

April 18, 2018

What makes a “well-supported comment” that is of benefit to the EPA? The following is provided as general supportive information for your consideration in development in your own comment for the open EPA comment period on the **Chlorpyrifos, Diazinon, and Malathion; National Marine Fisheries Service Biological Opinion Issued Under the Endangered Species Act** (EPA-HQ-OPP-2018-0141)

- Remember that EPA is looking for credible, substantive comments. The length of your comment will depend on what information you believe will be helpful to the EPA. Your comment may range from a paragraph to one or two pages typically. You can also attach any articles you think are relevant.
- The comment should be sincere, but also contain facts, such as types of pests controlled and yield impact, along with your own observations and thoughts.
- Comments must be submitted into the docket by the end of day on May 22, 2018. While it is a good idea to work on your comments as early as possible, we recommend waiting to the last week or two to submit in case new information should become available.

Points to consider including in your comments. The following is general guidance only and your comments are your own in both content and style.

1. Introduce yourself. Include information that will help the EPA understand that your background and experiences are relevant to commenting on this topic.
 - Your occupation
 - Your general location (region within a state)
 - Any current or past roles with ag-related organizations
 - If you are a farmer or grower:
 - Crop(s) grown and acreage
 - Is yours' a family owned farm?
 - How long have you farmed and how long have you used chlorpyrifos
 - If you do not farm yourself, indicate how you are related to agriculture through your business or occupation.
 - Because your comment will be made public on the docket, we recommend you do not include personal information such as telephone numbers, home addresses, or email addresses.**
2. It is important for EPA to understand why chlorpyrifos is important for your operation
 - Why do you use chlorpyrifos? Consider such aspects as broad spectrum control, effectiveness, ability to control a particular pest, fits well into your insect resistance program.
 - Are there any pests or conditions where chlorpyrifos is the only product that will do the job?
 - Are there situations, such as when a new pest is encountered, where chlorpyrifos is your go-to product?

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- What would be the impact on yields, the way you farm, or profitability/sustainability of your operation if chlorpyrifos was no longer available?
3. This comment period will have impact beyond just the current BiOp and decisions made here will impact how ESA is implemented for all crop-protection tools in the future. Consider letting EPA and both NMFS and F&WS hear the call for an ESA process that is fair, transparent, and scientifically-sound, and in a way that engages Agriculture for workable solutions.
 4. EPA has specifically asked from comments on NMFS's proposed Reasonable and Prudent Alternatives (RPA) and Reasonable and Prudent Measures (RPM) (refer to www.chlorpyrifos.com for further information). The elements and potential restrictions relative to your use of Dow AgroSciences' chlorpyrifos products include (from NMFS BiOp):
 1. Reduce pesticide loading for all high risk use sites¹. There are three options within this element
 - a. Remove the use from product labels (or modify labels to reduce the risk to acceptable levels)
 - b. Impose spray drift buffers to bodies of water of 1000' for aerial applications; 500' for all ground-based applications (including ground boom and airblast). Impose runoff mitigation of a 20' vegetative filter strip for all applications.
 - c. Implement a points-based mitigation systems (more details below)
 2. Allow only one application per year of chlorpyrifos
 3. Restrict mosquito adulticide uses to residential and developed areas Restrict wide-area uses to spot treatment only
 4. EPA must develop a plan to monitor the feasibility, effectiveness and implementation of the above RPAs

Consider including in your comment:

- NMFS did not consult with Ag stakeholders in developing these RPA's and RPM's. Should stakeholders be included from the very beginning for understanding impact and what is workable?
- How practical are the RPAs listed above to implement? How will they restrict the way your farm?
- Will implementing these affect yields?

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¹ High Risk Use Sites are any areas within NMFS-defined "evolutionarily significant units" (ESU) and "distinct population segment" (DPS) that the BiOP determined to be a risk. See the attached map.

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