



July 22, 2020

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

RE: Comments on Docket ID Number: EPA-HQ-OAR-2020-0044-0001 "Increasing Consistency and Transparency in Considering Benefits and Costs in the Clean Air Act Rulemaking Process"

OFFICERS

Cam Crawford
Chairman
Randy Brown
Past Chairman
Harry Ott
Vice Chairman
Sarah Windham
Secretary/Treasurer

EXECUTIVE COMMITTEE

Travis Avant
Chalmers Carr
Baynard Connelly
Scott Phillips
Bryant Sansbury
Jane Sosebee
Fred West
Edgar Woods

BOARD MEMBERS

Tim Amerson
Todd Berrian
Pat Calhoun
Clay Chappell
Kathy Coleman
Jason Dandridge
Robert Etheridge
John Gill
David Gossett
Charleston Laffin
Jody Martin
David Mears
Geoff Penland
Al Phillips
Belma Porobic
Jim Roquemore
Eric Smith
Henry Swink
Wayne Vermullen
Jason Walther
Hugh Weathers
Dr. Louis Whitesides

STAFF

Ronald L. Summers
CEO
Sandy Boozer
Executive Assistant

1901 Main St.
Suite 1225
Columbia, SC 29201
(803) 256-9099
(803) 926-3463 Fax
www.scagribusiness.org

I am writing on behalf of the Palmetto AgriBusiness Council (PABC) in support of 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 essential that federal regulatory review be made in an objective manner to determine whether regulations are likely to produce a benefit rather 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 those engaged in agriculture, members of the forestry community and other associated agribusiness operations.

PABC's mission is to sustain the economic viability of South Carolina's largest industry- agribusiness, which contributes \$42 billion to the state's economy and provides over 200,000 jobs. Our members recognize the importance of being environmentally responsible and respect the need for regulations to protect our natural resources. But we need to ensure that the regulation process is conducted to produce sound, objective decisions that are in the best interest of both the environment and the affected businesses. Sound cost-benefit analysis would help improve the rulemaking process and produce more effective and efficient regulations in the future. For the agribusiness industry, our economic well-being is affected by over burdensome regulations that threaten to negatively impact the cost of doing business. With this new rule, agribusiness owners will be able to develop long-term economic strategies with the knowledge of what regulatory framework is in place.

In this challenging economic environment, we must not diminish the ability for our agribusiness operations and associates to remain in business with over regulation and increased costs. The EPA proposal to standardize the approach to cost- benefit analysis in rulemaking is a step in the right direction.

Thank you for your consideration.

Sincerely,

Ronald L. Summers
CEO
Palmetto AgriBusiness Council