



August 19, 2024

Rachel Blatnick  
Pesticide Reevaluation Division  
Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Ave NW  
Washington, DC 20460

**RE: Extension Request on the public comment period for the Fish and Wildlife Service (FWS) Draft Biological Opinion on Methomyl; EPA-HQ-OPP-2024-0290**

Dear Ms. Blatnick:

Established in 1933, CropLife America (CLA) represents the developers, manufacturers, formulators, and distributors of pesticides and plant science solutions for agriculture and pest management in the United States. CropLife America's member companies produce, sell, and distribute virtually all the pesticide and biotechnology products used by American farmers. CLA respectfully requests an extension of the comment period of the methomyl draft biological opinion (BiOp) for an additional 45 days.

The BiOp is complex, containing multiple attachments and appendices. Some of these spreadsheets contain multiple tabs requiring careful review. Information used from the final Environmental Protection Agency (EPA) biological evaluation appears to be used in FWS BiOp which requires considerable time to review to understand linkages and to make informed comments. Finally, with every new BiOp, there are changes to methods, data and lines of evidence used to make Jeopardy and Adverse Modification determinations. This requires additional time and deliberation for us to understand the implications of the findings and provide product information and other details to FWS that may be relevant for the final BiOp.

Finally, there are several concurrent open dockets on which CLA and other stakeholders will also submit substantive comments. These dockets include, but are not limited to, the Draft Insecticide Strategy and associated technical documents, the updated operational exposure assessments for neonicotinoid seed treatment, and numerous Proposed Interim Decisions (e.g., dimethoate, mancozeb, and malathion).

By extending the public comment period, EPA will not only receive more diverse perspectives on the proposal, but also more meaningful feedback in comments received. We appreciate your consideration of our request.

Sincerely,

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

Katie Stump  
Senior Manager, Regulatory Affairs and Sustainability  
CropLife America