



Arizona Farm Bureau Federation

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March 23, 2023

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-2016-0141-0031; Pesticide Registration Review: Proposed Interim Decisions for Several Pesticides – Dicloran (DCNA)

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) proposed interim decision (PID) for Dicloran.

In previous comments submitted by the Arizona Farm Bureau regarding the draft human health and ecological risk assessment for Dicloran (Docket No. EPA-HQ-OPP-2016-0141-0026), 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.

As noted in our earlier comments, Dicloran is primarily used in celery production in Arizona. Although the overall acreage of celery production in Arizona is relatively small, production is significant. In celery, Dicloran is an effective fungicide for treating pink rot (*Sclerotinia sclerotiorum*). For some growers, Dicloran is a critical fungicide option because of its effectiveness with a single application. Alternative products, while effective, have shorter residuals and require multiple applications, and thus are more costly.

EPA's risk assessment for Dicloran has resulted in proposals including prohibiting all aerial applications and increasing the reentry interval (REI) to 58 days, which will essentially eliminate its use in Arizona. Our earlier comments noted that most Dicloran applications are made by air, because celery is watered every 7 to 10 days, making it difficult to access fields with ground equipment. However, EPA states in the PID, "Using the best available data, DCNA is mostly applied, if not entirely applied by ground." EPA is proposing the ariel application ban due to the risk to bystanders. We urge EPA to consider the comments submitted by the Arizona Pest Management Center (APMC) to this docket, which describe how growers minimize drift, specific to the use of Dicloran in celery (i.e., use of helicopters instead of airplanes, 50 ft. buffer zones, and the addition of drift retardant).

Even more concerning is the proposed 58-day REI in celery. Celery is a labor-intensive crop, with people in the field every two to three days for irrigation or scouting. Thus, an REI greater than two or three days is not feasible for celery production. EPA's rationale for the 58-day REI is based on a level of concern stemming from data gaps and the need to use studies for uses of Dicloran in another crop. Although there are alternatives for celery growers, the cost of using those products will be higher. Perhaps engaging IR-4 would help bridge this data gap for this particular specialty crop.

Another factor to consider each time a fungicide is no longer available is the resistance pressure. Fungi are highly adaptable organisms. Consequently, having a robust fungicide resistance management program that includes different products with different modes of action helps delay the development of resistance to active ingredients within a pathogen population. Eliminating the use of one fungicide, particularly one with a unique mode of action among options for this crop, weakens the resistance management program.

Dicloran is an important crop protection tool for a number of our growers in Arizona. EPA's proposed ariel application ban and 58-day REI would essentially cancel the use of Dicloran in Arizona celery production. And, although other products are available, would come at an increased cost.

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