AMERICAN METEOROLOGICAL SOCIETY
45 BEACON STREET, BOSTON, MA 02108-3693 U.S.A.
TEL: 617-227-2425
FAX: 617-742-8718
E-MAIL: amsinfo@ametsoc.org
WEB: www.ametsoc.org
KEITH L. SEITTER, EXECUTIVE DIRECTOR
E-MAIL: kseitter@ametsoc.org

14 May 2018

Scott Pruitt, Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator Pruitt,

On behalf of the American Meteorological Society (AMS), I urge you to reconsider your proposal to limit use of scientific evidence in rulemakings [Strengthening Transparency in Regulatory Science (April 30, 2018) – Docket ID No. EPA-HQ-OA-2018-0259].

Rulemaking must strive to include all of the best available information to the maximum extent possible; scientific evidence is a critical component of this information. We recognize the great effort and careful judgment needed as the agency works to ensure fair and responsive rulemaking. Subject matter specialists in the sciences are actively willing to participate in developing EPA assessments, as the agency carefully and comprehensively examines the available evidence, weighing that evidence based on merit.

AMS is on record supporting full and open access to data,[1] but recognizes that this is a complex issue. In the specific case of EPA rulemaking, the complexity often arises in the need for human subject data to be treated as confidential information. The proposed rule does not sufficiently account for these complexities and could compromise rulemaking by disallowing useful scientific insights that are critical to the comprehensive assessment of environmental issues.

It would be most appropriate to withdraw this proposal and initiate an independent examination of this issue. One option for doing so would be to work with the National Academies of Sciences, Engineering, and Medicine and request a study on the topic. Ultimately, however, no change in the rulemaking process should occur without careful analysis that ensures the best available knowledge and understanding is being applied for the protection of the public.

Sincerely,

Keith L. Seitter
Executive Director

[1] AMS Statement on Full and Open Data: https://www.ametsoc.org/index.cfm/ams/about-ams/ams-statements/statements-of-the-ams-in-force/full-and-open-access-to-data/