May 23, 2018

Tom Sinks
Office of the Science Advisor
U.S. Environmental Protection Agency
Mail Code 28221T
1200 Pennsylvania Avenue NW, Washington, DC 20460

Via regulations.gov: Docket ID No. EPA-HQ-OA-2018-0259

RE: Strengthening Transparency in Regulatory Science – Comment Deadline Extension Request

Dear. Mr. Sinks:

On behalf of the states, we write to request a 60-day extension to the comment period for the Strengthening Transparency in Regulatory Science Proposed Rule 83 FR 18768 (April 30, 2018).

The stated intent of the proposed rule is to strengthen regulatory transparency associated with the science the Environmental Protection Agency (EPA) uses for regulatory decision making and to ensure the data and models underlying rules are publicly available in a manner sufficient for independent validation and analysis.

Increased transparency is a worthy goal that can enhance agency deliberations and the regulatory process. More co-regulatory discussions regarding the intent, scope, and implementation processes associated with this rule will improve the quality of the comments the agency receives. Extending the comment period would allow those discussions to occur.

As our state associations and individual states prepare our comments, we require adequate time to thoughtfully evaluate the likely effect of the proposed rule and assess the scope, potential consequences of the rule, and the manner in which it may impact and/or alter state programs, decisions, and actions.

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 rule.

Thank you and 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, 202-756-0600) or any of the signatories below.

Sincerely,

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

Scott Pattison
CEO and Executive Director
National Governors Association

Alan Roberson
Executive Director
Association of State Drinking Water
Administrators

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

Jeanne Christie
Executive Director
Association of State Wetland Managers