

environmentalcommons

October 21, 2004

Regulatory Analysis and Development
PPD, APHIS, Station 3C71
4700 River Road Unit 118
Riverdale, MD 20737-1238.

RE: Docket No. 03-101-2

To Whom It May Concern:

We are writing in regard to Docket No. 03-101-2, the Animal and Plant Health Inspection Service's (APHIS) notice of intent to conduct an Environmental Impact Statement (EIS) for a genetically modified organism. The EIS would consider a petition received from Monsanto Company and The Scotts Company to de-regulate and therefore commercialize genetically modified creeping bentgrass. Environmental Commons believes it is of great importance that APHIS conduct the environmental impact statement on genetically modified creeping bentgrass, as the release of this organism has unique potential to negatively impact the natural environment.

We encourage APHIS to consider the following points in preparation of its environmental impact statement.

1. Creeping bentgrass is an outcrossing species and is compatible with at least a dozen other wild species in the United States. Deregulating this product will allow frequent and recurrent gene flow between the modified and wild species.
2. Creeping bentgrass is a perennial, wind-pollinated species that has potential to cross-pollinate with 12-14 wild relatives. No other commercialized genetically modified organism is a perennial species with the potential to cross-pollinate with such a large number of wild relatives.
3. A recent study conducted by the EPA found that bentgrass had the potential to cross-pollinate with species up to 13 miles away.
4. If Roundup Ready™ creeping bentgrass is commercially successful and is widely adopted in the United States, the transgenes will be naturally introduced into related species.
5. Introducing the transgenes into related grassy species is likely to cause "superweeds" or resistant weeds that can withstand the overspray of Roundup® herbicide.
6. The creation of "superweeds" and resistant weeds means we will need to use bigger quantities of weedkillers, not less!

Thank you for your consideration of the above points in your upcoming environmental impact statement. We believe the EIS is extraordinarily valuable and appreciate your careful deliberation.

Sincerely,

Britt Bailey, Director