

August 3, 2020

Docket ID EPA-HQ-OAR-2020-0044

RE: Comments in Support of the Proposed Rulemaking by the EPA: "Increasing Consistency and Transparency in Considering Benefits and Costs in the Clean Air Act Rulemaking Process"

Dear Administrator Wheeler:

I would like to voice my support for the proposed rulemaking published the U.S. Environmental Protection Agency (EPA) with regard to increasing consistency and transparency when considering benefits and costs of regulations under Clean Air Act.

As Chairman of York County Council in South Carolina, our mission is to help facilitate the economic development of our county by recruiting high quality companies and well-paying jobs. We also recognize the importance of upholding environmental protections that will keep our communities safe and safeguard public health. It is a delicate balance that can be easily thrown off by regulations not borne from informed decision-making.

That is why I support the EPA's proposal to bring new standards and clarity to an important tool in that regulatory decision-making: cost-benefit analysis. Americans deserve a regulatory system that will fairly and transparently evaluate the impacts of agency regulations on our communities and businesses. Global companies and manufacturers will have the confidence to invest and expand job opportunities in York County when they have regulatory certainty and transparency. York County has a diverse business community including manufacturers, construction companies, automotive businesses, and electric utilities among others; all of these businesses would benefit by greater transparency and regulatory certainty provided by the EPA's new rule.

Despite bipartisan support across presidential administrations for making the consideration of costs and benefits a straightforward process, the EPA has inconsistently applied this important analysis when evaluating major rules. This has led to results where the real benefits and costs can be either over-estimated or under-estimated, causing confusion amongst businesses and the public, and lead to a loss of neutrality for a supposedly objective analysis.

On top of that, information presented by the agency on the scope of the analysis and specifics on conclusions derived from the cost-benefit analysis have been limited. Transparency regarding any hidden costs is an essential component to a well-functioning government and growing economy.

Administrator Wheeler
August 3, 2020
Page Two

Additionally, full transparency when it comes to the impacts of these regulations will improve long-term financial planning for both households and companies alike.

This is a good proposal that will fix these discrepancies by providing transparency in the weight assigned to factors used in the analysis, increasing consistency in the interpretation of terminology used, and promoting adherence to best practices in conducting the technical analysis and presenting it to the American people.

The proposal will provide clarity to all sectors that the EPA has jurisdiction over, including healthcare, agriculture, and transportation, and create a more reliable regulatory framework for businesses and policymakers across the country.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. Michael Johnson, Jr.", written in a cursive style.

R. Michael Johnson, Jr.
Chairman, York County Council