October 22, 2023

OPP Docket # EPA-HQ-OPP-2023-0365

Environmental Protection Agency Docket Center (EPA/DC)

(28221T)

1200 Pennsylvania Ave. NW

Washington, DC 20460-0001

**Subject: Support for a Strong Herbicide Strategy Framework Document**

The undersigned XX groups are writing in support of a strong herbicide strategy framework to reduce exposure of federally listed endangered and threatened species and designated critical habitats from the use of conventional agricultural herbicides.

We recognize the enormous amount of work that has gone into developing the EPA’s draft herbicide strategy and the outside-the-box thinking that is vital to its scope. The herbicide strategy strives to implement commonsense protections for the majority of listed species from the most widely used type of pesticide in the country: herbicides. If put into practice, this would make the herbicide strategy one of the most substantial protections for endangered and threatened species from pesticides in the more than 50 years since the EPA began regulating their use.

Programmatic strategies, like the herbicide strategy, the vulnerable species pilots and future geographic strategies, are absolutely essential tools for the EPA to begin to come into compliance with the Endangered Species Act and implement on-the-ground protections for imperiled species as quickly as possible.

This letter signifies our support for programmatic strategies, like the herbicide strategy, to address pesticide harms to listed species and our hope that the EPA continues its work to make these plans as workable and effective as they can possibly be as it moves towards implementation.

Signed,