



Arizona Farm Bureau Federation

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

November 2, 2020

U.S. Environmental Protection Agency
EPA Docket Center (EPA/DC), 28221T
1300 Pennsylvania Avenue, NW
Washington, DC 20460-0001

RE: Docket No. EPA-HQ-OPP-2014-0048; Proposed Interim Decisions for Several Pesticides –
Fenamidone

To Whom It May Concern:

The Arizona Farm Bureau represents farmers and ranchers from across Arizona. Our members produce an array of crops and livestock that contribute over \$23.3 billion in economic impact to the state. Many of our members rely on fenamidone as a crop protection tool to produce high quality crops and sustain their operations. Our comments below address the Environmental Protection Agency's (EPA) proposed interim decision for fenamidone.

In previous comments submitted by the Arizona Farm Bureau regarding the draft human health and/or ecological risk assessment for fenamidone (Docket ID # EPA-HQ-OPP-2014-0048-0025), we noted the importance of this product in combating downy mildew in lettuce and vegetable crops. We request incorporation of these previous comments for consideration in EPA's current comment period.

In the proposed interim decision, the primary concern surfaced by several pest control advisors (PCAs) is the increased restricted entry interval (REI) from 12-hours to 4-days in head and stem brassica vegetables and Chinese cabbage. Although the usage of fenamidone is limited to only a percentage of the total vegetable acres on an annual basis, the significant increase in REI from 12-hours to 4-days would greatly impact its continued use in head and stem brassica vegetable, as well as Chinese cabbage production. Most PCAs we contacted agreed a 4-day REI would essentially eliminate the use of this product, due to the difficulty in predicting when work in the field may need to occur relative to treatment. Given these challenges, one PCA felt a 24-hour REI would be more workable and allow for continued use of the product.

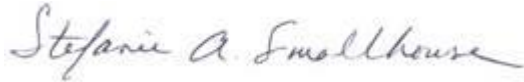
EPA's *Proposed Interim Registration Review Decision for Fenamidone* notes the availability of alternative products to address downy mildew. And while it is true these products are available, PCAs noted the fenamidone as being more effective against downy mildew as compared to available alternatives. Additionally, fenamidone is valued as rotational product and plays an important role in resistance management programs. Consequently, reducing the use or availability of fenamidone, as these

proposed changes would do, decreases the number of products available for a resistance management program.

We appreciate the opportunity to provide these comments highlighting grower community concerns with the proposed increased REI of fenamidone on certain crops from 12-hours to 4-days. We encourage EPA to consider a 24-hour REI, which would allow for the continued use of fenamidone in head and stem brassica vegetables and Chinese cabbage.

Thank you for your consideration.

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