



February 19, 2026

U.S. Environmental Protection Agency
EPA Docket Center
1200 Pennsylvania Ave., NW
Washington, DC 20460
Attn: Docket ID No. EPA-HQ-OAR-2025-0192

*RE: Interstate Transport Plan Review for the 2015 Ozone NAAQS Comment
Deadline Extension Request*

Dear Administrator Zeldin:

The Ozone Transport Commission (OTC) is requesting a comment deadline extension for the U.S. Environmental Protection Agency's (EPA's) proposed *Interstate Transport Plan Review for the 2015 Ozone NAAQS* [91 Fed. Reg. 4026-4045 (January 30, 2026)] (hereinafter referred to as the "proposed rule"). The important policy changes proposed, which entail complex technical analyses across multiple jurisdictions, require more than the 30-day public comment period currently planned. The OTC respectfully requests that the EPA extend the comment deadline to at least April 1, 2026.

The OTC and its members have profound and specific interests in the EPA's proposed rule. Congress created the OTC under the Clean Air Act (CAA) as a non-partisan multi-state organization to advise the EPA on addressing regional ground-level ozone problems.¹ Ozone pollution affects the health of more than 66 million people in the Ozone Transport Region (OTR), particularly the young, elderly, and other vulnerable populations. Protecting public health and the environment from the harms of ozone pollution is at the core of the OTC's work.

The EPA's proposed rule includes highly technical considerations and proposed changes to national policy for attributing upwind states' "significant contributions" to downwind states' ozone problems. Anything less than 60 days for public comment will not allow the OTC and other stakeholders time to meaningfully analyze and react in writing to the EPA's 13 proposed actions for 10 separate states packaged into a single notice. We also note that a comment period of at least 60 days would be closer in line with the prior EPA "Good Neighbor" SIP proposals.

¹ The 1990 Clean Air Act Amendments created the OTC under sec. 184 "Control of Interstate Ozone Air Pollution." The OTC members are Connecticut, Delaware, District of Columbia, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont, and Virginia.

Connecticut
Delaware
District of Columbia
Maine
Maryland
Massachusetts
New Hampshire
New Jersey
New York
Pennsylvania
Rhode Island
Vermont
Virginia

Paul J. Miller
Executive Director

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Thank you for your close consideration of our request for additional time and please extend the comment period to at least April 1, 2026.

Sincerely,

A handwritten signature in cursive script that reads "Emma Cimino".

Emma Cimino
Chair, Ozone Transport Commission, and
Deputy Commissioner, Connecticut Department of Energy and Environmental Protection

cc: OTC Air Pollution Control Officials