

June 10, 2026

Mr. Kyle Kunkler
Deputy Assistant Administrator
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection
Agency 1200 Pennsylvania Ave.,
N.W. Washington, DC 20460

Submitted electronically via Federal eRulemaking Portal

RE: Draft Fungicide Strategy to Reduce Exposure of Federally Listed Endangered and Threatened Species and Designated Critical Habitats from the Use of Conventional Agricultural Fungicides (EPA-HQ-OPP-2026-2973)

Dear Deputy Assistant Administrator Kunkler,

As organizations representing farmers, retailers, manufacturers, co-ops, academics, state regulators, and others, we write to urge the Environmental Protection Agency (EPA) to extend the public comment period for the Draft Fungicide Strategy to Reduce Exposure of Federally Listed Endangered and Threatened Species and Designated Critical Habitats from the Use of Conventional Agricultural Fungicides (EPA-HQ-OPP-2026-2973) (hereafter “draft Fungicide Strategy” or “draft FS”). While we desire to offer thoughtful, quality feedback to EPA on this proposal, we are concerned about several factors that will significantly impede our ability to do so during the short 60-day comment period EPA has afforded. As such, we request EPA offer an additional 90 days for public comment on the draft Fungicide Strategy.

Fungicides are vital to the continued productivity and sustainability of our activities, which growers use to protect our nation’s food, fuel, and fiber supplies; maintain important conservation practices; defend infrastructure; sustain public health initiatives; among other critical uses. Based on our assessment, we expect this lengthy, complex proposal—which, in addition to its supporting documents, totals hundreds of pages, would profoundly and fundamentally alter continued ability to access and effectively use fungicides. In fact, growers are in the middle of planting season, and for some specialty crops, in harvest season, which makes commenting within the allotted window challenging. A proposal of this significance warrants our thoughtful consideration and ability to prepare meaningful feedback for EPA, which is simply not possible in the short 60-day comment period.

Moreover, there are several other circumstances that further complicate our ability to comment and justify an extension to the draft FS public comment period, which include:

- **EPA Draft FS Webinar:** While we appreciate that EPA hosted a webinar on the draft FS to offer explanation and clarifications, this webinar happened twenty days into the public comment period. This leaves stakeholders roughly a month to consider the information presented and prepare comments, which is insufficient given the significance of this proposal.

- **Interactions with Other ESA Proposals:** The ESA Workplan is complex, and the proposed policies overlap each other in creating a framework for future registration decisions; thus, the draft FS must be evaluated in context with the other proposals. Stakeholders should understand their interactions and desire alignment between the proposals. There are meaningful differences between the released FS and the previously released Herbicide and Insecticide strategies. This is compounded by the fact that this strategy includes updates to the mitigation menu that happened after the finalization of the Insecticide Strategy, which will be used across strategies. Stakeholders not only must consider the draft FS in this short 60-day comment period but also seek to understand and incorporate input on the ways in which these proposals and web-based tools interact and how that interaction may impact future pesticide access and use. These complications warrant additional time for consideration.

We believe the shorter comment period may harm the Agency's ability to receive substantive comments. By collecting quality, well-informed feedback, it will enable EPA to more fully consider stakeholder perspectives than if public input is rushed and based in misunderstanding of this complex proposal. As EPA notes in the draft FS, the liability associated with implementation falls on the farmers and applicators. Those held liable, need adequate time to review and understand the document before finalization. It does not help that the 60-day comment period directly overlaps with crop planting and intensive early season farming activities critical to establishing a healthy crop.

We are eager to engage with EPA on the draft Fungicide Strategy to help the Agency meet its ESA and other legal obligations in a way that will allow for meaningful, continued use of fungicides. However, to provide EPA with the quality feedback on the proposal necessary to accomplish that goal, additional time will be needed. To that end, we urge EPA to extend the public comment period for the draft Fungicide Strategy by an additional 90 days. We thank you for your consideration of our request and look forward to a careful and thoughtful engagement with EPA on this proposal.

Sincerely,

Agricultural Retailers Association
Alabama Farmers Federation
American Farm Bureau Federation
American Soybean Association
American Sugarbeet Growers Association
AmericanHort
Arkansas Soybean Association
Association of equipment manufacturers
California Citrus Quality Council
California Farm Bureau
California Specialty Crops Council
California Walnut Commission
Colorado Farm Bureau
Council of Producers & Distributors of Agrotechnology

Florida Farm Bureau Federation
Georgia Farm Bureau
Idaho Farm Bureau Federation
Illinois Farm Bureau
Indiana Farm Bureau
International Fresh Produce Association
Iowa Farm Bureau Federation
Iowa Soybean Association
Kansas Farm Bureau
Kentucky Soybean Association
Louisiana Farm Bureau Federation
Michigan Farm Bureau
Michigan Soybean Association
Mid-Atlantic Soybean Association
Minnesota Farm Bureau Federation
Minnesota Soybean Growers Association
Mississippi Farm Bureau Federation
Missouri Farm Bureau Federation
Missouri Soybean Association
National Agricultural Aviation Association
National Association of Landscape Professionals
National Association of State Departments of Agriculture
National Association of Wheat Growers
National Barley Growers Association
National Cotton Council
National Onion Association
National Potato Council
National Sunflower Association
North Carolina Farm Bureau Federation, Inc.
New Jersey Farm Bureau
New Mexico Farm and Livestock Bureau
New York Farm Bureau
North Dakota Soybean Growers Association
Northwest Horticultural Council
Ohio Farm Bureau
Oklahoma Soybean Association
Oregon Farm Bureau
Oregonians for Food and Shelter
Pennsylvania Farm Bureau
Society of American Florists
South Carolina Farm Bureau
Tennessee Farm Bureau Federation

US Beet Sugar Association
US Canola Association
USA Pulses
USA Rice
Utah Farm Bureau Federation
Virginia Farm Bureau Federation
Washington Farm Bureau
Western Tree Nut Association
Wisconsin Soybean Association

CC: The Honorable Brooke Rollins, Secretary, U.S. Department of Agriculture
CC: The Honorable John Boozman, Chairman, U.S. Senate Committee on Agriculture,
Nutrition, & Forestry
CC: The Honorable Amy Klobuchar, Ranking Member, U.S. Senate Committee on
Agriculture, Nutrition, & Forestry
CC: The Honorable Glenn "GT" Thompson, Chairman, U.S. House Committee on
Agriculture
CC: The Honorable Angie Craig, Ranking Member, U.S. House Committee on
Agriculture