

Webinar Series--Transitions  
ECS 3167  
Critical Writing / Critical Thinking

Sample Responses to Final Exercise

**Sample #1**

Sometimes FIFRA action might be unusually complex, *complicated* by factors such as the ecological variations in geographic areas or number of species affected by the action, because the effects of pesticides may differ over variations in the ecology of habitats (such as in clay versus sandy soils) and among categories of species as disparate as plants, birds, and fish. *Therefore*, the FIFRA special provision (§402.47) allows EPA to address the effects of the action through successive effects determinations, *thus* enabling separate handling of related groups or categories. Related groups or categories are used, *as required* by EPA regulation, *because* effects are expected to be similar in related species or habitats. *Another* FIFRA provision *also* requires that EPA consult with the Service. This regulatory provision is needed *because* some species and habitats that are Service trust resources may be affected by a pesticide that is being reviewed by EPA for approval, with Endangered and Threatened species being most vulnerable because of restricted population and ranges. Sometimes the Service may not have adequate information to make a determination of the affects of a pesticide on one or more species groups or categories. For some widely-used pesticides, delaying the initiation of consultation until adequate information is available for every species or habitat may result in denying some of the most vulnerable species the benefits of the section 7 consultation process for as much as several years and result in reductions in populations or reproductive success.

**Sample #2**

Sometimes FIFRA action might be unusually complex *because* factors such as the geographic area or number of species affected by the action might complicate it. *Due to these complications*, a special provision allows EPA to address the effects of the action through successive effects determinations, *which* address groups or categories of species or habitats as established by the EPA and *for which* EPA must confer with the Service. This provision is needed *because* some species and habitats may be affected by the pesticide. *In fact*, for some widely-used pesticides, delaying the initiation of consultation until adequate information is available for every species or habitat may result in denying some of the most vulnerable species the benefits of the section 7 consultation process for as much as several years.