



Arizona Farm Bureau Federation

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March 5, 2021

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

RE: Docket No. EPA-HQ-OPP-2008-0850-0964; Registration Review: Proposed Interim Decision for Chlorpyrifos

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. Many of our members rely on chlorpyrifos 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 chlorpyrifos.

In previous comments submitted by the Arizona Farm Bureau regarding the tolerance revocations of chlorpyrifos (Docket ID # EPA-HQ-OPP-2015-0653), we noted the importance of this product in various Arizona crops. Additionally, the Arizona Pest Management Center provided comprehensive comments on the use of chlorpyrifos in Arizona crops.¹ We request incorporation of these previous comments for consideration in EPA's current comment period.

Alfalfa

The majority of chlorpyrifos use in Arizona occurs in alfalfa production and we appreciate seeing its use retained in the both 10X and 1X safety factor evaluations. Chlorpyrifos continues to be an effective tool against several important pests including aphids and worms, and it is especially effective against Egyptian alfalfa weevil. In particular, chlorpyrifos is effective when and other treatments are not successful and a specific pest gets out of control. In these cases, chlorpyrifos provides fast and effective

¹ Ellsworth P.C., A.J. Fournier, W.A. Dixon II, C.M. Rock. 2016. Chlorpyrifos Use in Arizona. University of Arizona, Arizona Pest Management Center. Document ID: EPA-HQ-OPP-2015-0653-0380.
<https://www.regulations.gov/document?D=EPA-HQ-OPP-2015-0653-0380>

Fournier A.J., A.M. Mostafa, J. Sherman, W.A. Dixon II, P.C. Ellsworth. 2017. Chlorpyrifos Use in Arizona and New Mexico. University of Arizona, Arizona Pest Management Center. Document ID: EPA-HQ-OPP-2015-0653-0654.
<https://www.regulations.gov/document?D=EPA-HQ-OPP-2015-0653-0654>

broad spectrum control that significantly reduces pest populations. The broad spectrum aspect can be important in situations when more than one pest species is present at damaging levels. Additionally, farmers have noted chlorpyrifos provides control over a longer period of time, with fewer applications.

There are however several areas of concern in the proposed interim decision that would create significant problems for the continued use of chlorpyrifos in the manner needed to control pests in alfalfa.

Closed System for Mixing and Loading

At the 10X safety factor level, EPA is proposing to require a closed system for mixing and loading that would apply to alfalfa applications. In interviews with pest control advisors from various alfalfa growing regions of the state, they noted most growers do not have these systems on their farms. Furthermore, among commercial applicators these systems are not always available in all of Arizona's alfalfa growing regions. Consequently, a requirement to use a closed system for mixing and loading would prove burdensome in some areas to both growers and commercial applicators.

EPA notes in the proposed interim decision that, "based on available information, the cost of [closed system] equipment may have been around \$300."² The reference EPA uses for this data is from a 2013 publication and no longer reflects the current costs of these systems. Interviews with Arizona growers and licensed Pest Control Advisors (PCAs) indicate the costs of closed mixing and loading systems ranging from \$700 to \$1,000. And although EPA's assessment may be correct, that a grower would likely not incur this cost if the only chemical application is for chlorpyrifos, there are farms where the primary crop is alfalfa and they would likely incur this new cost, given the importance of chlorpyrifos when there is significant pest pressure. Additionally, commercial applicators who do not already own these systems would likely have to invest in them.

Aerial and Chemigation Applications

The most limiting proposed requirement in the proposed interim decision to the effective and efficient use of chlorpyrifos in alfalfa is restricting aerial application. Depending on the growing region, aerial application is used on 50% to 90% of treated alfalfa acres. In alfalfa growing regions, some farms may have hundreds to thousands of acres to treat and the most efficient way to apply chlorpyrifos to such a large number of acres is by air. This is especially the case when there is heavy pest pressure and time is of the essence. A ground application would take too much time, resulting in delayed applications and economic damage to the crop. The use of aerial applications is also critical when field conditions are too wet for ground operations.

The proposal would also eliminate applications via chemigation. In the southwestern part of the state chemigation has been one of the most efficient ways to apply chlorpyrifos to control pests through wheel line irrigations systems.

Although the continued use of chlorpyrifos in alfalfa is included at both safety factor levels, the proposed limits to application methods and additional requirements for mixing and loading would significantly hamper the ability of Arizona farmers to continue to use the product. Significantly limiting

² Environmental Protection Agency. Chlorpyrifos Proposed Interim Registration Review Decision. December 2020, Page 54.

the use of chlorpyrifos or eliminating it all together would impact resistance management programs. One PCA noted, the importance of chlorpyrifos within the resistance management of Egyptian weevil. Currently, there are not many products available that effectively control this pest, and one of those products, a pyrethroid, is already showing reduced efficacy against this pest in other parts of the country. In other instances, products within a resistance management program may already be in use in other nearby crops. For example, in some parts of Arizona, chlorpyrifos is the preferred material for addressing aphid infestations and is an alternative to sulfoxaflor which may already be in use in other nearby crops for different pest pressures. In order for chlorpyrifos to remain an effective tool in Arizona alfalfa production and resistance management, the regulatory scheme of its use and application needs to be practicable.

Citrus

Citrus production in Arizona has historically played an important role in the state's economy, although it has diminished some, the state still ranks second nationally in the production of lemons.³ According to USDA 2017 data there were 10,031 acres of citrus, of that more than 70% is dedicated to lemon production.⁴ While chlorpyrifos use is limited to only a percentage of the total citrus acres on an annual basis, it is an important component of red scale treatment.

Red scale is an aggressive pest that can be brought into an area on a number of different plant hosts. Consequently, citrus growers must be vigilant for any signs of red scale infestations in their trees. Red scale attacks all parts of the tree, including the fruit which leads to quality downgrading and reduced economic value. To treat red scale most effectively and address resistance management chlorpyrifos is rotated with pyriproxyfen and carbaryl.

We are concerned that EPA's proposal does not include Arizona in the citrus section of either Table 10: Agricultural Uses Proposed for Retention in Chlorpyrifos Labels with an FQPA Safety Factor of 10X or Table 11: Regional Restrictions for Corn, Tart Cherries, Citrus, Pecan and Peach with an FQPA Safety Factor of 1X. This seems inconsistent, given EPA is considering reducing the application rate specifically in Arizona from 6 lbs a.i./acre to 4 lbs a.i./acre. We would like to believe the absence of Arizona in citrus section of Tables 10 and 11 was an oversight, especially given the importance of the product to Arizona's citrus producers. Additionally, with respect to the reduction in application rate to 4 lbs a.i./acre, this rate remains effective for the treatment of red scale, but any further reductions would impact its efficacy.

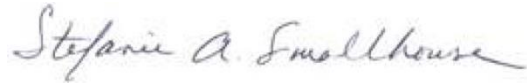
³ United States Department of Agriculture National Agricultural Statistics Service. Arizona Agricultural Statistics 2019. Available online at: https://www.nass.usda.gov/Statistics_by_State/Arizona/Publications/Annual_Statistical_Bulletin/2019/AZAnnualBulletin2019.pdf

⁴ United States Department of Agriculture. 2017 Ag Census. Arizona Full Report. Volume 1. Chapter 1. Available online at: https://www.nass.usda.gov/Publications/AgCensus/2017/Full_Report/Volume_1,_Chapter_1_State_Level/Arizona/st04_1_0037_0038.pdf

Along with the consideration of our comments we also support the comments submitted by the Arizona Pest Management Center that address additional Arizona crops impacted by the chlorpyrifos proposed interim decision.

We support EPA's efforts to properly consider the benefits and risks of chemicals and encourage the agency's strong consideration of the benefits of chlorpyrifos throughout the registration review process. We look forward to continuing to work with the EPA to ensure farmers have access to crop protection products such as chlorpyrifos and appreciate your consideration of our comments.

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