Arizona Farm Bureau Federation
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April 3, 2025

Submitted electronically via www.regulations.gov

RE: EPA-HQ-OPP-2013-0266; Pesticide Registration Review: Atrazine

To Whom It May Concern:

The Arizona Farm Bureau Federation represents farmers and ranchers from all across Arizona. Agriculture contributes $31 billion to the state's economy. We appreciate the opportunity to provide comments on the Environmental Protection Agency's proposed updates to the mitigation in the interim registration review decision (IRRD) for atrazine.

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). We also provided further comments to the EPA in 2022 regarding the initial proposed revisions to the Atrazine Interim Registration Review Memorandum. We incorporated those comments by reference as well (Docket ID EPA-HQ-2013-0266-1768).

We appreciate EPA's reevaluation of the Concentration Equivalent Level of Concern (CE-LOC). In its previous proposal, the much lower threshold for regulation (3.4 μg/L CE-LOC) would have negatively impacted Arizona's corn and sorghum growers by requiring additional mitigations that we believe were unnecessary based on the runoff assessment used in its earlier IRRD. However, the EPA's decision to retain the restriction of the annual application rate to 2 lbs. active ingredient per acre per year remains a concern for certain growers in Arizona.

As we noted in our most recent comment letter in 2022, 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, or back-to-back corn is planted in the same year, with atrazine used in both crops. Generally, the combined application of atrazine when double cropping occurs would require an annual maximum use rate closer to 3 lbs. ai/A, which exceeds EPA's proposed annual application rate. In other areas of the state, where corn is planted back-to-back, three applications across two sequential fields may be required within the calendar year to address weed issues present in the late-planted crop, where atrazine is the preferred weed control choice. 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 alternative products may be viable options for consideration, as some may have longer plant-back restrictions that do not align with current growing schedules and rotations, and do not address problematic weed control as effectively.

The EPA's updated mitigation proposal suggests that growers using more than 2.0 lbs/ai/year may achieve effective weed control through banded applications and/or co-applying another herbicide. However, according to at least one Pest Control Advisor who works with a number of corn and sorghum growers, banded applications are not a viable option. Furthermore, EPA's proposal does not appear to account for regions like Arizona, where double cropping is common, and atrazine is considered an essential tool for both crop cycles.

Additionally, in the EPA's 2016 Refined Ecological Risk Assessment for Atrazine, the Arizona modeled CELOC value of 0 indicated minimal ecological concern. While we recognize that establishing a nationwide maximum application rate simplifies label implementation, states with very low CELOC values, such as Arizona, would benefit from EPA considering a higher annual maximum application rate.

Atrazine is an important crop protection tool for Arizona farmers. As the EPA moves forward in finalizing its updates to the atrazine IRRD, we encourage its consideration of implementing a higher maximum annual application rate in Arizona.

We appreciate your consideration of our comments.

Sincerely,

John Boelts, President
Arizona Farm Bureau Federation