

May 4, 2018

Administrator Scott Pruitt
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460
Attention: Docket ID No. EPA-HQ-OA-2018-0259

Re: *Request for 90-day comment period and public hearings for Proposed Rule on Strengthening Transparency in Regulatory Science*

Dear Administrator Pruitt:

The Northeast States for Coordinated Air Use Management (NESCAUM)¹ respectfully request an additional 60 days along with public hearings to comment on the US EPA proposed rule “Strengthening Transparency in Regulatory Science” (Docket ID No. EPA-HQ-OA-2018-0259). The April 30th Federal Register notice provides for only a 30-day comment period, which ends May 30, 2018 (83 Fed. Reg. 18768).

EPA’s proposal has far-reaching consequences on the future use of science by the Agency. For example, the proposed rule lacks specificity. If finalized as is, it could unnecessarily restrict the use of peer-reviewed scientific studies that would inform reviews of the National Ambient Air Quality Standards (NAAQS). This will impede setting NAAQS levels with an adequate margin of safety necessary for public health protection as required by the Clean Air Act.

In light of its vagueness, the proposal comment period of only 30 days is too short to give our states and the public a meaningful time window for consideration and comment, therefore we ask for an additional 60 days to provide a full 90-day comment period. In addition, we also request that EPA hold public hearings during the extended 90-day comment period. A 90-day comment period with public hearings provides our states and the public a more reasonable opportunity to comment in light of this proposal’s significant implications for public health and environmental protection.

Sincerely,



Paul J. Miller
Deputy Director and Chief Scientist

¹ NESCAUM is the association of state air agencies in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont.

cc: NESCAUM state directors
Bill Wehrum, Assistant Administrator EPA OAR
Tom Sinks, EPA Office of the Science Advisor
Dave Conroy, EPA R1
Richard Ruvo, EPA R2