April 1, 2025

Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

RE: The Michigan Corn Growers Association comments on EPA's *Updated Mitigation Proposal for the Atrazine Interim Registration Review Decision, Case Number 0062; Docket ID: EPA-HQ-OPP-2013-0266*

Dear Sir/Madam,

The Michigan Corn Growers Association (MCGA) appreciates the opportunity to comment on the U.S. Environmental Protection Agency's (EPA) *Updated Mitigation Proposal for the Atrazine Interim Registration Review Decision, Case Number 0062; Docket ID: EPA-HQ-OPP-2013-0266.* Founded in 1971, MCGA represents 1,400 dues-paying corn growers across the state and the interests of 12,000 farmers who contribute to the Michigan corn checkoff program.

Atrazine is a critical tool for weed management and is included in more than 90 premix products available to Michigan producers. Since its introduction in 1958, atrazine has been the subject of more than 7,000 studies documenting atrazine's safety and effectiveness. Michigan farmers consistently rely on atrazine for weed control because of its broad-spectrum efficacy, its long residual period, and because it is the economic choice.

The use of atrazine as an effective weed control strategy has also allowed farmers to increase the use of conservation tillage. Conservation tillage practices reduce the erosion of sediment into waterways, conserve moisture, improve soil health, and increase plant resiliency ultimately leading to better yield outcomes. Without atrazine as a weed control option, farmers would have to select less effective and more expensive herbicides while also increasing tillage intensity to control problem weeds.

MCGA appreciates the inclusion of the August 2023 Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Scientific Advisory Panel (SAP) conclusions that resulted in a revised 60-day ecological Level of Concern (LOC) for atrazine. However, MCGA still has concerns with the scientific studies and approach used by the agency to reach this conclusion. As a member of the Triazine Network, MCGA refers the EPA to the Network's comments for a full description of remaining scientific concerns.

Broadly, our remaining scientific concerns are the continued inclusion of the Pannard et al. (2009) microcosm/mesocosm study to determine the ecological LOC. The Pannard study was poorly designed, is not representative of natural aquatic systems, and the observed effects were contradictory. Without its inclusion, the CE-LOC increases from 9.7 ug/L to 12 ug/L. Second, while MCGA appreciates that the revised CE-LOC value was used with the WARP-MP model to identify critical watersheds, using a 95% prediction interval instead of the Standard Median

Output results in substantially more acres requiring mitigation. When the 95% prediction interval is applied, 68% of corn acres require mitigation. This drops to just 13% of corn acres included when the Standard Median Output is applied – almost none of which are within the state of Michigan.

MCGA commends the EPA for including a mitigation framework that aligns with the agency's herbicide strategy and with an expanded menu of options for farmers. The opportunity for choice and flexibility of options is critical for successful implementation, but a farmer's ability to continue to rely on atrazine only through mitigation measures will require a financial investment in an agricultural economy already facing record thin margins. Therefore, MCGA believes there are proposed label changes and mitigation measures that would benefit from further review.

The proposed label change stating "do not apply more than 2.0 lbs. ai/A/year" is problematic. Lowering the cap for the maximum annual corn use rate to 2.0 lbs./acre from the previous rate of 2.5 lbs./acre is not supported by scientific technical data, does not allow for emergency use, such as a corn replant scenario, and has the potential to increase resistance issues with herbicide-tolerant weeds such as waterhemp and Palmer amaranth. MCGA urges the EPA to supply analyses demonstrating the need for this annual rate reduction.

The proposed mitigation strategy of cover crops is one that MCGA supports, however, cover crops can be expensive and challenging to implement, often requiring financial and technical assistance for farmers to get started. Cover crops are an important and versatile conservation tool that farmers use to control erosion, reduce nutrient runoff, suppress weeds, and enhance soil health aspects that make crop production more resilient. To be effective, farmers need additional support before this is a viable mitigation option. Further, cover crops are only successful if they are terminated effectively, which requires herbicides, including atrazine.

The proposed mitigation strategies of contour buffer strips, contour farming, terrace farming and strip cropping are not appropriate for Michigan's geography or applicable to Michigan's corn farmers. This narrows the menu of options for corn producers to choose from.

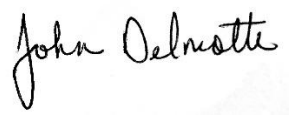
The proposed mitigation strategy of soil incorporation undermines the benefits of conservation tillage, as described previously.

MCGA would like to propose the following mitigation strategy be added to the list: exemptions for qualifying conservation programs and/or allowing point accumulation for participating in a qualifying program *and* working with a certified technical advisor. The benefits of conservation programs and their role in supporting technical assistance to farmers and verifying practice adoption are undervalued in the proposed framework. In Michigan, the Michigan Agricultural and Environmental Assurance Program (MAEAP) is an innovative, proactive program that helps farms of all sizes, and all commodities voluntarily prevent or minimize agricultural pollution risks. MAEAP is uniquely suited to support farmer technical assistance and ensure mitigations are in place. MCGA encourages the EPA to consider MAEAP as a qualifying conservation program.

MCGA believes the EPA has moved significantly closer to a mitigation strategy for atrazine that is scientifically based while also reducing the burden on farmers. Meeting our continued scientific concerns and further adapting the mitigation framework will support continued farmer access to this important product.

Thank you for the opportunity to comment on this critical tool for Michigan's corn farmers.

Sincerely,



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