

SENATOR PAUL G. CAMPBELL, JR.  
SENATORIAL DISTRICT 44  
BERKELEY COUNTY

COMMITTEES:  
AGRICULTURE & NATURAL RESOURCES, CHAIRMAN  
ETHICS  
FINANCE  
MEDICAL AFFAIRS  
TRANSPORTATION  
BANKING & INSURANCE



COLUMBIA OFFICE:  
POST OFFICE BOX 142  
COLUMBIA, SOUTH CAROLINA 29202  
PHONE: (803) 212-6230  
FAX: (803) 212-6299  
EMAIL: PAULCAMPBELL@SCSENATE.GOV

DISTRICT OFFICE:  
150 LOGANBERRY CIRCLE  
GOOSE CREEK, SOUTH CAROLINA 29445  
PHONE: (843) 296-1001

June 9, 2020

The Honorable Andrew Wheeler, Administrator

U.S. Environmental Protection Agency

1200 Pennsylvania Avenue NW

Washington, DC 20004

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

In the South Carolina Senate, where I serve, we formulate better policy when all stakeholders provide valuable input and work toward a common goal. As a business leader, I value regulatory certainty and transparency. Both of these roles give me an appreciation for smart and accountable government - and that is why I support the Environmental Protection Agency's (EPA) important efforts to include a cost-benefit analysis in proposed and final regulations under the Clean Air Act. (CAA).

While I appreciate the importance of EPA's vital mission to protect our environment, I also have seen first-hand the consequences of uninformed, over-regulation. Regulations out of the EPA account for nearly 70 percent of the costs of all significant federal regulations, with the CAA being easily the largest part of the agency's oversight authority. By one estimate, from the U.S. Chamber of Commerce, federal regulations cost the U.S. economy nearly \$2 trillion a year in direct costs, lost productivity and higher prices.

I brought this awareness of the trade-offs - the costs and the benefits, one might say - of regulatory oversight to my business career leading a major manufacturing firm in South Carolina. During policy discussions, I often reminded colleagues that the costs that accompany environmental regulations must be weighed against the benefits - now more than ever. Our South Carolina companies must compete globally to succeed and grow, and that often means beating competitors in countries such as China, which may have few if any regulations at all.

When government does need to get involved, regulations that are transparent and provide a clear benefit to our environment when weighed against the cost will find support from business leaders and policymakers alike. The EPA's proposed Clean Air Act rule is just such a measure. It will provide for a more complete and accurate accounting of costs and benefits, and a greater acknowledgment of the key uncertainties in these calculations

that are often hidden from view. It will enhance public accountability and engagement - always a good thing - and require EPA to conduct a much-needed more systematic review of all available evidence.

Perhaps best of all, I am encouraged to see that this rule will require the EPA to adopt best practices in how it assesses costs and benefits. This is a principal that industry and manufacturing apply every day. It should also apply to regulations.

I commend the EPA for working to improve the regulatory process in a way that will allow all stakeholders to better understand the science, the costs and the benefits behind any new regulations. My hope is that this process will bring together a broad coalition of stakeholders who share a common goal: more effective regulations based on objective science.

Thank you for the opportunity to provide these comments. I hope EPA moves ahead on this vitally important proposal.

Sincerely,

A handwritten signature in cursive script that reads "Paul Campbell". The signature is written in dark ink and is positioned to the right of the word "Sincerely,".

Senator Paul Campbell

Chairman of the South Carolina Senate Agriculture & Natural Resources Committee