Mr. Jake Li, Deputy Assistant Administrator for Pesticide Programs
Office of Chemical Safety and Pollution Prevention
Mail Code: 7101M
Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, DC 20460

Dear Administrator Li:

In comments to EPA related to the *Vulnerable Species Pilot Project* and *Draft Herbicide Strategy*, groups representing farmers, ranchers, retailers, manufacturers, and other stakeholders have outlined their significant concerns related to their implementation. These concerns include ensuring there are sufficient cost-effective and practicable mitigation options pesticide users and applicators can use to comply with these proposals. We are writing to urge the Agency to add **Drift Reduction Adjuvants (DRA)** to the list of mitigation options available to pesticide users for **Endangered Species Act (ESA) compliance**.

Use of DRAs is a highly effective, easy to implement and often low-cost option for growers and applicators to reduce drift risks and keep more product on the field, reducing potential exposure to non-target species. In addition, other types of adjuvants (e.g., stickers) coupled with DRAs can reduce runoff and offsite movement of products. Unfortunately, neither of these options is currently listed as a mitigation option.

DRAs are not new to the Agency and work has been ongoing internally since at least 2018, when EPA proposed establishing a **Drift Reduction Technology (DRT) Program** "to encourage the manufacture, marketing, and use of spray technologies scientifically verified to significantly reduce pesticide drift."[1] We understand that the Agency's Environmental Fate and Effects Division is working with university researchers and industry experts to establish standard testing methods with verifiable results so that producers and applicators will know which products are effective and those which they can trust and rely upon.

EPA is moving quickly to implement these proposals, and pesticide users and applicators need as many effective, practicable, and affordable options as possible to meet ESA obligations. We strongly urge EPA to add to the approved mitigation list DRAs and other adjuvants that can be effective in reducing off-target pesticide movement while providing pesticide users a practical compliance option.

Sincerely,

Agricultural Retailers Association
American Farm Bureau Federation
AmericanHort
American Soybean Association
American Sugarbeet Growers Association

[1] https://www.epa.gov/reducing-pesticide-drift/what-epa-doing-reduce-pesticide-drift; Last updated on August 23, 2023.

Arkansas Rice Growers Association
Association of Equipment Manufacturers
California Citrus Quality Council
California Specialty Crops Council
CropLife America
Council of Producers & Distributors of Agrotechnology
Illinois Soybean Growers
International Fresh Produce Association
Midwest Forage Association
Minnesota Canola Council
National Alfalfa and Forage Alliance
National Alliance of Independent Crop Consultants
National Association of Wheat Growers
National Barley Growers Association
National Corn Growers Association
National Cotton Council
National Onion Association
National Sunflower Association
North Dakota Corn Growers Association
North Dakota Grain Growers Association
Northern Pulse Growers Association
Washington State Potato Commission
Western Growers
U.S. Canola Association
U.S. Durum Wheat Growers Association
USA Dry Pea and Lentil Council
USA Rice Federation