



March 27, 2020

The Honorable Andrew Wheeler,  
Administrator, U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Attention: Docket ID No. EPA-HQ-OA-2018-0259

Re: 60-day comment deadline extension request– Strengthening Transparency in Regulatory Science

Dear Administrator Wheeler:

The undersigned associations request a minimum 60-day extension of the deadline to comment on the Strengthening Transparency in Regulatory Science Supplemental Notice of Proposed Rulemaking (SNPR) that appeared in the Federal Register on March 18, 2020 with a comment deadline of April 17, 2020. The supplemental notice is a significant expansion and revision to the original notice of proposed rulemaking that requires careful analysis and review. As we find ourselves in a unique and troublesome situation, we strongly urge you to consider an extension, which will enable our members time to give this notice the time and attention it deserves.

As you are well aware, on March 13, 2020, President Donald Trump declared a National Emergency due to COVID-19. While our associations strongly support the use of the best science to inform policy, the COVID-19 National Emergency poses new and unforeseen challenges to our members. Given the critical importance of this regulatory action, we respectfully submit that a 60 day extension on the comment period is necessary so that state environmental programs can provide the agency with thoughtful and well reasoned comments on the proposal. This extension is essential to EPA's evaluation of state impacts, and will contribute to an enhanced and improved final notice.

This proposed rule has the potential to cause changes for many of the state environmental organizations and the science that informs their actions. Because of this, we also request that EPA hold a minimum of two public hearings to receive input from the public. Due to the current situation regarding COVID-19, we request that these hearings be made virtual or over the phone.

We look forward to the Agency's response to this request. Should you have questions regarding this request, please contact Julia Anastasio, ([janastasio@acwa-us.org](mailto:janastasio@acwa-us.org), 202-756-0600) or any of the signatories below. Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Julia Anastasio". The signature is written in a cursive style with a large, looping initial "J".

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

A handwritten signature in blue ink that reads "J. Alan Roberson". The signature is written in a cursive style with a large, looping initial "J".

Alan Roberson  
Executive Director  
ASDWA