

July 29, 2020

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

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

Dear Mr. Wheeler,

On behalf of the Colorado Alliance of Mineral and Royalty Owners (CAMRO), I would like to express my strong support for your agency's proposed rule "Increasing Consistency and Transparency in Considering Benefits and Costs in the Clean Air Act Rulemaking Process".

Too often in the past, the EPA has been less than transparent when it comes to how it conducts cost-benefit analysis of proposed rules and regulations, including what inputs, assumptions, and datasets are used. As royalty owners who are often directly, or indirectly, impacted by EPA decisions, we believe that the public has a right to know to what extent cost/benefit estimates are uncertain, and what information was included or omitted. Further, we believe that the agency should require cost-benefit analysis be implemented throughout the agency in a uniform, consistent manner, and be applied to all significant new and proposed rules and regulations. This new rule provides for these things.

Improving the cost-benefit analysis in rulemaking will benefit not only our members, but a wide cross-section of the economy, including, but not limited to, agriculture, energy, transportation, manufacturing, and water conservation.

To be clear, this rule will not in any way impede the EPA in carrying out its duty to properly regulate industry for the protection of our shared environment but will improve the process by making it more transparent and effective.

Thank you for this opportunity to comment on this matter on behalf of CAMRO and Colorado mineral owners, and I urge your agency to adopt this rule.

Sincerely,

Neil Ray

President

Colorado Alliance of Mineral and Royalty Owners