

August 16, 2018

Andrew Wheeler  
Acting Administrator  
Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, DC 20460

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

Dear Mr. Wheeler:

On behalf of nearly 3,000 city and county health departments responsible for safeguarding the health of millions of Americans, the National Association of County and City Health Officials (NACCHO) provides 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).

NACCHO 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. NACCHO 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 the residents of their communities rely on the regulatory framework established by the EPA as the basis for developing local guidelines and policy. By 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, where people already face unfair disadvantages which would be compounded by the changes proposed in this rule. Therefore, NACCHO and local health departments urge the EPA to reconsider and withdraw the proposed rule.

Thank you for your attention to these comments. Please contact Eli Briggs, NACCHO Senior Government Affairs Director at [ebiggs@naccho.org](mailto:ebiggs@naccho.org) or 202-507-4194 with any questions.

Sincerely,



Lori Tremmel Freeman, MBA  
Chief Executive Officer

