

April 30, 2018

The Honorable E. Scott Pruitt
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Comment period extension request for proposed rulemaking– Strengthening
Transparency in Regulatory Science- Docket ID No. EPA-HQ-OA-2018-0259

Dear Administrator Pruitt:

The Union of Concerned Scientists, on behalf of more than 500,000 members and supporters across the country, respectfully requests that the Environmental Protection Agency (EPA) extend the comment period for the above-referenced proposed rule for a minimum of sixty (60) days beyond the currently scheduled public comment deadline. We also encourage you to schedule at least three public hearings in various locations across the country to encourage additional public input. The current timeframe and lack of opportunities for engagement are wholly inadequate and will not allow for thorough public input of this proposed rule and its impact on science-based health and environmental safeguards.

On April 30, 2018, EPA published notice in the Federal Register of a proposal to significantly change how science can be used in EPA regulatory decision-making. In its proposed rule, the agency solicits comments on a wide variety of complex scientific and technical issues that require careful and in-depth analysis by many public stakeholders. In addition, as EPA provided no analysis of the potential impacts of its proposal, the public will need to have additional time to consider what kinds of research could be excluded from the rulemaking process and what consequences this would have for public health and environmental protection.

Previous efforts to change the use of science in policymaking have allowed for significant public and scientific community input. For example, in 2006, when the Office of Management and Budget under President George W. Bush attempted to write guidance on risk assessment, they invited comment for six months and asked for review of the proposal by the National Academy of Sciences.¹

¹ <https://obamawhitehouse.archives.gov/sites/default/files/omb/assets/omb/pubpress/2006/2006-01.pdf>

Given the complexity of the proposed rule, which could have significant consequences for the ability of EPA to adequately protect the public from the impacts of air pollution, unsafe chemicals, and other public health and environmental hazards, we urge EPA to extend the comment period by a minimum of sixty (60) days.

Thank you for your consideration of this request. We would appreciate acknowledgement of this letter and look forward to your reply.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Rosenberg". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Andrew A. Rosenberg, Ph.D.
Director, Center for Science and Democracy
Union of Concerned Scientists