



## *Arizona Farm Bureau Federation*

325 S. Higley Rd, Suite 210  
Gilbert, AZ 85296

September 12, 2022

Submitted electronically via regulations.gov

RE: Docket No. EPA-HQ-OPP-2015-0378-0093; Registration Reviews Proposed Interim Decisions for Several Pesticides – Tebuconazole

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 tebuconazole 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 tebuconazole.

In previous comments submitted by the Arizona Farm Bureau regarding the draft human health and/or ecological risk assessment for tebuconazole (Docket ID # EPA-HQ-OPP-2015-0378-0034), 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.

Tebuconazole is an important fungicide used to address fungal diseases impacting various crops (e.g., rusts in cotton, garlic and wheat, Alternaria and powdery mildew in melons). The most significant and consistent agricultural use of tebuconazole in Arizona is on cotton to address Southwest cotton rust, which can cause yield losses up to 50% under favorable conditions. There is occasional use of tebuconazole reported in garlic, wheat, barley, and melons. Usage of the product also fluctuates annually based on the intensity of Arizona's monsoon season and corresponding rain amounts, which increase the risk for fungal diseases.

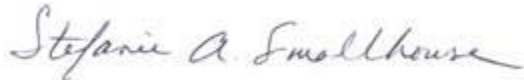
In EPA's PID for tebuconazole we are most concerned with the proposed "Alternate Year, Buffer to Aquatic Areas and Vegetative Filter Strip" label language. The cotton growing region in southeastern Arizona is also the area of the state where cotton rust is most prevalent and where some farm fields are in proximity to the Gila River. Under the proposed label changes, these farmers would be required to apply tebuconazole only during alternate years; would not be able to apply tebuconazole by ground or air within 100 feet of the river; and would need to maintain a 10-foot wide non-cultivated vegetative strip to prevent movement into bodies of water. Under this scenario growers would need to use an alternative option which generally is less effective, more expensive, or both. Additionally, another concern is leaving portions of a field untreated due to the 100-foot buffer, which could potentially lead to yield losses. The 10-foot-wide non-cultivated vegetative strip is a mitigation measure that is not likely to negatively impact farmers.

Although the majority of cotton growers in Arizona would not be impacted by the proposed mitigation measures, those along the Gila River would be significantly impacted, especially if there are successive heavy monsoon seasons.

Tebuconazole is an important fungicide for Arizona's farmers, and especially for cotton growers in the southeastern Arizona. We urge EPA to consider our concern with mitigation measures as it moves forward with the interim decision for tebuconazole. Additionally, we support the more technical comments prepared by the Arizona Pest Management Center for this regulatory docket.

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, with a long, sweeping underline.

Stefanie Smallhouse, President  
Arizona Farm Bureau Federation