

March 3, 2020

Office of Pesticide Programs Regulatory Public Docket
Environmental Protection Agency Docket Center, (28221T)
1200 Pennsylvania Ave. N.W.
Washington, DC 20460-0001



RE: Docket ID EPA-HQ-OPP-2013-0266

Dear Office of Pesticide Programs:

On behalf of our membership, the Texas Corn Producers Association (TCPA) appreciates your careful consideration of the following comments and concerns in regard to the Preliminary Interim Decision (PID) for atrazine. Atrazine is a key tool for weed management on farms in Texas and nationwide.

TCPA and farmers in our state offered our strong objection to the unsound research cited in the draft ecological risk assessment in 2016. We appreciate the efforts the PID by revising the level of concern (LOC) of 15 ppb over a 60-day rolling average. However, an October 2019 Regulatory Update provided by EPA indicates a community-equivalent LOC (CE-LOC) range of 1.9 to 26 ppb. This vast CE-LOC range should be dismissed. EPA must ensure 15 ppb means 15 ppb.

TCPA and fellow farm organizations remain concerned that EPA is using outdated and misleading studies in the ecological risk assessment, while high-quality studies continue to be excluded. Several poor-quality fish, bird, and amphibian studies remain in the PID. Low-quality research such as this should not be factored in at the same level of the extensive, replicated studies exhaustively evaluated in relevant peer-reviewed publications. This updated assessment should provide the necessary framework for EPA's biological opinion for the atrazine review in the Endangered Species Act review.

Farmers rely on atrazine to produce corn crops that are environmentally and economically sustainable. More than half of all U.S. corn acres rely on this safe and essential herbicide to produce food sustainably. More than 90 herbicide products contain atrazine to improve weed control.

Atrazine offers the nation environmental and economic benefits, alike. Its use is essential to conservation tillage practices, which reduce soil erosion and fuel use, and improve water and wildlife habitat. Further, it provides low-cost, long-acting weed control for farmers – even reducing the use of other pesticides on corn crops. This saves farmers money and generally increases crop yields.

TCPA urges the EPA to use credible science in its regulatory decisions – just as its farmer members rely on sound science and technology to sustainably produce feed, fuel and food for Americans. We appreciate your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "David Gibson".

David Gibson
Executive Vice President

www.TexasCorn.org
4205 N. Interstate 27 • Lubbock, Texas 79403
806.763.CORN (2676) phone • 806.762.2674 fax