



January 17, 2023

Melanie Biscoe
Pesticide Re-Evaluation Division (7508P)
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001
Submitted via regulations.gov

Re: Request for Extension of Comment Periods for Proposed Interim Decisions for the Rodenticides: Docket EPA-HQ-OPP-2017-0750; FRL-10219-01-OCSP

Dear Ms. Biscoe:

On behalf of the Association of American Pesticide Control Officials (AAPCO), we are requesting a 60-day extension to the current comment period for the proposed interim decisions for the following pesticides: *Brodifacoum*, *Bromadiolone*, *Bromethalin*, *Chlorophacinone*, *Cholecalciferol*, *Difenacoum*, *Difethialone*, *Diphacinone*, *Strychnine*, *Warfarin*, and *Zinc Phosphide*.

The current comment period for these pesticides closes on February 13th, 2023. The breadth of rodenticide products included in the PID reflect both agricultural and nonagricultural uses and potentially impacts many individuals and organizations. Changes could have immediate and significant impacts across pesticide regulatory programs as well as the applicator community. We do not believe this is sufficient time for AAPCO, its committees and broader membership to complete a thorough review and provide meaningful comments on the proposed interim decision (PID).

AAPCO is committed to supporting EPA and the use of sound science in all registration decisions. We request that EPA extend the comment period and allow us to continue to work with you throughout this process.

Thank you for your consideration.

Sincerely,

Liza Fleeson Trossbach, AAPCO President
Virginia Department of Agriculture and Consumer Services

cc: AAPCO Board of Directors