



August 24, 2009

Mr. Steve Owens
Assistant Administrator, Office of Prevention, Pesticides and Toxic Substances
US Environmental Protection Agency
MC 7101M
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear Mr. Owens:

As the EPA approaches critical decisions related to the implementation of mitigation measures following the NOAA Fisheries biological opinion (BiOp) on the potential effects of organophosphate insecticides on salmon, we urge the Agency to avoid unnecessary consequences to western agriculture. Any necessary restrictions should be developed using a more sophisticated and complete scientific analysis than found in the BiOp.

The restrictions proposed in NOAA's BiOp are unreasonable and would wreak havoc with fruit and vegetable production as well as harm the economic viability of the affected rural communities. We believe there are more reasonable solutions that can be implemented by the November deadline.

The NOAA BiOp was criticized by the Washington State Department of Agriculture (WSDA) because it failed to take into account current use practices or water monitoring data collected by WSDA specifically for that purpose.

The 1000-foot aerial and 500-foot ground buffer zones as well as restrictions on applying during windy conditions or when a storm is predicted would constitute a de facto ban on use of these products in many areas. Similar restrictions on the next 34 ingredients under the court order would wreak not only economic havoc but also limit the ability to manage key pests and compromise the ability to grow healthy foods for American consumers.

The implications for growers, agricultural production and consumers are significant and any necessary new restrictions must be based on comprehensive scientific analysis. Restricting tools without refined, scientifically defensible risk assessments and current data offers little benefit to the environment and no assurance of protection for salmon. It does make it more difficult for our growers to compete with growers across the country and overseas. It also increases their financial risk and the sustainability of their operations which in turn threatens the rural towns they support. Given the current economic climate, Federal agencies should take care not to impose arbitrary restrictions that will cause further economic upheaval and increase the cost of food. President Obama promised that his administration would use sound science.

