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August 16, 2018

Andrew Wheeler
Acting Administrator
U.S. Environmental Protection Agency
USEPA Headquarters
William Jefferson Clinton Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: EPA's proposed rulemaking Strengthening Transparency in Regulatory Science (EPA-HQ-OA-2018-0259)

Dear Mr. Wheeler:

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the proposed rule, *Strengthening Transparency in Regulatory Science* (EPA-HQ-OA-2018-0259) published in the Federal Register on April 30, 2018. NACWA represents the interests of over 300 municipal clean water and stormwater utilities across the country, who every day provide an essential public service managing billions of gallons of wastewater and stormwater to ensure the protection of human health and the environment.

NACWA and its members have long advocated for objective, evidence-based science to serve as the foundation for any EPA action, including the many Clean Water Act regulations that guide the management of wastewater in the United States. We have also stressed the need for increased transparency during the regulatory process wherever possible. The April 30 proposed rule appears to seek additional transparency in select aspects of EPA's rulemaking process, but the rule lacks clarity and it is difficult to ascertain what it seeks to achieve, whether EPA is interested in greater transparency across all of its programs and activities, and what the long-term implications could be of any changes made.

NACWA welcomes additional dialogue with the Agency on what this rule aims to achieve, but even with an extended comment period, the proposed rule is too ambiguous for the Association to provide detailed comments.

NACWA looks forward to engaging the Agency in the future on meaningful efforts to increase the transparency in EPA's decision-making throughout its clean water-related programs. Please do not hesitate to contact me at eremmel@nacwa.org, with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Emily Rimmel". The signature is fluid and cursive, with a large initial "E" and a long, sweeping tail.

Emily Rimmel
Director of Regulatory Affairs