



July 22, 2020

As the Town Manager for Rangely, Colorado, I respectfully submit the following comments in response to the notice of proposed rulemaking published by the U.S. Environmental Protection Agency (EPA) [docket no. EPA-HQ-OAR-2020-0044-0001] titled, "Increasing Consistency and Transparency in Considering Costs and Benefits in the Rulemaking Process."

The EPA's significant regulatory power under the federal Clean Air Act is an important tool. It ensures that the development and natural resource extraction which propels our economy forward is done in a manner that upholds environmental standards which help make this region special. That is why I am supportive of efforts to create a more straightforward and unambiguous approach when it comes to accounting for the cost and benefits of these regulations.

Here in Rangely, the oil and gas sector provides about 70% of our community's budget. Whenever businesses within this industry and its robust supply chain are hamstrung by needless regulations, projects and operations critical to our economic survival become delayed or even canceled, and our town and the people who call it home suffer as a result. It is difficult for us to accurately predict our annual budget as we never know when our businesses are going to face new additional costs due to a new regulation promulgated by the EPA. Furthermore, whenever the town does consider new construction or potential development, we must undergo the arduous gymnastics of factoring in the costs of EPA compliance.

Often when we are confronted with a new EPA regulation, it is not clear how, or even if, considerations were made of their impact on businesses and the economies of our local communities. A clear, straight-forward cost-benefit analysis that the public could understand would help us better determine and prepare for these impacts. Increased transparency would greatly help towns like ours that are dependent on heavily regulated industries such as the oil and gas sector. When local companies in our area can operate with greater certainty regarding the costs they may face going forward they will be better able to what they do best – provide local jobs, produce value, generate revenue, and operate with more consistency. In addition, local governments in towns like Rangely that are dependent upon natural resources for revenue would benefit from their municipal budgets being more predictable and stable as long term projects could be undertaken with fewer costly delays.

As the EPA goes about properly conducting a true cost-benefit analysis, it should utilize all available resources in order to understand the true impact a regulation may have. Considering that the EPA currently accounts for [70% of all regulations](#), there is no reason that they shouldn't



be utilizing a set of pre-determined best practices to examine all regulations, including those enacted in the past, to ensure that these rules are not doing more harm than good. Also, considering the potential economic impact that the EPA's regulations have, it is important that cost-benefit analysis are objective and less prone to political considerations, and legal battles that can go on for years.

The EPA itself would also benefit from increased credibility and respect due to this greater transparency. The public should have access to the data the government utilizes to make these crucial decisions so that they can have a greater understanding of how these rules and regulations may impact their livelihoods. In return, the public would be more likely to support the EPA's mission, a factor that encourages compliance by businesses. Cost-benefit analysis is nothing new, and it is time for the EPA to establish a better way of going about it.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lisa Piering", is written over a faint, light blue circular stamp or watermark.

Lisa Piering, Town Manager