

Alliance for the Great Lakes * Concerned Citizens of Cattaraugus County* Delta Institute *
Detroit Audubon * Dwight Dwight Lydell Chapter, Izaak Walton League of America *
Environment Michigan * Environmental Defenders of McHenry County * Environmental Law &
Policy Center * FLOW (For Love of Water) * Freshwater Future * Friends of the Chicago River
* Genesee Valley Audubon Society * Green-Rock Audubon * Headwaters Chapter Izaak Walton
League of America * Holy Spirit Missionary Sisters, USA-JPIC * Hoosier Environmental
Council * Illinois Council of Trout Unlimited * Illinois Environmental Council * Indiana
Wildlife Federation * Lake Erie Charter Boat Assn.* Lakeshore Natural Resource Partnership *
Luckey Farmers, Inc * Michigan Wildlife Conservancy * Midwest Environmental Advocates *
Milwaukee Riverkeeper * Milwaukee Water Commons * Ohio Conservation Federation *
Openlands * Red Bud Wine Co. * Religious Coalition for the Great Lakes * River Alliance of
Wisconsin * Save Lake Superior Association * Save Our Sky Blue Waters *
Save The Dunes * Schlitz Audubon Nature Center * Sierra Club * Society of Concerned
Scientists * The Student Conservation Association * The Watershed Center Grand Traverse Bay
Water You Fighting For? * Western Reserve Chapter, Izaak Walton League of America *
Wisconsin Metro Audubon Society

March 24, 2020

Submitted electronically to docket and osp_staff@epa.gov

Administrator Andrew Wheeler
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

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

**Re: Request for EPA to Withdraw the Proposal or in the Alternative an Extension of the
Comment Period and Appropriate Public Hearings for EPA's Strengthening
Transparency in Regulatory Science supplemental proposal published March 18, 2020**

Dear Administrator Wheeler,

The undersigned groups respectfully request that EPA recognize that the country is in a national emergency as it confronts the novel coronavirus (and the resulting disease COVID-19). EPA should withdraw the proposed Strengthening Transparency in Regulatory Science supplemental proposal (Docket ID No. EPA-HQ-OA-2018-0259). If it does not, it is important, necessary and appropriate to leave open the comment period for at least 60 days or at least 30 days beyond when the federal government lifts the national emergency concerning COVID-19. EPA must also hold appropriate public hearings.

The role of science and public health studies is of utmost importance to ensure that EPA protects public health and the environment through effective standards for clean air, clean water and across all EPA program areas. Providing only a curtailed 30-day comment period is untenable under any circumstances, and even more so as the public faces the enormous COVID-19 crisis. Executive Order 12866 suggests that a 60-day comment period is the minimum necessary to afford the public a meaningful opportunity to comment during normal times. This is especially true for a rule that would have significant impact on nearly every aspect of EPA's scientific and regulatory work.

Moreover, the supplemental proposal here is substantially different from the proposed rule announced on April 30, 2018.

In addition to an extended comment period, EPA must hold public hearings on the supplemental proposal. At this time, virtual hearings are appropriate. These virtual hearings should include both the option for video conferencing and call in. This technology is readily available to ensure the public has the same opportunity as in an in-person hearing to testify face-to-face with EPA's experts and "see" the other witnesses offering testimony. Even as we ask for virtual hearings for this proposal, however, virtual hearings are not a replacement for in-person hearings and should not become the norm for EPA rulemakings.

The Midwest, with its industrial and agricultural heritage, experiences the full range of environmental and public health challenges to air, land and water. The Midwest is home to the Great Lakes, an international treasure, with huge ecological, cultural, recreational and economic values. The Great Lakes comprise the largest freshwater ecosystem on Earth, containing 20% of the world's freshwater supply, and they provide drinking water to over 40 million people.

The public depends upon EPA to effectively implement foundational environmental laws including the Clean Air Act, Clean Water Act, Safe Drinking Water Act, Toxic Substances Control Act and other important laws enacted by Congress to protect public health and the environment. We strongly oppose EPA's proposal to pick and choose and otherwise constrain the science it will consider in developing a broad range of essential public health and environmental protection regulations.

To fulfill its statutory mandates and responsibility to protect public health and our environment, EPA should continue to rely upon the best available science. This Supplemental Proposal should be withdrawn. If EPA fails to withdraw the proposal, the 30-day public comment period is wholly inappropriate under any circumstances and more so in the present situation as every American is directly feeling the impacts of the COVID-19 public health crisis.

Sincerely

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