

February __, 2003

[EPA, Interior, Commerce officials]

Re: Endangered Species Act Section 7 Counterpart Regulations (68 Fed. Reg. 3786 (January 24, 2003))

Dear _____:

On behalf of the following _____ conservation and environmental organizations, we request a minimum 45-day extension of the comment period on the Advanced Notice of Proposed Rulemaking concerning development of Endangered Species Act (ESA) section 7 counterpart regulations for the Environmental Protection Agency's pesticide registration program. This Advanced Notice states clearly that the Administration is contemplating a major overhaul of longstanding regulations governing the ESA section 7 consultation process with respect to the registration and use of pesticides in this country. Section 7 and its implementing regulations are a cornerstone of the ESA "our nation's most important wildlife conservation law. Any amendments to them, therefore, should only be made, if at all, after first affording the public a meaningful opportunity to fully consider and comment on any proposed or contemplated changes. Such a meaningful opportunity has not been provided with respect to this Advanced Notice. The public has been afforded just 45-days to analyze and comment on this notice. This is clearly insufficient given both the complexity of the issue and the significance to the ESA and our nation's most imperiled wildlife of what is being considered. If the Administration is truly committed to the principles of meaningful public involvement in the administration of our nation's conservation and environmental laws, it will extend the comment period as requested by an additional 45-days, which will afford all interested parties an opportunity to adequately analyze and comment on this notice.

Sincerely,

Defenders of Wildlife