August 16, 2017

Andrew Wheeler
Acting Administrator
Environmental Protection Agency

Via electronic submission

Re: Comments on proposed rule: Strengthening Transparency in Regulatory Science (Docket ID No. EPA-HQ-OA-2018-0259)

Dear Mr. Wheeler:

The Big Cities Health Coalition is a forum for the leaders of America’s largest metropolitan health departments to jointly promote and protect the health and safety of the 55 million people (1 in 6 Americans) they serve. I submit the following comments on the Environmental Protection Agency’s (EPA) proposed rule “Strengthening Transparency in Regulatory Science” (Docket ID No. EPA-HQ-OA-2018-0259) on behalf of the Coalition.

The Coalition supports national, state, and local policies, regulations, programs, and research that will enhance the ability of local health departments to promote safe, healthy, productive, and sustainable environments in all communities. The Coalition opposes the proposed rule because it would limit the available science that can be used in regulatory decision making and could result in the repeal of important regulations that currently protect the public’s health.

Under the proposed rule, the available science and evidence that could be used to inform future regulations would be limited by the requirement to make all datasets publicly available, potentially severely limiting the science base for regulatory decision making because of privacy concerns. The requirement to make all datasets publicly available goes against best practice in the research field and is an unnecessary hurdle for science that would be used in regulatory decision making.

City and county health departments charged with protecting residents in their communities rely on regulatory frameworks established by the EPA as the basis for developing local guidelines and policy. In limiting the available science that could be used to inform regulatory decision making, the proposed rule would hamper local efforts. Further, the proposed rule would have a disproportionate impact on the most vulnerable, disadvantaged communities.

For these reasons, the Coalition urges the EPA to reconsider and withdraw the proposed rule. Thank you for your attention. Please do not hesitate to contact me (cjuliano@naccho.org or 202-783-3627) for additional information.

Chrissie Juliano
Director, Big Cities Health Coalition