



July 15, 2020

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

RE: Comments on Docket ID Number: EPA-HQ-OAR-2020-00044 - "Increasing Consistency and Transparency in Considering Benefits and Costs in the Clean Air Act Rulemaking Process"

As the president and CEO of the Forestry Association of South Carolina, I would like to voice my support for the Environmental Protection Agency's (EPA) proposal to increase consistency in considering of benefits and costs in future rulemakings under the Clean Air Act. It is paramount that federal regulatory review be conducted in an objective, dispassionate manner to determine whether they are likely to produce more good than harm. This proposal will promote accountability among regulators and enforce transparency on any new regulations that might impact the cost of doing business for our members.

The Forestry Association of South Carolina <https://www.scforestry.org/about-sc-forestry-association.htm> supports the landowners, professionals, and companies that make up South Carolina's \$21 billion forest industry by promoting sustainable forest development, use of wood products, and working forests. Since our industry relies on the health of this state's natural resources, we understand and respect the need for regulations that protect them.

But this proposal is about smart regulations.

As advocates for a business friendly climate for our landowners and forest industry, it is important that our members understand the full costs and benefits of federal regulations, which according to the U.S. Chamber of Commerce cost the American economy as much as \$1.9 trillion a year: [https://www.uschamberfoundation.org/smallbizregs/?sm au =iVV2rSPqJs4WfR4401TfKK3Qv3fc4](https://www.uschamberfoundation.org/smallbizregs/?sm%20au=iVV2rSPqJs4WfR4401TfKK3Qv3fc4)

In an industry with a complex supply chain that includes tree farmers, loggers, manufacturers, foresters, and small businesses, an increase in the cost of doing business from EPA regulations: www.epa.gov/regulatory-information-sector/forestry-and-logging-sector-naics-113 for our members gets passed along to local consumers and countless other sectors that we do business with.

The proposed rulemaking will clarify a process routinely utilized by this powerful agency, that is frankly not easily understood by the business community and general public as to its rationale and factors considered. By imposing codified best practice guidelines to the cost-benefit analysis of future

rulemaking, businesses, consumers, and regular citizens can better hold regulators accountable with understanding what drives costly policies. In the forest industry, our companies' bottom line is constantly affected by the maze of regulatory red tape they have to navigate. With this new rule, they will be able to develop long-term economic strategies knowing the regulatory framework that they are dealing with.

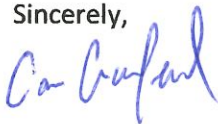
Arguments that these welcomed efforts by the EPA to standardize the approach to cost benefit analysis is a rollback of environmental protections is a baseless claim. The agency simply seeks to improve the process and hopefully produce more effective and efficient rules in the future. In fact, former Obama White House official Cass Sunstein wrote in an editorial:

<https://www.bloomberg.com/opinion/articles/2019-05-28/epa-s-wheeler-on-costs-of-clean-air-regulation> commenting that in principle, the move by the EPA should improve the agency's performance and that "careful attention to costs and benefits can help spur, and often has spurred, aggressive environmental regulation, not least in the domain of air pollution and climate change."

Shoring up the practice of sound cost-benefit analysis is a win for our environment and economy. It is vital that the EPA continues on its path to develop a systematic, agency-wide approach for analyzing the benefits and costs of regulations in order to drive sound, objective decision making that is in the best interests of both the environment and the affected businesses. As advocates of conservation and sustainable forestry, environmental protection is important to the forest industry.

Thank you again for allowing me the opportunity to voice my support for this proposal on behalf of our organization and its members.

Sincerely,



Cam Crawford

President and CEO, Forestry Association of South Carolina