



## Arizona Farm Bureau Federation

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February 19, 2021

Office of Pesticide Programs  
Environmental Protection Agency Docket Center  
1200 Pennsylvania Ave. N.W.  
Washington, D.C. 20460-0001

RE: EPA-HQ-OPP-2020-0514 –Draft Endangered Species Act Biological Evaluations

To Whom It May Concern:

The Arizona Farm Bureau Federation represents farmers and ranchers from all across Arizona. Agriculture contributes \$23.3 billion dollars to the state's economy. A number of our state's farmers and dairymen would be negatively impacted if the Environmental Protection Agency (EPA) were to restrict or eliminate the availability of atrazine. We strongly support the continued use of atrazine and urge the agency not to prohibit or restricts its availability and use.

In Arizona, atrazine is an important crop protection tool in the production of corn and sorghum. The 2019 National Agriculture Statistics Service's State Agriculture Overview reported 90,000 acres of corn planted in the state. Additionally, according to Arizona Pest Management Center data, atrazine is also used consistently each year in a small percentage of Arizona's cotton acreage. Atrazine is an economical product that is used extensively in controlling various weeds. In some cases, alternative products cost three to five times more than atrazine and are not always as effective. Consequently, restricting or eliminating the use of atrazine would increase the costs of production, potentially reduce yields, and negatively impact profitability.

As a member of the American Farm Bureau Federation (AFBF), we support their comments submitted to the above referenced docket and share the same concerns regarding the EPA's draft Biological Evaluation (BE) – primarily that the methodologies used to conduct the BE for atrazine did not use the best available science, is unrealistically conservative, and lacks transparency. Consequently, the decision based on the current biological evaluation may lead to limitations on its use and limit the availability of the product.

Additional concerns with the Biological Evaluation of atrazine include:

- The BE found atrazine to adversely affect nearly all species and critical habitats in the continental U.S., including some already extinct species.
- The MAGtool used in the BE relies on formulas as opposed to detailed studies that more accurately capture a product's actual impact on a species. The results of the MAGtool shows 90% of species receiving a Likely to Adversely Affect determination (LAA).
- The EPA uses unrealistic data in determining which species' critical habitat would receive LAA determinations.

- Transfer of responsibility - The LAA determinations require assessment by the Fish and Wildlife Service and/or National Marine Fisheries Service (the Services). This effectively transfers the responsibility of making accurate and realistic assessments of the potential impacts of atrazine to the Services who may not have the resources to carry out the work. This situation could result in restrictions on the use of atrazine justified by inadequate evaluations.

Given that the biological impacts of pesticides are a required component of a product's registration review we urge EPA:

- To take steps to ensure the most accurate data is used in its decision making and that these methodologies can be replicated by stakeholders to verify EPA's results.
- Use actual data in this decision making instead of incorrectly assuming treated acres in each species range or critical habitat were treated at the maximum application rate with the maximum number of applications and minimum re-treatment interval.
- Consider publishing an update to this draft BE that incorporates new data made available in the comments.

Furthermore, because the EPA will continue to use biological evaluations to assess other pesticide products, it is critical that the agency use the best scientific methods. The MAGtool yielded unrealistic usage data for atrazine and resulted in overly cautious determinations that atrazine is likely to adversely affect listed species. Continuing the use of the MAGtool is likely to yield similar unrealistic results in subsequent pesticide evaluations and threaten their continued use. How EPA responds to these findings, based on this biological evaluation methodology, has broad impact for other active ingredients equally important to the agriculture industry.

As we have noted in previous comments, farming is not an easy job, yet there are tools available to help deal with the pests and weeds that can infiltrate and take over a crop. Atrazine is one of those important tools used by Arizona's farmers. Its loss or significant restrictions on its use due to flawed evaluation methodology would prove costly.

We appreciate your consideration of our comments.

Sincerely,

A handwritten signature in cursive script that reads "Stefanie A. Smallhouse".

Stefanie Smallhouse, President  
Arizona Farm Bureau Federation