grass, and alfalfa. Relative to other insecticides, it represents a small portion of use in these crops, and in other diverse crops where it is occasionally used (e.g., spinach, melons, celery, and seed crops including alfalfa seed, lettuce and cole crop seed). Approximately 95% of the leafy vegetables consumed in the U.S. from November to March are produced in Arizona. With regards to alfalfa, Arizona yields are the highest in the nation at 8.4 tons per acre average, as compared to the national average of 3.4 tons per acre.<sup>1</sup> The volume and output of these commodities grown in Arizona highlights the importance of preserving methomyl as a crop protection tool.

Methomyl is an effective broad-spectrum insecticide that is lethal to insects in two ways as a contact and systemic. It is used to control a number of pests including flea beetles, thrips, loopers, and beet army worms. Each of these pests can significantly damage crops and cause economic harm if left untreated. High value crops, such as leafy greens and vegetables, have strict quality standards that allow for little to no damage or contamination of the harvested product. Therefore, controlling various pests from infesting and contaminating leafy vegetables is critical. The same can be said for other crops, like alfalfa, where high quality and damage free yields results in premium prices.

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<sup>1</sup> 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 March 22, 2017.

While methomyl is an older broad-spectrum chemistry, and other reduced risk products are available to manage many crop / pest scenarios, retaining its use is critically important. For example, methomyl is one of the most effective chemistries available in Arizona leafy green vegetables for control of Western flower thrips. It is generally tank-mixed with a pyrethroid for the best control, and is used in rotation with spinetoram, a more selective material which also provides control of leafminers and lepidopteran pests<sup>2</sup>. An ever-present concern with pesticide use is pest resistance. Methomyl has been an important product to use in combination and rotation with other products to help address and prevent resistance. Retaining access to methomyl is critical to abating resistance pressures.

Methomyl provides effective broad-spectrum pest control and is an important rotational tool to prevent resistance. We strongly encourage the EPA to consider the extremely safe track record and the economic importance of methomyl to Arizona's farmers as it conducts its draft human health/ecological risk assessment.

Sincerely,

A handwritten signature in dark ink, reading "Stefanie A. Smallhouse". The signature is written in a cursive, flowing style.

Stefanie Smallhouse, President  
Arizona Farm Bureau Federation

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<sup>2</sup> Palumbo, J.P. 2016. Thrips Management in Desert Leafy Vegetables. Vegetable IPM Update, Vol. 7, No. 5.