



ADVANCING EARTH  
AND SPACE SCIENCE

30 April 2018

The Honorable Scott Pruitt  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460

Dear Administrator Pruitt –

On behalf of the American Geophysical Union (AGU) and its 60,000 members, I urge you to extend the public comment period for the proposed rule entitled “Strengthening Transparency in Regulatory Science” to at least 60 days from the date the rule was published in the Federal Register.

The proposed rule would significantly alter how the EPA uses and views scientific research, represents a marked shift in agency best practices, and could have widespread, potentially negative, consequences for the public’s health and the environment. It is not inappropriate then, for the agency to seek comment on such a lengthy list of issues in the proposed rule. However, thirty days is an entirely inadequate amount of time for stakeholders to provide the kind of detailed response necessary for EPA 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 – a minimum of 60 days.

The agency would benefit from hearing from as many stakeholders as possible, particularly scientists. AGU members are scientists from diverse 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 stands ready to work with you to ensure that science can continue to inform decision-making.

Respectfully,

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

Lexi Shultz  
Vice President, Public Affairs  
American Geophysical Union