



25 March 2020

The Honorable Andrew Wheeler
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear Administrator Wheeler,

On behalf of the American Geophysical Union (AGU) and its community of more than 110,000 Earth and space scientists, I urge you to extend the public comment period for the supplemental notice of the proposed rule “Strengthening Transparency in Regulatory Science” a minimum of 30 days from when the current National Emergency regarding the COVID-19 crisis is lifted.

The supplemental notice makes significant changes to the original proposed rule text and would significantly alter how the EPA uses and views scientific research, not only in proposed regulations, but in any “influential scientific information” used by the agency. This represents a marked shift in agency best practices, and could have widespread, potentially negative, consequences for the public’s health and the environment. Thirty days is an inadequate amount of time for stakeholders such as AGU’s community of scientists to provide the kind of detailed responses EPA should consider to make the most informed decision about any final proposal. Instead, the comment period should be open for a period on par with that of other proposed rules with similar potential impacts on our communities. However, especially during this time when the nation, including many of its scientific, health, and research institutions which would be directly impacted by this rule are working around the clock to address the COVID-19 crisis, an extension should be granted. The first iteration of the rule drew nearly 600,000 comments over a roughly 90-day period. The same opportunity should be afforded to this supplemental so the scientific community and the public can properly weigh-in on such a far-reaching proposal when there is no longer a national emergency.

The agency would benefit from hearing from scientists. AGU are scientists from diverse and relevant disciplines who all have expertise in the scientific process, scientific publishing standards, and open data initiatives. Their insights should be represented and considered by the agency during the rule-making process. Extending the comment period will ensure that these experts, as well as other stakeholders, have adequate time to assess the proposed rule and provide crucial feedback.

AGU stand ready to work with you and the EPA to ensure that science can continue to appropriately inform the agency’s work to protect the health and well-being of communities across the nation.

Respectfully,

A handwritten signature in black ink that reads 'Lexi Shultz'.

Lexi Shultz
Vice President, Public Affairs
American Geophysical Union