



ASSOCIATION OF  
METROPOLITAN  
WATER AGENCIES



American  
Water Works  
Association

Water Environment  
Federation®  
the water quality people®

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,

A handwritten signature in black ink that reads "Adam Krantz". The signature is fluid and cursive, with a prominent flourish at the end.

Adam Krantz  
Chief Executive Officer  
National Association of Clean Water Agencies

A handwritten signature in black ink that reads "Diane VanDe Hei". The signature is cursive and somewhat stylized, with a clear "D" at the beginning.

Diane VanDe Hei  
Chief Executive Officer  
Association of Metropolitan Water Agencies

Handwritten signature of G. Tracy Mehan, III in black ink.

G. Tracy Mehan, III  
Executive Director of Government Affairs  
American Water Works Association

Handwritten signature of Eileen J. O'Neill, Ph.D. in black ink.

Eileen J. O'Neill, Ph.D.  
Executive Director  
Water Environment Federation