



THE UNITED STATES  
CONFERENCE OF MAYORS



March 20, 2020

President Donald J. Trump  
The White House  
1600 Pennsylvania Avenue, N.W.  
Washington, D.C. 20500

Dear Mr. President:

On behalf of the nation’s states, cities, and counties, we write to request a formal pause, beginning on March 11, for all open public comment periods concerning both active rulemakings and non-rulemaking notices across every federal department or agency. State and local government policymakers’ thoughtful input into proposed federal agency actions is a vital component of our democratic system and provides federal agencies with much-needed perspectives and potential impacts of federal actions.

We recognize that our members are facing massive challenges in responding to, and as a result of, this global pandemic. At present, regulations.gov acknowledges nearly 700 open comment periods that will close in the next 30 days and more than 1000 over the next 90 days. Regulations.gov stated vision of its eRulemaking Program is “to enable the public ease of access to participate in a high quality, efficient, and open rulemaking process.” The extreme impact on normal working and living conditions will impair the ability of not only state and local officials, but also the general public, issue experts and others to provide thoughtful and meaningful participation and involvement in potential federal government actions that directly affect millions of people.

Consistent and meaningful engagement and consultation between intergovernmental partners is vital in the development and implementation of effective policies, programs and regulations. Therefore, state and local governments urge you to extend agency comment periods for a reasonable period of time, which will allow our state and local policymakers to focus on addressing the nation’s immediate pandemic response needs and ensure their ability to devote proper consideration of agency regulations. Thank you for your consideration.

Most respectfully,

National Governors Association  
National Conference of State Legislatures  
The Council of State Governments  
National Association of Counties  
National League of Cities

The United States Conference of Mayors  
Government Finance Officers Association  
International City/County Management Association  
National Association of State Auditors, Comptrollers  
and Treasurers