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Submitted Via Electronic Mail and First Class Mail
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Draft EA for Use of Glyphosate-Tolerant Soybeans and Corn

Mr. Tom Koerner
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c/o Sand Lake National Wildlife Refuge Complex
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Re: Draft Environmental Assessment: *Use of Genetically Modified, Glyphosate-Tolerant Soybeans and Corn on National Wildlife Refuge Lands in the Mountain-Prairie Region (Region 6)*[1]

Dear Colleague:

These comments are submitted by the Biotechnology Industry Organization (BIO) in response to the February 2, 2011, release by the Mountain-Prairie Region of the U.S. Fish and Wildlife Service (the Service) of its draft Environmental Assessment (EA) evaluating the use of glyphosate-tolerant corn and soybeans on lands within the region's National Wildlife Refuge System (NWRS). BIO appreciates the opportunity to submit comments in support of the Service's Preferred Alternative: *Continue Using Glyphosate-Tolerant Soybeans and Corn for Habitat Restoration and Management on System-Managed Lands in Region 6 (No Action).*

BIO is the world's largest biotechnology organization, providing advocacy, business development and communications services for more than 1,200 members worldwide. BIO members are involved in the research and development of innovative healthcare, agricultural, industrial and environmental applications of biotechnology. Corporate members range from entrepreneurial companies developing their first product to Fortune 100 multinationals. We also represent state and regional biotechnology-derived associations, service providers to the industry, and academic centers.

BIO appreciates the Service's acknowledgement throughout the draft EA of the extensive analyses conducted on genetically engineered (GE)[2] crops by the U.S. Department of Agriculture

[1] Available at http://www.fws.gov/sandlake/web-gmo-draftea-02-01-11.pdf .

[2] The Mountain-Prairie region's Draft Environmental Assessment uses the term "genetically modified" to discuss these crops. While this phrase has been used in the popular literature to describe these crops, the term is neither scientifically nor legally descriptive. All plants have been "genetically modified" since the dawn of human agriculture. The term used by the U.S. Department of Agriculture's Animal and Plant Health Inspection Service (APHIS), which regulates all of these plants, is "genetically engineered" and that is the term used throughout this letter. *See* 7 C.F.R. Part 340. BIO encourages the Service to use the legal term for these crops throughout the draft EA.

(USDA), U.S. Food and Drug Administration, and, where appropriate, the U.S. Environmental Protection Agency to verify their safety to humans and the environment before these products enter the marketplace. In keeping with the requirements of the National Environmental Policy Act (NEPA), the USDA deregulation process for GE crops includes a NEPA review that analyzes many of the same issues the Service addressed in its draft EA. We are also pleased that the Mountain-Prairie region's Planning Team consulted with scientists at these agencies who, collectively, have many decades of experience assessing GE crops both before and after they are commercialized. The working relationship you have developed in preparing this draft EA should prove useful as new GE crops are placed on the market and adopted by growers.

BIO applauds the Service's conscientious work in considering a number of comments and alternatives, deciding which alternatives to develop further, and addressing each sufficiently in the draft EA. Your methodical approach and thorough analyses of the alternatives and attendant issues provide a model for other FWS regions that might be embarking on a similar evaluation of the potential environmental impacts and appropriateness of using GE crops to meet refuge goals.

We agree with the Service's rationale that the Mountain-Prairie region's continued allowance of the use of GE, glyphosate-tolerant corn and soybeans is in "conformance to the establishing purposes of the System and the desire to have the least impact on the environment."[3]

We believe the same statement could be made for other GE, herbicide-tolerant crops that have successfully completed a safety review by USDA and other federal agencies. These crops allow the use of broad-spectrum herbicides that, like glyphosate, "provide an alternative for farming that poses less risk to wildlife" (page 14 – Issue 1) and allow the use of "conservation tillage practices used by the Service to minimize soil erosion on cultivated lands" (page 15 - Issue 5) within the National Wildlife Refuge System.

The use of additional types of herbicide-tolerant corn and soybeans can be another means to reduce the potential for the development of herbicide resistant weeds identified in the draft EA (page 15 – Issue 6). Virtually all conventionally bred corn and soybeans grown in the United States have been treated with herbicides since the 1970's. Not unexpectedly, some populations of some weed species that are found in corn and soybean fields have evolved resistance to some of those herbicides.

Growers with a population of resistant weeds in their fields need to utilize a herbicide with a different mode of action, and/or other weed management practices, in order to control resistant weeds. One strategy to minimize the development of herbicide resistant weeds is to provide growers with crops that are tolerant to herbicides with various modes of action. This would allow growers to rotate herbicides with different modes of action, providing a useful tool for controlling weeds that have become resistant to a herbicide. Rotating herbicide modes of action also helps to delay the development of herbicide resistant weeds.[4]

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[3] Draft Environmental Assessment - *Use of Genetically Modified, Glyphosate-Tolerant Soybeans and Corn on National Wildlife Refuge Lands in the Mountain-Prairie Region (Region 6),* Summary

[4] http://www.extension.uidaho.edu/forage/Proceedings/2004%20Proceedings%20pdf/shuster.pdf

Allowing the use of additional GE herbicide-tolerant crops will maximize the many benefits of glyphosate-tolerant corn and soybeans, which the draft EA lists and elaborates, while lessening the risk described in Issue 6.

Therefore, we encourage the Service to consider mechanisms that would broaden the scope of the EA, either now or in the future, to accommodate GE corn or soybean varieties that have been deregulated by the USDA and are tolerant to herbicides approved for use on NWRS lands in the Mountain-Prairie region.

BIO appreciates the opportunity to provide comments in response to the Mountain-Prairie region's draft Environmental Assessment.

Sincerely,

Adrianne Massey, PhD
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