

March 26, 2008

Secretary of Labor Elaine L. Chao
United States Department of Labor
200 Constitution Ave., NW,
Washington, DC 20210

Re: Regulatory Information Number (RIN) 1205–AB55
Request for an Extension of the Comment Period to 90 Days
H-2A Temporary Foreign Agricultural Worker Program

Dear Secretary Chao,

As members of the California Roundtable on Agriculture and the Environment (CRAE), we are writing to request an extension of the comment period of the proposed rules published at 73 Fed. Reg. 8538 (February 13, 2008). CRAE represents diverse constituencies including agricultural, environmental and labor organizations. CRAE provides a forum for these constituencies to identify common interests and opportunities for collective action and advocacy. The passage of AgJOBS and securing a legal workforce is of great importance to all CRAE members.

The 45 day public comment period is insufficient for the public to analyze such a comprehensive and complicated proposal, and to thoughtfully respond. The organizations listed below request an extension of the comment period to 90 days so that they and others may have sufficient time to prepare and submit comments on the proposed rules.

An extension is necessary because the proposed rules constitute a comprehensive set of revisions to regulations that have been in effect without substantial modification for over two decades. Some components of the H-2A program that would be altered have been recognized as central to its statutory purpose and operation for over 55 years. A careful review and analysis of the proposed rule, and thoughtful comment, cannot be accomplished in the allotted time.

This collective request for the comment period is a reflection of the good working relationships that have emerged in the past several years due to the healthy dialogue needed to develop and maintain strong support for AgJOBS legislation. Farmworkers, the agriculture industry, and those interested in long-term economic sustainability understand the need to define a solution that serves all sides in a balanced manner.

Sincerely,

Ag Council of California
American Farmland Trust
California Association of Winegrape Growers
California Rural Legal Assistance Foundation

Community Alliance with Family Farmers
Ecological Farming Association
Farmworker Institute for Education and Leadership Development
Marrone Organic Innovations, Inc.
Roots of Change
Western United Dairymen