



**AGRICULTURAL
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December 14, 2022

Melanie Biscoe
Pesticide Re-Evaluation Division (7508P)
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

Re: Docket EPA-HQ-OPP-2017-0750; FRL-10219-01- OCSPP

Bromadiolone, Case Number 2760
Bromethalin, Case Number 2765
Chlorophacinone, Case Number 2100
Cholecalciferol, Case Number 7600
Difenacoum, Case Number 7630
Difethialone, Case Number 7603
Diphacinone (and its sodium salt), Case Number 2205
Strychnine, Case Number 3133
Warfarin (and its sodium salt), Case Number 0011
Zinc Phosphide, Case Number 0026

Dear Ms. Biscoe:

Thank you for the opportunity to submit comments on the Proposed Interim Decisions (PIDs) for the rodenticides. Given the complexity of the issues and mitigation measures raised in the PIDs and the significant impacts of the decisions on our members and their grower customers, the Agricultural Retailers Association (ARA) requests that EPA provide an additional 60 days to provide detailed and substantive comments.

ARA is a 501(c)(6) non-profit trade association that represents the interests of agricultural retailers and distributors across the United States on legislative and regulatory issues. Ag retailers supply farmers and ranchers with products and services such as seed, nutrients, crop protection products, feed, equipment, and technology. Retailers also provide consultative services such as crop scouting, soil testing, field mapping, custom planting and application and development of nutrient management and conservation plans. Agricultural retailers range in size from small, family-held businesses to large companies and farmer-owned cooperatives with multiple outlet stores. Large and small retail facilities are scattered throughout all fifty states and provide critical goods and services, as well as jobs and economic opportunities in rural and suburban communities.

It will take significant time to adequately address each of the proposed individual proposed mitigation measures for the three first-generation anticoagulant rodenticides, four second-generation anticoagulant rodenticides, four non-anticoagulant rodenticides and strychnine. In addition, these PIDs include draft evaluations for three species and one critical habitat. According to EPA, these evaluations and proposed mitigation measures are intended to be pilots for approximately 90 other listed species. Our comments may also be further informed by EPA's upcoming draft biological evaluation for these products. Finally, this comment period encompasses the December holidays, a time in which many people are out of the office.

Due to the diversity of chemistries, issues and use patterns involved, the additional 60 days will allow us to provide a more robust evaluation of the impacts on agricultural retailers and our grower customers. Thank you for your review and consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard D. Gupton". The signature is fluid and cursive, with a large initial "R" and "G".

Richard D. Gupton
Senior Vice President, Public Policy & Counsel