

# NORTHWEST ENVIRONMENTAL ADVOCATES



May 2, 2018

Scott Pruitt, Administrator  
Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

*Submitted via Regulations.gov*

Re: **Extension Request for “Proposed Rulemaking– Strengthening Transparency in Regulatory Science,” 83 Fed. Reg. 18,768 (Apr. 30, 2018), Docket No. EPA-HQ-OA-2018-0259**

Dear Administrator Pruitt:

Northwest Environmental Advocates hereby requests that the Environmental Protection Agency (“EPA”) extend the comment period for the above-referenced proposed rule for at least 60 days beyond the currently-scheduled deadline for public comments, for a minimum period of 90 days. We also request that EPA schedule public hearings in regions across the country to allow for public input.

The 30-day comment period that EPA has established for this proposed rule is wholly inadequate, particularly for such a proposed wholesale change in the agency’s relationship to science. Thirty days is not sufficient time to assess the impact of this proposed rule on environmental regulation that is essential to protection of public health and the environment.

These draft regulations are proposed to apply to “dose response data and models underlying pivotal regulatory science that are used to justify significant regulatory decisions,” made by EPA. 83 Fed. Reg. 18,768, 18,733 (April 30, 2018). Our ability to comment meaningfully on the broad scope of this proposed rule, which affects the science that EPA relies upon for all of its significant decisions, will require extensive and careful analysis. Because EPA has provided no analysis of the potential impacts of its proposal, we and other members and representatives of the public will need to evaluate what kinds of scientific research EPA could exclude from future regulatory actions and what the effect of these exclusions would have for public health and environmental protection.

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Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Nina Bell". The signature is fluid and cursive, with a large initial "N" and a long, sweeping underline.

Nina Bell  
Executive Director