



February 19, 2021

Office of Pesticide Programs
Environmental Protection Agency Docket Center
1200 Pennsylvania Ave. N.W.
Washington, DC 20460-0001

RE: EPA-HQ-OPP-2020-0514

Dear Sir or Madam:

Illinois Farm Bureau® (“IFB”) submits these comments in connection with the above-referenced docket, which pertains to EPA’s request for comments on the agency’s biological evaluation for atrazine.

IFB is a member of the American Farm Bureau Federation® (“AFBF”), a national organization of farmers and ranchers. Founded in 1916, IFB is a non-profit, membership organization directed by farmers who join through their county Farm Bureau (“CFBs”). IFB has a voting membership of more than 74,000. IFB represents three out of four Illinois farmers. IFB and the CFBs share the same set of individual members.

Atrazine is an important tool for weed mitigation in several crops including corn, sorghum, and sugarcane. IFB strongly supports the continued use of atrazine without additional restrictions as it is widely used across many crop systems, enables farmers to utilize conservation practices, and provides cost-savings.

In addition to this organizational comment, over 1,100 IFB members provided their individual comments in the above-referenced docket, including their own personal experience using atrazine in their farming operation. Here are a few highlights from our own member comments:

- Having farmed since 1974 in the state of Illinois, atrazine has been a key component of my weed control program. While it is no longer the primary component in tank mixes of herbicides, it provides a synergistic effect when mixed with other herbicides. With the reduced rates of today compared to the early days pre-2000, it is a chemical that is broken down easily by soil microbes. If we were to lose it, there would be other potentially more harmful chemicals that would have to be used in its place. Loss of atrazine would result in the need to develop other herbicides which may be a worse alternative to keeping atrazine. - Douglas Gray, Herscher, IL.
- Atrazine has been proven repeatedly to be an effective tool against invasive weeds and to aid in conservation practices that ultimately result in good soil health. It is

affordable with minimal residual impact. Please do not remove or limit its use. -
Heather Knodle, Fillmore, IL

- Atrazine, when used in moderate dose and combination with other chemistries that source from different "modes of action", provides enhanced results in specific hard to control weed species. As a general rule, farmers today are not using the high single dose levels of atrazine that may have been applied 30+ years ago. We are being responsible citizens for our neighbors and our own water supplies, as well as the general environment. - David Klein, El Paso, IL
- I have been using atrazine safely for over forty years. It complements so many different chemicals over the years that I do not know what I could use in my no-till system to work any better in controlling weeds. - Paul Edwards, Quincy, IL
- As we move towards minimal or no till, it is critical to have atrazine available to move forward in our conservation efforts. - Michael Deppert, Green Valley, IL
- Atrazine enables us to control tough broad leaves and vines on our farm that would drastically decrease our yields and our ability to feed the world. Atrazine is a major asset in the production of corn on our farm. - Brad Meese, Oblong, IL
- Atrazine is one of the main ingredients in our corn herbicide program. We use it in conjunction with other chemicals in premixed products that are applied to our fields. It is a very cost-effective product and is very effective in controlling broad leaf weeds in our fields. We apply our atrazine in one of two ways, either in a split application (half at planting, the other half post applied at the v3 growth stage) or all of it post applied at v3 growth stage. We believe by split applying, or applying it all post, we are reducing the amount of time the atrazine is on the field without a crop growing. Once our crop is growing water runoff is drastically reduced, so chemical runoff is reduced as well. When I am applying atrazine, I use a sprayer that has the most up to date technology. This allows me to apply atrazine to my fields without drifting onto off target areas, as well as not over applying in any area of the field. My farming operation depends heavily on atrazine as a cost effective and efficient weed control tool. It would be detrimental to my operation to lose this technology. - Eric Lambdon, Wolf Lake, IL
- As an Illinois corn producer, the loss of atrazine as a crop protection tool would negatively impact my ability to produce this crop. My operation is 100% no-till, offering significant environmental benefits including reduction of soil loss, improvement of water quality, reduction of commercially applied nutrients and reduction of greenhouse gases produced. No-till requires producers to prescriptively eliminate weed pressure without the use of tillage tools. Atrazine is an effective way to economically manage weed pressure. Without atrazine, many farmers would not be

able to utilize no-till methods that result in the positive environmental outcomes outlined above. - Richard Johnson, Monee, IL

Use of Atrazine in US Corn Production¹

Atrazine is a critical component for corn production in the United States. In 2018, the National Agricultural Statistics Service surveyed corn producers in eighteen states², including Illinois, that collectively account for nearly ninety-three percent of corn acreage—a land area totaling over eighty-nine million acres of corn production. According to USDA, atrazine was the most widely used active ingredient (AI) and was applied to approximately fifty-five percent of planted acres. Assuming this applicator rate remains, of the nearly 91 million acres of corn planted during 2020, nearly 50 million acres used atrazine as a critical component.³

The following table, extracted from the NASS survey, shows graphically the relative importance of atrazine to corn production.

Table 2. Top Herbicides Applied to Corn Planted Acres, 2018 Crop Year

Active Ingredient	% of Acres with Ingredient ^a	Average Rate (lbs/acre)	Total Applied (mil lbs)
Atrazine	65	1.037	55.9
Mesotrione	42	0.121	4.2
Glyphosate isopropylamine salt	34	0.993 ^b	27.7 ^b
Acetochlor	33	1.433	38.8
S-metolachlor	29	1.198	28.3

^aAcres with multiple ingredients are counted in each category.

^bExpressed in acid equivalent.

The following table, taken from the NASS 2020 Acreage survey, lists the highest states in corn production and demonstrates the vast amount of acreage in which atrazine could be used to mitigate weed threats, improve crop quality and boost yields.

¹ For further information about the extent and use of atrazine and its importance to corn production please see [https://www.nass.usda.gov/Surveys/Guide to NASS Surveys/Chemical Use/2018 Peanuts Soybeans Corn/Chem UseHighlights Corn 2018.pdf](https://www.nass.usda.gov/Surveys/Guide%20to%20NASS%20Surveys/Chemical%20Use/2018%20Peanuts%20Soybeans%20Corn/Chem%20UseHighlights%20Corn%202018.pdf)

² Colorado, Illinois, Indiana, Iowa, Kansas, Kentucky, Michigan, Minnesota, Missouri, Nebraska, New York, North Carolina, North Dakota, Ohio, Pennsylvania, South Dakota, Texas, and Wisconsin.

³ USDA Office of the Chief Economist. World Agricultural Supply and Demand Estimates. February 2021.

Corn Area Planted for All Purposes and Harvested for Grain – States and United States: 2019 and 2020

State	Area planted for all purposes		Area harvested for grain	
	2019 (1,000 acres)	2020 (1,000 acres)	2019 (1,000 acres)	2020 ¹ (1,000 acres)
Alabama	320	370	305	355
Arizona	90	95	37	35
Arkansas	770	640	725	625
California	460	420	60	50
Colorado	1,550	1,600	1,300	1,300
Connecticut ²	23	23	(NA)	(NA)
Delaware	185	175	180	170
Florida	90	80	54	45
Georgia	395	390	350	345
Idaho	385	350	148	130
Illinois	10,500	10,900	10,200	10,700
Indiana	5,000	5,400	4,820	5,250
Iowa	13,500	14,000	13,050	13,550
Kansas	6,400	6,100	6,020	5,750
Kentucky	1,550	1,550	1,450	1,430
Louisiana	570	580	545	565
Maine ²	29	27	(NA)	(NA)
Maryland	510	500	460	455
Massachusetts ²	14	13	(NA)	(NA)
Michigan	2,000	2,300	1,610	1,940
Minnesota	7,800	8,100	7,250	7,650
Mississippi	660	550	620	530
Missouri	3,200	3,500	2,990	3,350
Montana	115	130	60	75
Nebraska	10,100	9,800	9,810	9,450
Nevada ²	15	17	(NA)	(NA)
New Hampshire ²	12	12	(NA)	(NA)
New Jersey	77	90	68	84
New Mexico	145	130	46	30
New York	1,020	1,000	545	495
North Carolina	990	1,020	930	960
North Dakota	3,500	2,400	3,130	2,200
Ohio	2,800	3,600	2,570	3,400
Oklahoma	370	420	330	370
Oregon	80	85	48	45
Pennsylvania	1,450	1,470	1,060	1,000
Rhode Island ²	2	2	(NA)	(NA)
South Carolina	380	390	350	360
South Dakota	4,350	5,400	3,870	4,920
Tennessee	970	950	910	900
Texas	2,500	2,400	2,150	2,000
Utah	85	95	26	30
Vermont ²	81	81	(NA)	(NA)
Virginia	540	520	380	375
Washington	170	200	90	115
West Virginia	52	46	38	32
Wisconsin	3,800	4,000	2,670	2,900
Wyoming	95	85	67	57
United States	89,700	92,006	81,322	84,023

(NA) Not available.
¹ Forecasted.

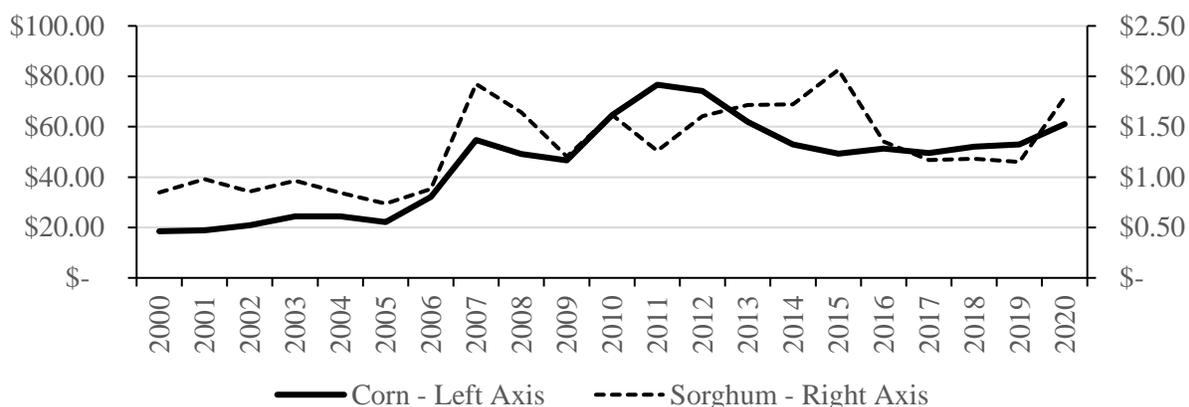
Environmental Benefits

The use of atrazine, especially in corn production, enables added environmental benefits for farmers seeking to utilize conservation tillage and no-till practices. These methods help to conserve soil, preserve and increase nutrients, and improve water quality. In addition to trapping excess carbon in the soil and reducing greenhouse gas emissions, no-till techniques play an integral role in reducing runoff and protecting aquatic ecosystems and water quality. Without atrazine, many farmers would not be able to utilize these methods that provide environmental benefits.

Economic Benefits

Atrazine provides a low-cost, long-acting weed control for farmers. By using atrazine, farmers can utilize lesser amounts of other herbicide products, while boosting their yields and improving crop quality. As weed resistance becomes more prevalent on farms, it is important farmers maintain a wide variety of herbicide tools, including atrazine, to address a multitude of weed threats.

Figure 1. Value of Corn and Sorghum Production in the U.S., Billion Dollars, USDA NASS



To highlight the importance of atrazine to farmers consider that the value of corn production in the U.S. annually exceeds \$50 billion. In 2020, due to higher corn prices in the U.S., the value of corn production is projected at \$61 billion. For corn, the value of production in 2020 is the highest since 2013.⁴

Given the value of the markets and their impact on the economies in both agriculture and rural America, it is imperative farmers maintain access to atrazine as there is no other substitute for this affordable, off-patent and well understood product. Moreover, a recent recovery in the farm economy should not overshadow the slim margins between profitability and loss. Each year farmers must maintain all forms of cost-savings possible. The cost savings helps to reduce overall corn production costs by 4% each year, based on the national average cost of production estimates from USDA's Economic Research Service.⁵

⁴ USDA NASS Quickstats and USDA Office of the Chief Economist. World Agricultural Supply and Demand Estimates. February 2021.

⁵ Commodity Costs and Returns. USDA ERS. <https://www.ers.usda.gov/data-products/commodity-costs-and-returns/commodity-costs-and-returns/#Recent%20Cost%20and%20Returns>

Draft Biological Evaluation

Considering how this product benefits agriculture and aids farmers in being good stewards of the environment, IFB strongly supports the continued use of atrazine without additional restrictions. IFB worries that the methodology used to conduct the biological evaluation for atrazine may lead to limitations on registered uses and compromise the availability of the product. IFB asserts that the methodology used to conduct the biological evaluation did not use the best available science, is unrealistically conservative, and lacks transparency.

In its biological evaluation, EPA found that atrazine is likely to adversely affect nearly all species and critical habitats in the continental United States, including some that are already extinct. After determining those listed species and critical habitats overlapping the atrazine action area would receive May Affect (MA) determinations in the first step of the biological evaluation, EPA then proceeded to use the MAGtool to conduct further analyses. The MAGtool relies upon formulas to conduct this step of the biological evaluation instead of more detailed studies that more accurately capture a product's actual impact on species. Because of EPA's use of the MAGtool, over 90% of species received Likely to Adversely Affect determination (LAA). Per statute, these LAA determinations are required to be assessed by the Fish and Wildlife Service and/or National Marine Fisheries Service ("the Services"). Since EPA's analyses resulted in broad LAA determinations for 90% of the species in question, the use of the MAGtool has effectively transferred the responsibility to make accurate and realistic assessments of the potential impacts of atrazine on listed species and critical habitats to the Services. IFB worries that the Services do not have the appropriate resources to fully evaluate each species and habitat assigned as LAA. This lack of resources could result in restrictions on atrazine justified by inadequate evaluations.

IFB understands EPA's decision to use an automated decision-making tool, like the MAGtool, could be due to resource restrictions. However, we urge EPA to take steps to ensure the most accurate data is used in its decision making and that these methodologies can be replicated by stakeholders to verify EPA's results. EPA should ensure high-quality studies carry more weight in its decision making moving forward.

Additionally, IFB is concerned that EPA used unrealistic usage data in determining which species' critical habitat would receive LAA determinations. IFB urges EPA to use actual data in this decision making instead of incorrectly assuming treated areas in each species range or critical habitat were treated at the maximum application rate with the maximum number of applications and minimum re-treatment interval.

As EPA reviews the public comments filed in this docket, IFB urges the Agency to consider publishing an update to this draft biological evaluation that incorporates new data made available in these comments. IFB expects there to be more accurate data provided by stakeholders and EPA's response to these new data, should be subject to further public comment.

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Atrazine is an important tool for weed protection in American agriculture that enables farmers to partake in environmentally beneficial practices. It is critical farmers maintain access to atrazine without restrictions on use. While IFB understands biological impacts of pesticides must be part of a product's reregistration process, we must ensure there is confidence in the science used in the evaluations. However, it is evident that the use of the MAGtool and unrealistic usage data have resulted in overly cautious determinations that atrazine is likely to adversely affect listed species. While this draft biological evaluation specifically relates to atrazine, the process in which EPA conducts its assessments has the potential to limit other critically important pesticide products using inaccurate data assessment methodologies. How EPA responds to these findings based this biological evaluation methodology has broad impact for other active ingredients equally important to the agriculture industry.

We appreciate the opportunity to submit these comments. If you should have any questions, please do not hesitate to contact Lauren Lurkins, Director of Environmental Policy, at llurkins@ifb.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard L. Guebert, Jr.", with a stylized flourish at the end.

Richard Guebert, Jr.
President
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