



Arizona Farm Bureau Federation

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June 22, 2021

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-2013-0749; Registration Review: Proposed Interim Decision for Several Pesticides – Aminopyralid

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. Grazing is a dominant land use in Arizona, making up 73 percent of the state's total land area. Accordingly, livestock production and ranching are a critical components of the state's agricultural industry.¹ Our comments below address the Environmental Protection Agency's (EPA) proposed interim decision (PID) for aminopyralid, a product used on rangelands and pastures.

Aminopyralid is an herbicide found in several different formulations available to Arizona farmers and ranchers, including Milestone, DuraCor, and Sendero. According to sales data provided by Corteva, the manufacturer of these products, the state's average annual use of aminopyralid is 15,000 acres (based on 2018-2020 sales data).

Kim McReynolds, University of Arizona County Extension Director and weed scientist for Cochise, Graham, and Greenlee counties, works directly with landowners on rangeland health and weed management. According to McReynolds, Milestone is the primary product used in the southeastern portion of Arizona, particularly in Greenlee County. It is often applied by landowners on rangeland and abandoned fields to control noxious weeds including Russian knapweed, yellow starthistle, and Malta starthistle. In southeastern Arizona, the maximum label rate of 7 oz/acre is used for Russian knapweed control and 5 oz/acre for starthistle control. A single application is used and provides excellent contact and residual control. Corteva, the manufacturer of Milestone, notes that the product is the most flexible herbicide for rangelands, providing selective control of many noxious and invasive weeds.

¹ Kerna, Ashley, George Frisvold, Russell Tronstad, and Trent Teegeerstrom. 2014. "The Contribution of the Beef Industry to the Arizona Economy." Available at https://ag.arizona.edu/arec/sites/cals.arizona.edu/arec/files/publications/contrib_beef_industry_to_az_econ_complete.pdf. Accessed May 17, 2016.

DuraCor is a premix of aminopyralid and florypyrauxifen-benzyl and is noted to have a lower volatility and even broader spectrum of broadleaf weed control than Milestone. However, it is a new product that may not be as widely used as Milestone. Sendero is also used in some areas of the state, including Cochise County to control mesquite. The product works well as it does not harm grasses and desirable brush species.

Although the use of aminopyralid is not reported on pastures in southeastern Arizona, there may be such applications in other parts of the state. Arizona does require 100 % use reporting of all agricultural applications. By statute, all applications which are custom applications (for-hire) must be reported to the Arizona Department of Agriculture, along with certain other applications such as odiferous compounds and pesticides on the Arizona Department of Environmental Quality's groundwater protection list. Aminopyralid is not on the groundwater protection list. Thus, given the extensive areas of rangeland throughout Arizona there is a likelihood of aminopyralid applications on pastures in those areas. Pastures offers ranchers the opportunity to graze their animals in a particular location or use the pastures to grow grass hay for their own use or to sell. This is likely a practice among ranches that grow their own hay to off-set feed costs or provide extra income if they hay is sold.

Concerns with EPA's PID

EPA is proposing to remove the special label extension on the Section 3 aminopyralid label that allows producers across 22 states, including Arizona, to harvest and move hay off their treated fields within the 18-month post-harvest interval on the main Federal 3 aminopyralid label.

Additionally, the EPA is proposing new mitigation measures to address potential residues in compost, which would impact ranchers who apply aminopyralid to their pastures:

- Prohibiting off-site composting of treated plant matter and manure from grazing animals until residues have adequately declined to reduce compost contamination;
- Requiring a clean-out period of at least three days for animals fed with treated plant materials;
- Requiring pasture and turf applicators to notify the property owners/operators of the compost prohibition, and for the applicator to keep a record of this notification for two years;

We urge the EPA to review its Incident Data System and recognize that since the supplemental labels were issued in 2011 allowing hay movement, there have been no reported issues due to registered uses.²

Aminopyralid is an important weed management tool for Arizona's farmers and ranchers We encourage EPA to reconsider its proposed mitigation measures, renew the federal aminopyralid label and retain the existing label extension. Additionally, as a member of the American Farm Bureau Federation, we wholly support and endorse the comments they submitted to the docket and incorporate them by reference here.

² U.S. Environmental Protection Agency. Aminopyralid: Amendment to the Draft Ecological Risk Assessment for Registration Review. Available online at: <https://www.regulations.gov/document/EPA-HQ-OPP-2013-0749-0058>

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, with a long, sweeping tail on the final letter.

Stefanie Smallhouse, President
Arizona Farm Bureau Federation