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Office of Chemical Safety and Pollution Prevention
Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, D.C. 20460

20 July 2026

Subject: Conservation Groups Comments on EPA Draft Fungicide Strategy

Dear Director Overstreet and Director Blankinship,

On behalf of 41 organizations representing thousands of members across the United States, we respectfully submit these comments on the Environmental Protection Agency's Draft Fungicide Strategy to Reduce Exposure of Federally Listed Endangered and Threatened Species and Designated Critical Habitats from the Use of Conventional Agricultural Fungicides, Docket EPA-HQ-OPP-2026-2973.

We appreciate that the Environmental Protection Agency (EPA) is developing a framework to address the impacts of fungicides and pesticides used as seed treatments on Endangered Species Act (ESA)-listed wildlife and accompanying critical habitat. The Strategy is a good first step in mitigating the impacts of these chemicals on listed wildlife. In order to best protect the 1,600+ species named under the ESA, and the dozens more awaiting potential inclusion, we feel that additional measures should be included in the Strategy.

1. Fungicide seed treatments should be accounted for in the Usage Data Layer (UDLs) analyzed as part of spatial overlap with listed species range to determine potential impacts.
2. Species, especially birds and mammals, which may consume treated seed fragments should be included as species potentially at risk of ingesting treated seeds on field
 - a. This includes the Streaked Horned Lark (*Eremophila alpestris strigata*).
3. Least Bell's Vireos (*Vireo bellii pusillus*) should have impacts from fungicide use on grasses grown for seed included in their risk assessments.
4. Synergistic impacts of insecticides and fungicides should be assessed as part of the Strategy.
5. Modeling and on-field monitoring should be used to validate all mitigations and statements suggested and made in the Strategy.

6. Insecticide seed treatments should be mitigated through the Strategy and the Final Insecticide Strategy in addition to the labels prescribed during registration and registration review.
7. Pesticide Use limitation Areas (PULAs) should continue to be a key part of this and all strategies developed by the EPA in order to maximize conservation outcomes in a targeted, on-the-ground manner for all ESA-listed species.
8. The primary mitigation measure for impacts of fungicide and all other pesticide seed treatments should be avoidance of use and/or requirement of prescription by an agronomist prior to on-field deployment.

Pesticides used as seed-coatings are a unique threat in the way they directly deliver chemicals into soil, waterways, and wildlife. Their cascading effects include disruption of soil ecosystems, non-target insect population depletion and subsequent predator impacts, water contamination, and non-lethal impacts from exposure which can later lead to death. As such, we appreciate the EPA's work to address these impacts and the opportunity to comment.

Sincerely,

Advocates for Snake Preservation
American Bird Conservancy
Beyond Toxics
Center for Biological Diversity
Conservation Law Foundation
Eastern Long Island Audubon Society
Endangered Habitats League
Endangered Species Coalition
Environmental Protection Information Center (EPIC)
FOUR PAWS USA
Friends of the Earth
Hawaii Alliance for Progressive Action (HAPA)
Hawk Mountain Sanctuary Association
International Wildlife Coexistence Network
Kettle Range Conservation Group
Maryland Pesticide Education Network
Massachusetts Pollinator Network
New Hampshire Audubon
New Hope Bird Alliance
Next 100 Coalition
Northwest Arkansas Audubon Society
People & Pollinators Action Network
Predator Defense
Quad City Audubon Society
Re:wild Your Campus
Rockbridge Conservation
Safe Skies Maryland
Salem Audubon Society
San Diego Bird Alliance
Santa Cruz Bird Club
Save Lake Superior Association

Save Our Sky Blue Waters
Spokane Audubon Society
Toxic Free North Carolina
Valley Forge Audubon Society
Western Watersheds Project
Western Wildlife Outreach
Wild Farm Alliance
WildEarth Guardians
Wildlife for All
Wyoming Wildlife Advocates