

**From:** [Tucker, Jennifer - AMS](#)  
**To:** [Johanna Mirenda](#)  
**Cc:** [Laura Batcha](#)  
**Subject:** RE: Comment filed on OLPP Economic Analysis Report  
**Date:** Friday, May 15, 2020 4:09:23 PM

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Dear Johanna – Thank you for sending me OTA's public comment requesting an extension to the public comment period for Regulations.gov Docket # AMS-NOP-20-0037 regarding the OLPP Economic Analysis Report. As you are likely aware, there are currently two lawsuits challenging USDA's withdrawal of the OLPP rule, one in the District of Columbia and one in the Northern District of California. The District of Columbia lawsuit has only been stayed for a limited period of time to complete these remand proceedings, and although USDA has requested a stay in the California case, that request has not yet been granted and is opposed by the plaintiffs in that lawsuit. Due to the tight timelines involved in analyzing comments and developing a subsequent notice in time to comply with the court deadlines in the District of Columbia case, the uncertainty as to the timelines in the California case, and the many public comment periods provided for in the past, USDA has decided not to extend the public comment period beyond the 30 days. Additionally, both regulatory impact assessments have been publicly available since March 2018 and we believe that 30 days is sufficient to review a report analyzing specific flaws in those assessments.

Have a good weekend.

Jenny

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**From:** Johanna Mirenda <[jmirenda@ota.com](mailto:jmirenda@ota.com)>  
**Sent:** Friday, May 1, 2020 4:21 PM  
**To:** Tucker, Jennifer - AMS <[jennifer.tucker@usda.gov](mailto:jennifer.tucker@usda.gov)>  
**Cc:** Laura.Batcha - Contact <[lbatcha@ota.com](mailto:lbatcha@ota.com)>  
**Subject:** Comment filed on OLPP Economic Analysis Report

Hi Jenny

This message is to alert you that the Organic Trade Association has just filed a comment on Regulations.gov Docket # AMS-NOP-20-0037 regarding the OLPP Economic Analysis Report. We are sharing the filed comment with you here for maximum and immediate visibility.

Thanks,

Jo

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Johanna Mirenda | Farm Policy Director  
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