



Arizona Farm Bureau Federation

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December 21, 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-2015-0288; Proposed Interim Decision for Several Pesticides –
Cycloate

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. Our comments below address the Environmental Protection Agency's (EPA) proposed interim decision (PID) for cycloate and the critical role this chemistry provides to the success of certain agricultural specialty crops in Arizona.

Cycloate is a herbicide primarily used on Arizona's spinach and beet crops. Both crops are important components of Arizona's winter leafy green production. In 2020 Arizona's spinach production was valued at \$133 million.¹ Similar data is not available for beets, however according to a pest control advisor (PCA) who works closely with Arizona beet growers, there are approximately 1,000 to 2,000 acres of beet grown in the Yuma, Arizona and Bard, California area. An important distinction for EPA to consider in its definition of table beets and in the PID, is that a significant portion of beets grown in Arizona is for bagged salad mix. When grown for bagged salads, only the leaves are harvested, and the time from planting to harvest ranges from 25 to 50 days, depending on temperature. EPA's proposed preharvest interval of 45 days for table/garden beets will be problematic for growers who harvest leaves for salad. For the majority of the growing season, harvest would need to occur within fewer than 45 days from planting and application.

EPA's PID for cycloate makes several proposals that impact Arizona growers, in particular a soil restrictions label statement and revised preharvest intervals (PHI). We support the comments

¹ USDA National Agricultural Statistics Service. 2020 State Agriculture Overview Arizona. Available online at: https://www.nass.usda.gov/Quick_Stats/Ag_Overview/stateOverview.php?state=ARIZONA.

prepared by the Arizona Pest Management Center (APMC), which outlines the various impacts the proposal would have on Arizona's spinach and beet growers. We encourage EPA to fully consider APMC's analysis in its final interim decision.

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