



Arizona Farm Bureau Federation

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September 5, 2025

U.S. Environmental Protection Agency
EPA Docket Center
New Use of Dicamba on DT Cotton and DT Soybean
Mail Code 28221T
1200 Pennsylvania Ave, NW
Washington, DC 20460

RE: Docket No. EPA-HQ-OPP-2024-0154; Memorandum Supporting Proposed Decision to Approve Registration for the Uses of Dicamba on Dicamba-Tolerant Cotton and Dicamba-Tolerant Soybean

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 \$31 billion of economic impact to the state. Our comments below address the Environmental Protection Agency's (EPA) memorandum supporting the proposed decision to register three new dicamba products proposed for use on dicamba-tolerant cotton and soybeans. Dicamba plays a critical role for cotton production in Arizona, and our comments are specific to its use in cotton.

We appreciate that the EPA has advanced a proposed decision to approve the registration of dicamba for use. Last year, we respectfully urged the Agency to take this step to help ensure timely availability and to minimize the risk of delays in its use for the upcoming cropping cycle.

Cotton is one of Arizona's original "Five C's" of the economy: copper, cattle, citrus, cotton, and climate. Although the state's economic drivers have evolved over time, cotton remains a significant agricultural commodity, generating \$176 million in cash receipts in 2022.¹ While Arizona produces only 2% of the nation's cotton, it plays a disproportionately large role in several counties. A recent University of Arizona study found that Pinal County ranks in the top 1% of all U.S. counties for cotton and cottonseed sales, while Graham County ranks in the top 10%. Yuma and Maricopa counties fall within the top quarter nationally, and Pima County ranks in the top third.²

¹ Montania, Claudia, George Frisvold, and Dari Duval. The Contribution of Cotton to Arizona's Economy. University of Arizona Cooperative Extension. May 2025. Available online at <https://extension.arizona.edu/publication/contribution-cotton-arizonas-economy>

² Ibid

A substantial portion of Arizona's cotton acreage is planted with dicamba-tolerant varieties.³ The availability and use of dicamba provides growers with an effective tool for managing difficult and herbicide-resistant weeds, particularly herbicide-resistant pigweed, thereby helping to protect crop yields.

The University of Arizona Pest Management Center (APMC) conducted a survey targeting cotton growers and Pesticide Crop Advisors to solicit feedback on the various mitigation proposals in this dicamba registration docket. We urge EPA to carefully consider the more technical comments provided by the APMC and the results of that survey.

Overall, the APMC survey results indicated that the mitigation measures already in place under the current label, application rate limits, the restriction to two applications, and the 240-foot downwind buffer, were viewed as workable. EPA's proposal to allow flexibility through multiple options to reduce the buffer distance is also a constructive improvement. Most respondents found the 240-foot buffer either workable or sometimes workable, with more than half identifying at least one of the proposed reduction options as sometimes workable for their production systems. The requirement for drift-reducing agents does not represent a new obligation, as this practice is already widely adopted, and the use of volatility-reducing agents appears feasible for many operations.

By contrast, the proposed 40 percent reduction in treated area was identified as unworkable for many growers, and the prohibition on tank mixes raises significant concerns. Taken together, these measures, particularly the addition of volatility-reducing agents, the 40 percent reduction in treated area, and the prohibition on tank mixing, would impose substantial economic impacts by increasing input costs and requiring additional field operations. However, the mitigation measure that is most concerning is the proposed 95-degree temperature application restriction. This requirement, if not modified, will effectively remove dicamba as a tool during periods of greatest weed pressure, thereby severely limiting its practical utility.

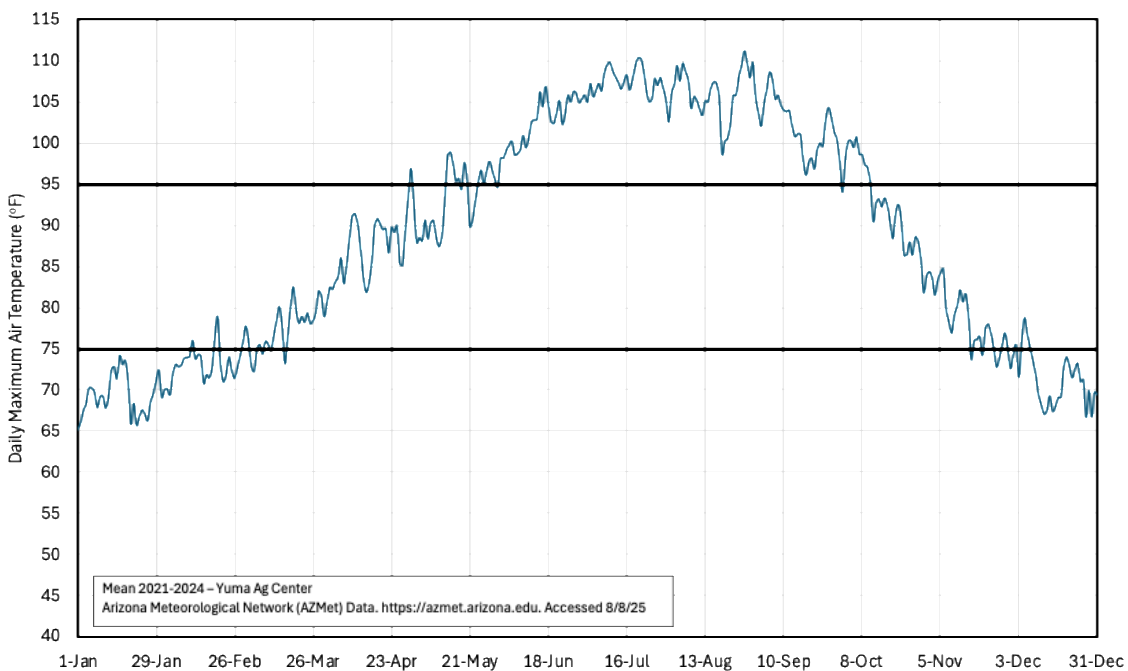
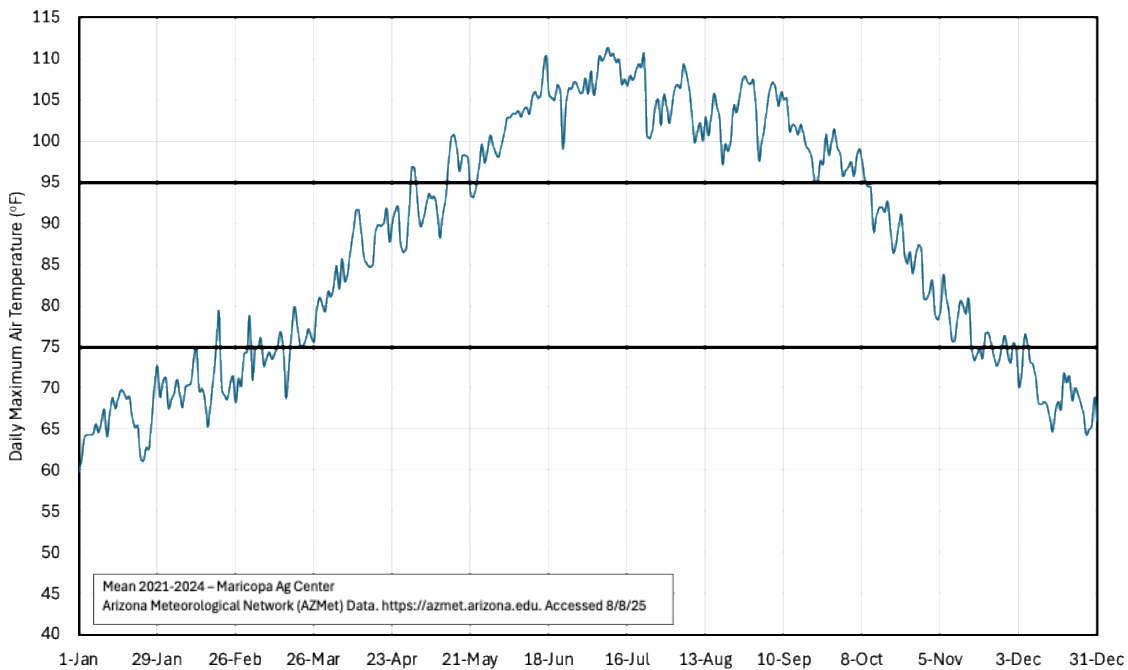
The EPA notes that to minimize volatility from use sites to non-target areas, it is proposing that labels include temperature-dependent requirements. These requirements aim to provide flexibility for growers and applicators to increase mitigations only in situations where higher temperatures are present, as the likelihood of dicamba volatility increases at higher temperatures. Specifically, applications would be prohibited on days when the forecasted high temperature is 95°F or greater, as well as the following day. This 95°F threshold presents significant challenges for Arizona's cotton growers, and the added requirement to consider a second day of forecasts further increases compliance burdens.

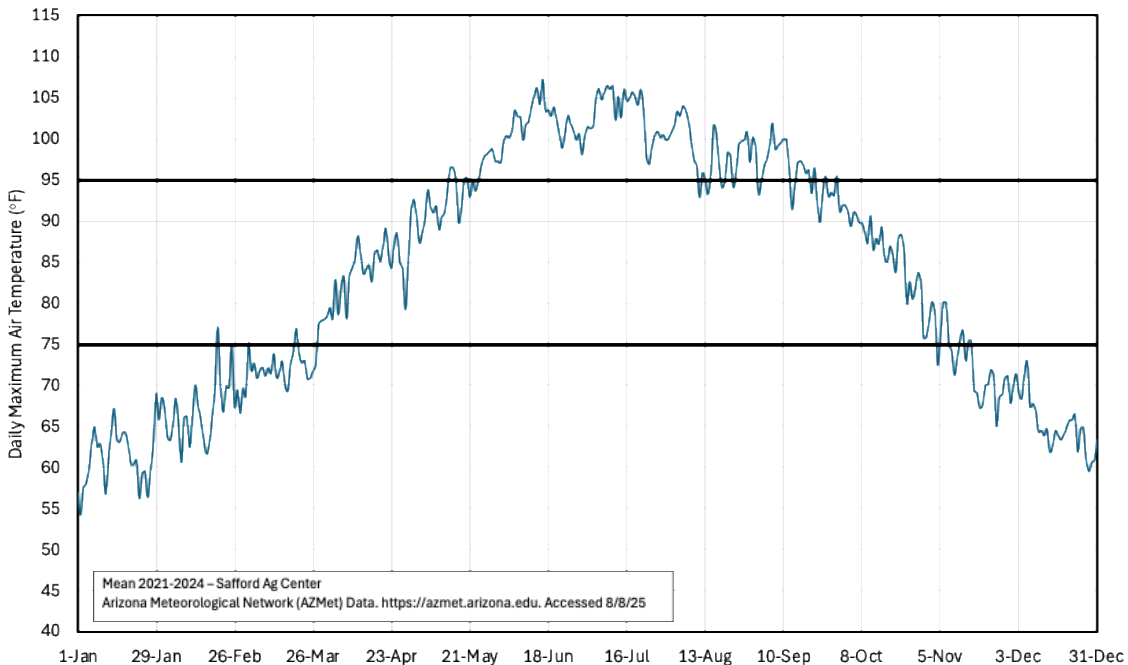
Arizona's cotton-growing regions experience high temperatures during the growing season, particularly in the crucial window for dicamba applications. Applications typically occur from May through July, with critical use in June and July when glyphosate-resistant pigweed emerges and control is most needed.

University of Arizona researcher and director of the Safford Agriculture Center, Randy Norton, compiled daily maximum temperature data from 2021 to 2024 at three agricultural centers in

³ University of Arizona Cotton Pest Losses Surveys from 2018 to 2021 reported on average 74% of the cotton acres planted with dicamba-tolerant varieties (i.e., Bollgard 2 XtendFlex or Bollgard 3 XtendFlex).

Maricopa, Yuma, and Safford (see charts below). The centers are located in major cotton-producing areas of the state. The data show that while some days in early May remain below the 95°F threshold, by late May and early June, maximum temperatures consistently exceed 95°F and often surpass 105°F. In Safford, which represents the eastern cotton-growing region, temperatures are somewhat lower but still regularly exceed 95°F beginning in mid-May. Plantings in Safford typically occur two or three weeks later than other regions of the state, and key weed emergence is also a bit later.





The proposed 95°F application cutoff would limit May dicamba use and preclude use beginning in June, which coincides with the emergence of herbicide-resistant pigweed. This period represents a critical time for weed management, essential for protecting cotton yields. Thus, we urge EPA to consider a higher temperature threshold for Arizona, such as 105 degrees. Otherwise, access to dicamba is essentially eliminated during a critical time and would not only compromise effective resistance management but also impose higher production costs on growers.

We are also concerned with the proposal’s requirement that growers rely on NOAA weather station forecasts to determine compliance with temperature-based thresholds. We urge the EPA to consider alternative temperature measurement systems that more accurately reflect conditions in and around agricultural fields where pesticide applications occur. NOAA weather stations are often located in urban areas, frequently sited on concrete or asphalt, which do not represent conditions in agricultural settings. In highly populated areas such as Phoenix, cotton fields border urban development and are subject to the “heat island effect,” where ambient temperatures are artificially elevated due to dense urbanization. This discrepancy results in inaccurate temperature data for nearby farming operations.

As an alternative, we recommend the EPA consider the University of Arizona’s AZMET stations, which are strategically situated across the state, typically on bare ground adjacent to agricultural fields. These stations provide real-time weather data, including temperature and dew point, offering a more accurate and reliable reflection of field conditions. We strongly encourage the EPA to adopt more localized and representative weather sources, such as AZMET, to ensure that any temperature-based compliance requirements are both fair and practical for growers.

We respectfully urge EPA to consider regional modifications to the volatility temperature restriction to account for Arizona’s climate, cropping systems, and strong record of safe dicamba use. An EPA memorandum summarizing 2021 usage and incident reports identified Arizona as one of five states

with either no reported incidents or none submitted to the Agency.⁴ Additionally, the Arizona Department of Agriculture's Environmental Services Division has recorded only one potential incident of off-site damage since dicamba was first registered in the state.

It is also important to note that, even prior to the 2020 label restrictions on dicamba-tolerant crops, University of Arizona Cooperative Extension specialists had been actively providing guidance to growers and pest control advisers on practices to avoid off-target movement.^{5,6} Furthermore, Arizona's environmental conditions and farming practices are such that off-site damage is not prevalent. Due to high summer temperatures and low humidity, which contribute to herbicide volatility, growers and PCAs have long recognized the need to exercise caution and best management practices when using products like dicamba.⁷ Crops in Arizona are grown on a smaller scale and are more diverse than in many other parts of the country.⁸ Thus, Arizona farmers must practice more careful management. Furthermore, there is a high level of cooperation and communication among neighboring growers to help limit planting of sensitive crops in proximity to dicamba-tolerant cotton.

Dicamba is regarded by many growers in our state as a critical herbicide and has been used for many years with little to no off-site impact on non-dicamba-tolerant crops or plants. Arizona cotton production relies on the benefits of dicamba for effective crop protection and would be negatively affected if its use were technically permitted but effectively precluded by overly restrictive conditions. For these reasons, we strongly urge EPA to implement regionally tailored, science-based measures that provide effective alternatives to broad restrictions, ensuring growers maintain access to this essential tool during critical application periods.

Thank you for your consideration.

Sincerely,



John Boelts, President
Arizona Farm Bureau Federation

⁴ 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

⁵ 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

⁶ 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

⁷ Pena, Marco. "Why is off-target Movement of Dicamba and 2,4-D Not a Major Problem in Arizona?" June 24, 2020. Available online at <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>

⁸ Ibid