



Arizona Farm Bureau Federation

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October 7, 2022

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

RE: EPA-HQ-OPP-2013-0266 –Atrazine; Proposed Revisions to the Atrazine Interim Registration Review Decision Memorandum; Notice of Availability and Request for Comment

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 would be impacted by the Environmental Protection Agency's (EPA) proposed revisions in the Atrazine Interim Registration Review Decision Memorandum. We appreciate the opportunity to provide input.

Previously, our organization provided EPA with comments highlighting the use of atrazine by Arizona farmers and shared concerns with previous evaluations of atrazine. We incorporate these comments by reference (Docket ID EPA-HQ-OPP-2013-0266-0682 and EPA-HQ-OPP-2013-0266-1229).

Atrazine remains an important herbicide product for use in Arizona's corn and sorghum production. Pest Control Advisors (PCAs) who work closely with growers note the effectiveness of atrazine in controlling certain problem weeds like morning glory and glyphosate resistant pigweed. Atrazine is a cost-effective product, and as one PCA noted, "there is no other product that works as well for the money." There are other effective alternative products for atrazine in corn production (i.e., Callisto (mesotrione), and dicamba mixed with other products like Aim (carfentrazone-ethyl) or ET (pyraflufen ethyl)). However, the alternative products generally cost significantly more, \$40 to \$50 per acre versus \$6 to \$7, and have longer plant back restrictions which impact crop rotations and planting schedules. Furthermore, there are much fewer herbicide options for sorghum.

EPA's proposed revisions to the Atrazine Interim Registration Review Decision centers around the Concentration Equivalent Level of Concern (CE-LOC) and replacing the current 15 ug/L level of regulation with a significantly lower 3.4 ug/L CE-LOC. Based on the new CE-LOC EPA is proposing changes for all atrazine runoff from fields, as well as requiring the adoption of additional mitigation measures in certain watersheds with predicted atrazine concentrations of 3.4 ppb and greater. We do not believe EPA should adopt a lower CE-LOC and recommend EPA convene another Scientific Advisory Panel (SAP) to provide a scientific basis as to whether a lower CE-LOC is warranted. The proposed label changes based on a lower CE-LOC would have significant and costly impacts on Arizona's corn and sorghum growers.

Of EPA's four proposed measures for all atrazine labels, two measures impact Arizona's growers, and include prohibiting aerial applications for all formulations and restricting the annual application rate to 2 lbs. active ingredient per acre per year for applications to field corn, sweet corn, and sorghum. The use

of aerial applications for atrazine is relatively low in Arizona. One PCA reported that 95% of their applications are by ground. Data compiled by the Arizona Pest Management Center corroborates that aerial applications occur far less than ground applications and that in fact, the number of aerial applications has declined in the last several years. Although aerial applications are employed when conditions dictate, the declining use of this application method indicates growers will not be significantly impacted if this application method is no longer available.

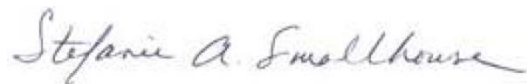
The proposed maximum application rate of 2 lbs. ai/A or less per year for applications to field corn, sweet corn, and sorghum will have the most significant impact on growers around the state. In some areas of Arizona, field corn and sorghum are double cropped in the same year with atrazine use in both crops. Generally, the combined application of atrazine in the two crops would require an annual maximum use rate of 2.9 lbs. ai/A, which exceeds EPA's proposed annual application rate. In other areas of the state, PCAs report using the current maximum application rate of 2 lbs. ai/A and on occasion make two applications at this rate to control challenging weeds including morning glory and glyphosate resistant pigweed. In both cases EPA's proposed maximum application rate of 2 lbs. ai/A per year would negatively impact Arizona growers by limiting their choice for a second application of atrazine in a given year resulting in significantly higher costs. Additionally, not all of the alternative products may be viable options for consideration given some may have longer plant back restrictions that do not work with current growing schedules and rotations.

EPA's proposed picklist of conservation practices for field corn, sweet corn, and sorghum in certain watershed with predicted atrazine concentrations of 3.4 ppb or greater does not seem to impact Arizona growers based on maps that have been published.¹ Although we do not support EPA's proposal to adopt a lower CE-LOC, any proposed changes that would result in mitigation measures for certain watersheds should clearly state on the product label as to which areas or regions the requirements would apply.

Atrazine is an important crop protection tool for Arizona farmers. We urge EPA to provide the scientific basis for reducing the CE-LOC before moving forward with any of its proposals in the atrazine Interim Registration Review.

We appreciate your consideration of our comments.

Sincerely,



Stefanie Smallhouse, President
Arizona Farm Bureau Federation

¹ O'Connor, B. 2022. EPA Accepting Comments on Atrazine Rule Changes Until October. Strip-Till Farmer.
<https://www.striptillfarmer.com/articles/4387-epa-accepting-comments-on-atrazine-rule-changes-until-october>