



NATIONAL POTATO COUNCIL

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Via Electronic Docket Submission <http://www.regulations.gov>

August 31, 2023

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

Re: Request for Extension of the Comment Period for the *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*. EPA-HQ-OPP-2023-0365

Dear Ms. Matuszko:

This request for extension of the comment period for the subject *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* ("draft Herbicide Strategy") is submitted on behalf of the National Potato Council (NPC) and its members. The Agency originally announced on its website a sixty-day public comment period on the draft Herbicide Strategy with the comment period closing on September 20, 2023. Due to its sheer volume and complexity, additional time is needed to obtain input from the affected potato growers that NPC represents so that meaningful, substantive comments can be assembled and submitted to the Agency on the draft Herbicide Strategy. NPC believes the comment period should be extended for at least an additional ninety (90) days.

NPC grower members are responsible for the production of more than 95 percent of the potatoes grown in the United States. The economic contribution to the U.S. of that production is more than \$10.8 billion dollars at farm gate. Further processing, distribution, domestic and international sales and related activities increase that [economic contribution](#) for the U.S. economy to \$100.9 billion annually, supporting over 714,000 domestic jobs.

NPC's members are extremely interested in the development and safe use of pest management tools including crop protection chemicals that are environmentally sound, safe for applicators,

workers and the public, and do not represent an unreasonable adverse risk to the environment, including humans and non-target organisms such as pollinators.

The draft Herbicide Strategy reflects an approach that will have potential widespread impacts on potato production as herbicides are widely used by growers. Overall, if finalized as proposed, the approach reflected in the draft Herbicide Strategy will likely result in significant burdens for growers throughout the country because of having to address additional restrictions including in some cases, resulting in being unable to use the herbicide tools they need to address their pest problems. Obviously, this will have significant negative economic consequences for their farm operations.

In NPC's opinion, public policy strongly supports the Agency extending the comment period. Unlike some other times in this Administration where the Agency was constrained and denied comment period extension requests because it was operating under court-imposed deadlines, that is not the case in the instant situation. The Agency certainly has the ability to grant an appropriate extension so that affected stakeholders have the necessary time to fully examine the proposal and formulate meaningful comments.

In view of the foregoing, NPC is submitting this extension request. Please let me know if any additional information is needed or if you have any questions. We appreciate your consideration of this request.

Sincerely,



Mike Wenkel
Chief Operating Officer

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