



Arizona Farm Bureau Federation

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October 17, 2022

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

RE: Docket No. EPA-HQ-OPP-2016-0223; Pesticide Registration Review; Dicamba Revised Human Health and Draft Ecological Risk Assessment; Notice of Availability

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) revised human health and draft ecological risk assessments for dicamba and the critical role this chemistry provides to the success of a number of Arizona's agricultural crops.

Dicamba is an effective herbicide used to control annual, biennial, and perennial broadleaf weeds. According to Arizona Pest Management Center (APMC) Pesticide Use Database, dicamba agricultural use is primarily in cotton, corn, sorghum, wheat, and other grain crops, Bermudagrass and Sudan grass, and on fallow fields. They also note that dicamba is an important tool for controlling noxious and invasive weeds in rangelands, watersheds, and other natural areas.

Grasses, Corn, Wheat

In Sudan grass and Bermudagrass production, pest control advisors (PCA) who work closely with growers noted that dicamba is an effective herbicide for tackling certain problem weeds, in particular purslane and pigweed. Knowledge of where problem weeds are known to occur in a field is beneficial, as one PCA noted they do use dicamba every season, but not on every acre. In crops like wheat, not only is dicamba used for weed control, but it is also effective in controlling volunteer alfalfa in wheat planted following alfalfa.

In corn and sorghum production, several PCAs reported using dicamba in a couple of different ways, either early after planting when weeds are small or as a layby application. The layby applications are utilized later in the growing season using a premix product that includes dicamba and is a good option when other herbicide products can no longer be used.

In corn, sorghum, Sudan grass, Bermudagrass and other grain crops, there are dicamba labels that allow for aerial applications. PCAs in some parts of the state reported using few to no aerial applications due to the proximity of sensitive crops. In other parts of the state where aerial applications are used, PCAs noted there is always an evaluation made to ensure that no sensitive crops are nearby before these types of applications are made.

Fallow Fields

Dicamba is also an important tool for controlling weeds on fallow fields and ditch banks and is especially effective on glyphosate resistant pigweed. In Central Arizona, increasing drought conditions and water shortages will likely result in more fallow fields. Consistent treatment with dicamba or other herbicides prior to weed seeding can help reduce seed banks for difficult to manage weeds.

Cotton

Arizona cotton farmers grow high-quality, high-yielding cotton. Of the state's 15 counties, cotton is grown in 9 and continues to be an important agricultural commodity. Dicamba is of significant importance to Arizona's cotton production, as nearly three-quarters of the cotton acreage is planted with varieties with the dicamba-tolerant trait (i.e., Bollgard 2 XtendFlex or Bollgard 3 XtendFlex).¹ The availability and use of dicamba provides Arizona growers with effective weed management to help protect crops from hard-to-control and herbicide-resistant weeds, in particular herbicide-resistant pigweed.

Off-site Target Damage

EPA's revised Human Health and Draft Ecological Risk Assessment notes, that despite new control measures implemented in 2020 to reduce off-site exposure they received 3,500 incident reports for the 2021 growing season. A review of EPA's December 15, 2021 memo regarding a summary of 2021 usage and incidents shows that Arizona is one of five states that either had no incidents or did not report to the Agency.² We reached out to staff at the Arizona Department of Agriculture Environmental and Plant Services and learned that there were no reported dicamba damage incidents in 2021.³

Even before the 2020 label restrictions on dicamba tolerant plants, University of Arizona Cooperative Extension specialist were providing Arizona farmers and PCA's with information on avoiding off-target movement of dicamba.^{4,5} Furthermore, Arizona's environmental conditions and farming practices are

¹ University of Arizona Cotton Pest Losses Surveys from 2018 to 2021 reported on average 74% of the cotton acres planted with dicamba-tolerant varieties.

² Environmental Protection Agency. Status of Over-the-Top Dicamba: Summary of 2021 Usage, Incidents and Consequences of Off-Target Movement, and Impacts of Stakeholder-Suggest Mitigations [Memorandum]. Dec. 15, 2021

³ One possible dicamba off-target incident was reported in 2020.

⁴ McCloskey, William B., Peter Ellsworth, and Kia Umeda. "Auxin herbicides in Arizona Cotton: Avoiding Off-Target Movement. June 2017. https://acis.cals.arizona.edu/docs/default-source/ipm-shorts/auxindrift.pdf?sfvrsn=f9f9284a_2

⁵ McCloskey, William B. and Naomi M. Pier. "Avoiding 2,4-D and Dicamba Off-Target Movement from Cotton. May 2019. https://acis.cals.arizona.edu/docs/default-source/ipm-shorts/auxin.pdf?sfvrsn=73bf26fd_2

such that off-site damage is not prevalent. Because of high summer temperatures and low humidity that contribute to herbicide volatility, growers and PCAs have long recognized and understood the need to be cautious when using products like dicamba.⁶ Crops in Arizona are grown on a smaller scale and are more diverse than in many other parts of the country.⁷ Thus Arizona farmers must practice more careful management.

Dicamba is considered a critical herbicide by many growers in our state and has been used for many years with little to no off-site damage to nearby non-dicamba tolerant crops or plants. The Arizona crops on which dicamba is used benefit from its availability for crop protection and would be negatively impacted if it were no longer available or if major restrictions were implemented on its use. For those reasons, we urge the EPA to continue to allow its use.

Thank you for your consideration.

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

⁶ Pena, Marco. "Why is off-target Movement of Dicamba and 2,4-D Not a Major Problem in Arizona?" June 24, 2020. <https://acis.cals.arizona.edu/agricultural-ipm/vegetables/vipm-archive/vipm-weeds-view/why-is-off-target-movement-of-dicamba-and-2-4-d-not-a-major-problem-in-arizona>

⁷ Ibid