

February 12, 2021

Office of Pesticide Programs  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave, NW  
Washington, DC 20460-001

Re: Comments on the Draft Endangered Species Act Biological Evaluations: Atrazine, Simazine, and Propazine Registration Review; Docket ID EPA-HQ-OPP-2020-0514

To Whom it May Concern:

The Illinois Corn Growers Association appreciates the opportunity to submit comments in support of atrazine, simazine, and propazine reregistration. It is imperative that the farmers we represent have access to these very important chemicals, that aid in our ability to farm with the earth and the natural resources we steward in mind.

Atrazine and its family of chemicals have been studied for decades and have consistently been proven safe for wildlife, for the earth, and for humankind. Access to the chemical allows our farmers to control weeds without tilling the earth, to reduce fuel usage and to keep carbon sequestered in the soil. Without access to atrazine, farmers would have to consider additional tillage and additional chemical applications, which increase fuel usage, increase carbon released into the air, and in general do not support the conservation-minded transitions farmers are making to their practices.

Sadly, a finding that atrazine is likely to diversely affect nearly all species and critical habitats in the continental United States will impact the chemicals availability to farmers. We believe the findings are inaccurate and based on outdated and faulty science.

First and foremost, ICGA would implore EPA to use the best available science in this evaluation. High-quality studies must carry more weight than low-quality studies in the decisions, just as you promised would occur. If the science is lacking, and precedent is set that faulty, low-quality science can be used to justify a means, the integrity of our regulatory process is jeopardized.

ICGA would also urge the EPA to not delegate the responsibility to evaluate the impact on species and habitat to the U.S Fish and Wildlife and National Marine Fisheries Service who lack the time and resources to fully accomplish this goal.

Finally, ICGA asks that the EPA simply fulfill the commitments required in this process. Answer all public comments. Update your approach and endpoints such that they

incorporate the multitudes of scientific comments received. Incorporate the best and most recent data and publish an update to the draft biological evaluation that we can review and provide comment.

Losing atrazine puts farmers at risk of no longer being able to be the solution to the global climate problem we see before us. Without atrazine as an available chemical, farmers will till more, release more carbon into the environment, use more chemicals and more fuel, and in general, reduce the positive gains we have been able to achieve in recent years.

Thank you for reviewing my thoughts on this matter.

Sincerely,



Randy DeSutter  
PRESIDENT