



June 18, 2019

Tracy Perry  
Pesticide Re-Evaluation Division (7508P)  
Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

Re: Request for Comment Period Extension, Pesticides; Draft Revised Method for National Level Endangered Species Risk Assessment Process for Biological Evaluations of Pesticides; Notice of Availability and Public Meeting; 84 FR 22120; May 16, 2019; Docket No. EPA-HQ-OPP-2019-0185

Dear Ms. Perry:

The American Association of Pesticide Control Officials (AAPCO) respectfully requests a 45-day extension to the comment period on the Environmental Protection Agency's (EPA) draft guidance document, Pesticides; Draft Revised Method for National Level Endangered Species Risk Assessment Process for Biological Evaluations of Pesticides. Representing pesticide regulatory agencies around the nation, we serve as co-regulators in implementing all aspects of FIFRA including the Pesticide Endangered Species Act (ESA) components and programs. AAPCO has a focus on scientifically sound approaches to assessing potential risks of pesticides and creating cooperative approaches that will result in common sense regulation of pesticides.

AAPCO and our member states appreciate the opportunity to provide comments on the ESA process for pesticides. This is a complex document and the document also has a foundation related to other documents that date back at least five to ten years, including the 2013 National Academy of Sciences National Resource Council Report, *Assessing Risks to Endangered and Threatened Species from Pesticides*. AAPCO encourages an opportunity to have adequate review time to solicit input from various members and we request that EPA extend the public comment period by 45-days to allow us to gather and submit comments on this important guidance document.

Please feel free to contact me if you should have any questions.

Sincerely,

Rose Kachadoorian  
AAPCO President  
Pesticides Program Manager, Oregon Department of Agriculture  
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