

May 9, 2016

Mr. Michael Goodis
Acting Director, Pesticide Re-Evaluation Division
Office of Pesticides Programs
United States Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460 -0001

Re: Request for Extension of Time to Respond to Notice of Availability of Draft
Biological Evaluations of Chlorpyrifos, Diazinon, and Malathion
(81 Fed. Reg. 21341 (April 11, 2016))

As organizations representing U.S. agriculture and users of crop protection tools and pest control products, we are deeply concerned about the EPA's opening of only a 60-day comment period for the stakeholder community to provide meaningful input on the Draft Biological Evaluations of Chlorpyrifos, Diazinon and Malathion. These three Organophosphates (OP's) are critical tools for a wide array of commodities, specialty crops, and public health uses throughout the United States.

These three dockets for these draft biological evaluations contain over 75 documents for each of the active ingredients and total more than 12,000 pages. These documents then link to thousands of database and matrix files which contain millions of estimated daily environmental concentration values and lines of data. All of these documents and files rely on a vast number of assumptions and estimations covering multiple scientific areas of expertise.

Not only are these evaluations critical to the long-term availability of these three important crop protection tools for our grower members, but since these evaluations are the EPA's first attempt at nationwide assessments, and will set the stage for future evaluation efforts, stakeholders must have adequate time to consider and respond. Only 60 days is totally inadequate.

Also, in addition to the review challenges posed by the massive volume of materials, a thorough review of these evaluations is rendered nearly impossible due to missing data, lack of proper citations, significant internal errors and discrepancies, and the failure to fully present key information. These issues with the evaluations must be corrected and then an adequate extension of time granted for development of submission of meaningful comments. We are requesting that these significant inherent problems with the materials made available first be resolved and then the comment period be extended another 120 days.

Our organizations look to the EPA to provide materials that are sufficiently robust and accurate to allow our review and then enough time to properly comment.

Thank you,

Agricultural Retailers Association
Almond Hullers & Processors Association

American Farm Bureau Federation
American Society of Sugar Beet Technologists
American Soybean Association
American Sugarbeet Growers Association
Beet Sugar Development Foundation
California Citrus Mutual
California Citrus Quality Council
California Cotton Ginners Association
California Cotton Growers Association
California Dried Plum Board
California Fig Advisory Board
California Fresh Fruit Association
California Strawberry Commission
California Walnut Commission
Cherry Marketing Institute
Cranberry Institute
Florida Fruit & Vegetable Association
Golf Course Superintendents Association of America
National Agricultural Aviation Association
National Association of State Departments of Agriculture
National Association of Wheat Growers
National Corn Growers Association
National Cotton Council
National Potato Council
National Sorghum Producers
North American Blueberry Council
Pacific Northwest Vegetable Association
Sunsweet Growers Inc.
United Fresh Produce Association
U.S. Apple Association
Washington Asparagus Commission
Washington Blueberry Commission

Washington Cranberry Alliance
Washington Friends of Farms and Forests
Washington State Potato Commission
Western Agricultural Processors Association
Western Growers Association

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