



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

August 3, 2023

Gary Bahr
SFIREG Chair

Dear Gary:

Thank you for providing SFIREG's request to extend the comment period on the Environmental Protection Agency's (EPA's) Draft Vulnerable Species Pilot (VSP).

After careful consideration of your request, EPA has determined that an extension is not appropriate in this situation for the following reasons: (1) the draft VSP applies to only 27 of the over 1600 federally threatened or endangered (listed) species; (2) the species have small ranges and therefore any potential impact that could result from the mitigations identified in the VSP to pesticide users nationally is small; (3) EPA has provided additional tools to make public review more efficient (e.g., storymaps); and (4) EPA intends to consider whether any changes to the identified mitigations are necessary by the end of this year. To determine whether any changes are necessary by the end of this year, EPA regretfully cannot accommodate an extended comment period for the VSP, especially given that EPA also needs to work on other ESA initiatives during the same timeframe (e.g., Herbicide Strategy).

I also want to make sure you are aware that you have additional time to review the draft technical document associated with the draft VSP because it was also included in the docket for the draft herbicide strategy, which will, in effect, provide stakeholders more time to review and comment on it.

Finally, EPA appreciates SFIREG's engagement in our ESA efforts. EPA appreciated the opportunity to meet with your organization to answer any questions you had on the draft VSP. We look forward to continuing conversations with SFIREG on the VSP, and other strategies, as we move forward.

Thank you,

Jan Matuszko
Director, Environmental Fate and Effects Division
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