

Aug 3, 2020

Andrew Wheeler, Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20004

Re: Docket ID Number: EPA-HQ-OAR-2020-00044

Dear Mr. Wheeler,

It is my sincere hope that the Environmental Protection Agency (EPA) will fully adopt the above-referenced rule to require transparency and consistency in the completion of cost-benefit analyses on any future rule promulgated under the auspices of the Clean Air Act.

The purpose of the cost-benefit analyses, which is ostensibly required in the course of the evaluation of a proposed rule, is to do just what the name implies – determine the likely and potential economic harms that the new regulation would impose, weighed against the benefit to society. Too often in the past, and especially during the previous administration, these evaluations have been suborned by purely political considerations; i.e. the benefits of a proposed agency action have been exaggerated, while the costs have been downplayed, minimized, or outright dismissed. This rule would rectify that by providing clear guidance as to what factors ought to be considered, and making those determining factors clear as well to the public.

A proper, objective accounting of the cost of regulation is essential to the pursuit of good government. Indeed, leaders of both parties have indicated publicly their desire for such an accounting to occur. It is arguably even more important now, as the nation looks to recover economically from the ravages of the COVID-19 pandemic and the societal shutdown resulting from it, for the true costs of government action to be accurately determined and plain for all to see. Some regulation, of course, is necessary for the protection of our natural heritage, but it must be done in a manner that is not economically debilitating. This proposed rule is a valuable tool for the agency to use in determining which rules ought to be implemented, and those which ought to be rethought.

Regulatory costs are excessive in this country, as several studies have shown. This proposed rule will help illuminate those costs, and identify where government is doing more harm than good. As such it is a valuable public policy, and I encourage the EPA to adopt it in due course.

Cordially,

Kelly Sloan
Denver, CO