MAY 02 2019

Ms. Rose Kachadoorian
President
Association of American Pesticide Control Officers Inc.
Oregon Department of Agriculture
635 Capitol Street Northeast
Salem, Oregon 97301

Dear Ms. Kachadoorian:

The U.S. Environmental Protection Agency greatly values its partnership with the Association of American Pesticide Control Officials, and we recognize the states as our regulatory partners. We appreciate your engaging with the agency on the issue of special local need determinations involving state registrations under section 24(c) of the Federal Insecticide, Fungicide, and Rodenticide Act.

The EPA understands your concerns and acknowledges the importance of state flexibility when approving new uses. We are not making any immediate adjustments in this area and do not expect any potential changes to have an impact on 24(c) registrations that states submit ahead of the 2019 growing season. Before adopting any changes in this regard, we will solicit public comment on our proposed new approaches.

We look forward to a robust public dialogue with our stakeholders, partners, and co-regulators on this matter. In the meantime, please feel free to contact Kable Davis of my staff at davis.kable@epa.gov or (703) 306-0415 with any additional questions or concerns.

Sincerely,

Richard P. Keigwin, Jr., Director
Office of Pesticide Programs