



June 19, 2018

The Honorable Scott Pruitt Administrator U.S. Environmental Protection Agency USEPA Headquarters William Jefferson Clinton Building 1200 Pennsylvania Avenue, N.W. Washington, DC 20460

Re: Request for Comment Extension on EPA's Advanced Notice of Proposed Rulemaking (ANPRM) Increasing Consistency and Transparency in Considering Costs and Benefits in the Rulemaking Process (EPA-HQ-OA-2018-0107)

**Dear Administrator Pruitt:** 

On behalf of the organizations below, we appreciate the opportunity to comment on the Advanced Notice of Proposed Rulemaking (ANPRM): *Increasing Consistency and Transparency in Considering Costs and Benefits in the Rulemaking Process* (EPA-HQ-OA-2018-0107) published in the *Federal Register* on Wednesday, June 13, 2018. Due to the short turnaround of thirty (30) days for public comment and the detailed nature of the expert input requested by EPA, the organizations herein would greatly appreciate an extension of ninety (90) days from to June 13, 2018 to September 11, 2018 to fully review the request.

The 90-day extended comment period would allow the undersigned organizations the opportunity for meaningful engagement with their members and the ability to fully understand the ANPRM and provide a thorough and useful response. Therefore, the Association of Metropolitan Water Agencies, the American Water Works Association, the National Association of Water Companies, and the National Association of Clean Water Agencies request an extension in the comment period for an additional 90 days.

Thank you for consideration of our request.

Sincerely,

Adam Krantz Chief Executive Officer

National Association of Clean Water Agencies

Diane VanDe Hei Chief Executive Officer

Association of Metropolitan Water Agencies

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Eileen J. O'Neill, Ph.D. **Executive Director** 

Water Environment Federation