Endangered Species Act Compliance:

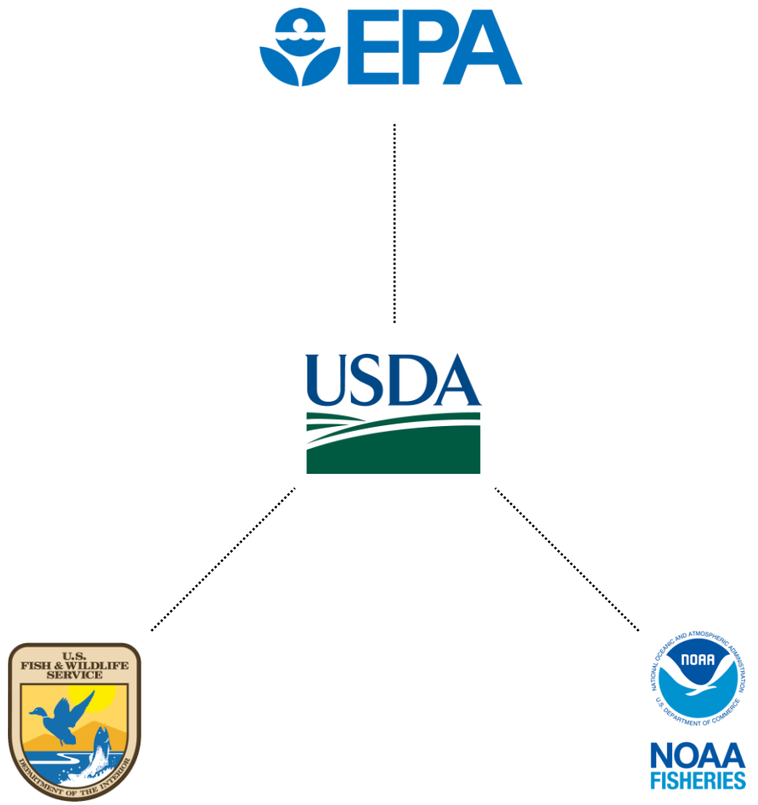
Grower Challenges and Ways Forward

Clayton Myers and Elyssa Arnold
USDA Office of Pest Management Policy

AAPCO Spring Conference
March 4, 2025

USDA's Role in Endangered Species Act (ESA) Consultations for FIFRA Actions

- **Member of the FIFRA-ESA Interagency Working Group (IWG) created under the 2018 Farm Bill.**
- **USDA provides the grower perspective to help EPA and the Services understand:**
  1. **how pesticides are typically used (*e.g.*, rates, timing, locations, application methods, target pests), and**
  2. **the implications of proposed mitigations (*e.g.*, feasibility, alternatives, potential unintended consequences).**
- Mitigations must be practical for growers so they can be effectively implemented for the protection of listed species.



Individual Consultations for Insecticides

NOAA FISHERIES	U.S. FISH & WILDLIFE SERVICE	USDA United States Department of Agriculture
Malathion Diazinon Chlorpyrifos Methomyl Carbaryl	Malathion Methomyl Carbaryl	Survey: Malathion Vegetable Usage

EPA ESA Strategies

Herbicide Strategy	• Finalized Aug 20, 2024
Vulnerable Species Action Plan	• Finalized Sept 26, 2024
Rodenticide strategy	• Finalized Nov 22, 2024
Insecticide Strategy	• Final due by Mar 31, 2025
Fungicide Strategy	• Draft April 2026; Final Nov 2026

Implementation

- The Insecticide Strategy will be implemented through individual registration and registration review cases with an opportunity for public comment on each case.
- Lots of new resources to learn for growers and applicators:
  - Bulletins Live! Two
  - Mitigation Menu Website
  - Mitigation Calculator
- Growers will need technical and financial assistance.
- State Lead Agencies are figuring out how to enforce the new requirements.
- Substantial training, education, and outreach will be needed.
- Complexity is a major concern.

7.3 Appendix C. Flow Chart of Managerial Decisions

Q1. Read label – what mitigations are on the label? And does the label have a BLT link?

Q2. Once in bulletins, determine if I am in a PULA and what mitigations are in BLT.*

Q3. Consolidate label and BLT mitigations

Q3a. Do I have **runoff/ erosion mitigation?**

Q3a1. Do any of these apply to my field/application?
- Does the field slope **away** the "protected" habitat?
- Is the field ≥1,000 feet away from the "protected" area?
- Is the application an Injection (soil or tree)?
- Is the pesticide chemigated under plastic mulch?
- Is the treated area ≤1/10 acre (<4,356 square feet)?
- Does the field have a tailwater return system?
- Is there a tile-drain and a controlled drainage system?
- Are berms in place at the time of application?

Yes – Additional runoff/ erosion mitigation **not** identified

No

Q4a. Do any of these apply to my field?
- Pesticide Runoff vulnerability = 0 to 6 points (pts) *
- Soil type: sandy, loamy sand or sandy loam soil = 2 pts*
- Fields with slope of ≤3% or less = 2 pts
- Part of a conservation program = 2 pts – **OR** – follow recommendations of a conservation expert = 1 pts
- Voluntary mitigation tracking = 1 pts

Q5a. Can I get points for non-structural mitigations by using any of these practices?
- Reduction in area treated (via, banded or spot treatments, smart spray technologies) = 2–4 pts
- Reduced Annual application rate (reducing the rate as part of a premix or number of applications) = 1 to 3 pts
- A cover crop = 1-3 pts *
- Reduced tillage = 2 pts *
- No-till = 3 pts *
- Reservoir tillage = 3 pts *
- Soil incorporation (if not already on the label) = 1 pt

Q6a. Which structural mitigations are/could be adopted? *
- Have vegetative ditched along the field = 1 pt
- Utilize irrigation water management = 2-3 pts*
- Have terraces = 2 pts
- Farm on the contours = 2 pts
- Have grassed waterways = 2 pts
- Use in-field vegetative strips = 2 pts
- Mulch with artificial or natural materials = 1 or 3 pts*
- Have a riparian area = 1-3 pts*
- Have a vegetative filter strip = 1-3 pts*
- Constructed or natural wetland = 3 pts
- Terrestrial habitat landscape improvement = 1-3 pts*
- Filtering devices (activated carbon/compost) = 1-3 pts*
- Use erosion barriers = 2 pts
- Have a water retention system = 2 pts
- Tile drains without controlled drainage systems = 1 pt

Q7a. Did I use 2 of these 3 mitigation categories?
- In field, adjacent to field, or water retention systems = 1 pts

Q3b. Do I need **spray drift mitigation?**

No – buffer is not needed, but if the direction shifts, buffer is needed. Consider starting all applications near the "sensitive" habitats so shifts in wind are less likely to impact the need for buffer.

Q3b.1 Is the wind blowing **towards** the "sensitive" habitat?

Yes

Q3b.2. Is the field more than 500 feet (or the maximum buffer distance for the application parameters) away from the "protected" area? – **OR** – Is the treated area ≤1/10 acre (<4,356 square feet)?

Yes – Additional spray drift mitigation **not** identified

No

Q4b. What is my application method?

Q4b-A1. Aerial

Q4b-A1. What is my droplet size and max buffer distance? **

Droplet size	Max buffer distance
Very Fine to Fine	500 feet
Fine to Medium	320 feet
Medium to Coarse	250 feet
Coarse to Very Coarse	200 feet

Q4b-B1. Ground

Q4b-B1 What is my droplet size and max buffer distance? **

Droplet size	Max buffer distance
Very Fine to Fine (high boom)	230 feet
Very Fine to Fine (low boom)	130 feet
Fine to Medium/Coarse (high boom)	100 feet
Fine to Medium/Coarse (low boom)	80 feet

Q4b-C1. Airblast

Q4b-C1 What is my droplet size and max buffer distance? **

Droplet size	Max buffer distance
Sparse	160 feet

Q4b-D1. Other Methods

Q4b-D.1 Is the application made with one of these methods?
- Chemigation with: micro-sprinklers, drip-tape, drip emitters, subsurface or flood (excludes overhead and impact sprinkler chemigation)
- In-furrow sprays when nozzle height is ≤8 inches above soil surface
- Trees: trunk drench, trunk paint, injections
- Soil injections
- Solid formulations that are used as a solid

Yes – Additional spray drift mitigation **not** identified

No – See the other application methods for options.

Q5. Can I Reduce My Buffer? (Options to reduce buffers are additive.)

Q5a-A1. Are there Application Parameters that I can adjust?
- Reduced Application Rate (for every 10% reduction in rate = 10 % reduction in buffer)
- Addition of a drift reducing adjuvant (15 -30% reduction in buffer for herbicides, other pesticide types under consideration)
- Using a larger droplet size than what is on the label (20-40% reduction).

Q5b-A2. How many passes do I need to make to treat my field?
- Making 8 passes or less (10 – 55% reduction in buffer)

Q5c-A3. Do I have certain field/environmental condition?
- Downwind windbreak/hedgerow (50-100%)
- Relative humidity is ≥ 60% (10% reduction in buffer)

Q5b-B1. Are there Application Parameters that I can adjust?
- Reduced Application Rate (for every 10% reduction in rate = 10 % reduction in buffer)
- Addition of a drift reducing adjuvant (15 -30% reduction for herbicides, other pesticide types under consideration)
- Using a larger droplet size and/or release height than what is on the label (40-75% reduction).
- Application with a broadcast hooded spray (50% reduction)
- Between-row hooded sprayer (75% reduction)
- Spraying below the crop (e.g., drop nozzles, layby) (50% reduction)

Q5b-B2. Can I reduce the area treated?
- Making 10 passes or less (15 – 75% reduction in buffer)

Q5b-B3. Do I have certain field/environmental conditions?
- Downwind windbreak/hedgerow (50-100%)
- Relative humidity is ≥ 60% (10% reduction in buffer)

Q5b-C1. Are there Application Parameters that I can adjust?
- Reduced Application Rate (for every 10% reduction in rate = 5 % reduction in buffer)

Q5b-C2. Can I reduce the area treated?
- Making 10 passes or less (15 – 70% reduction in buffer)

Q5-C3. Do I have certain field/environmental condition?
- Downwind windbreak/ hedgerow (50-100%)

Q6b. Do my reductions equal ≥100%?

Yes - adequate mitigations in place such that the entire field can be treated

No – Assess the surroundings of the field and see if there are downwind management areas that can further reduce the need for an in-field buffer.

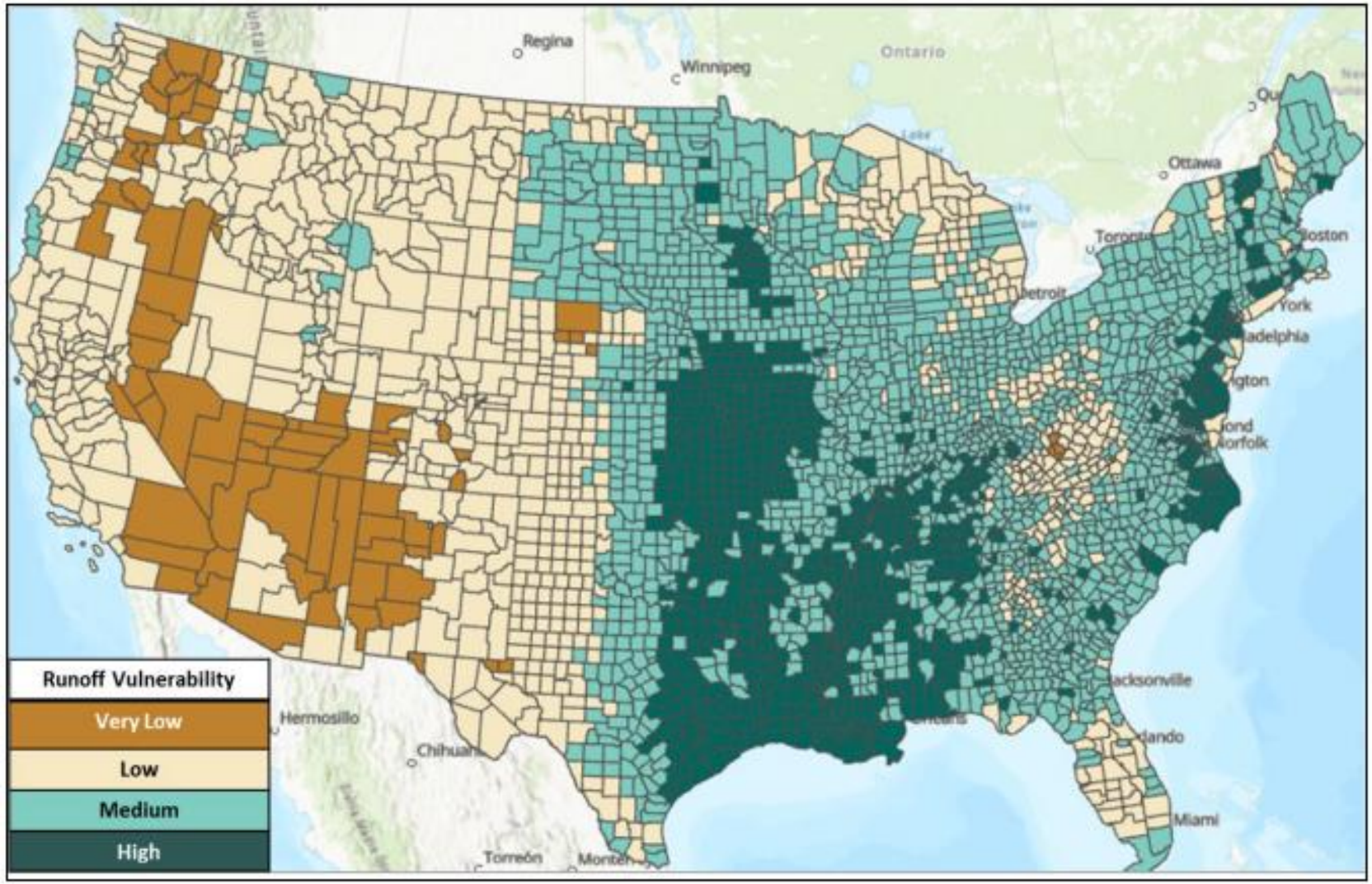
Q8a/Q7b. I have my points requirements for runoff/ erosion and buffer distance; do I have the mitigations in place to be able to apply?

Yes – You can apply.

No – You cannot apply. You must find another product or suffer potential yield/ quality losses.

*** Applicators may need to check the EPA Mitigation Website for more details.**

Runoff Vulnerability Points



6 points →
3 points →
2 points →
0 points →

Mitigation Measures: Runoff and Erosion Menu

Application Parameters

- Rate reduction (from annual max)
- Soil incorporation
- Proportion of field treated (banded/precision)

Field Management

- Conservation tillage
- Contour farming
- Cover crop/double crop/relay crop
- In-field vegetative filter strip
- Irrigation water management
- Mulching
- Terrace farming
- Erosion barriers

Field Characteristics

- Sandy soils
- Flat or low slope field (≤3% slope)

Adjacent to the Field

- Vegetative filter strip
- Grassed waterway
- Riparian area
- Vegetated ditch
- Constructed wetlands
- Habitat improvement
- Activated carbon or compost filters

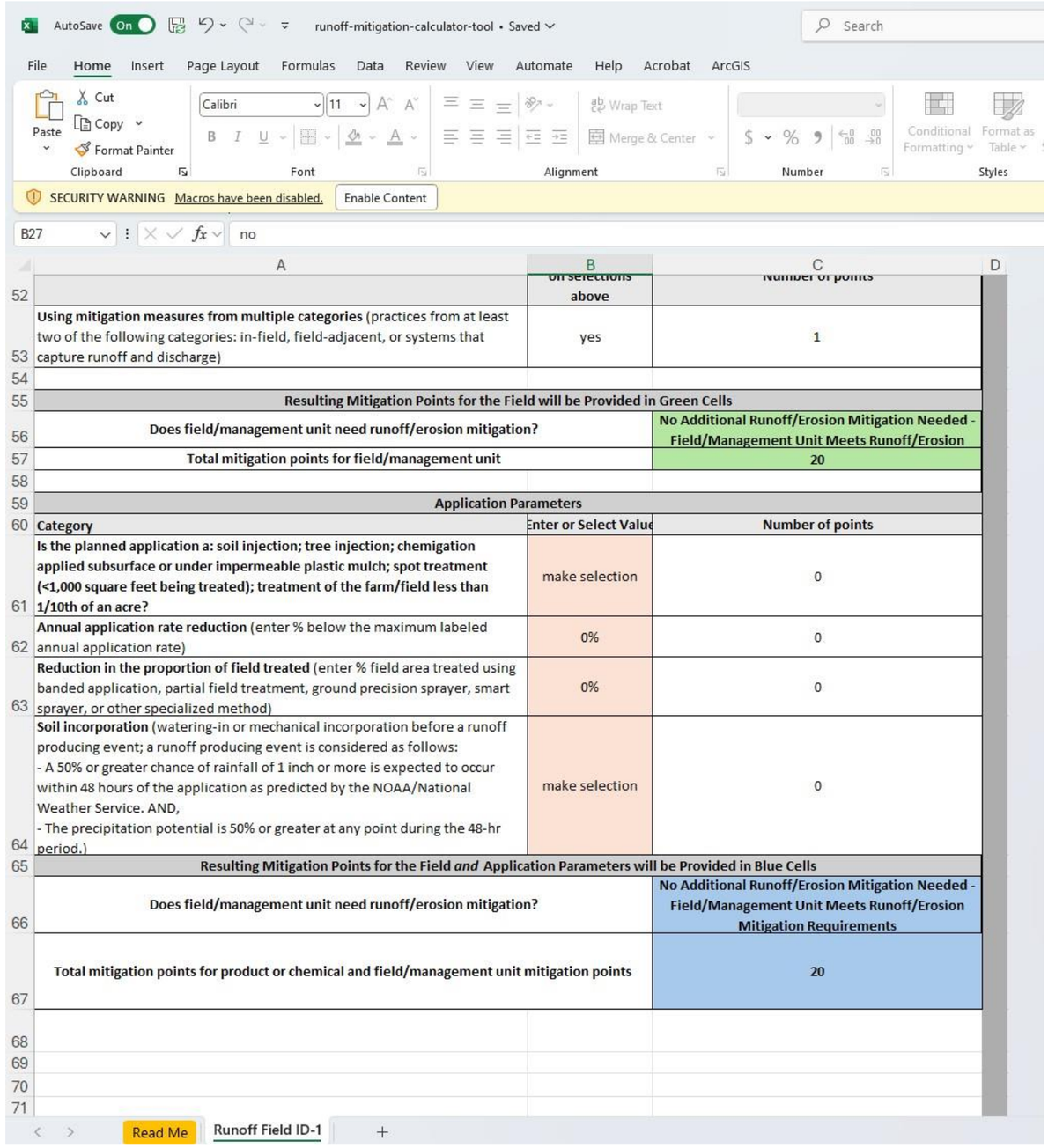
Other Mitigations

- Water retention system
- Tile drains
- Conservation program participation
- Consulting with an expert
- Mitigation tracking

https://www.canr.msu.edu/news/grassed_waterways_can_help_maintain_soil_quality_and_productivity

ESA Runoff/Erosion Mitigation Menu, Calculation of Points

The Goal: get growers to 9 or more



	A	B	C	D
52		on selections above	Number of points	
53	**Using mitigation measures from multiple categories** (practices from at least two of the following categories: in-field, field-adjacent, or systems that capture runoff and discharge)	yes	1	
54				
55	**Resulting Mitigation Points for the Field will be Provided in Green Cells**			
56	**Does field/management unit need runoff/erosion mitigation?**		**No Additional Runoff/Erosion Mitigation Needed - Field/Management Unit Meets Runoff/Erosion**	
57	**Total mitigation points for field/management unit**		**20**	
58				
59	**Application Parameters**			
60	**Category**	Enter or Select Value	**Number of points**	
61	**Is the planned application a: soil injection; tree injection; chemigation applied subsurface or under impermeable plastic mulch; spot treatment (<1,000 square feet being treated); treatment of the farm/field less than 1/10th of an acre?**	make selection	0	
62	**Annual application rate reduction** (enter % below the maximum labeled annual application rate)	0%	0	
63	**Reduction in the proportion of field treated** (enter % field area treated using banded application, partial field treatment, ground precision sprayer, smart sprayer, or other specialized method)	0%	0	
64	**Soil incorporation** (watering-in or mechanical incorporation before a runoff producing event; a runoff producing event is considered as follows: - A 50% or greater chance of rainfall of 1 inch or more is expected to occur within 48 hours of the application as predicted by the NOAA/National Weather Service. AND, - The precipitation potential is 50% or greater at any point during the 48-hr period.)	make selection	0	
65	**Resulting Mitigation Points for the Field *and* Application Parameters will be Provided in Blue Cells**			
66	**Does field/management unit need runoff/erosion mitigation?**		**No Additional Runoff/Erosion Mitigation Needed - Field/Management Unit Meets Runoff/Erosion Mitigation Requirements**	
67	**Total mitigation points for product or chemical and field/management unit mitigation points**		**20**	
68				
69				
70				
71				

PNW (Palouse) Wheat Production

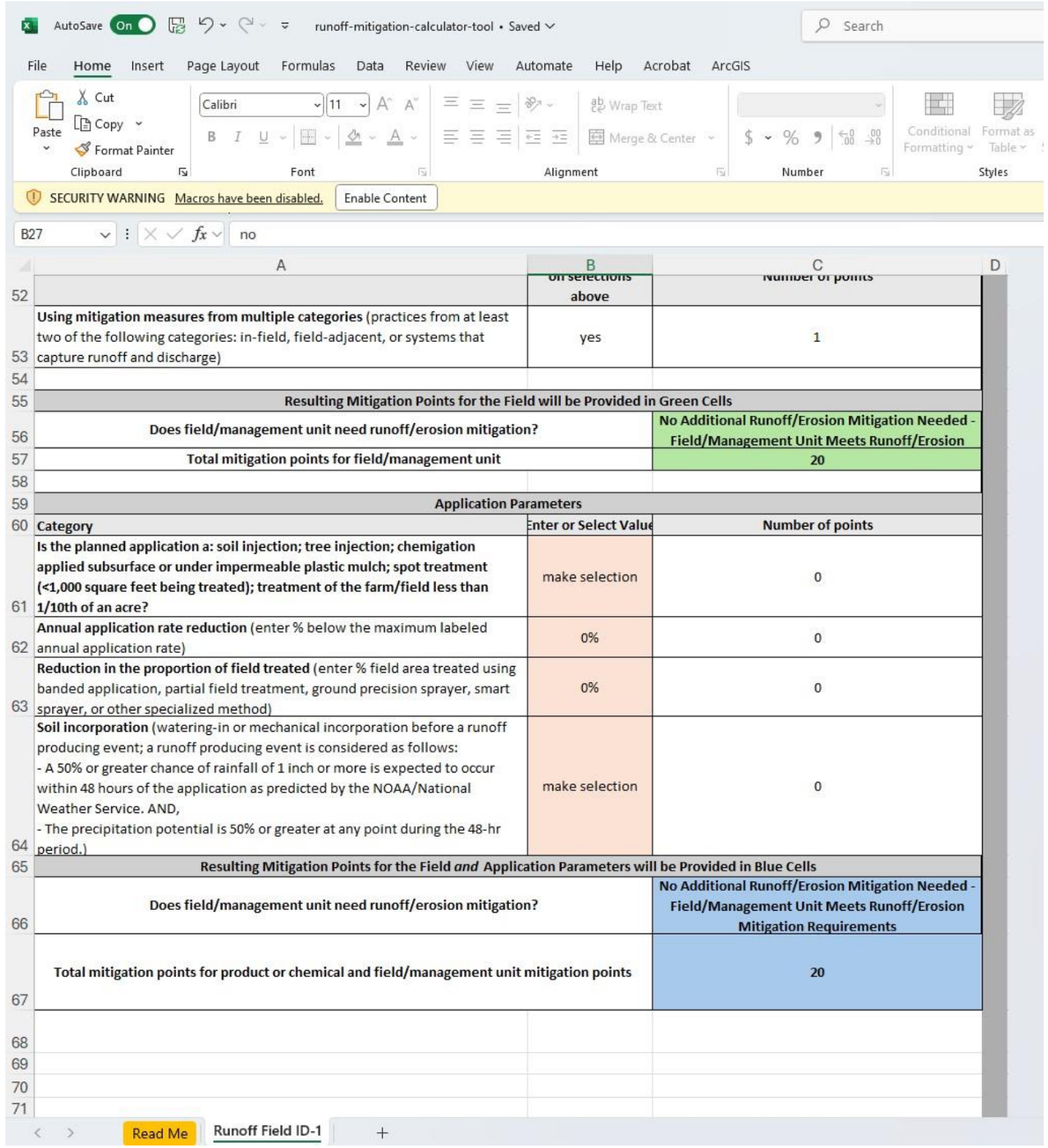
Common Practices and Allowances:

-3-6 ‘relief points’ from the vulnerability map (entire region)
-1 point for tracking: anyone using the calculator gets this
-3 points for non-irrigated land
-2 points for contour farming
-2-3 points, ‘reduced tillage’ or ‘no-till’

9-15 total points (9 is the maximum needed)

Other possibilities:

-1 point for vegetative filter strips or field border (headlands)
-2 points for participation in a qualifying conservation program
-2 points for predominantly sandy soils (sandy loam/loamy sand, no hard pan)
-2 points for “terrace” farming
-1 points for vegetative ditches
-2 points for riparian forest/herbaceous buffer
-3 points for constructed or natural wetlands
-1-3 points for “filtering devices” such as runoff socks, more for compost or activated charcoal/biochar amendment
-1 point, using measures from multiple menu categories
-1 point, vegetative filter strips or field border (headlands)
-1 point, using measures from multiple menu categories



	A	B	C	D
52		on selections above	Number of points	
53	**Using mitigation measures from multiple categories** (practices from at least two of the following categories: in-field, field-adjacent, or systems that capture runoff and discharge)	yes	1	
54				
55	**Resulting Mitigation Points for the Field will be Provided in Green Cells**			
56	**Does field/management unit need runoff/erosion mitigation?**		**No Additional Runoff/Erosion Mitigation Needed - Field/Management Unit Meets Runoff/Erosion**	
57	**Total mitigation points for field/management unit**		**20**	
58				
59	**Application Parameters**			
60	**Category**	**Enter or Select Value**	**Number of points**	
61	**Is the planned application a: soil injection; tree injection; chemigation applied subsurface or under impermeable plastic mulch; spot treatment (<1,000 square feet being treated); treatment of the farm/field less than 1/10th of an acre?**	make selection	0	
62	**Annual application rate reduction** (enter % below the maximum labeled annual application rate)	0%	0	
63	**Reduction in the proportion of field treated** (enter % field area treated using banded application, partial field treatment, ground precision sprayer, smart sprayer, or other specialized method)	0%	0	
64	**Soil incorporation** (watering-in or mechanical incorporation before a runoff producing event; a runoff producing event is considered as follows: - A 50% or greater chance of rainfall of 1 inch or more is expected to occur within 48 hours of the application as predicted by the NOAA/National Weather Service. AND, - The precipitation potential is 50% or greater at any point during the 48-hr period.)	make selection	0	
65	**Resulting Mitigation Points for the Field *and* Application Parameters will be Provided in Blue Cells**			
66	**Does field/management unit need runoff/erosion mitigation?**		**No Additional Runoff/Erosion Mitigation Needed - Field/Management Unit Meets Runoff/Erosion Mitigation Requirements**	
67	**Total mitigation points for product or chemical and field/management unit mitigation points**		**20**	
68				
69				
70				
71				

Eastern Tree Fruit Production

Common Practices and Allowances:

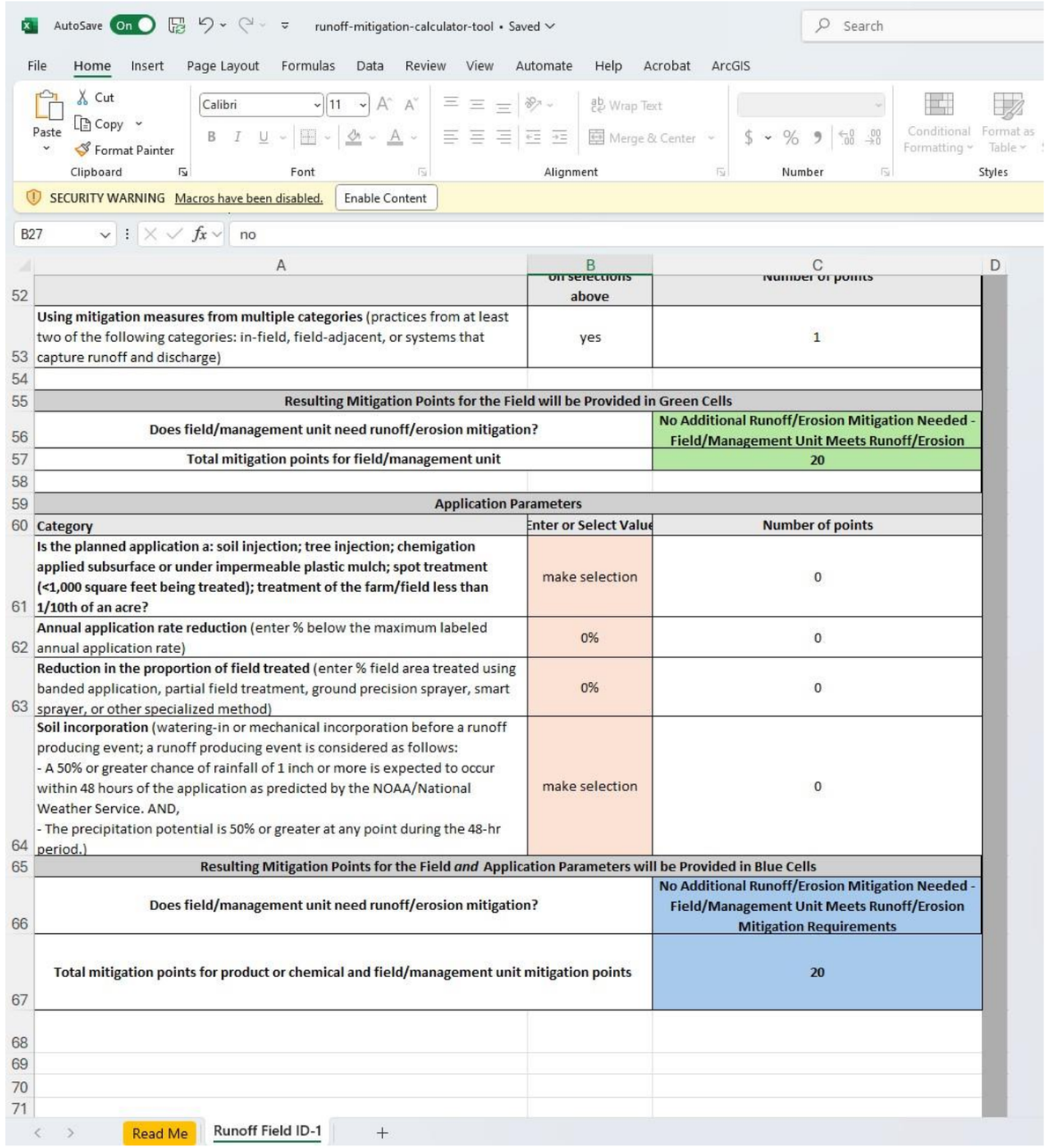
-2 ‘relief points’ from the vulnerability map (most areas)
-1 point for tracking: anyone using the calculator gets this
-3 points, ‘perennial crop’ conservation tillage/no-till
-2 points, contour farming (or 2 points for flat ground <3% slope)
-2 points, vegetative strips in-field (drive aisles)
-3 points, cover crop or continuous ground cover (drive aisles)
-1 point, vegetative filter strips or field border (headlands)
-1 point, using measures from multiple menu categories

---

15 total points (9 is the maximum needed)

Other possibilities:

-2 points for participation in a qualifying conservation program
-2 points for predominantly sandy soils (sandy loam/loamy sand, no hard pan)
-3 points for non-irrigated land or 2 points for drip-tape only
-2 points for “terrace” farming
-1 points for vegetative ditches
-2 points for riparian forest/herbaceous buffer
-3 points for constructed or natural wetlands
-1-3 points for “filtering devices” such as runoff socks, more for compost or activated charcoal/biochar amendment
-1 point for sub-surface tile drainage without controlled outlet



	A	B	C	D
52		on selections above	Number of points	
53	**Using mitigation measures from multiple categories** (practices from at least two of the following categories: in-field, field-adjacent, or systems that capture runoff and discharge)	yes	1	
54				
55	**Resulting Mitigation Points for the Field will be Provided in Green Cells**			
56	**Does field/management unit need runoff/erosion mitigation?**		**No Additional Runoff/Erosion Mitigation Needed - Field/Management Unit Meets Runoff/Erosion**	
57	**Total mitigation points for field/management unit**		**20**	
58				
59	**Application Parameters**			
60	**Category**	Enter or Select Value	**Number of points**	
61	**Is the planned application a: soil injection; tree injection; chemigation applied subsurface or under impermeable plastic mulch; spot treatment (<1,000 square feet being treated); treatment of the farm/field less than 1/10th of an acre?**	make selection	0	
62	**Annual application rate reduction** (enter % below the maximum labeled annual application rate)	0%	0	
63	**Reduction in the proportion of field treated** (enter % field area treated using banded application, partial field treatment, ground precision sprayer, smart sprayer, or other specialized method)	0%	0	
64	**Soil incorporation** (watering-in or mechanical incorporation before a runoff producing event; a runoff producing event is considered as follows: - A 50% or greater chance of rainfall of 1 inch or more is expected to occur within 48 hours of the application as predicted by the NOAA/National Weather Service. AND, - The precipitation potential is 50% or greater at any point during the 48-hr period.)	make selection	0	
65	**Resulting Mitigation Points for the Field *and* Application Parameters will be Provided in Blue Cells**			
66	**Does field/management unit need runoff/erosion mitigation?**		**No Additional Runoff/Erosion Mitigation Needed - Field/Management Unit Meets Runoff/Erosion Mitigation Requirements**	
67	**Total mitigation points for product or chemical and field/management unit mitigation points**		**20**	
68				
69				
70				
71				

Southern Row Crop Production

Common Practices and Allowances:

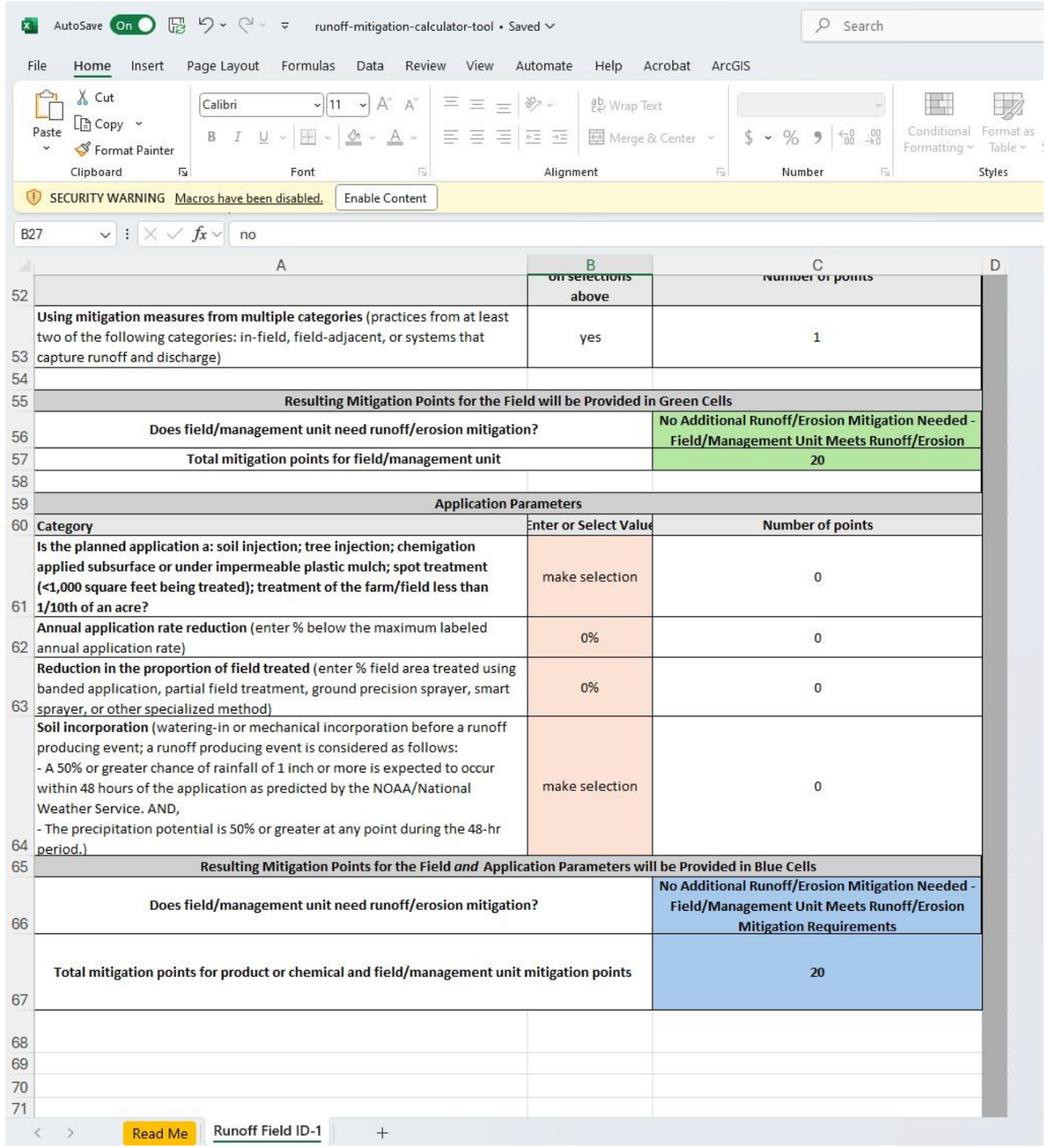
-1 point for tracking: anyone using the calculator gets this
-3 points for non-irrigated land
-2-3 points, 'reduced tillage' or 'no-till'
(rice is already covered by "perimeter berm" requiring no further points)

-2 points, contour farming (or 2 points for flat ground <3% slope)
-1 points for vegetative ditches and/or 1 point vegetative filter strips/field border (headlands)

9-11 total points (9 is the maximum needed)

Other possibilities:

-2 points for participation in a qualifying conservation program
-2-3 points for cover cropping
-2 points for predominantly sandy soils (sandy loam/loamy sand, no hard pan)
-2 points for "terrace" farming
-2 points for riparian forest/herbaceous buffer
-3 points for constructed or natural wetlands
-1-3 points for "filtering devices" such as runoff socks, more for compost or activated charcoal/biochar amendment
-1 point for sub-surface tile drainage without controlled outlet



AutoSave On runoff-mitigation-calculator-tool • Saved

File Home Insert Page Layout Formulas Data Review View Automate Help Acrobat ArcGIS

SECURITY WARNING Macros have been disabled. Enable Content

B27 no

	A	B	C	D
52		on selections above	Number of points	
53	**Using mitigation measures from multiple categories** (practices from at least two of the following categories: in-field, field-adjacent, or systems that capture runoff and discharge)	yes	1	
54				
55	**Resulting Mitigation Points for the Field will be Provided in Green Cells**			
56	**Does field/management unit need runoff/erosion mitigation?**		**No Additional Runoff/Erosion Mitigation Needed - Field/Management Unit Meets Runoff/Erosion**	
57	**Total mitigation points for field/management unit**		**20**	
58				
59	**Application Parameters**			
60	**Category**	**Enter or Select Value**	**Number of points**	
61	**Is the planned application a: soil injection; tree injection; chemigation applied subsurface or under impermeable plastic mulch; spot treatment (<1,000 square feet being treated); treatment of the farm/field less than 1/10th of an acre?**	make selection	0	
62	**Annual application rate reduction** (enter % below the maximum labeled annual application rate)	0%	0	
63	**Reduction in the proportion of field treated** (enter % field area treated using banded application, partial field treatment, ground precision sprayer, smart sprayer, or other specialized method)	0%	0	
64	**Soil incorporation** (watering-in or mechanical incorporation before a runoff producing event; a runoff producing event is considered as follows: - A 50% or greater chance of rainfall of 1 inch or more is expected to occur within 48 hours of the application as predicted by the NOAA/National Weather Service. AND, - The precipitation potential is 50% or greater at any point during the 48-hr period.)	make selection	0	
65	**Resulting Mitigation Points for the Field *and* Application Parameters will be Provided in Blue Cells**			
66	**Does field/management unit need runoff/erosion mitigation?**		**No Additional Runoff/Erosion Mitigation Needed - Field/Management Unit Meets Runoff/Erosion Mitigation Requirements**	
67	**Total mitigation points for product or chemical and field/management unit mitigation points**		**20**	
68				
69				
70				
71				

Read Me | Runoff Field ID-1

Iowa Corn/Soybean Production

Common Practices and Allowances:

-1 point for tracking: anyone using the calculator gets this
-3 points for non-irrigated land *(1-2 points for various irrigation management practices)*
-2 points flat ground <3% slope
-1 point, vegetative filter strips or field border (headlands)
-1 points for vegetative ditches or 2 for grassed waterway?
-1 point for sub-surface tile drainage without controlled outlet?
-1 point using practices from multiple categories

5, 6, 7-10 total points (9 is the maximum needed)

Other possibilities:

-2 points for participation in a qualifying conservation program
-2 points for countour farming on slopes
-2 points for predominantly sandy soils (sandy loam/loamy sand, no hard pan)
-2 points for “terrace” farming
-3 points for “reservoir tillage”
-2-3 points, ‘reduced tillage’ or ‘no-till’
-2-3 points for cover cropping
-2 points for riparian forest/herbaceous buffer
-3 points for constructed or natural wetlands
-1-3 points for “filtering devices” such as runoff socks, more for compost or activated charcoal/biochar amendment
-1 point for sub-surface tile drainage without controlled outlet

Drift Becomes the Driver for Most Scenarios

- Default ***wind-directional*** drift buffers determined by risk likelihood
- Maximum worst-case buffers:
  - Ground, 230’ (fine droplet high boom); Reduced to 80’ (medium droplet low boom)
  - Airblast, 160’
  - Aerial, 320’
- Buffer reduction pathways—some are very commonly applied
  - Drift-reducing adjuvants (15-30%)
  - Droplet sizes and boom heights (20-75%)
  - Hooded sprayers (50-75%)
  - Wind-breaks, riparian vegetation (50-100%)
  - Relative Humidity >/= 60% (10%)
  - Rate reduction (from single application maximum—linear)
  - Reduced passes (oddly shaped fields, e.g., point rows on contours)

Drift Becomes the Driver for Most Scenarios

- **<u>BUFFERS TO WHAT</u>?** ***The most key question of all for drift.***
- **Managed vs. Un-managed lands.**
- **What is habitat vs. what is riparian vegetation??**

On-field Mitigation

- EPA identified **9 butterflies** and **beetles** that may occur on agricultural fields.
  - *Assessment still ongoing, possibly fewer in the Final IS.*
- Mitigation plan is unclear and will be determined on a case-by-case basis.
- Timing / bloom restrictions are possible, discussions on-going.

Fenders blue butterfly

Karner blue butterfly

Bertram's scrub-hairstreak butterfly

Mitchell's Satyr

Dakota Skipper

Grower Challenges

Feasibility, Affordability, Certainty

Impacts and Complications for IPM

- **Conflicting Goals Between Conservation and Compliance**
- **Vegetative Filter Strips: Can harbor pest populations like *Lygus***
- **No-Till/Cover Crops: Can lead to high soil pest pressure and necessitate more pre-plant or seed treatments**
- **Reduced application rates can exacerbate resistance concerns**
- **Droplet size is a complicated problem for some pests—adequate under-side leaf coverage and efficacy vs. adequate drift reduction**
- **Crop rotations: compliance varies depending on the chemical toolbox**
- **Complications of leased land: contractual limits and/or disincentives to some land improvements**

Regulatory Certainty?

- **Still a very fluid process**
- **Strategies applied *going forward*: EPA comment periods are key**

Early Implementation Learning Opportunity

- **Glufosinate-P (Liberty® ULTRA, L-glufosinate):**
  - **Label directs users to BL!T; Point requirements for runoff; small PULAs in Tennessee, restricting use from Sept to May. Otherwise, mitigations are fairly low impact.**
  - **SLAs and Growers—identify questions and pain points, start to work out kinks and get better clarity.**
  - **Label and BL!T interpretation, documentation requirements, etc.**
  - ***A change to practice the process with a relatively simple case***

Monarch Listing (December 2024)

- **Proposed listing published out for comment through March 12, 2025**
- **Proposes protections and flexibilities under Section 4(d)**
- **Listing isn't pesticide driven, but pesticides are discussed among multiple factors, particularly breeding habitat (milkweeds, insecticide use.)**
- **Listing highlights data needs. This is an opportunity.**
- **Helpful comments could focus on how existing ag practices, BMPs, habitat establishment, and strategies/label mitigations are protective of monarch exposure**

Future Engagement and Learning Opportunities

- **No one will master these issues overnight**
- **SLAs have as steep a learning curve as consultants and growers**
- **USDA Co-op with Regional IPM Centers: developing regional ESA workshops for 2025-2026**
  - **Southern, Western, North Central, Northeastern**
- ***Ultimately, all parties want and <u>NEED</u> this process to work***

Questions? Reach Out!

- **Learn more about pesticide registration: https://www.epa.gov/pesticide-registration/about-pesticide-registration**
- **Learn more about pesticide reevaluation: https://www.epa.gov/pesticide-reevaluation/registration-review-process**
- **Learn more about providing public comments: https://www.regulations.gov/help**

- ***Contact us:*** ***sm.opmp.pesticides@usda.gov***
  - ***Clayton.Myers@usda.gov***
  - ***Elyssa.Arnold@usda.gov***