

Congress of the United States

Washington, D.C. 20515

September 26, 2016

Honorable Gina McCarthy
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator McCarthy,

We are concerned with the EPA's preliminary ecological risk assessment for atrazine currently out for public comment. We have heard from many farmers who rely on this herbicide for a safe and good crop. We share their deep concerns with the quality of science, assumptions and interpretations used by EPA in this assessment. It is critically important that this assessment be scientifically sound and based upon realistic assumptions and interpretations. The conclusions of this assessment will have far-reaching and direct impacts on the economic viability of Missouri farmers, as well as broader impacts on Missouri soil conservation and soil health efforts.

Atrazine is an important tool enabling Missouri farmers to better manage herbicide resistant weeds and to implement soil and nutrient saving conservation practices such as no-till. The use of any similarly effective alternative would increase farmers cost of production by \$30-\$60 an acre. These cost increases are based on the EPA's own economic studies as well as studies conducted by the University of Chicago. A more expensive and less effective product is simply not an option for our farmers as the current cost of production for corn and other row crops is already above the market price received at the farm. Many farmers who have successfully implemented conservation tillage practices may be forced to revert back to conventional tillage practices to manage hard to control weeds. This will be trading 50 years of soil conservation improvements and billions of public and private conservation dollars for this scientifically flawed and unrealistic risk assessment.

Of greatest concern are the obvious departures from sound science in this assessment. Some of the specific concerns are as follows.

- The assessment erroneously lowers the chronic no-effect level for birds (end-point) by a factor of three, without new information or data to support such a change.
- The assessment relies on a study — not conducted in accordance with required guidelines — to lower the fish end-point 12-fold, while overlooking the results of a more recent, guideline-compliant study, as well as other fish studies conducted by

EPA itself.

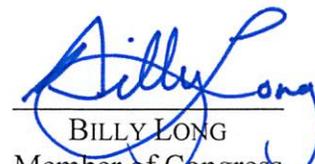
- Against the advice of EPA's own Scientific Advisory Panels (SAPs), this assessment relies on and includes scientifically invalid aquatic plant (microcosm/mesocosm) studies to define the aquatic level of concern (LOC).
- Quality assurance and quality control errors in the exposure database and methodological errors lead to extraordinary overestimates of aquatic and terrestrial exposure.
- This assessment estimates inflated hypothetical risks that have not been observed in the real world during Atrazine's 50 years of closely scrutinized use.

This departure from sound and common-sense based science calls into question EPA's credibility as well as their responsibility to regulate atrazine, as well as future crop protection products in a fair and objective manner. We request your cooperation in addressing the above concerns as well as the many comments and concerns the agricultural community is raising on the assessment. The public confidence and integrity of EPA's regulatory science framework is at stake. We look forward to receiving your response.

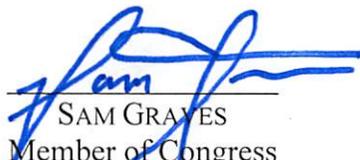
Kind Regards,



JASON SMITH
Member of Congress



BILLY LONG
Member of Congress



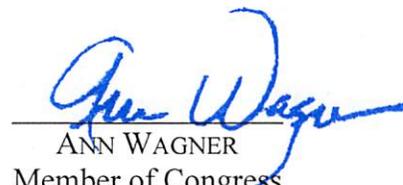
SAM GRAVES
Member of Congress



VICKY HARTZLER
Member of Congress



BLAINE LUETKEMEYER
Member of Congress



ANN WAGNER
Member of Congress