

To: Dravis, Samantha[dravis.samantha@epa.gov]
Cc: Rees, Sarah[rees.sarah@epa.gov]; Estreicher, Herb[estreicher@khlaw.com]; Novak, Michael[Novak@khlaw.com]
From: Votaw, James G.
Sent: Wed 4/26/2017 11:35:10 PM
Subject: Keller and Heckman FIFRA Coalition Request for Extension of Comment Period (Dkt. No.EPA-HQ-OA-2017-0190)
[removed.txt](#)
[Keller and Heckman FIFRA Coalition Request for Extension of Comment Period.pdf](#)

Dear Ms. Dravis:

We represent an ad hoc coalition of companies forming to develop recommendations for the responsible repeal or modification of particular regulations issued to implement the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and that are outdated, unnecessary, or unnecessarily burdensome or costly, including specific suggestions for repeal or modification (as applicable). This is to request a 30-day extension of the comment period. The process of bringing affected companies together, identifying and vetting the range of potential reform candidates, and developing thoughtful and appropriate, consensus reform proposals, requires significant coordinated effort among many people and is difficult to complete within the original 30-day period allowed. While work is underway to meet the original deadline, a somewhat longer comment period will provide the Agency with higher quality input from all groups and a much better basis for future decision-making. A reasonable extension is particularly appropriate here where there are no underlying legal deadlines, and EPA's substantive action on the recommendations may be months or years away. Thank you for your consideration.

Very truly yours,

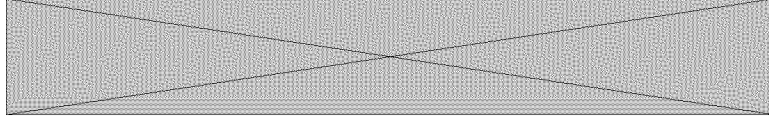
James G. Votaw

Partner

Keller and Heckman llp

tel: 202-434-4227 | m: 202-604-5461 | votaw@khlaw.com

1001 G Street, NW, Suite 500 West, Washington DC 20001



Visit our website at khlaw.com for additional information.

If you print, please recycle.

This message and any attachments may be confidential and/or subject to the attorney/client privilege, IRS Circular 230 Disclosure or otherwise protected from disclosure. If you are not a designated addressee (or an authorized agent), you have received this e-mail in error, and any further use by you, including review, dissemination, distribution, copying, or disclosure, is strictly prohibited. If you are not a designated addressee (or an authorized agent), we request that you immediately notify us of this error by reply e-mail and then delete it from your system.

1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001
tel. 202.434.4100
fax 202.434.4646

Writer's Direct Access
James G Votaw
(202) 434-4227
votaw@khlaw.com

April 26, 2017

Via Electronic Mail and Mail

Samantha K. Dravis
Regulatory Reform Officer and
Associate Administrator, Office of Policy
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, N. W.
Mail Code: 1804A
Washington, DC 20460

Re: 30-Day Extension of Comment Period
Evaluation of Existing Regulations,
82 Fed. Reg. 17,793 (Apr. 13, 2017), Docket No. EPA-HQ-OA-2017-0190

Dear Ms. Dravis:

We represent an ad hoc coalition of companies forming to develop recommendations for the responsible repeal or modification of particular regulations issued to implement the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and that are outdated, unnecessary, or unnecessarily burdensome or costly, including specific suggestions for repeal or modification (as applicable). This is to request a 30-day extension of the comment period. The process of bringing affected companies together, identifying and vetting the range of potential reform candidates, and developing thoughtful and appropriate, consensus reform proposals, requires significant coordinated effort among many people and is difficult to complete within the original 30-day period allowed. While work is underway to meet the original deadline, a somewhat longer comment period will provide the Agency with higher quality input from all groups and a much better basis for future decision-making. A reasonable extension is particularly appropriate here where there are no underlying legal deadlines, and EPA's substantive action on the recommendations may be months or years away. Thank you for your consideration.

Very truly yours,


James G Votaw

cc: Sara Rees
Docket No. EPA-HQ-OA-2017-0190

4818-1546-6567, v 1

Washington, D.C.

Brussels

San Francisco

Shanghai

Paris

This document was delivered electronically.

www.khlaw.com