



# PPC

## PESTICIDE POLICY COALITION

A Coalition Working for Sound Pest Management Policies

December 22, 2023

Dana Freidman  
Chief, Risk Management and Implementation Branch 1  
Pesticide Re-Evaluation Division (7508P)  
Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, DC 20460-0001  
*Submitted via regulations.gov*

**Re: Docket EPA-HQ-OPP-2023-0567**

Request for Extension of the Public Comment Period for the Draft Biological Evaluation, Effects Determinations, and Mitigation Strategy for Federally Listed and Proposed Endangered and Threatened Species and Designated and Proposed Critical Habitats

Dear Ms. Friedman:

We are writing to request a 60-day extension of the public comment period for the Draft Biological Evaluation for the Rodenticides (Draft BE).

The PPC represents agriculture, food, fiber, public health, pest management, landscape, environmental, and related industries, including small businesses/entities, which are dependent on the availability of pesticides. Our coalition supports development and implementation of public policies and laws that utilize the best available science and technology to ensure protection of human health and the environment.

PPC members include national and regional trade associations; commodity, specialty crop, and silviculture organizations; cooperatives; food processors and marketers; pesticide manufacturers, formulators, and distributors; pest and vector-control applicators and operators; research organizations; state departments of agriculture; equipment manufacturers, and other interested stakeholders. The PPC serves as the unifying voice for the review, discussion, development and advocacy on pest management regulation and policy that is based on the best available science.

Additional time is needed to evaluate the BE given the number of species for which the Agency has made determinations of Jeopardy/Adverse Modification, the large geographical areas identified in the BE (including entire states), and the complexity of the mitigation measures proposed. The additional time will allow a more thorough evaluation of the findings and proposed mitigation measures that includes input from technical and species experts. Further, the current comment period spans holidays, making it harder to assemble the required technical expertise needed to provide thorough and thoughtful comments.

While we understand that agency faces a deadline for completing the BE under the settlement agreement in *Ctr. for Biological Diversity v. EPA* (commonly known as the 'Mega Litigation'), the agreement gives the Agency discretion to extend the 60-day comment period if it receives requests 'with good cause'. The complex review of the draft BE and the time needed to develop appropriation recommendations and refinements is an appropriate reason for extending the comment deadline by 60 days.

We appreciate your consideration of our request.

Sincerely,

A handwritten signature in black ink that reads "Steve Hensley". The signature is written in a cursive, flowing style.

Steve Hensley  
Chair, Pesticide Policy Coalition

Attachment: Pesticide Policy Coalition Membership List

## **Attachment: Pesticide Policy Coalition Membership List**

ADAMA	National Alliance of Forest Owners
Agricultural Retailers Association	National Alliance of Independent Crop Consultants
American Chemistry Council, Biocides Panel	National Association of Landscape Professionals
American Farm Bureau Federation	National Association of State Departments of Agriculture
American Mosquito Control Association	National Associations of Wheat Growers
American Mushroom Institute	National Corn Growers Association
American Seed Trade Association	National Cotton Council
American Soybean Association	National Council of Farmer Cooperatives
American Sugarbeet Growers Association	National Farmers Union
American Vanguard	National Onion Association
Association of Equipment Manufacturers	National Pest Management Association
BASF Corporation	National Potato Council
Bayer Crop Science	North Dakota Grain Growers Association
California Citrus Quality Council	Northwest Horticultural Council
California Dried Plum Board	RISE
California Farm Bureau	Scotts Miracle Gro
California Processed Onions Garlic Research Committee	Society of American Florists
California Specialty Crops Council	Syngenta Crop Protection
Corteva	U.S. Apple Association
Council of Producers & Distributors of Agrotechnology	U.S. Beet Sugar Association
CropLife America	U.S. Canola Association
Florida Fruit & Vegetable Association	U.S. Hop Industry Plant Protection Committee
FMC	United Fresh Produce Association
Golf Course Superintendents Association	USA Rice
Gowan	Valent U.S.A Corporation
ISK Bioscience	Washington State Potato Commission
Minor Crop Farmer Alliance	Western Growers