



June 17, 2020

The Honorable Andrew Wheeler
 Administrator, U.S. Environmental Protection Agency
 1200 Pennsylvania Avenue, N.W. Washington, DC 20460

Re: Comment Period Extension for proposed rulemaking – Docket No. EPA-HQ-OA-2018-0107

Dear Administrator Wheeler:

On March 13, 2020, the President declared a national emergency in response to the COVID-19 pandemic. Many health professionals including nurses, physicians, researchers, and other public health professionals continue to be focused on response to the pandemic, as they should be. The undersigned health and medical organizations respectfully request that the U.S. Environmental Protection Agency (EPA) extend the comment deadline on the proposed rule “Increasing Consistency in Considering Benefits and Costs in the Clean Air Act Rulemaking Process” to at least 30 additional days after the end of the national emergency, or 30 additional days after the close of the currently scheduled comment period, whichever is later. We thank EPA for scheduling a public hearing and ask that additional days for testimony are provided.

EPA’s proposed rule could have profound implications for all future EPA rulemakings. Ending the established practice of including important secondary costs and benefits of proposed rules would diminish consideration of co-benefits in future cost-benefit analyses, essentially stacking the deck in favor of costs over health benefits of air pollution standards. Further, the proposal itself offers vague, unclear guidelines for eliminating the use of co-benefits. This lack of clarity places a significant burden on parties commenting to analyze for themselves the potential far-reaching impacts of EPA’s proposal. This burden justifies additional time to craft public comments in response.

In addition, a comment period for a rule such as this merits full public participation, especially from health and medical professionals who treat patients suffering from health issues related to air pollution or perform research on air pollution impacts. Since many health professionals are focused on the COVID-19 pandemic, more time is required to ensure they can engage.

We also request that EPA provide additional opportunities for public input, either virtually or, if it is safe to gather, in person. EPA's recent public hearings on its proposal to maintain the existing National Ambient Air Quality Standards for Particulate Matter garnered strong public interest, requiring EPA to add two additional hearing days to the schedule, even amid the pandemic. It is critical that members of the public from across the country have the opportunity to weigh in on this proposal.

An extension of this comment period of at least 30 additional days after the end of the national emergency, or 30 additional days after the close of the currently scheduled comment period, whichever is later and additional public hearings will provide us and other stakeholders, particularly those in the health and medical community, greater opportunity for full and meaningful public participation. Thank you for your consideration of this request.

Sincerely,

Allergy & Asthma Network
Alliance of Nurses for Healthy Environments
American Lung Association
American Public Health Association
Association of Schools & Programs of Public Health
Asthma and Allergy Foundation of America
Center for Climate Change and Health
Children's Environmental Health Network
Climate for Health
Health Care Without Harm
International Society for Environmental Epidemiology - North American Chapter
Medical Society Consortium on Climate Change and Health
Physicians for Social Responsibility