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September 1, 2023

Ms. Jan Matuszko, Director
Environmental Fate and Effects Division
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460-0001

Re: Docket EPA-HQ-OPP-2023-0365; Draft Herbicide Strategy Framework to Reduce Exposure of Federally Listed Endangered and Threatened Species and Designated Critical Habitats from the Use of Conventional Agricultural Herbicides. Herbicide Strategy Framework Document

Dear Ms. Matuszko:

On behalf of the Agricultural Retailers Association (ARA), I respectfully request a 90-day extension to the public comment period on the U.S. Environmental Protection Agency's (EPA or the Agency) July 2023 *Draft Herbicide Strategy Framework to Reduce Exposure of Federally Listed Endangered and Threatened Species and Designated Critical Habitats from the Use of Conventional Agricultural Herbicides (Herbicides Strategy)*.

ARA is a not-for-profit trade association that represents America's agricultural retailers and distributors. ARA members provide goods and services to farmers and ranchers which include fertilizer, crop protection chemicals, seed, crop scouting, soil testing, custom application of pesticides and fertilizers, and development of comprehensive nutrient management plans. Retail and distribution facilities are scattered throughout all 50 states and range in size from small family-held businesses or farmer cooperatives to large companies with multiple outlets.

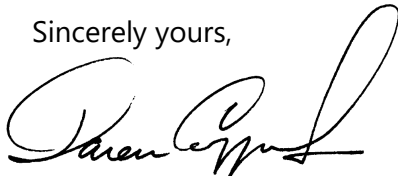
ARA's agricultural retail members and their farmer customers are faced with constantly evolving pest and disease threats that impact their ability to produce America's food, feed, fuel, and fiber. Our industry needs essential pesticides, fertilizers, seeds, biostimulants, and other modern agricultural technologies to remain globally competitive, maintain the ability to produce the healthiest, most abundant food supply for consumers, and protect the public health. ARA agrees that it is important for the EPA to develop a draft herbicide strategy to fully comply with the agency's obligations under the ESA as well as the Federal Insecticide, Fungicide, and Rodenticide

Act (FIFRA). However, ARA believes the proposed additional modifications need to be made to the draft herbicide strategy to ensure it is more targeted and does not cause severe disruptions to America's agricultural industry.

In the last several months the Agency has announced several concurrent comment periods on important pesticide policy matters that are of interest to ARA and our members. For example, specifically under ESA actions, EPA issued its Vulnerable Species Pilot Program, the proposed NPDES PGP settlement agreement, and other ESA related initiatives.

To ensure the Agency receives constructive feedback on all of these proposals, an extension is essential. ARA respectfully requests an extension of 90 days, to allow all stakeholders an opportunity to submit comments on this critically important program. ARA and its members are committed to sustainable agricultural practices that protects the environment, human health, and endangered species. If ARA members can be of assistance in any way, or if you have questions, please do not hesitate to contact me at 202-595-1724 or Richard Gupton, ARA Senior Vice President of Public Policy & Counsel at richard@aradc.org or 202-595-1699.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Daren Coppock", with a large, stylized flourish extending from the end of the signature.

W. Daren Coppock
President & CEO