

# Minor Crop Farmer Alliance

Via Electronic Mail to [Keigwin.Richard@epa.gov](mailto:Keigwin.Richard@epa.gov)

January 29, 2020

Richard Keigwin  
Director, Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Ave NW  
Washington, DC 20004

Re: Request for Brief Extension Concerning the EPA Request for Comments on New Methodologies to Estimate Pesticide Concentrations in Surface Waters.

Dear Mr. Keigwin:

As you are aware, on January 15, 2020, the Environmental Protection Agency (“EPA” or “Agency”) distributed a request for public comments “on new methodologies developed by the agency to estimate exposure to pesticides from surface water sources. These methodologies would increase the accuracy of the agency’s estimates by minimizing underestimation, reducing the magnitude of overestimation, and increasing consistency” (“Methodologies Request”). Currently, the Agency must receive any comments on the Draft Guidance by February 29, 2020. The Minor Crop Farmer Alliance (“MCFA”) requests a 30-day extension of the comment period in order to prepare appropriate comments on the Draft Guidance.

MCFA is an alliance of national and regional organizations and individuals representing growers, shippers, packers, handlers and processors of various agricultural commodities, including food, fiber, turf grass, nursery and landscape crops, and organizations involved with public health pesticides. Our members are extremely interested in the development and safe use of pest management tools including crop protection chemicals that are environmentally sound, safe for applicators, workers and the public, and do not represent an unreasonable adverse risk to the environment, including humans. While our commodities are often called “minor crops” or “specialty crops,” they contribute to the diversity and highly nutritious diets available for the global population and to safe and aesthetic surroundings for our homes, schools, and places of business. U.S. farmers grow more than 500 types of fruit, vegetable, tree nut, flower, ornamental nursery and turf grass crops in addition to the major bulk (row) commodity crops. Specialty crop production accounts for more than \$60 billion, or approximately 40% of total U.S. crop receipts.

The estimation of pesticide concentrations in surface waters can significantly affect our members’ access to critical pesticides. Over-estimating such concentrations can result in additional regulatory restrictions regarding the application of a pesticide or even influence the continued availability of the pesticide. We applaud the Agency’s efforts to initiate the Methodologies Request soliciting public comment on those methodologies. However, the

information presented is extensive, involving a number of disciplines, and the methodologies warrant serious review and consideration. MCFA is very interested in having a meaningful opportunity to participate in the comment process. As such, our members are unable to complete a comprehensive review and prepare the type of comments that we would like to provide within the current comment period. We believe our situation is not unique. Other stakeholders are likely in the same position. Consequently, MCFA requests a relatively brief 30-day extension of the comment period.

We appreciate your consideration of this request.

Sincerely,



Edward M. Ruckert  
Counsel to MCFA

CC: Marietta Echeverria

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