



Arizona Farm Bureau Federation

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

May 21, 2021

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

RE: EPA-HQ-OPP-2015-0061; Registration Reviews: Draft Human Health and/or Ecological Risk Assessments for Several Pesticides – Diuron

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) draft human health and ecological risk assessment of Diuron and highlights the important role this chemistry provides to Arizona's cotton and alfalfa production.

Cotton

Of the state's 15 counties, cotton is grown in 9 and continues to be an important agricultural commodity. Arizona cotton yields are consistently twice the national average and contribute \$140 to \$180 million annually to the state's economy. Cotton farmers today face a number of challenges including fluctuating commodity prices, rising input costs, and increasing global competition. Added to this are the day-to-day challenges of dealing with weeds, insects, disease, and weather.

Weeds are an ever-persistent problem in crop production. If weeds are not managed quickly and effectively, they can choke out a crop by competing for light, nutrients, moisture and serving as a refuge for insects and diseases. Both farmers and pest control advisors acknowledge the importance of using products such as Diuron to control weeds in cotton production. One of the uses of Diuron is as a layby herbicide to control broadleaf weeds until the cotton canopy is sufficiently developed to shade furrows and beds tops thus suppressing the growth of small weeds. Diuron is particularly useful because it provides a broad range of weed control with a long residual, reducing the need for additional herbicide applications. In addition to its use as a layby material, Diuron is also an active ingredient (along with thiadiazuron) in Ginstar and Redi-pik, the main defoliants used throughout Arizona's cotton growing regions.

Alfalfa

Arizona is extremely productive and unique when it comes to alfalfa production. According to USDA data from 2020, there were 260,000 acres of alfalfa harvested that produced 2.21 million tons valued at \$397.8 million. Arizona growers have the highest alfalfa yields in the nation with 8.4 tons per acre on average, compared to about 6.4 tons per acre in California. The national average is 3.4 tons per acre.¹

Addressing weeds in alfalfa production is important for a number of reasons: (1) weeds compete for essential elements like water and nutrients; (2) if left unchecked, weeds reduce yields; and (3) weeds can negatively impact forage quality. There are cultural practices that help to reduce weed growth, however the use of herbicides is an integral element in a weed management system. In Arizona alfalfa production Diuron is primarily used to control winter weeds and is generally applied in late fall as the alfalfa is going dormant. Pest control advisors (PCA) note that Diuron provides excellent broad-range weed control throughout the winter, in particular on weeds that are tough to manage, and provides control for up to three to four months. Diuron works well without irrigation at time of application, which also makes it well suited for weed control during alfalfa dormancy.

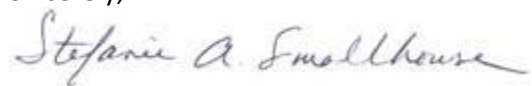
Other uses

Diuron is also an effective herbicide for controlling weeds along ditch banks and fallow fields. Diuron has a long residual requiring little to no water to maintain its effectiveness. Consequently, the product retains its efficacy until moisture either from rain or irrigation reaches it months later.

Retaining the use of Diuron is also important for managing herbicide resistance. The use of Diuron along with other products ensures that multiple herbicides are available with different mechanisms of actions which allows farmers and PCA's to alternate products, sequence of use and use across seasons to help mitigate weed resistance.

We believe Diuron should remain a viable weed control option. The continued use of Diuron as a crop protection tool is critically important to maintain the productivity and profitability of Arizona's farmers. We strongly encourage the EPA to consider the safe track record and the economic importance of Diuron to Arizona's farmers as it conducts its human health and ecological risk assessment.

Sincerely,



Stefanie Smallhouse, President
Arizona Farm Bureau Federation

¹ Blake, Cary. "Alfalfa: High cutworm damage, gains made in TRR control in Arizona." *Western Farm Press*, August 17, 2016. Available online at: <http://www.westernfarmpress.com/alfalfa/alfalfa-high-cutworm-damage-gains-made-trr-control-arizona>, Accessed June 5, 2019.