



April 1, 2020

Via Federal eRulemaking Portal  
(<http://www.regulations.gov>)

Public Comments Processing  
Attn: Docket No. EPA-HQ-OPP-2020-0090  
Ms. Tracy Perry  
Pesticide Re-Evaluation Division (7508P)  
Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

Re: Request for Comment Period Extension, *Draft Endangered Species Act Biological Evaluations: Carbaryl and Methomyl Registration Review*; 85 FR 15168; March 17, 2020; Docket No. EPA-HQ-OPP-2020-0090

Dear Ms. Perry:

CropLife America (CLA) respectfully requests a 60-day extension to the comment period on Environmental Protection Agency's (EPA) *Draft Endangered Species Act Biological Evaluations: Carbaryl and Methomyl Registration Review* (the Draft Biological Evaluations).

Established in 1933, CLA represents the developers, manufacturers, formulators, and distributors of crop protection chemicals and plant science solutions for agriculture and pest management in the United States. CLA represents the interests of its registrant member companies by, among other things, monitoring legislation, federal agency regulations and actions, and litigation that impact the crop protection and pest control industries, and participating in such actions when appropriate. CLA's member companies produce, sell and distribute virtually all the crop protection and biotechnology products used by American farmers. CLA greatly appreciates the opportunity to provide comments on the Draft Biological Evaluations.

The Draft Biological Evaluations are extremely lengthy, complex and highly technical documents that require the consideration and review of a number of experts from CLA's member companies familiar with the subject matter. Given the number of parties and stakeholders potentially impacted by the Draft Biological Evaluations, it is incumbent upon the Agency to ensure that all parties have the opportunity to learn about the drafts, understand their content, and formulate meaningful feedback for the Agency. Therefore, the current 60-day comment period does not provide CLA sufficient opportunity to analyze the draft Biological Evaluations, solicit input from its members, and develop constructive comments.

**Representing the Crop Protection Industry**

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CLA respectfully requests the EPA to extend the public comment period by 60-days to allow us to gather and submit comments on these important documents.

Should you have any questions or comments, please feel free to contact me at [mbasu@croplifeamerica.org](mailto:mbasu@croplifeamerica.org) or (202) 833-4474.

Regards,

A handwritten signature in black ink, appearing to read 'Manojit Basu', with a horizontal line underneath.

Manojit Basu, PhD  
Managing Director, Science Policy  
CropLife America

cc: Richard Keigwin, Director, OPP