

The Honorable David Bernhardt
Secretary
U.S. Department of the Interior
1849 C St. NW Washington, DC 20240

The Honorable David S. Ferriero
Chief Administrator
The National Archives and Records Administration
8601 Adelphi Road
College Park, MD 20740-6001

The Honorable Andrew Wheeler
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, NW
Washington, D.C. 20460

March 19, 2020

Dear Secretary Bernhardt, Archivist Ferriero and Administrator Wheeler:

Due to the emerging health crisis in the United States and beyond, and the recent executive order declaring a state of national emergency on March 13, 2020, we request a formal pause on all open public comment periods¹ on active rulemakings and non-rulemaking notices from the Department of Interior (DOI) and Environmental Protection Agency (EPA), primarily managed by the Federal Register and Regulations.gov, as well as the ePlanning and Planning, Environment & Public Comment (PEPC) sites for the Bureau of Land Management and National Park Service, respectively.

As the leaders of our nation's largest environmental and advocacy organizations, we write on behalf of our millions of members and supporters nationwide to recognize the significant impact of COVID-19 on normal working and living conditions. These new circumstances are impairing the ability of the general public, issue experts and others to conduct their daily routine, regular business, and/or weigh in on federal government actions that affect them. As a result, there will be significant impacts to so many of our typical democratic processes, not the least of which is the [vision of the eRulemaking Program](#) "to enable the public ease of access to participate in a high quality, efficient and open rulemaking process," that governs our rulemaking procedures. Inevitably, the ease of access and the efficiency of the program will be affected by the current health crisis and disruption to public services, disabling responses to various comment periods and notices published on regulations.gov and in the Federal Register from DOI, EPA, NOAA and other agencies.

At present regulations.gov acknowledges [90 open comment periods on rulemakings](#) and [over 70 open comment periods on non-rulemaking](#) notices (e.g. pesticide registrations and product reviews, water quality certifications, etc.) at DOI and EPA. While the federal government should

¹ With the exception of those comment periods subject to a court-ordered deadline.

consider pausing all open comment periods across every federal department or agency, our organizations share a specific and significant interest in issues under the jurisdiction of DOI and EPA. As agencies tasked with protecting our nation's public health, environment, wildlife, natural and cultural resources, and more, we request your understanding at this time and willingness to pause agency rulemakings and other issues requiring public comment periods. The impacts of the COVID-19 pandemic are extensive, and with so many contributing to the response, upending their lives, ill or caring for the ill, and unable to comment on federal actions or work normally, there is no way to ensure adequate public engagement in federal agency actions.

Thank you for your consideration. Please contact Ani Kame'enui at the National Parks Conservation Association (akame'enui@npca.org) with any information, questions or concerns.

Sincerely,

Theresa Pierno, President & CEO
National Parks Conservation Association

Robert Wendelgass, President
Clean Water Action

Jamie Rappaport Clark, President & CEO
Defenders of Wildlife

Adam Kolton, Executive Director
Alaska Wilderness League

Annie Leonard, Executive Director
Greenpeace USA

Wm. Robert Irvin, President and CEO
American Rivers

Collin O'Mara, President & CEO
National Wildlife Federation

Wendy Wendlandt, Acting President
Environment America

Jamie Williams, President
The Wilderness Society

Michael Brune, Executive Director
Sierra Club

Abigail Dillen, President
Earthjustice

Erich Pica, President
Friends of the Earth

Gene Karpinski, President
League of Conservation Voters

Sally Jewell, Interim CEO
The Nature Conservancy

Janis Searles Jones, Chief Executive Officer
Ocean Conservancy