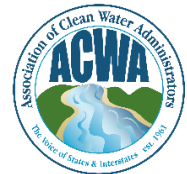




June 26, 2018



Administrator Scott Pruitt
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW Washington, DC 20460
Via regulations.gov: Docket ID No. EPA-HQ-OA-2018-0107



Re: Request for 120-day Comment period and Public Hearings on Proposed Rule on Increasing Consistency and Transparency in Considering Costs and Benefits in the Rulemaking Process

CC: Troy Lyons, Associate Administrator, Office of Congressional and Intergovernmental Affairs
David Ross, Associate Administrator, Office of Water
Bill Wehrum, Assistant Administrator, Office of Air and Radiation
Barry Breen, Acting Assistant Administrator, Office of Land and Emergency Management



Dear Administrator Pruitt:

On behalf of the undersigned associations representing state and local decision-makers, we respectfully request that EPA extend to 120 days the public comment period for the proposed rule, "Increasing Consistency and Transparency in Considering Costs and Benefits in the Rulemaking Process," (83 Fed Reg. 27524, June 13, 2018). We also request that EPA hold at least three public hearings to gather additional public input on the proposal.

The direction that EPA sets for itself on this matter would benefit from the perspectives of those charged with implementing the laws that would be affected. We share a vision of cooperative federalism in which federal, state and local governments interact cooperatively and collectively to solve common problems. For that partnership to be fairly engaged, sufficient time and resources must be available to give state and local agencies any possibility of playing an effective part. State and local authorities have primary responsibility for implementing many of the laws (including the Clean Air Act and Clean Water Act) that would be profoundly affected by this rule. Because this proposal could fundamentally alter EPA's basis for understanding the benefits and costs of proposals in policymaking, its implications for decision-making warrant careful study, the highest transparency in the development of a record on which to set our common direction, and broad public discussion.

Thirty days is insufficient for any agency to give the proposal the meaningful review and analysis it requires. We request that the public comment period should be extended by (at least) 90 days from the current date of July 13, 2018 to Thursday, October 11, 2018 to provide a full 120-day comment period. EPA's decision on this matter would also benefit from input gathered through at least three public hearings held in different geographic locations. A 120-day comment period with public hearings provides state and local leaders and experts a more reasonable opportunity to comment at the level of depth and experience that is consistent with cooperative federalism.



Thank you for considering this extension request. If you have further questions, please do not hesitate to contact Alan Roberson, (aroberson@asdwa.org, 703-812-9505) or any of the undersigned points of contact.

Sincerely,



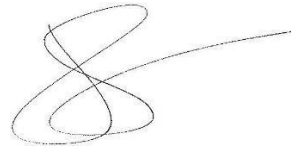
Alan Roberson Executive Director Association of State Drinking Water Administrators



Miles Keogh Executive Director National Association of Clean Air Agencies



Julia Anastasio Executive Director & General Counsel Association of Clean Water Administrators



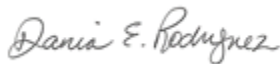
Jason E. Sloan Executive Director Association of Air Pollution Control Agencies



Sam Sankar Executive Director Environmental Council of the States



Greg White Executive Director National Association of Regulatory Utility Commissioners



Dania Rodriguez Executive Director Association of State and Territorial Solid Waste Management Officials



Scott Pattison CEO and Executive Director National Governors Association



Jeanne Christie Executive Director Association of State Wetland Managers