



Arizona Farm Bureau Federation

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May 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-2015-0459; Registration Reviews Draft Human Health and/or Ecological Risk Assessments for Several Pesticides – Propiconazole

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 assessments of propiconazole and the important role this chemistry provides to the success of Arizona's agricultural crops.

The most significant and consistent agricultural use of propiconazole in Arizona is on celery, where a high portion of acres are treated annually. Propiconazole has also been used consistently on a small portion of acres in the following crops since 2015: carrots, fennel, and corn. Additional crops with reported applications include citrus (lemons) and wheat.

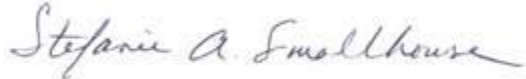
Propiconazole is an important fungicide used to address fungal diseases impacting all these various crops. In celery, where propiconazole is used most consistently over a significant number of acres, it is an effective treatment against late blight (*Spetoria blight*), which is a major disease of celery worldwide, as well as early blight (*Cercospora apii*). It is used to treat these same diseases in fennel, and to treat a variety of different blight diseases in corn. Although Arizona's environment is generally dry, wet weather creates the ideal environment for growth of the disease that can result in significant yield and quality losses. Wet weather also contributes to the fungal diseases in carrots, fennel, corn, wheat, and lemons where propiconazole can be an effective treatment.

Because fungi are adaptable organisms and can become resistant to fungicides, ensuring propiconazole continues to be available is important for maintaining a robust fungicide resistance management program. According to Mike Matheron, former University of Arizona Extension Plant pathologist, such a program should rotate among products with different modes of action to delay development of

resistance to active ingredients within a pathogen population.¹ Propiconazole is often either tank mixed or included in prepackaged materials to address resistance management.

Propiconazole is an important crop protection tool for many growers in our state and has been used for many years without evidence of an unreasonable risk to human or environmental health. All crops grown in Arizona on which propiconazole is used would be negatively impacted if it were no longer available or if major restrictions were put on its use as a crop protection tool. For those reasons, we urge the EPA to continue to allow its use.

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

¹Matheron, Michael. "Biology and Management of Downy Mildew of Lettuce." College of Agriculture and Life Sciences Cooperative Extension, az1682, September 2015. Available online at https://desertagsolutions.org/sites/desertagsolutions.org/files/az1682-2015%20downy%20mildew%20of%20lettuce%20Cooperative%20Extension%20Publication_MM.pdf