

October 10, 2024

Dana Friedman
Chief, Risk Management and Implementation Branch
Pesticide Re-Evaluation Division (7508P)
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

Re: Comment for the Biological Evaluation, Effects, Determinations, and Mitigation Strategy for Federally Listed and Proposed Endangered and Threatened Species and Designated and Proposed Critical Habitats – Docket EPA-HQ-OPP-2023-0567

Dear Ms. Friedman:

The undersigned national agricultural organizations thank you for the opportunity to offer comments on the Environmental Protection Agency's Draft Biological Evaluation for the Rodenticides (Draft BE) and the Rodenticide Strategy (Docket EPA-HQ-OPP-2023-0567). Our organizations represent most of the farmer and ranchers in the US today raising livestock, including animals to produce eggs, milk or meat for consumers. The information included herein is in addition to our collective comment provided in this same docket on February 13, 2024, and in follow up to the conversations we had with EPA staff in April 2024.

Our organizations strongly support and share with the Agency a desire to improve rodenticide stewardship to reduce or eliminate rodenticides' effects on non-target species, including threatened and endangered species under the Endangered Species Act. Our members have a long and successful history of working cooperatively with the Agency, and other federal and state agencies, to continually improve rodenticide's performance and eliminate, to the extent achievable, the risks associated with addressing the critical need to control rodent populations on farms and ranches.

We stand ready to work with the Agency to engage with the rodenticide manufacturers and stakeholders to conduct serious studies of how specific uses of rodenticides, and the resulting possible pathways of exposure, may cause harm to endangered species. Only then can sound, effective and efficient mitigation measures be devised. Rodenticides are just too important to our country's farms and ranches, as well as the numerous critical societal objectives agriculture serves, for the Draft BE's policies and measures to move forward as proposed.

Following our April 2024 meeting with EPA, the message was clear: the agriculture industry needed to provide more information to EPA to show what farmers and ranchers are already doing to responsibly use pesticides. In using rodenticides, just as in using other pesticide products, farmers and ranchers look to the State Departments of Agriculture and Land Grant University/Extension network for science-based best practice recommendations. Below are

examples of State Departments of Agriculture and Land Grant University/Extension resources that outline research and different IPM practices that are recommended to farmers and ranchers across the country for responsible use of rodenticides. It is common for these resources to be shared beyond state boundaries.

State Extension/Federal Article Information:

State Extension / Federal Article Information	University Extension Service/Organization	Article
Arizona	University of Arizona	<u>Roof Rat Control Around Homes and Other Structures</u>
California	UC Davis Extension; University of California Agriculture and Natural Resources	<u>Pest Notes: Rats</u> <u>Pest Notes: House Mouse</u>
Florida	University of Florida IFAS Extension	<u>Rodenticides</u> <u>Rat and Mouse Control</u>
Maine	Maine Department of Agriculture, Conservation, & Forestry; University of Maine Cooperative Extension	<u>Rural Rodent IPM</u>
Massachusetts	University of Massachusetts Amherst Center for Agriculture, Food, and the Environment	<u>Rodent Control</u>
Michigan	MSU Extension	<u>Management Over Medication: Pest Management Program for Small Farms</u> <u>Rodent Control for Michigan Fruit, Nut, and Christmas Tree Producers</u>
Mississippi	Mississippi State University	<u>Muskrats</u>
Missouri	University of Missouri Extension	<u>Bait Stations for Controlling Rats and Mice</u> <u>Controlling Rats</u>
Montana	Montana Department of Agriculture	<u>Chipmunk Damage Prevention and Control Methods</u> <u>Chipmunks</u> <u>Columbian Ground Squirrel – Its Biology and Control</u> <u>Controlling Mice In and Around Structures</u> <u>Pocket Gophers - Their Biology & Control</u>

State Extension / Federal Article Information	University Extension Service/Organization	Article
		<u>The Richardson's Ground Squirrel - Its Biology & Control</u> <u>Skunk Management</u> <u>Voles in Montana – Their Biology, Damage and Control</u> <u>Controlling Woodchucks Without Trapping</u>
Nebraska	University of Nebraska- Lincoln	<u>Rodenticide Use in Agricultural Crops</u> <u>Bait Stations for Controlling Rats and Mice</u> <u>Using Burrow Builders for Pocket Gopher Control</u> <u>Controlling Rats</u> <u>The Thirteen-Lined Ground Squirrel</u> <u>Control of Tree Squirrel Damage</u>
Nevada	University of Nevada, Reno Extension	<u>Non-Chemical Rodent Control</u>
New York	Cornell College of Agriculture and Life Sciences	<u>To Better Protect Food, Place Rodent Traps Near Warmth, Shelter</u>
North Carolina	North Carolina Cooperative Extension	<u>Rodent Control on the Farm</u>
Oregon	Oregon State University Extension Service	<u>Strategies for Rodent Control</u> <u>Controlling Rats</u>
Pennsylvania	Penn State Extension	<u>Is There a Mouse in the House? Eliminate Mice with IPM</u>
Texas	Texas A&M AgriLife Extension; Texas Department of Agriculture	<u>SPN: Rodenticides How Do They Fit Into Your IPM Program?</u> <u>Rodenticide Risk Mitigation</u>
Washington	Washington State University	<u>Rodent Management</u>

Thank you again for the opportunity to provide these comments. We would welcome the opportunity to answer any questions you might have about these comments or if further clarification is needed. It is critically important that farmers and ranchers across the country

maintain access to rodenticide products in order to effectively and efficiently control rodent populations.

Sincerely,

American Farm Bureau Federation
American Horse Council
National Cattlemen's Beef Association
National Chicken Council
National Council of Farmer Cooperatives
National Milk Producers Federation
National Pork Producers Council
National Turkey Federation
Public Lands Council
United Egg Producers
U.S. Poultry & Egg Association