



Arizona Farm Bureau Federation

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March 12, 2021

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

RE: EPA-HQ-OPP-2020-0585 –Draft Endangered Species Act Biological Evaluations for the
Registration Review of Glyphosate

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 ranchers would be negatively impacted if the Environmental Protection Agency (EPA) were to restrict or eliminate the availability of glyphosate. We strongly support the continued use of glyphosate and urge the agency not to prohibit or restricts its availability and use.

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 glyphosate to control weeds. Consequently, it is critical that glyphosate remain a viable option in weed management strategies.

In Arizona glyphosate is critically important to cotton production, as the majority of cotton grown in the state is herbicide tolerant and/or insect resistant. Growing herbicide resistant cotton has provided Arizona farmers the ability to adopt conservation tillage and no-till farming practices. However, in order effectively implement conservation tillage and no-till farming, farmers must have weed control options like glyphosate.

Furthermore, glyphosate can be a cost-effective method for controlling broad-spectrum weeds in fallow fields. Unlike other herbicides whose soil residual activity may delay planting a new crop after application, glyphosate has little to no soil residual activity, allowing a producer to plant a new crop soon after application.

Another important application for glyphosate in Arizona is in the sanitation of weedy species anywhere along water distribution systems. There are few effective and safe alternatives for maintaining these environments weed-free. Weeds in these areas are harbors for more weed seed and other pests, but can also produce environments hazardous to workers who have to navigate ditch banks and other irrigation systems so crucial to crop production.

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 glyphosate did not use the best available science, are unrealistically conservative, and lack transparency. Consequently, the decision based on the current biological evaluation may lead to limitations on its use and limit the availability of the product.

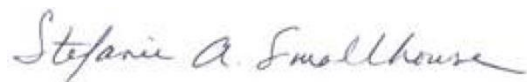
Additional concerns with the Biological Evaluation of glyphosate include:

- The BE found glyphosate to adversely affect nearly all species and critical habitats in the continental U.S., including some already extinct species.
- The use of the MAGtool determines likely adverse effects on almost all species and habitats, thus transfers EPA's responsibility to make accurate and realistic assessments to other agencies (the U.S. Fish and Wildlife Service and the National Marine Fisheries Service).
- The EPA's use of unrealistic data in determining which species' critical habitat would receive LAA determinations. EPA assumes maximum rates per acre of glyphosate for all agricultural and non-agricultural uses, that all potential acres are treated during applications, and does not account for crop specific or site-specific uses.

We along with AFBF recognize the process in which EPA conducted the draft biological evaluation for glyphosate is flawed. The process does not utilize data that reflects actual product use and instead relies upon formulas to assess and calculate the impact of glyphosate. Because it is critical that EPA base the biological evaluation on the most accurate data, we urge the agency utilize information already submitted during the glyphosate registration review that provides information on its uses and stewardship.

Glyphosate is an important crop protection tool 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,



Stefanie Smallhouse, President
Arizona Farm Bureau Federation