Arizona Farm Bureau Federation
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December 5, 2022

Submitted electronically via https://www.regulations.gov

RE: EPA-HQ-OPP-2010-0751; Registration Review: Proposed Revisions to the Proposed Interim Decision for Methomyl: 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. We appreciate the opportunity to comment on the Environmental Protection Agency's (EPA) proposed revisions to the Proposed Interim Decision for Methomyl.

Methomyl is used on many of Arizona's crops including leafy vegetables (i.e., lettuce/leafy greens), cole crops, onions, Bermuda grass, and alfalfa. Relative to other insecticides, it represents a small portion of use in these crops, and in other diverse crops where it is occasionally used (e.g., spinach, melons, celery, and seed crops including alfalfa seed, lettuce and cole crop seed). However, the continued availability of methomyl is important as it does play an important role protecting crops from a number of pests including flea beetles, thrips, loopers, and beet army worms. Each of these pests can significantly damage crops and cause economic harm if left untreated. High value crops, such as leafy greens and vegetables, have strict quality standards that allow for little to no damage or contamination of the harvested product. Therefore, controlling various pests from infesting and contaminating leafy vegetables is critical. The same can be said for other crops, like alfalfa, where high quality and damage free yields results in premium prices.

It is worth noting that approximately 95% of the leafy vegetables consumed in the U.S. from November to March are produced in Arizona. With regards to alfalfa, Arizona yields are the highest in the nation at 8.4 tons per acre average, as compared to the national average of 3.4 tons per acre.[1] The volume and output of these commodities grown in Arizona highlights the importance of preserving methomyl as a crop protection tool.

EPA's proposed revisions to the methomyl PID includes geographic specific mitigation measures for three pilot listed species, as well as proposed mitigation measures that address the National Marine Fisheries Service (NMFS) April 2009 Biological Opinion (BiOp) that impact all agricultural uses of methomyl. The listed pilot species are not present in Arizona; hence the geographic specific mitigation

[1] Blake, Cary. "Alfalfa: High cutworm damage, gains made in TRR control in Arizona. "Western *Farm Press*, August 17, 2016. Available online at: http://www.westernfarmpress.com/alfalfa/alfalfa-high-cutworm-damage-gains-made-trr-control-arizona., Accessed March 22, 2017.

measures do not impact Arizona crop production. The proposed mitigation measures impacting all agricultural uses include runoff reduction language, restricting the maximum annual application rate to 13 lbs. AI/A/year, and adding label language for reporting ecological incidents. Outreach to several individual Arizona growers and pest control advisors (PCAs) who use methomyl revealed that the proposed mitigation measures for all agricultural uses are feasible and do not negatively impact the effective use of methomyl.

Methomyl provides effective broad-spectrum pest control and is an important rotational tool to prevent resistance. We urge EPA to consider the extremely safe track record and the economic importance of methomyl to Arizona's farmers and not impose any further mitigation measures which would inhibit its continued use.

Thank you for your consideration.

Sincerely,

Stefanie Smallhouse, President
Arizona Farm Bureau Federation