



Arizona Farm Bureau Federation

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October 4, 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-2014-0778; Proposed Interim Decisions for Several Pesticides – Oxyfluorfen

To Whom It May Concern:

The Arizona Farm Bureau represents farmers and ranchers from across Arizona. Our members produce an array of crops and livestock that contribute over \$23.3 billion in economic impact to the state. Many of our members rely on oxyfluorfen 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 (PID) for oxyfluorfen.

In previous comments submitted by the Arizona Farm Bureau regarding the draft human health and/or ecological risk assessment for oxyfluorfen (Docket ID # EPA-HQ-OPP-2014-0778-0032), we noted the importance of this product as a crop protection tool for Arizona farmers. We request incorporation of these previous comments for consideration in EPA's current comment period.

The areas of the PID that were of significance to our farmers included reducing maximum application rates and frequencies in cotton and beans, cancelling the application of oxyfluorfen via chemigation to orchards, and the requirement of a 25-foot wide vegetative filter strip.

Maximum Application Rates and Frequencies

According to Pest Control Advisors (PCAs) from various parts of the state who use oxyfluorfen in cotton, only one application is made during the growing season. Thus, EPA's proposal to reduce the maximum annual sprays in cotton from two to one, is consistent with the use of oxyfluorfen in Arizona cotton production.

In beans, the EPA is proposing to reduce the maximum number of applications from six to two. A variety of dry beans are grown in Arizona including, garbanzo beans and pinto beans. Although, we did not highlight this crop in our original comment letter, beans are grown in several different areas of the state. PCAs who use oxyfluorfen in beans noted that they typically use one to two applications in a growing season. Thus, EPA's proposal to reduce the maximum annual sprays in beans from six to two, is consistent with the use of oxyfluorfen in Arizona's bean production.

Although the proposed maximum number of applications of oxyfluorfen in cotton and beans is consistent with current use, we urge the EPA make no further reductions. Any additional reductions would hamper the effective use of this product and limit herbicide options for growers.

Chemigation in Orchards

Oxyfluorfen is a very important herbicide used in Arizona tree nut (pecans and pistachios) production and applications are generally done by ground after the trees are well established. Banded treatments are also commonly used. Given that these are the most common application methods reported by PCAs, EPAs proposal to restrict chemigation (and the use of backpack sprayers) in orchards should not impact Arizona's tree nut producers.

Vegetative Filter Strips

The EPA is proposing to require the use of vegetative filter strips (VFS), to be maintained between the edge of a field and any water body, except in the states of California, Oregon, and Washington. In the PID the EPA notes the following reasons for exempting the three states: (1) rainfall in these states that causes runoff occurs during the winter and out of the growing season, (2) most of the agriculture is irrigated and VFS are not easily compatible with irrigated agriculture (primarily flood and furrow irrigation), and (3) many of the crops grown are under contracts that require "clean" field borders to minimize contamination. As noted below, Arizona closely meets characteristics that exempt CA, OR, and WA.

1. The average statewide rainfall in Arizona ranges between 9 and 13 inches. In some areas like Yuma, Arizona, where the majority of the state's cole crop is produced, the average annual rainfall is 3 inches. (As noted in our original comment letter, oxyfluorfen is an important weed management tool in cole crop production.)
2. Arizona's desert environment and low rainfall means all agriculture in the state is irrigated. Additionally, laser leveling fields is a common practice used to conserve water and minimize runoff.
3. Many of the crops grown in Arizona are also under contract, in particular cole crops, and have similar requirements for "clean" field borders.

We urge EPA to include Arizona in the list of states exempted from the VFS requirement, as the criteria that exempts those states similarly applies to Arizona.

In addition to our comments, we support the comments prepared by the Arizona Pest Management Center (APMC), which further explain many of the points highlighted in our comments. We encourage EPA to fully consider our information we have provided in its final interim decision.

Thank you for your consideration.

Sincerely,



Stefanie Smallhouse, President
Arizona Farm Bureau Federation