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BURDENSOME REGULATIONS: EXAMINING THE IMPACT OF EPA REGULATIONS ON MAIN STREET

HEARING

BEFORE THE

COMMITTEE ON SMALL BUSINESS
UNITED STATES
HOUSE OF REPRESENTATIVES

ONE HUNDRED EIGHTEENTH CONGRESS

SECOND SESSION

HEARING HELD
FEBRUARY 14, 2024

Small Business Committee Document Number 118–040
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BURDENSOME REGULATIONS: EXAMINING THE IMPACT OF EPA REGULATIONS ON MAIN STREET

WEDNESDAY, FEBRUARY 14, 2024

HOUSE OF REPRESENTATIVES,
COMMITTEE ON SMALL BUSINESS,
Washington, DC.

The Committee met, pursuant to call, at 10:00 a.m., in Room 2360, Rayburn House Office Building, Hon. Roger Williams [chairman of the Committee] presiding.

Present: Representatives Williams, Luetkemeyer, Stauber, Meuser, Van Duyne, Salazar, Mann, Ellzey, Molinaro, Alford, Crane, Bean, Hunt, LaLota, Maloy, Velázquez, Golden, McGarvey, Gluesenkamp Perez, Scholten, Thanedar, and Davids.

Chairman WILLIAMS. The Committee will come to order. Without objection, the Chair is authorized to declare a recess of the Committee at any time.

I now recognize myself for my opening statement.

Welcome to today's hearing, which will focus on examining the impact of burdensome EPA regulations on main street. I would like to start off by thanking our witnesses for joining us today. You all have traveled a long way to be with us this morning, and we appreciate your attendance and appreciate your input.

When I travel around and speak to small businesses, I hear all the time how the cost of everything is so high. From the price of utilities to their labor costs, businesses feel like they are struggling to get ahead. Unfortunately, there is another new aspect that has made their operations even more challenging over the last 3 years, and that is the increased cost of complying with regulations.

Most small businesses do not have a team of lawyers or a compliance department to look through all the new mandates coming out of Washington, D.C. Figuring out what needs to be done in order to comply takes time away from the employees or owner that could be better spent looking for growth opportunities or doing other revenue-generating activities.

Now, while there are laws on the books that are supposed to protect small businesses from the worst of these regulations, they seem to be failing. Since President Biden was sworn into office, his administration has issued 766 final rules costing over $450 billion to Main Street America. This type of overregulation has real world consequences on American small businesses.

Of all the agencies creating the increased burden on Main Street America, it is the EPA and has been one of the worst offenders.

This agency has taken a radical approach of environmental extremism over practical policies to promote the environment. Some of the EPA's rules, which we will examine in more detail today, would have drastic impacts in a variety of different industries throughout our country. In some of the most extreme examples, entire industries would be regulated out of existence. This Agency takes a heavy-handed government approach to force change, rather than letting free markets and businesses make their own decisions.

And additional unintended consequence of these overbearing EPA regulations is that not only do they harm America's businesses, but they also put us at a competitive disadvantage with our adversaries, like China. For example, the EPA is determined to force a transition to clean alternatives by regulating coal, oil, and gas companies into oblivion, thus making their product more expensive and less competitive in the market. Meanwhile, China's focused on building whatever types of power plants are needed to satisfy their demand.

And outside of being the voice for main street and Congress, this Committee's top priority is to hold agencies accountable for impacts of rules and regulations on Main Street America. We have sent five oversight letters to the EPA sounding the alarm on the negative impacts of their rules. And unfortunately, many of their responses are untimely and all of them are lacking in sufficient detail.

So, to ensure main street can thrive, our agencies need to listen to small businesses during the rulemaking process. After all, the government should be in the business of working for the people, not against the people. And entrepreneurs have all endured significant challenges over the past few years, and I hope this hearing spotlights where the EPA has gone wrong and more importantly, what can we do to fix it?

So lastly, I ask unanimous consent to submit documents for the record for the American Chemistry Council and the National Sandstone and Gravel Association. Without objection, so ordered.

So thank you again for all of the witnesses being here today. I am very much looking forward to our conversation.

And with that, I yield to our distinguished Ranking Member, Ms. Velázquez, from the great State of New York.

Ms. VELÁZQUEZ. Thank you, Mr. Chairman, and thank you to all the witnesses for being here today.

The hearing we are holding today will focus on the impact of EPA's rules on small businesses. It is the third hearing in a series on regulation. While we have heard that complying with federal, state, and local rules can be onerous for small business owners, we also heard that smart, well-crafted regulations can level the playing field and help small businesses compete against larger corporations.

Most importantly, small businesses want their voices to be heard during the rulemaking process, and they need compliance assistance. That is why Congress enacted the Regulatory Flexibility Act and established the Office of Advocacy and the National Ombudsman. The role of advocacy is to monitor the rule-writing process and ensure agencies listens to the concerns of small businesses. The role of the National Ombudsman is to assist with excessive regulatory issues.

They also make sure that agencies offer small businesses timely compliance assistance materials. It is important to note that both of these offices gave the Environmental Protection Agency an A for their compliance with the Regulatory Flexibility Act.

We can all agree that regulations are vital to Americans and small businesses. EPA's rules safeguard our nation's air, lands, and waters, and they yield more benefits for Americans than any other agency. In fact, the benefits outweighed the cost by a ratio of 13-to-1.

However, we may hear claims today that EPA is running amok and the regulations stifle the growth of small businesses. I disagree.

First and foremost, the agency is carrying out our laws, the laws that Congress passed. The EPA has to operate within the statutory guidelines, involve public participation, respond to comments, ensure the benefits, justify the costs, and follow the procedural requirements of the Administrative Procedures Act and RFA. Put simply, there is no overreach. The EPA is doing what Congress asked them to do.

Secondly, between the passage of the Clean Air Act and 2022, air pollution dropped by 78 percent and the economy grew. Smart, well-crafted regulation can spur innovation and the development of new clean technologies.

New opportunities abound for entrepreneurs to produce materials in cleaner ways. We cannot get stuck on the message that regulations hinder the growth of small businesses. We must look to the future and understand that regulations can drive innovation and grow the economy and protect public health and our environment at the same time.

I would like to enter into the record testimony from Dr. Lemir Teron. Dr. Teron aptly points out the consequences of environmental pollution and their contribution to a long history of environmental racism and inequality. Research has shown that large polluting facilities expose frontline communities made up of African American and other socially and economically disadvantaged groups to their dangerous levels of pollution. This aspect cannot be overlooked in our discussion today, particularly for small businesses in this community.

With that, I look forward to hearing from the witnesses today about EPA's rule and hearing more about their experiences with the agency, the Office of Advocacy, and the National Ombudsman Office. It is important to know what we can do better to help you succeed.

Thank you, Mr. Chairman. I yield back.

Chairman WILLIAMS. The Ranking Member yields back. I now will introduce our witnesses.

Our first witness here with us today is Mr. Brandon Farris. Mr. Farris is the vice president of domestic economic policy for the National Association of Manufacturers, also known as NAM, located here in Washington D.C. Prior to joining NAM, Mr. Farris was the head of federal government regulations for The Chemours Company, where he played an integral role in the passage of the AIM Act.

After serving in the Marine Corps Reserves, thank you for that, he began his career in Washington as Bryce Harlow Foundation Fellow at the George Washington University School of Law, while working on the U.S. House Agricultural Committee.

Mr. Farris attended the Virginia Military Institute where he earned his bachelor of arts in history and philosophy before attending the Johns Hopkins University where he received his master of arts in government. He also holds a JD from the George Washington University Law School.

I want to thank you for joining us today and look forward to conversing.

Our next witness here with us today is Ms. Cye Cooper Wagner. Ms. Wagner is the vice president of exploration, Cooper Oil and Gas, located in the great city of Fort Worth, Texas. And Ms. Wagner has been with the Cooper Oil and Gas since 2009, where she serves in an executive management role over exploration regulatory departments, among others.

She has over 10 years of regulatory management working with the Texas Railroad Commission, Environmental Protection Agency, and the Texas Commission on Environmental Quality. Ms. Wagner recently completed a 2-year term as Chairman of the Board of Directors for the Texas Alliance of Energy Producers, becoming the first female and youngest serving Chairman of the Board in his 92-year history.

Ms. Wagner attended Texas A&M University, where she earned her bachelor of science in petroleum engineering.

It is great to have you in Washington, and thank you and we look forward to our hearing together.

Our next witness here with us today is Dr. Lashan Aklog. Dr. Aklog is the Chairman and CEO of PAVmed Inc., located in New York City. PAVmed Inc. is a commercial stage medical technology company cofounded by Dr. Aklog. He previously co founded a medtech holding company, which founded four medical device companies and led one of its portfolio companies, which commercialized one of his lifesaving inventions.

Prior to entering the life sciences industry as an entrepreneur and executive, Dr. Aklog had a career in cardiac surgery, serving on the faculty of academic medical centers, including Harvard Medical School. He was recognized as America's top doctor for over a decade. So it is really good to have you here today. All right.

So Dr. Aklog received his undergraduate degree in physics from Harvard University and his M.D. from Harvard Medical School.

Thank you for joining us today, Doctor. We look forward to the conversation that we have ahead of us.

And I now recognize the Ranking Member from New York, Ms. Velázquez, to briefly introduce our last witness appearing before us today.

Ms. VELÁZQUEZ. Thank you. It is my pleasure to introduce Mr. Michael Green, who leads American Sustainable Business Network Climate and Energy Working Group. Mike is passionate about environmental change and new innovative opportunities for small businesses. His passion shines through his work. President Obama recognized this commitment and presented Mike with the Champion of Change Award for his contribution to climate change.

Welcome. I look forward to your testimony.

Chairman WILLIAMS. Thank you. And again, thanks for all of you being here today. We appreciate it.

Now, before I recognize the witnesses, I want to remind them that their oral testimony is restricted to 5 minutes in length. That is a big deal here, 5 minutes. Okay? And if you see the light turn red in front of you, it means that your 5 minutes has concluded and you should wrap up your testimony.

Now, if you hear this, you are going over and you need to stop and listen to the gavel. Okay? The gavel is important.

I now recognize Mr. Farris for your 5-minute opening remarks.

STATEMENTS OF MR. BRANDON FARRIS, VICE PRESIDENT, DOMESTIC ECONOMIC POLICY, NATIONAL ASSOCIATION OF MANUFACTURERS; MS. CYE COOPER WAGNER, EXECUTIVE VICE PRESIDENT, EXPLORATION, COOPER OIL AND GAS; DR. LISHAN AKLOG, MD, CHAIRMAN & CHIEF EXECUTIVE OFFICER, PAVMED, INC.; AND MR. MICHAEL GREEN, DIRECTOR OF CLIMATE AND ENERGY POLICY, AMERICAN SUSTAINABLE BUSINESS NETWORK

STATEMENT OF BRANDON FARRIS, VICE PRESIDENT, DOMESTIC ECONOMIC POLICY, NATIONAL ASSOCIATION OF MANUFACTURERS

Mr. FARRIS. Good morning. Chairman Williams, Ranking Member Velázquez, Members of the Committee, thank you for the chance to speak with you on behalf of the 13 million people who make things in America to convey the urgency of halting the regulatory onslaught.

Small businesses are essential for our economy. They account for 44 percent of U.S. economic activity. In the manufacturing sector, the majority of firms are small and function as the backbone of the manufacturing supply chain. Yet manufacturing is facing significant headwinds in the form of the cost, complexity, and uncertainty associated with a new wave of overreaching and burdensome federal regulations.

The NAM commissioned a study which found that the total cost of federal regulations is over $3 trillion, an amount equal to 12 percent of our GDP. The average U.S. company pays approximately $13,000 per employee per year to comply with federal regulations, yet the burden is substantially higher for manufacturers, especially small ones. U.S. manufacturers with fewer than 50 employees incur regulatory compliance costs of an estimated $50,000 per employee per year. This is more than three times the cost borne by the average U.S. company, money that would be much better spent investing in new machinery, hiring more workers, or developing new and innovative products.

The NAM analysis only reflects regulations in place as of 2022, but new proposed regulations have been especially disruptive and will further chill manufacturing growth. For example, the EPA recently finalized an early reconsideration of the particulate matter air quality standards. These revised standards will create permitting gridlock throughout the country as permit applicants will have to model the new standard within 60 days. It leaves little room for

industrial activity, as EPA itself concedes that as much as 70 percent of particulate matter comes from non manufacturing sources.

Ultimately, states are going to have to ration which new investments should be allowed to break ground to avoid falling into nonattainment. Needless to say, this regulation will cut manufacturing investment directly and potentially drive cutting-edge factories to other nations with less onerous standards.

This is just one example of an Agency action that will have far reaching effects across the manufacturing economy. Many other proposals are moving forward towards finalization.

The EPA has just proposed a burdensome reporting requirements and actions that will restrict or create de facto bans on PFAS production or use. The issue is that for many of the current uses, semiconductors, EV batteries, medical devices, items for national defense, there are no existing replacements for PFAS. These proposed restrictions would force manufacturers to abandon domestic production of critical items and instead rely on foreign production.

Another proposed EPA regulation would impose new requirements on natural gas and coal power plants, which account for more than 60 percent of our total power generation. Noncompliant facilities will be shut down.

In another instance, the EPA has proposed regulations at levels so low it would create a de facto ban on the production and use of ethylene oxide, which is used to sterilize medical devices, including PPE used by doctors and hospitals.

The EPA has also proposed additional barriers to its review under the TSCA program, which is critical to innovation. Under TSCA, the EPA is mandated to review new chemical applications within 90 days. However, the vast majority of these take much longer, and the new requirements may further extend that approval period, delaying deployment of new, efficient products.

Small businesses are vital to our economy and our lives. If we fail to reduce the regulatory burden on them, the U.S. is at risk of threatening the spirit that has allowed small businesses to thrive. On the other hand, if we reduce their burdens and their cost, there is no limit to what small businesses can accomplish.

Thank you.

Chairman WILLIAMS. I recognize Ms. Wagner for her 5-minute opening remarks.

STATEMENT OF CYE COOPER WAGNER, VICE PRESIDENT, EXPLORATION, COOPER OIL AND GAS

Ms. WAGNER. Thank you, Mr. Chairman, Ranking Member, esteemed Members of the Committee. It is an honor to be able to speak with you today.

Thank you, Mr. Chairman, for the introduction. And that is quite enough about me. Let's talk about my small business.

I am a second generation E&P operator. We are based in Fort Worth, Texas, and the majority of our production is in north central Texas, in rural areas where I grew up. I graduated from a high school class of about 30 kids and went off down to Texas A&M and got an engineering degree. And after working for some great esteemed, large independent companies and even a super major during college, I landed back in Fort Worth with a small independent,

and then came knocking on my dad's door for a job and I enjoy being the second generation running that company, which I do now with my husband and my brother. So, a true family business.

We employ 11 people full-time. We have about 20 contractors that we hire on a month-to-month basis. And in addition, we, in 2023, sent 1099s to around 200 other contractors that the majority of their payroll, you know, is Joe Smith, LLC. It is just Joe. He just comes and does all of the roustabout work or another type of repair work. His wife is a nurse in the local hospital. She comes in and does the books at night.

We are the lifeblood of the small rural communities where I was born and raised. We have a significant community impact as a company. Not only do the taxes from our wells, the ad valorem taxes, the property taxes, go straight to the rural hospitals, the school district, and the local communities. But we are very active members in the lifeblood that keeps these rural areas thriving.

We sponsor the county stock shows, the Little League teams, the volunteer fire departments, because there is no full-time staffed fire department in these rural areas. The towns are a size of 200 to a couple thousand people. We are one of the largest employer in almost a four-county area to offer 401(k), health insurance, paid leave. Our company is a vital piece of the micro economy of these rural areas.

And while I am pleased to be here today to share what is probably a unique perspective, because not only am I a second generation E&P mom-and-pop oil and gas operator, I am a fifth generation farmer and rancher. So stewardship of natural resources is in my veins. It runs through my blood.

I am a staunch supporter of clean air, clean water, and caring for the lands on which we provide these natural resources to America. It is a message that I tell my kids daily. My two young children are frequently riding around with my husband and I in rural areas and on our ranch. And I say, this is how we farm this wheat crop responsibly. This is how we raise these thousands of cattle, all natural, with no steroids or antibiotics, and care for the water they drink, the air that they breathe, and the land that they graze. This is how we hunt, fish, and manage the game responsibly on this property, and do so, so that we can continue to do that for generations to come. And these are the oil and gas wells that mommy and daddy drilled right here in the middle of it where your great grandparents still live.

And I am not alone. While that may sound like a unique perspective from the oil and gas industry, I am just a small representation of a very large swath of small to midsized operators, not only in Texas, but when I was Chairman of the Board of the Texas Alliance of Energy Producers, a 3,000 strong member organization in Texas, I was able to meet folks from all over the country, from Kansas, Illinois, New Mexico, Oklahoma, Louisiana, and learn they share the same small business ethos and regulatory environments that I have in Texas.

In that regulatory environment, I am mandated right now on basically three levels of regulation. We have state-mandated regulation, federally delegated regulation to the state of Texas, and also American Petroleum Institute standards for my equipment for safe-

ty and emissions. In 2023, in oil and gas friendly Texas, in 365 days in a calendar year, I was inspected 297 times. I passed all of those inspections, some with reinspections. And that is up in average from 215 inspections on average per year from August 1 of 2015.

I am a proud member of a highly regulated industry. And within those existing rules, the state of Texas has done great things. The oil and gas industry has done great things. We have sextupled production, meaning a sixfold increase of production, with the same or lower greenhouse gas emissions than we have had since 2010.

We are stewards, not wasters. The wells I operate are very marginal. They make an equivalent of five barrels of oil a day. I do not have room to waste in my business. I have to monitor every single product that I produce because it is vital to be able to give the good jobs and support the communities of which I live in.

The regulations on small business like mine provide certainty for me, my employees, and the communities we support. I urge this Committee to please know that if you do not allow my company to continue to produce these viable in-demand products in the cleanest and best ways that we do in the world, you will push these jobs and this environment overseas where they don't do it cleaner because they don't have an EPA, an API, or a Texas Railroad Commission.

Thank you so much.

Chairman WILLIAMS. The lady yields back. And I now recognize Dr. Aklog for his 5-minute opening remarks.

STATEMENT OF DR. LISHAN AKLOG, MD, CHAIRMAN & CEO, PAVMED, INC.

Dr. AKLOG. Good morning, Chairman Williams, Ranking Member Velázquez, and Members of the Committee. Thank you for inviting me to testify today.

My name is Dr. Leshan Aklog. I am a heart surgeon, medical technology innovator, and small company chief executive. Last summer, I was honored to testify before the Subcommittee on Health on Medicare Coverage of Innovative Medical Devices. My testimony today focuses on upcoming EPA regulations on ethylene oxide, which is used to sterilize billions of medical devices a year.

Although there is broad industry support for updated regulations, EPA's proposals are projected to greatly reduce sterilization capacity and patient access to critical medical devices. I am here to provide my perspective as a surgeon and small company chief executive. I am not an expert on environmental science, toxicology, sterilization technology, or even the deeper policy dimensions.

Most lifesaving medical innovation happens at small companies such as mine. Government can have a significant positive impact on patient access to our innovations. For example, SBIR and STTR funding are a lifeline to early stage companies, and I commend the House for reauthorizing these programs and for including innovation, fostering R&D expensing provisions in the recent tax bill.

I was also pleased that H.R. 1691, the innovation-focused subject of my testimony last summer made it out of Committee.

Today, however, we address a proposed government action with a large potential negative impact, exposing millions of patients to

the risk of delayed care and even death. And I assure you that is not hyperbole.

Sterilization lies at the heart of medical device manufacturing. One of the most time-consuming and costly steps of the FDA clearance process is sterilization validation. We must prove that the device possesses zero infectious risk to the patient and that sterilization does not damage or impair its function. This is more difficult than it sounds. Sterilization using heat or radiation can damage intricate components and can't penetrate the inner parts of a complex assembly. Ethylene oxide gas, however, can sterilize every inner surface of a device without damaging its structure or function. It is the only available technique to sterilize the majority of medical devices.

Let me offer an example from my own experience as a heart surgeon. Nearly a million patients per year receive lifesaving artificial heart valves. They are marvels of modern medical technology. Perfect sterilization is critical since artificial heart valve infection is catastrophic and sometimes fatal. Ethylene oxide is the only available technique to sterilize an artificial heart valve.

A large percentage of heart valves are sterilized at a single U.S. facility. The sudden closure of this facility, even temporarily, would be devastating and many patients would die.

I also have experience with ethylene oxide sterilization as an entrepreneur and chief executive.

Our experience commercializing our EsoCheck device illustrates the unique challenges small, innovative companies face with sterilization. EsoCheck is a deceptively simple tool which allows precise, targeted collection of lower esophageal cells for precancer testing. It is performed in a doctor's office in less than 2 minutes without anesthesia or sedation. A small balloon attached to a thin catheter gently swabs cells from the target area, and a capsule protects the sample as the catheter is withdrawn. EsoCheck's gentle approach to noninvasive cell collection is a dramatic and elegant improvement over cruder, decades-old technology, which involves dragging a Brillo pad-like sponge on a string indiscriminately scraping cells from the stomach, esophagus, and mouth. It is a big advancement.

EsoCheck's initial FDA clearance required ethylene oxide sterilization. Unlike large companies who can bring sterilization in house, we are dependent on a small number of third party sterilization companies with limited capacity. We are the lowest priority customers and as a result, experience serious supply challenges as EsoCheck demand grew.

To mitigate supply chain risk from proposed EPA regulations, we decided to deploy precious resources and successfully resubmitted EsoCheck for FDA clearance as a nonsterile device.

The other products in our pipeline, however, must be delivered and remain at severe risk if EPA regulations move forward as proposed. Although, as I noted, I am not an ethylene oxide sterilization expert, I am a mainstream small company executive who is deeply concerned that pending EPA regulations, if implemented as proposed, will have a devastating effect on patient care.

I am also first and foremost a physician and recently lost a family member to cancer. No one in this room is more committed than I am to preventing cancer. Cancer prevention is the sole mission

of Lucid Diagnostics, which occupies the majority of my professional time.

As a first-generation American who fled political violence in Ethiopia, I have faith that this great country, which has given me boundless opportunities, can apply technology and commonsense solutions to address its challenges.

Let me be blunt, as surgeons are prone to be, updated EPA regulations require the surgical precision of a scalpel. We can keep communities safe without compromising patient access to critical devices. I implore this Committee in Congress to urgently work with the EPA, FDA, and the medical technology industry to get the updated ethylene oxide regulations right. Patient access to critical and lifesaving technologies depend on it. Thank you very much.

Chairman WILLIAMS. Thank you very much, Doctor.

And I now recognize Mr. Green for his 5-minute opening remarks.

STATEMENT OF MICHAEL GREEN, DIRECTOR, CLIMATE AND ENERGY POLICY, AMERICAN SUSTAINABLE BUSINESS NETWORK

Mr. GREEN. Let me start by just saying happy Valentine's Day. Hopefully, you guys have a second to reach out to somebody that you love or think about them.

Chairman Williams, Ranking Member Velázquez, and fellow Members, I welcome the opportunity to engage with your Committee to discuss the nature of regulatory policies coming from the EPA and their impact on main street businesses. I have the opportunity today to represent the American Sustainable Business Network and our hundred of membered businesses, chambers of commerce, and affiliated groups spread across the country.

I also have the opportunity to speak to you from a unique perspective of owning a small business that is on my community's main street in Woodstock, Vermont. I would like to start with sharing the experience of our community this past summer when a series of irregular weather caused our second 100-year flooding event in the last 15 years. Between July 10 and 11, we had nine inches of rainfall on the green mountain spine. The waters rushed down in inundated towns across our state, causing widespread damage to businesses, farms and homes. My family was fortunate to be spared from the devastation experienced by my neighbor right next door and many of the businesses in our community.

On the morning of the 11th, people woke up across the state to complete destruction as several communities were completely cut off from rescue services with roads sucked into the raging rapids. In Woodstock this storm not only flooded our businesses, but it also wiped out our town's public water and drinking supply in what should have been our busiest summer peak season.

This experience is not unique to Vermont. This is the same story of small businesses across the country as we learn to adapt to climate change. We know that small businesses are disproportionately impacted by the threats of climate change due to their limited resources to absorb financial shocks from such catastrophic events. A study by FEMA highlighted that 40 percent of the small businesses never reopen following such a disaster. This is caused by a

lack of ability to relocate our brick-and-mortar businesses, being locked into less diversified supply chains, and an inability to compete with large corporations in the global marketplace.

Businesses are not only feeling the impact of the climate crisis through major flooding events, as many businesses are also forced to shutter their doors because of extreme heat and poor air quality over this past summer. The impacts of unchecked localized air pollutants have an impact on our workforce as they exasperate these issues and our customers and communities as a whole, as they are either stuck inside at best or struggling to breathe from asthma and acute pulmonary impacts of air pollution at worst. Strong EPA regulations, such as the recent final rule on soot, play a critical role in safeguarding public health and reducing pollution related illnesses, lowering our health care costs for our small business community.

The EPA can also support main street businesses when they are left powerless, facing the challenges outside their control. The Good Neighbor plan is a great example of this, as a policy protects companies from the pollution from faraway facilities that don't mitigate their downstream effects. It would be almost impossible for a main street business to create these sort of protections in their own state, let alone to do this in a neighboring state.

These are the threats that we should be focused on today, and we should be discussing. For far too long, we have been fed by a false narrative that environmental and public health regulation hamper our economic growth. Experience shows the exact opposite is true. EPA regulation and technical assistance grants open the door for innovation and investment into otherwise antiquated, polluting industry. This innovation creates jobs, aligns the marketplace with a healthier environment, and the opportunity for growth.

EPA regulations have often been a catalyst for innovation, driving both large and small businesses to develop, adopt, and market environmental-friendly technologies and practices. This has created a wave across the country of clean technology, and it makes it one of the fastest growing sectors in many of the states that have given it the opportunity.

I would like to end my testimony today by challenging the premise offered for our conversation. Main street businesses are often the backbone of their local economy, especially in small towns like mine. At the end of the day, we have to look at our neighbors face to face. Main street business owners are often compelled to pursue decisions based on what is right for their community as they understand the delicate role for public health and environment play in their strong community fabric.

Plain and simple, we will choose stronger controls over putting the local environment and public health at risk 10 out of 10 times and side with the health and safety of future generations. This is a different motive than the out of state, shareholder-controlled polluting industries that are driven by no other motive than profit.

Time in today's conversation would be best spent focusing on the resources needed to align with large point source pollution emitters, which I have never seen on a community's main street in the first place, with what is best for our public health and our envi-

ronment. I will continue to work with this Committee, as well as with the EPA to ensure that small businesses are provided a seat at the table and push for the strongest protections possible for our environment, public health.

I welcome any questions. Thank you.

Chairman WILLIAMS. Great job. And before we get started, I want to just say you will see Members moving in and out, coming, and eventually everybody will have worked their way through here. But don't take it personal, okay? We have got a lot of Committees going on today, so that is important to know that.

I now recognize myself for 5 minutes.

In some cases, the EPA is so aggressive that they look to regulate entire industries and rules out of existence. My family has been in the automobile business for almost 89 years. I have been in it 50 years. And we have never seen such an aggressive push to regulate tailpipe emissions and force the transition to electric vehicles.

The problem with this is in Texas, there is no market, I repeat no market, for electric vehicles. People are looking for a car or truck that can pull a horse trailer or a boat hundreds of miles and not have to be worried about finding a charging station and waiting a long time for electric vehicles to get charged back up. And the EPA doesn't understand this. They just don't. And they are trying to force this transition on the market when the people simply should decide they want it or not want it and let the product sell on its own.

So the oil and gas industry is currently seeing similar hostilities, I believe, from this agency. So, Ms. Wagner, can you elaborate on the way the EPA treats the oil and gas industry compared to renewable energy companies? And what do you think the long-term impacts of this forced transition will be?

Ms. WAGNER. Thank you, Mr. Chairman. The difference between a lot of what you see in the green industry and the renewable industry, to which I am very familiar with, on one of our farms and ranches, we have wind turbines on a ranch of ours that is in my family land. So I have seen what happens when the big renewables come to the small towns and what they do and a big push from the EPA and a lot of people that support more regulation is that the jobs that will go away in my industry, because of this duplicitous regulation that is coming.

Like I mentioned in my testimony, I am highly regulated already. I am a marginal well producer. I know what resources are coming out at the wellhead and what I am selling. And if there is a loss anywhere between those two points, I am looking at it before any regulator because I cannot afford to have a leak, a spill, or anything else. So these proposed regulations are onerous and would cost the jobs in the community and the lifeblood in those small towns.

And when the big green companies come in, it is a temporary job. A lot of people, you hear the rhetoric that there are green jobs out there for everyone that leaves the oil and gas industry because fossil fuels are bad and they are all going away. Well, we need fossil fuels. We need them for the medical products that the good doctor has talked about here.

And those jobs did not come to our small town and stay. They were temporary guys that came in. And the green companies that come in have wonderful subsidies and grants and things that the federal government has done for them that do not get reinvested into Main Street USA. Very different than the oil and gas economy.

So while they are getting helped, we are getting hindered.

Chairman WILLIAMS. Thank you for that testimony.

Mr. Farris, it is estimated that U.S. small businesses spend over $60 billion per year on electricity. As electricity rates increase for consumers across the U.S., we must prioritize the importance of affordable and reliable electricity access for small businesses.

So my question to you is, can you please speak to the cumulative impact of EPA's regulations targeting the energy sector on the electric bills of small businesses?

Mr. FARRIS. Thank you, Mr. Chairman, and absolutely. With the EPA's new power plants proposal, they are targeting 60-plus percent of our power generation, and that is natural gas and that is coal. And they have to, within 10 years, have widespread deployment of carbon capture and hydrogen. Both of those are wonderful technologies, but they are not available at the scale needed for this. And what will happen in those 10 years is that 60 percent of our power generation will shut down. And so bills will go up trying to meet these, but also we will have widespread power outages in the U.S. because of that power generation shutting down. So it can have a catastrophic effect on small businesses, Mr. Chairman.

Chairman WILLIAMS. Thank you. Dr. Aklog, I got about a minute left to go here and I want to talk about ethylene. Is that how you say it? Say it again. Ethylene oxide, right? Explain to the Committee what banning the use of ethylene oxide would mean for human health.

Dr. AKLOG. Well, it starts from the fact that there are 20 billion medical devices sterilized by it with ethylene oxide in this country a year, and that represents about one in two medical devices. Ethylene oxide sterilized devices are everywhere in healthcare. You step into a hospital, every corner has IV, syringes, you know, very simple technologies, as well as the most complex technologies, such as the heart valve that I described.

So a decline, a meaningful decline in capacity for sterilization with ethylene oxide will lead to supply chain issues and patient access to lifesaving medical technologies. And in some cases, where they are urgent, where these procedures are urgent, it could lead to severe patient suffering and death.

Chairman WILLIAMS. Okay, thank you. My time is up.

I now recognize the Ranking Member for 5 minutes of questions.

Ms. VELAZQUEZ. Thank you, Mr. Chairman.

Mr. Green, Americans want a livable planet, but some in Congress believe there is a trade-off, either the environment or the economy. Is this true?

Mr. GREEN. This shouldn't be true, but that is their sense.

Ms. VELAZQUEZ. How are new, innovative technologies emerging from environmental regulations leading to new business starts?

Mr. GREEN. Yeah. So I have had the opportunity to spend some time at an innovation space called Greentown Labs, which they have an operation in Houston as well as an operation in Boston,

Massachusetts. They are growing, incubating, and supporting small businesses that are revolutionizing clean technology. And guess who is one of the largest supporters in embracing of these new technologies, is the oil and gas industry. They look at this as an opportunity to change their business models and start to innovate and clean up in ways that are being less maybe facing the regulation and more towards the opportunity of growth and looking forward to a new American economy.

Ms. VELÁZQUEZ. Mr. Green, the regulations written by the EPA clean our nation's air, land, and waters. In your testimony, you mentioned that they can also level the playing field for small businesses. Can you please expound on this aspect of your testimony?

Mr. GREEN. Small businesses and main street businesses that we work with don't have the opportunity to use our air and water as a dumping ground. And they often are at the feeling the impacts of such decisions that are made by large corporations. So when leveling the playing ground, all it is doing is it is holding the corporations to the same thing that a small business would probably decide in the first place of supporting public health in their local environment.

Ms. VELÁZQUEZ. Thank you. Dr. Aklog, the proposed rule doesn't ban EO, does it?

Dr. AKLOG. I don't believe so. But as I mentioned, I am——

Ms. VELÁZQUEZ. Correct. I support strong rules to protect public health. I understand your concerns with the proposed rule, and I really appreciate your testimony here today. I would like to know, has the EPA worked with federal agencies and the private sector to hear your concerns?

Dr. AKLOG. Yes. So, I serve on the board of AdvaMed. I am the incoming Chair of the Excel division, which focuses on small companies. And I have been invited to participate in discussions with the EPA, with the administrator, with the deputy administrator, mostly for my perspective, not on the policy side, but on the healthcare side. And so those conversations have occurred. I know FDA has weighed in. I believe the SBA has also weighed in. So those conversations are happening.

And I think the important point is that industry supports updated regulations. It is just the specific aspects of these rules are not surgical. They have the potential to have an impact. And I believe there are sensible modifications that can achieve those goals without having that adverse patient impact.

Ms. VELÁZQUEZ. Thank you. Mr. Farris, you cite a 2023 Crane & Crane report. I haven't read the report, but I do know that in 2010, a study that was produced by Crane & Crane was criticized by CRS and the Government Accountability Office, two independent offices that work with Congress, as well as the Economic Policy Institute for using unreliable methodology and flood data. Were you aware of that?

Mr. FARRIS. We are aware that anytime there is an academic study, there will be questions about the validity of the data. We stand behind the Crane study and believe that is a valid snapshot of the cost of regulation.

Ms. VELÁZQUEZ. So do you believe that the Congressional Research Office and the Government Accountability Office were wrong in their assessment of the Crane & Crane report?

Mr. FARRIS. Yes, ma'am. We stand behind the Crane data.

Ms. VELÁZQUEZ. Okay. Well, I questioned the data based on the study and the opinion issued by our government agencies.

Mr. Green, Democrats delivered on two new laws: the Bipartisan Infrastructure and Jobs Act and Inflation Reduction Act. How are the regulations to carry out these laws helping small businesses to grow and flourish?

Mr. GREEN. Thank you so much for the question. You know, in small mountain communities and communities that are feeling the impacts of climate change such as ours, we are looking for folks down here in D.C. to pull every single lever you possibly can to help us get on the right trajectory. So these regulations work hand-in-hand with the innovation and the grant programs that are coming out of the EPA, as well, to help businesses reach to compliance, as well as to reach the innovation goals that we all have for a healthy environment.

Ms. VELÁZQUEZ. Thank you, Mr. Chairman. I yield back. Thank you.

Mr. GREEN. Thank you.

Chairman WILLIAMS. The lady yields back.

I now recognize Representative Meuser from the great state of Pennsylvania for 5 minutes.

Mr. MEUSER. Thank you very much, Mr. Chairman. And thank you very much to our witnesses. Really appreciate it. It is very interesting and highly informative.

So, as I think most of us know, inflation over the last 3 years is up over or nearly 18 percent, 17.9 percent. We get CBO records that show regulations on businesses in general are up since the Biden administration has taken—went into effect, over $400 billion. Clearly, that adds to inflation.

Regulations do serve, clearly, a cost on your business, Ms. Wagner, as you were pointing out. We also have a letter from the Small Business Administration Office of Advocacy stating how on this proposal, Clear Power Plan 2.0, that the EPA has significantly underestimated the cost that its proposed rules would impose on small entities.

I am interested in hearing, Mr. Green brought up that or the question was do we have to forsake the environment for land development, for manufacturing development, for the development of medical devices that are life-saving?

I would like, Mr. Farris, I am going to start with you, A, tell me what you think about that comment as well. You have how many manufacturers that you represent?

Mr. FARRIS. Nearly 14,000.

Mr. MEUSER. Fourteen thousand. And how many of them are small business?

Mr. FARRIS. The vast majority.

Mr. MEUSER. Okay, the vast majority. Number one, do you think they would agree with that comment? And number two, has the EPA come and spoken to you and asked how would this rule affect those vast majority of 14,000 small businesses that create

the jobs that pay for the Little Leagues, that take care of—truly are the ones invested in taking care of their communities' environment?

Mr. FARRIS. Thank you, Congressman. And what I can say is there doesn't have to be a trade-off. Industry has worked, and we have some of the cleanest air in the world. We have innovated, and those technologies have led to having some of the cleanest air in the world.

One of the great problems that we are seeing right now with these regulations is that they are so close to zero that they are unachievable. So, yes, there does not have to be a trade-off. We can have clean air and we can have a wonderful economy, but we cannot have it with these regulations that we are seeing right now.

And then to your point about is EPA hearing? Is EPA listening? I differentiate hearing and listening. Yes, there are hearing sessions where they hear concerns, but are they listening? What we have seen on PFAS, what we have seen on ethylene oxide, is that other agencies are weighing in with EPA and saying, if you create a de facto ban on PFAS, we can't make semiconductors in the U.S., and the EPA isn't listening.

We have heard the same thing on ethylene oxide. If you create a de facto ban on ethylene oxide, we will no longer be able to sterilize most medical equipment. And EPA isn't listening, sir.

Mr. MEUSER. Thank you. Ms. Wagner, I am going to ask you a question. So of all the regulations that you deal with, would you say half have the type of effect that was intended on the environment and the other half are unnecessary costs? I don't want to put words in your mouth. You tell me what you think the outcomes are of those regulations that obviously add a lot to your cost of doing business.

Ms. WAGNER. Absolutely.

Mr. MEUSER. Which ones are worth it and which ones aren't.

Ms. WAGNER. In Texas, the regulations that we are functioning under now that, like I said, my family business has been under and in good standing with the Texas Railroad Commission for 40 years, those regulations are prudent and just and necessary. They are based on science, fact, common sense. There is a lot of boots on the ground work to understand how these things work in the real world.

There is understanding of the difference in a marginal well that a producer like myself with a couple of hundred wells across the state of Texas versus the super majors and millions of barrels a day that they are moving. The economies of scale are taken into consideration, the volumes, the pressures. There is a lot of science to that.

So the regulations we have, like I said in my testimony, I think both written and oral, I am a proud member, as many operators are, of a highly regulated industry. We have a duty to protect and steward the natural resources, not only the ones that we produce, but the ones that we protect. The problem with the regulations that are ambiguously being proposed right now, the ambiguity, pardon me, is a huge part of the problem.

And the rest of that is we are doing it. We are stewards. We are doing it now. So now it is just duplicitous and punitive and it is not going to help the environment.

Mr. MEUSER. Thank you very, very much.

Ms. WAGNER. Sure thing.

Mr. MEUSER. Question to you, Doctor. Do you think there is a more realistic and effective way in which the EPA could implement this rule that would not be detrimental, that could actually be positive to you?

Dr. AKLOG. My understanding is there are engagements and there are alternatives really focused around the time to implementation and the flexibilities that we have.

Mr. MEUSER. I apologize, sir.

Dr. AKLOG. Thank you.

Mr. MEUSER. I didn't leave you enough time to respond.

I yield back, Mr. Chairman.

Chairman WILLIAMS. The gentleman yields back.

I now recognize Ms. Scholten from the great state of Michigan for 5 minutes.

Ms. SCHOLTEN. Fantastic. Thank you so much, Mr. Chair, and thank you to our witnesses. I am up a little earlier in my order than I thought I would be, so I am going to jump right in here.

This is the third regulatory oversight hearing that we have had, and I really look forward to hearing how smart, well-crafted regulations help level the playing field for small businesses throughout America. To that end, it is important to recognize when it comes to the EPA that the Agency is carrying out the laws passed by Congress using science and leveraging the latest technologies available.

My first question is for you, Mr. Green. Cutting through the rhetoric that compliance with commonsense environmental protections stifles opportunities for small businesses to grow and operate, to what end is the impact of these regulations measurable economically? Can we safely say that the benefits outweigh the costs of the regulations or vice versa?

Mr. GREEN. We absolutely can. It is 30-to-1, $30 to gained to our economy for $1 spent in the regulation.

Ms. SCHOLTEN. Fantastic. I am not going to argue with you there.

As the effects of climate change hit more and more doorsteps across the country, it is clear that Main Street America has to adapt. That being said, it is not easy to say what we can reasonably expect small businesses to do on their own while remaining solvent and, in some cases, quite literally above water. We also know not all small businesses are created the same, right, ranging in scale from a couple dozen to a couple hundred.

This question, again, is for Mr. Green. In your testimony, you highlight ways environmental regulations help to level the playing field for small businesses. Can you also speak to their impact on markets and any new and innovative strategies that they may produce?

Mr. GREEN. Yeah. No, they absolutely create the opportunity to move markets and create new products for consumers that I think there is a strong demand. As an electric vehicle driver in a rural community, my family has taken advantage of such amazing pro-

grams. And I was really pleased when I took the opportunity to look up Roger Williams Chrysler, Jeep, and Dodge, and at the very first top of the menu was how to purchase an electric vehicle.

And so we are already seeing a lot of consumer interest and consumer demand pushing towards these new innovative technologies. And industries, even as old as the auto industry, are really getting to harness that opportunity.

Ms. SCHOLTEN. Well, I thank you so much for your testimony and for all the witnesses being here today.

I yield back the remainder of my time.

Chairman WILLIAMS. The lady yields back.

I now recognize Representative Ellzey from the great state of Texas for 5 minutes.

Mr. ELLZEY. Thank you, sir. Thank you, Mr. Chairman.

On behalf of Mr. Meuser, I would like to ask unanimous consent to enter a joint trade letter into the Record from National Mining Association, American Exploration and Mining Association, the Essential Minerals Association discussing the challenges small businesses face due to the U.S. Environmental Protection Agency's burdensome regulations.

Chairman WILLIAMS. So moved.

Mr. ELLZEY. Costs have been going up in our country for a long, long time. Under the Biden administration, the cost of living in the United States is about 20 percent, has gone up about 20 percent. Makes it very difficult for people to afford basic necessities.

The Environmental Protection Agency is a part of that problem. They are one of the most oppressive rulemaking agencies, and they are responsible for approximately $70.6 billion in new regulatory costs in 2023. That is not borne by the companies. It is borne by the consumers in passalongs. You can't afford a truck, you can't afford your rent, you can't afford to pay your taxes, you can't afford to go to the grocery store.

An additional 5.5 million paperwork hours for companies. These regulations have increased the cost and regulatory burden for nearly every job creator in America. What the administration fails to understand, these regulations have real world consequences for the American public overall, and specifically small businesses.

We have the cleanest environment, water and air, of any industrialized nation on the planet. And the only thing the EPA knows to do is serve as a self-licking ice cream cone to provide for its own existence and create new difficulties for American businesses to succeed. And those businesses hire people who live in this country.

Now, in our appropriations bill in the Interior, we have cut back on the EPA by 40 percent. Forty percent. And that is just a start. But we have to get that appropriations bill through the Senate and signed by the President so we can stop allowing the EPA to have total control when they so choose over the business community in the United States of America.

I have a lot of questions to ask three of you, and I wish I had time to get to them. But I did some digging about our folks on the end there. The American Sustainable Business Network is a merger between 2021 American Sustainable Business Council and the Social Venture Circle. And then I did some more digging on what this group actually does. It is a member of the Declaration for

American Democracy Coalition, a left-leaning activist coalition that advocates electoral administration policy changes.

And then I read a little bit further that they are a project of the Public Citizen Foundation founded by Ralph Nader. And then I did a little bit further digging. The foundation, located in Washington, D.C., provides administrative and financial support to Public Citizen, in addition to running its own research and media programs with a focus on health, environmentalism, and limiting business rights.

Make no mistake about what is going on with the EPA and groups like our group on the end. This isn't about American businesses and making them stronger. This is about shutting down American businesses and outsourcing our guilt, like we have done with the mining of our rare earth metals, which we need for our national security and the very lives we lead every day for microchip production, for energy independence. So we are going to limit LNG production in the United States so that Germany is more dependent on our enemy, Russia, for their natural gas.

This is harmful to national security. It is harmful for the security of our families. It is making life more difficult for them.

Mr. Chairman, I appreciate what you have done in these hearings on promoting American businesses, holding the Small Business Administration accountable, trying to improve their ability to help small businesses. But when somebody says they are trying to help the 33 million small businesses in this country by making it harder for them to do their jobs, and the restrictions on a five-barrel-a-day production, well, limiting the ability for our medical community to clean the things that we use to take care of our American people, they are making it difficult to live in the United States.

And I think it is about time to go back to the Administrative Procedures Act and do away with the EPA, because we already have a redundancy in every state. Every state has their own EPA. In Texas, it's the TCEQ. And those TCEQ members do a very good job of making sure that the air and the water in the state of Texas is clean. We don't need the EPA's help.

I am about out of time. Sorry I didn't get to ask any questions, but it needs to be clear on what the agenda is of some folks in this country when they claim it is about supporting American businesses.

With that, I yield back, Mr. Chairman.

Chairman WILLIAMS. The gentleman yields back.

I now recognize Ms. Maloy from the great state of Utah for her 5 minutes.

Ms. MALOY. Thank you, Mr. Chairman. I had a bunch of thoughts I was prepared to share about federalism and how redundant and unnecessary some of these EPA regulations are, but Mr. Ellzey just did a fantastic job of that, so I am going to move on. In fact, I wish I had said what he just said.

Ms. Wagner, first of all, thank you for your testimony. You are a fantastic witness. And I have a high school graduating class of 32. I rarely meet people who can beat me on that, besides my siblings, so great to hear about that.

And what you said really had a ring of truth to me. I grew up in a small town in a rural area where people are dependent on resources to make a living, and we have a built-n incentive. We learn from the time we are tiny that we have a responsibility to take care of the resources God gave us on this Earth. So thank you for sharing that.

And to that point, reading through the materials for this hearing, I am reading that small business optimism is very low. One reason is the burdensome regulations that are coming from unaccountable federal agencies that can't be voted out of office, that don't have to go back and face the voters every 2 years like we do.

And the EPA isn't just regulating pollution and protecting human health anymore. They are trying to change the way we do business in this country, which is outside of their scope. They are part of the executive branch. We, as the legislative branch, have the responsibility to act as a check on them. And that is why you are here. That is what we are doing here today.

Overregulation kills main street under the weight of compliance and also the cost of inadvertent noncompliance, when rules get so burdensome that people don't even know whether they are in compliance or not. So I am getting to questions here.

Our friend Mr. Green on the end just said that he sees a 30-to-1 return on regulation. For every dollar they spend, they get a $30 bump. And I want to go down the line with the other three of you and ask you individually, Mr. Farris, you represent a lot of small businesses. Do you find that to be accurate?

Mr. FARRIS. I would say that I would love to see those studies. All of our studies do not show that.

Ms. MALOY. So your Members don't feel like regulation from the EPA helps their bottom line?

Mr. FARRIS. Not from what we are seeing right now. We can work together on regulations. Regulations can be helpful, but what we are seeing right now is they are not helpful, and they are all set at zero to where, to your point, it is shutting down businesses.

Ms. MALOY. Thank you. Ms. Wagner?

Ms. WAGNER. I would say the inverse of the other witnesses, duplicitous regulations cost money. They will never produce more oil and gas or any cost savings for my business, which will hurt my employees and the communities that we support.

Ms. MALOY. Thank you. That also has the ring of truth to me. Mr. Aklog?

Dr. AKLOG. So, I work in an industry that is primarily regulated by the FDA. And obviously, we all would accept that healthcare technologies needs to be regulated. And so the issue is really about smart regulations and coordination between the regulatory agencies to make sure that we don't end up with adverse consequences to patients. And that is what we are trying to accommodate here.

Ms. MALOY. And do you think that further regulations give you a 30-to-1 increase in your profit margin?

Dr. AKLOG. I am not focused on our profit margin. I am focused on patients and patient outcomes. And that, to me, is the overriding question here, is that we have to have regulations that pro-

tect patients, but don't do the opposite, which is what we are facing here.

Ms. MALOY. Thank you. And during your testimony, it struck me that, you know, the justification for these environmental regulations is that we are trying to keep our air and water clean, protect human life. But in the case of removing something we need to sterilize medical devices, it is having the opposite impact. We could be taking human lives in the effort to protect human lives. You don't have to respond to that. Just an observation.

With that, Mr. Chairman, I yield back.

Chairman WILLIAMS. The gentlelady yields back.

I now recognize Representative Alford from the great state of Missouri for 5 minutes.

Mr. ALFORD. Thank you, Chair. And I apologize for not being here sooner. We have a lot of competition on the Hill today. Just met King Abdullah from Jordan and Secretary Vilsack in another hearing. But this is so important, and I wanted to be here for your testimony.

I have read it. I appreciate you coming here on your own time and your own dime, as I like to say, because I know that is part of being American is coming before Committees like this. We are concentrated on making America great again through making main street great again. And I thank the Chairman and the Ranking Member for holding this.

The EPA, of course, you know, was created by President Nixon to monitor and enforce our national guidelines on the environment. However, under President Biden the EPA has completely abandoned this mandate. Instead, taking their cues from radical environmentalists, they are attempting to regulate entire industries out of existence.

In 2023 alone, the EPA was responsible for approximately $70.6 billion in regulatory cost and an additional 5.5 million paperwork hours for companies. The Biden EPA might be happy to learn that America is actually reducing the amount of greenhouse gas emissions and has been since 2007.

As the United States has drastically decreased our emissions, communist China emissions have spiked. China's emissions have approximately doubled since '06, when they became the world's largest emitter of greenhouse gases. While American emissions have been constantly decreasing, the Chinese continue to increase their pollution.

While the radical environmentalists would love to claim that America's progress is due to their activism, the data clearly shows that this happened despite their best efforts. The reason American emissions peaked in '07 is because of hardworking independent energy producers, like Cooper Oil and Gas.

America reduced emissions and gained energy independence because of the shale revolution and the policies of the Trump administration. This has led to cheap and plentiful energy, including a doubling of the natural gas produced since 2006. America reduced emissions and gained energy independence because of our small energy producers, not because of the roadblocks thrown in their way by radical environmentalists. As Ms. Cooper Wagner will surely at-

test, the shale revolution has been the greatest environmental boon the world has ever seen.

Now to our questions. For Ms. Cooper Wagner, American carbon emissions have declined year on year since '07, as I mentioned. Much of the progress has been due to increased usage of natural gas from small-scale producers like your own. Why do you think the Biden administration is proposing rules and regulations that would crush small energy producers like yours if you are part of the solution?

Ms. WAGNER. That is a fabulous question and I appreciate your comments. And will even say something I don't get to to most people, you are welcome.

Our industry is fiercely private. We are a small mom-and-pop. Again, I work with my dad and mom, with my husband and my brother. We never knew that we needed to be so public and educate regulators, legislators, and the general public about what we do and the quality and quantity of life that we provide. I don't know if it is just a lack of education and how things work, why the lights are on, why your cars are safe, why when there is disaster, you are safe from it. And the majority of those reasons are because of fossil fuels.

You know, I am not sure why there is a target on my back. And as a mother of two young kids, I never try to be a doomsday sayer and everything is bad and, you know, the big guys are after us. I don't like to live in that world. I believe there is good in all people and good in this world. But it is a difficult line to walk as an E&P producer and someone in the oil and gas industry, and I am not quite sure they want to wipe us out, but it definitely feels that way.

Those returns that you are talking about and leveling playing fields between super majors and us don't exist. I will never compete with them. The economies of scale, we are in different markets, different everything. They can absorb erroneous regulations from the EPA for no real environmental benefit and push that cost to the end consumer. I can't do that. I am the end. The buck stops with me and my small company and my small business and our small community.

Mr. ALFORD. Well, thank you so much. And, you know, they like to say that ignorance is bliss. In this case, ignorance is dangerous. It is dangerous to your company, your business, and to the American people.

This administration has put the crosshairs on the backs of the American people by demonizing fossil fuels with overregulation. We have got to regain our territory. We must be energy independent once again.

And with that, Mr. Chairman, I yield back.

Chairman WILLIAMS. The gentleman yields back.

I now recognize Representative Van Duyne from the great state of Texas for 5 minutes.

Ms. VAN DUYNE. Thank you very much, Mr. Chairman.

The subject at today's hearing is one of tremendous importance and one we hear about again and again from small businesses. The EPA is determined to overstep its authority and get in the way of Americans and job creators. Small businesses are already having

to suffer 3 years of disastrous policies under the Biden administration that have driven up the cost of living, making food, electricity, housing, and transportation nearly impossible to afford.

Last June, I, along with the Chairman and several other Members of this Committee, sent a letter to the EPA Administrator on their proposed rule to ban the use of PCE, which is used in dry cleaners as a cleaning solvent, and, if banned, would force thousands of small businesses to close their door. The EPA estimates that their rule could cost businesses anywhere, and this is great, this is just phenomenal work from the EPA, they are estimating that it could cost businesses anywhere from $850 to $10.4 million. That is a huge margin. And I want to know, I mean, how do you plan as a small business for that type of a margin?

Last year, this Committee passed my bill, the Small Business Regulatory Reduction Act, which requires the Small Business Administration to ensure for each fiscal year that the cost to small businesses of the administration's rulemaking is not greater than zero, while also requiring the SBA to issue a report on any regulations issued by other federal agencies that impact small businesses. And I am looking forward to expanding these provisions beyond just the SBA and into EPA. And I think EPA is a perfect place to start when you consider what is happening in our energy industry and its huge impacts on our economy.

Ms. Wagner, thank you for being here today. I know it is a little chillier here than at home in Fort Worth. I appreciate your testimony. I appreciate your responses just now to Mark Alford's questions. His questions were very similar to mine. This is what happens when you are one of the last speakers, right? All the questions have already been asked. But I know that you have invested a lot in what is going on in the environment. It is not in your best interest, you know, for the environment to not be taken seriously and to be unsafe.

Can you talk a little bit about those investments? And can you talk about the overregulations, the regulatory burdens that your small business, that Cooper Energy is having to face, and possible solutions or what specifically you think could help get rid of some of those regulations? If you have got any ideas, I would love to be able to hear them.

Ms. WAGNER. Sure. Thank you. Thank you for the questions and for the time. It is an honor to be here today.

The regulations that we have in place in our small company, we employ a full-time person to just manage the regulations that we have now. So just in our little company, it is a full-time job in the office for staff, just on the paperwork side of things. For my guys in the field, it is part of their job every day to make sure that these regulations are followed.

More regulations for me are going to mean I am going to have to hire more people with, again, no benefit from those regulations to be able to pay those people, to be able to give them those good-paying jobs in a rural area that are so hard to come by.

Again, regulations and being a part of a regulated industry, like you have heard from the three of us, is important, and we are a proud member of that. If EPA, if other regulatory agencies could listen to some of the comments that we have submitted, the input

that we have tried to have, that seems to go—I echo your comments on the difference between listening and hearing. We need to be able to partner to be able to make good, responsible decisions that aren't going to wipe out small businesses.

We are a scrappy bunch. We make money on stuff that all the majors have walked away from. We make money where you shouldn't be able to. But there is a whole economy of that that supports millions of vital rural economy Americans—American economies, rather, and these regulations will effectively wipe that out. There are businesses that will not survive and jobs that will not survive.

Ms. VAN DUYNE. I appreciate your testimony and your answer.

Dr. Aklog, I have heard from doctors in my district about the concerns they have if the EPA moves forward with their proposed rule banning ETO, which is used as a sterilization agent for medical equipment. What type of alternatives exist if the rule is finalized? And how realistic are they for small businesses?

Dr. AKLOG. Thank you. There are a couple of other traditional alternatives, such as steam heating and radiation that have been used to sterilize medical devices, but they are just not appropriate or they don't work in the vast majority. So about 50 percent of medical devices, the only currently available technology is ethylene oxide. There is active R&D, and we are in the innovation business, so we certainly welcome new types of sterilization. The problem is that none of them are yet ready for prime time.

There is one example called vaporized hydrogen peroxide, which is a gas like ethylene oxide, and in theory, could have some of the benefits of being able to sort of work your way through the innermost parts of these complex devices. But it is really new, and we don't have the data. The processes of determining that they actually work is quite overburden.

Ms. VAN DUYNE. Thank you. My time has run out.

I yield back, but thank you for your answer.

Dr. AKLOG. Thank you.

Chairman WILLIAMS. The gentlelady yields back.

I now recognize Representative Hunt from the great state of Texas for 5 minutes.

Mr. HUNT. Thank you, Chairman Williams, and thank you, Ranking Member. I want to thank our witnesses for joining us here today.

I want to look at some of the burdensome regulations that have been implemented by the EPA and the Biden administration as they continue to put more hurdles in front of businesses like yours, ma'am, and our hardest working citizens in our country.

Ms. Wagner, I want to thank you so much, ma'am, for what you have done. I want to thank you for your company. I want to thank you for helping the smaller pieces of the oil and gas industry in a rural part of our state where it is not the easiest to create and thrive. Really appreciate you, ma'am.

And thank you for working to keep our houses cool in the summer and heated in the winter. Without you, your dedicated employees, and other companies like yours, our quality of life in this country would be way worse than it is right now, for the record.

President Biden has been actively calling for the end of oil, of the oil and gas industry since the day and before the day he took office. And he put the priorities of the radical left's climate change agenda over the needs of the American people and commonsense policies.

The administration is more than willing to use fossil fuels to prop up their failing ESG initiatives, just as long as those fossil fuels don't come from America or American companies. We continue to see the Biden administration purchasing oil from Venezuela and critical minerals from child labor mines in Africa and allowing China to continue to build their multiple coal-powered plants each month while ignoring their climate footprint as they continue to increase their climate footprint from time to time, from generation to generation, although we continue to decrease our carbon footprint.

All foreign countries where they have less regulation, less oversight, and exponentially dirtier oil, we continue to see Joe Biden and the climate cartel approving pipelines in Europe that allow natural gas to flow freely into homes of European families while killing the very same projects domestically.

Our American energy companies are world leaders in innovation, productivity and accountability. I cannot think of a single energy company that does not obsess over their compliance, field equipment maintenance, and take general preventative measures on their own outside of whatever regulations that are already in place to ensure that we continue to operate at 100 percent capacity.

Ma'am, Ms. Wagner, this question is for you. What is your estimated compliance cost over the next 5 years for the methane rule and with other EPA regulations, and how does it impact your bottom line?

Ms. WAGNER. Thank you. I appreciate your comments very much.

Mr. HUNT. Appreciate you.

Ms. WAGNER. Thank you. The cost estimate currently, this is also very ambiguous, and I hate to sit here and say I don't know, but it is not clear. So many things are not finalized. So many things are being restructured. There is a tax that we are subject to that goes into effect before the formulaic work and the empirical evidence has been shown to know if I am subject to that tax.

I pay taxes. I don't do tax law myself.

Mr. HUNT. I pay a lot of taxes.

Ms. WAGNER. Yeah. A whole bunch of taxes, yes, sir. I know that there are companies that have already been so concerned and so, quite honestly, scared so many small businesses that are living in fear that they have hired some environmental companies to do this just to find out if they might qualify. Because the environmental companies can't tell you for sure yes or no has cost small operators like myself approximately $10,000. And the answer is, thank you for the $10,000. Here is all the work we have done based on what EPA has put out. I don't know if you qualify or not. And if so, if you do, it will be up to a range, like the Congresswoman pointed out earlier, it could be hundreds of dollars if you don't qualify. It could be millions of dollars if you do.

The problem is, if you do or don't qualify under these rules. what I am concerned about as a small operator is maybe I am under a

threshold. Maybe I don't emit, maybe I don't fit the formulas. Proving the negative is going to be just as expensive as if I did. And proving the negative means I am going to have to do all of the same things that will not help my business. They will not make my business more money to be paying those taxes, paying those royalties, helping my communities. They are just going to be a net cost that will wipe out businesses that are the size of mine and smaller.

Mr. HUNT. Would you consider it to be like a hidden tax.

Ms. WAGNER. I would consider it to be erroneous and overburdensome regulation.

Mr. HUNT. Understood. Quick, simple question for you as well. Did you find it easier or more difficult to produce energy for the American people today when Donald Trump was president or when the current administration is now in office?

Ms. WAGNER. Our business practices basically sustain over 40 years, regardless of who is in office.

Mr. HUNT. Understood.

Ms. WAGNER. But I did not feel the target on my back that I do since President Biden has taken office.

Mr. HUNT. Understood. I want to close with this, ladies and gentlemen. As a candidate for President, Joe Biden again promised to end the oil and gas industry. He said this with his own words, but here is a dirty little secret. He only wants to end it in America. Biden doesn't have any problem buying dirty oil from Venezuela. He doesn't have any problem buying oil from our adversaries. And Joe Biden and his colleagues want the oil. They just don't want to see how the sausage is made.

The Biden administration's energy policy is out of sight, out of mind. And as long as it is not being produced in America, the climate lobby won't be upset. We have got to fix this.

And thank you so much. I yield back the rest of my time. Thank you for being here, ma'am.

Ms. VAN DUYNE. [Presiding.] I now recognize Rep. Gluesenkamp Perez from Washington for 5 minutes.

Ms. GLUESENKAMP PEREZ. Thank you, Chairwoman. And thank you to the witnesses for being here today.

So before coming to Congress, I ran an auto repair in a machine shop with my husband. We are an independent. Not especially lucrative, right? And I will never forget going into wrecking yards. I remember I was picking up parts for, like, a '90s Toyota, and the guy was like, the owner, a buddy was like, crying. He had an inspector there, so, right, wrecking yards, cheap land. It is not a high-margin business. You are operating often in wetlands.

So the environmental impact, you know, and businesses like mine, I mean, we didn't cause the oil leak. We are fixing the oil leak. We are stopping the oil from going into the river. And we are the ones who are under scrutiny because we are the one fixing the problem. And, you know, in these wrecking yards that we see getting shut down all across the country, they are the independents, usually, and they don't have the money for the lawyers to navigate the system.

And, you know, you think about what is the average consumer going to do when they can't get their Toyota Corolla fixed? Instead of remanufacturing a part that is always been in America, they are

going to have to get some cheap thing from China that is going to fail. And you think about the downstream effects on the economy of shutting down these small repair shops and wrecking yards when they are not compliant with EPA regulations. That hinders a really important part of the supply chain.

And so, you know, I guess my question is how—this is the tension we see between the EPA's mission, which I value. I like knowing my water is clean. I like knowing my air is clean. But I also want equity and who is being held accountable and who has the capacity to navigate these rules.

And, Mr. Green, in your opinion, how do you balance the needs of the economy with that, like, lens of equity for the smaller companies that don't have the infrastructure to navigate?

Mr. GREEN. I think the lens of equity should really be focused on the communities that have been disproportionately impacted by the negative health impacts and the environmental impacts, because their communities have often been overlooked, overshadowed, and underrepresented when they are making decisions about where to put things that are going to create a lot of pollution in their backyard.

Ms. GLUESENKAMP PEREZ. When you say "they are making decisions," like, who are you referring to about making the decision to put their wrecking yard in the only place they can afford to put it? Who is making that decision?

Mr. GREEN. The business.

Ms. GLUESENKAMP PEREZ. The small business.

Mr. GREEN. The business is making a decision.

Ms. GLUESENKAMP PEREZ. So then you want to hold the small business accountable for not having the resources to go to a wealthier neighborhood.

Mr. GREEN. I would want the small business to be accountable for the footprint and their business decision and the impact that their business is having on their local community.

Ms. GLUESENKAMP PEREZ. Mm-hmm. Yeah, I mean, I think that, like, my experience is that the smaller guys are the ones who are accountable. We are the ones who are sponsoring the Little League team and donating to teachers. We are part of the community. The small ones are the ones who are also the ones who can't navigate these rules.

When I bought my property, when I bought my auto shop, the seller literally had a heart attack because that is his whole net worth. And if there was an environmental finding there, like, he is liable. He can't afford to go to a nursing home after that, you know. I mean, how do we balance? I don't know if anybody here has insight, like, how do we balance in creating a system that the smaller guys can navigate, also?

Because I think a lot of this is just contributing to consolidation is my concern. And then you really do have the big guys who don't go to the bake sale, you know, who aren't selling Girl Scout cookies, you know.

Mr. GREEN. Right. Can I take——

Ms. GLUESENKAMP PEREZ. Yeah, please.

Mr. GREEN. Yeah. And so I think part of it is that we are moving the American public away from the understanding of the true

intent of the EPA by using, you know, like kind of these tactics of talking about how scary these regulations, how it is going to support, you know, countries over abroad that maybe, you know, it is being placed in a way where people are anti-EPA rather than trying to engage within the EPA process. So if we used a conversation or had a conversation about these rules are something that we all agree on and want to see happen rather than fear tactics when we are talking about these things, rather than scaring those small businesses away from the conversation, we could bring them into the conversation.

Ms. GLUESENKAMP PEREZ. Yeah. How would you recommend bringing those small businesses in? And how would you recommend—or can you point to things that you would——

Mr. GREEN. Yeah. So at the clean power plan ruling, there were in the Region 1 offices in Massachusetts, there was a overflow. And we actually filled not only the hearing room, but also outside the hearing room with small businesses that were around the Salem Harbor Power Plant, around the Brayton Point Power Plant. So I would actually say that small businesses, when there is the opportunity to engage, are engaging. Most of us here today are claiming to or do support and represent the small business community. So I think it is actually a words decision to bring those businesses in and the mechanisms already exist to continue to have them.

Ms. GLUESENKAMP PEREZ. Thank you all for being here today. Thank you, Mr. Green.

I yield back.

Ms. VAN DUYNE. Thank you. I now recognize Representative Stauber from Minnesota for 5 minutes.

Mr. STAUBER. Thank you, Madam Chair.

To my colleague that just spoke, I couldn't agree with you more. I appreciate your comments about the small operators, the small folks.

And Mr. Green, I couldn't disagree with you more about the EPA. Let me tell you something. The EPA has shut down mining, manufacturing, logging, and timber producing in our great state, so I disagree with you fundamentally on the EPA trying to work with them. Okay. I have seen the devastation. I have seen our farmers and ranchers. The WOTUS rule was devastating, devastating to small businesses. And so I think—I read your comments. I appreciate where you come from. But sir, I adamantly disagree with you.

The Biden administration is run by extreme radical environmentalists who abuse the law and bend it to their will. The unelected bureaucrats at the EPA are by far the worst offenders. EPA regulations constantly attack my constituents and our way of life. They restrict our mining operations, our logging operations, and wildlife management. They force extreme Green New Deal policies on our businesses without care for the overwhelming costs. And now they are going after our healthcare.

The proposed rule on ETO sterilization, ethylene oxide sterilization, that technology will eliminate a chemical used to sterilize medical equipment. Eliminating ETO would require manufacturers to change how they sterilize medical equipment, either adopting more costly or less effective solutions.

Additionally, there are many instances where ETO simply cannot be replaced by other sterilization methods. Tools such as respirators, heart valves, pacemakers, and catheters can only be properly sterilized by ETO as other methods are ineffective or even harmful.

Make no mistake, this rule will increase costs, reduce access, and eliminate services in our healthcare industry. And rural America is always the first one negatively impacted. Rural America, rural healthcare, rural hospitals matter.

Dr. Aklog, each year millions of separate medical instruments are needed for nearly 1 million breast biopsies, 300,000 hysterectomies, 500,000 open heart surgeries, and the 1.1 million C sections that are performed each year. Are the instruments for all these procedures just mentioned sterilized by ETO? And what would be the impact if they were not available due to the lack of sterilization?

Dr. AKLOG. They are. The answer is—the simple answer is yes.

Mr. STAUBER. Microphone. Thank you.

Dr. AKLOG. Apologize.

Mr. STAUBER. I am hard of hearing. I am an '80s metalhead. Go ahead.

Dr. AKLOG. The answer is yes. So all of the examples that you gave, and I could list numerous more, those are kits, surgical kits that are packaged for use in surgery, and they require a gas to penetrate the packaging in order to be able to offer a sterile device. And so the answer is, they are—that is the only option for those. And not having that would have, again, a devastating impact on delays for surgery and potentially death and harm.

Mr. STAUBER. And, you know, you added "potentially death and harm." Here is the EPA making these decisions.

Under EPA's proposal, millions of products would require revalidation. What would this mean for capacity and supplies of the critical medical technology needed for patient care?

Dr. AKLOG. In its current form, it would have a significant impact. So to revalidate, even if there was an alternative for those, to revalidate that technology, you have to go through a very rigorous FDA process, which we all understand it is part of what we do every day. And that to revalidate a complex technology can take many, many years. So the idea that you can channel into an alternative quickly without having an impact on patient care, it is just not true.

Mr. STAUBER. Do you think small businesses like yours feel heard in the federal rulemaking process?

Dr. AKLOG. I think, thanks to organizations like AdvaMed, small businesses like myself do actually have a say. And I would say there is engagement, and that is why we are here. I am here to hopefully continue that and send the message that there are alternatives that are less onerous, that, you know, where the time to implementation and flexibility on standards can mitigate the risks that we see with the rule as it is currently proposed.

Mr. STAUBER. We must do more to increase the affordability and accessibility of healthcare. And the EPA regulations just put more people in harm's way.

As a reminder for this panel, $360 billion of additional regulations put on our small businesses and farmers by this administration. And I will repeat that, 360 billion. That is with a B.

Madam Chair, I yield back.

Ms. VAN DUYNE. I now recognize Rep. Bean from Florida for 5 minutes.

Mr. BEAN. Thank you very much, Madam Chair. Good morning to you and good morning, Small Business Committee. Lady and gentlemen of the witness panel, good morning. We are glad to have you here.

Hats off to all small business owners. I have been a small business owner. You are often the first to show up for work, the last to leave. You are the last to get paid. And in a perfect world, it is just hard to run a business. It is just hard, let alone when the invisible hand of government comes and tries to push you down and stifle you. That invisible hand is not invisible anymore. We see it, we feel it. And hats off to you.

Has it ever been this bad? Anybody want to jump in? Has it ever been this bad? Ms. Wagner, you want to jump in? What say you, has it been this bad before?

Ms. WAGNER. I have the history. I am not quite 40 years old, and I keep saying my company is 40 years old. Well, that is because it is the second generation, and my parents started it from nothing themselves. The same with farming and ranching. It is five generations.

So while I don't have the experience of myself, I have learned from the experience of generations of my family, and in telling stories of this is what I am facing. This is what it is like now. The generations past, my parents, my grandparents say to me, I can't believe that this has happened in our great country. I can't believe that they are making it so hard for us to feed the world and fuel the world and do it cleaner and better than anywhere else in the world.

Mr. BEAN. Amen.

Ms. WAGNER. It is shocking. It is disheartening.

Mr. BEAN. You would testify today it has never been this bad or even your folks, when you have lunch with them, they say, it has never been this bad.

Ms. WAGNER. I have their history to go off of.

Mr. BEAN. Very good. Well done.

Mr. Farris, you have testified and given us that information. We are now over $3 trillion in just crazy rules and regulations that have come down. That is an all-time high. That is 12 percent of our GDP. How about that? Often duplicative or just wacky rules.

We all want to live in a safe, clean environment. But you say we have gone too far. Is that correct?

Mr. FARRIS. Absolutely. I have only been around for a couple of decades working on this. I haven't seen anything like this onslaught. Every regulation coming out near zero, every regulation targeting consumer choice, doing away with consumer choice and doing away with entire industries. So, no, sir, I haven't seen it as bad as this.

Mr. BEAN. Ten four. Okay. So they are making rules. They make rules. Do they, A, give you all a chance to have input? Don't

they come have public hearings and say, Ms. Wagner, how would this affect your business? Do they say to your team members and members of the Manufacturers Association, do they say, will this adversely affect, are we going too far? Do they give you that opportunity? Does anybody get a chance to speak at these rule hearings? Do they even have rule hearings?

Mr. FARRIS. I will say that we have been asked. I don't believe that we have been listened to, but we have been asked.

Mr. BEAN. Okay. That is my next question. Do you feel listened to or do you feel like you are just talking to a brick wall? What do you think, Ms. Wagner? Is it a brick wall or do you feel like they are listening to you?

Ms. WAGNER. It is a brick wall.

Mr. BEAN. Brick wall.

Ms. WAGNER. We have submitted through the Texas Alliance of Energy Producers, which represents 3,000 members in the state of Texas of small to midsized independent operators. we have submitted multiple comments with very specific here are the problems, here are the issues, and nothing changes. It is falling on deaf ears.

Mr. BEAN. Would you say they have a narrative going in and that is what we are going to end and it doesn't matter what you say? I don't even want to hear what you say. We already know what we are going to do.

Ms. WAGNER. Unfortunately, I think you are correct.

Mr. BEAN. Do you think they know that? In fact, this is something I learned on the Steve Scalise energy tour last year, going to spend a couple of days in the Gulf on a platform to look at how we produce energy in America, learning that no one does it cleaner than America, no one does it safer than America. Do you think people that are making these rules understand that? Anybody want to jump in?

Ms. WAGNER. They don't.

Mr. BEAN. They don't. So what happens when we—what I have learned, would you agree with this statement, that when we, in fact, we learn it is not a battle that the Biden administration has on oil and gas, it is just American oil and gas? Because when we don't allow it to be made here or produced here, we are going to go somewhere else where they don't make it as clean or as safe as others. True statement?

Ms. WAGNER. Very true.

Mr. BEAN. Very true. All right. Let's talk about what happens if the unthinkable happens and Cooper Oil and Gas goes away or just succumbs to the pressure. What happens to your wells? What would happen?

Ms. WAGNER. Depending on how we go away, a lot of the issue that we have in this country is not with responsible operators. It is with things from the past or things that have been forced upon them. If regulations are forced upon small operators, there will be no resources for them. You will have more abandoned wells, not more production, you will have less production in the United States.

The fallacy and all of that issue, which is its own environmental hazard, is that the demand for our product goes nowhere. We must have fossil fuels to power our lives as they exist today and for the

foreseeable future. And if you don't get it here, you are getting it from overseas. There is no Texas Railroad Commission, API, EPA.

Mr. BEAN. Let me just say, amen. Thank you.

And I yield back, Madam Chair.

Ms. VAN DUYNE. Thank you very much. I would like to thank our witnesses for your testimony and for appearing before us today.

Without objection, Members have 5 legislative days to submit additional materials or written questions for the witnesses to the Chair, which will be forwarded to the witnesses. I ask the witnesses to please respond promptly.

If there is no further business, without objection, the Committee is adjourned.

[Whereupon, at 11:34 a.m., the committee was adjourned.]

APPENDIX

TESTIMONY OF BRANDON FARRIS, VICE PRESIDENT OF DOMESTIC POLICY,

NATIONAL ASSOCIATION OF MANUFACTURERS

BEFORE THE U.S. HOUSE COMMITTEE ON SMALL BUSINESS

Hearing on

"Burdensome Regulations: Examining the Impact of EPA Regulations on Main Street."

FEB. 14, 2024

Good morning, Chairman Williams, Ranking Member Velázquez and distinguished members of the committee. Thank you for the opportunity to appear before you and for holding this important hearing today on how the regulatory onslaught is hurting small businesses.

Introduction

My name is Brandon Farris. I serve as the vice president of domestic policy at the National Association of Manufacturers. The NAM is the largest manufacturing association in the United States, representing small and large manufacturers in every industrial sector. At the NAM, we advocate policies that grow manufacturing in the United States and improve the lives of everyone, including the families of the nearly 13 million people who make things in America. The vast majority of the NAM's members are small and medium-sized businesses, giving us key insight into the issues they face every day.

I come from a small business family. My parents ran a driving school. My father, brother and I laid tile. My brother has a woodworking shop. I have seen firsthand how small businesses and entrepreneurship can raise the quality of life for families and communities. I have also seen the burdens that can accumulate quickly as family-led

businesses attempted to meet their customers' demands while struggling to comply with complex and costly, narrowly-tailored government mandates.

Small businesses are essential for our economy. A recent Small Business Administration study shows that small businesses account for 44% of all U.S. economic activity.[1] In the manufacturing sector, the majority of firms are small. According to the U.S. Census Bureau, in 2021, there were 238,851 firms in the manufacturing sector, with all but 3,920 firms considered to be small (i.e., having fewer than 500 employees). In fact, three-quarters of these firms have fewer than 20 employees, and 93.4% have fewer than 100 employees. These firms are the backbone of the manufacturing supply chain, often producing key components for larger firms making complex finished goods for consumers, the military or industrial uses. Manufacturing in America could not survive without a thriving small business sector.

Small businesses pay severe costs to comply with regulations

Manufacturing faces significant headwinds in the form of the cost, complexity and uncertainty associated with overreaching and burdensome federal regulations. To put it bluntly, manufacturers are facing a regulatory onslaught. This onslaught has a direct impact on manufacturers' ability to invest, hire and grow in the United States—threatening America's leadership.

The NAM recently released a landmark study analyzing the cost of unbalanced regulations through 2022,[2] and the results are shocking:

- The total cost of federal regulations is an estimated $3.079 trillion, an amount equal to 12% of U.S. GDP. The average U.S. company pays $13,000 per employee per year to comply with federal regulations.

[1] https://advocacy.sba.gov/2018/12/19/advocacy-releases-small-business-gdp-1998-2014/
[2] https://nam.org/competing-to-win/cost-of-regulations/

- For manufacturers, the cost of federal regulations is roughly $350 billion, a 26% increase from 2012. The regulatory burden on manufacturers is larger than the economies of 29 U.S. states.
- The average manufacturer in the United States pays $29,100 per employee per year to comply with federal regulations—more than double the regulatory burden faced by other industries.
- The burden on small manufacturers is even more severe, as they incur regulatory costs of $50,100 per employee per year. A small manufacturing firm with 20 employees bears more than $1 million in compliance costs per year.

The regulatory compliance burden for small businesses is more than three times the cost borne by the average U.S. company. Small businesses are exhausting time and resources to comply with inefficient, duplicative and unnecessarily burdensome regulations, instead of investing in new machinery, hiring more workers or developing new and innovative products. Surveyed manufacturers indicate that they could enhance their competitiveness if the cost of federal regulations were reduced, reallocating compliance funds toward compensation and hiring, research and development, sales and marketing, enhancing price competitiveness and improving return on investment.

Revised particulate matter standard can freeze economic growth

The NAM analysis only reflects regulations in place as of 2022, but new regulations or expansive revisions of existing ones have been especially disruptive and will surely chill manufacturing growth. For example, the Environmental Protection Agency recently finalized an early reconsideration of the National Ambient Air Quality Standards for fine particulate matter. The revision moved the current standard of 12 µg/m3 down to 9 µg/m3—which is approaching

or lower than natural background levels for many parts of the country.[3] The revised standard will make manufacturing in the U.S. less competitive globally and will create permitting gridlock throughout the country, as permit applicants will have to model to the new standard within 60 days. Ultimately, states will have to choose which new investments should be allowed to break ground. This revision was made despite the EPA itself saying that some 70% of particulate matter comes from nonmanufacturing sources, such as wildfires (29%), agriculture and prescribed fires (15%), crop and livestock dust (12%), unpaved road dust (10%), paved road dust (3%) and "dust" (2%).[4] As we saw last year, wildfires have had a demonstrable effect on air quality in the U.S.

This new regulatory burden will affect manufacturing investment directly, potentially diverting cutting-edge factories to other nations. The EPA's revision is far more stringent than the guidelines in place in Europe, where the current EU standard is 25 µg/m3 with a proposed reduction to 10 µg/m3 by 2030. And this revision seems to ignore the fact that the U.S. has improved its air quality dramatically. The EPA's 2022 Air Trends and National Emissions Inventory reports show that PM2.5 concentrations have declined by 42% since 2000,[5] driven by major emissions reductions from both mobile sources and the power sector. As a result, our air is cleaner than ever.

When a standard is set at naturally occurring levels, there are fewer tools available for compliance. The vast majority of PM2.5 emissions come from natural sources, yet the manufacturing industry will shoulder the greatest burden to comply with a standard that in many areas of the country is unachievable. If the air quality in an area reaches the level proscribed under the new standard, then no economic growth can happen and no new factories or infrastructure can be built without placing the area into nonattainment. Furthermore, even an

[3] https://www.epa.gov/air-trends/particulate-matter-pm25-trends
[4] https://www.epa.gov/system/files/documents/2023-06/PM_2022.pdf
[5] https://gispub.epa.gov/air/trendsreport/2023/#air_trends

area where air quality currently complies with the new standard may not be able to build new projects unless sufficient headroom exists to allow projects without placing the area into nonattainment. This will hit small businesses particularly hard because of the time, cost and expertise necessary to model their operations to the new standard quickly. Furthermore, many state permitting systems work on a first-in/first-out system, meaning that expansions or new factories for small businesses may not be able to be permitted for years to come.

Regulatory Onslaught

This is just one example of an agency action that will have far-reaching effects across the manufacturing economy. Many other proposals are moving toward finalization.

- The EPA has proposed numerous regulations that include burdensome reporting requirements and would restrict or create a de-facto ban on PFAS production or use. The carbon-fluorine bond that is the hallmark of PFAS is unmatched in chemistry, meaning that for many of its current uses, such as semiconductors, EV batteries, medical devices and items necessary for national defense, there are no existing replacements. These proposed restrictions would force manufacturers to abandon domestic production of critical items and instead rely on foreign production.
- Another proposed EPA regulation would impose new requirements on natural gas and coal power plants, which account for more than 60% of our nation's total power generation, requiring widescale deployment of carbon capture and sequestration/storage or co-firing with hydrogen. Noncompliant facilities would be shut down. Because the technologies required to meet the rule are unlikely to be available at scale in the timeframe required by the EPA, a large portion of our nation's power supply runs the risk of being taken offline if the rule is finalized as proposed.

- The EPA has proposed a regulation at levels so low it would create a de facto ban on the production and use of ethylene oxide, which is used to sterilize medical devices, including personal protective equipment used by doctors and hospitals, as well as other equipment that cannot be sterilized by steam.
- There are multiple conflicting vehicle emissions standards, including the EPA's proposed greenhouse gas and tailpipe emissions standards that would increase the cost of both manufacturing and purchasing vehicles. The EPA proposal would reduce consumer choice, as it requires two-thirds of vehicles produced to be battery-electric by 2032, notwithstanding the current limits on charging infrastructure, critical minerals and grid capacity that would be nearly impossible to address at this scale in this timeframe.
- The Toxic Substances Control Act program is vital to the innovation that drives our country. To ensure continued access to the newest chemicals that can make essential technologies even more effective and efficient, the TSCA needs to be administered in a manner that provides timely decisions on which manufacturers can rely. However, the EPA has proposed additional barriers and requirements that could stunt manufacturing innovation, such as potentially lowering the scientific rigor of risk evaluations by eliminating the definition of "best available science". The EPA's proposal also now essentially ignores the existence of Occupational Safety and Health Administration standards requiring manufacturers to use personal protective equipment, creating a duplicative need for manufacturers to prove they follow rules that have been in place for decades—rules governed by another agency that is better positioned to determine whether industry is following guidance. The EPA is mandated to review new chemical applications within 90 days; however, the vast majority of

approvals take much longer, and these new requirements may further extend that approval period, delaying deployment of new, efficient products.[6]

- The Securities and Exchange Commission's proposed climate disclosure rule would increase manufacturers' compliance costs dramatically, divert resources from job creation and growth, expose companies to increased liability, reveal proprietary and confidential information and ensnare wide swaths of the manufacturing supply chain. These effects would be felt throughout the industry, including by small and privately held businesses.
- The Department of Energy recently announced a freeze on pending decisions to export liquefied natural gas. Since the U.S. shale revolution, manufacturers in the U.S. have depended on access to clean, affordable, reliable American natural gas—and our abundance has allowed the U.S. to bolster our allies' energy security. For instance, after the invasion of Ukraine, the EU was able to slash Russian gas imports to one-third of 2021 levels mainly by tripling U.S. imports.[7] At a time when energy security is paramount, we cannot leave our allies or our manufacturers in the cold.

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Small businesses are vital to our economy and our lives. If we fail to reduce the regulatory burden on them, the U.S. is at risk of threatening the entrepreneurial spirit that has allowed small businesses to thrive. On the other hand, if we reduce their burden and costs, there is no limit to what small businesses in the United States can accomplish—for the good of our people and the good of the world.

[6] https://www.epa.gov/reviewing-new-chemicals-under-toxic-substances-control-act-tsca/statistics-new-chemicals-review
[7] https://www.politico.com/news/2024/01/19/biden-europe-gas-exports-00136671

As the NAM has emphasized consistently, regulatory reform is not about cutting corners. It is about keeping up with the world around us. It is about ensuring regulatory certainty that can guide investment decisions and ensure that this country's economic competitiveness is not outpaced or outflanked or overtaken by nations that do not share our values.

Thank you for inviting me to testify today. I look forward to continued engagement with members of this committee.

Testimony

of

Mrs. Cye Cooper Wagner

Executive Vice President, Exploration

Cooper Oil and Gas, Inc.

Before

House Small Business Committee

"Burdensome Regulations: Examining the Impact of EPA Regulations on Main Street"

2360 Rayburn House Office Building

February 14, 2024

Chairman Willams, Ranking Member Velaquez, and Members of the Committee,

Thank you for the opportunity to submit testimony in today's hearing. The expected adverse impact of EPA's regulations, particularly those related to methane, on small businesses like mine and others across Texas and the nation is of great concern and an important topic to discuss. I thank you for your careful consideration and the opportunity to share my perspective and experience, which is unique. My background is multifaceted in professional disciplines and steeped in real world everyday experience of challenges – and reward – that comes from running a successful small business. I am a past Chairman of the Board – and active current member – of the Texas Alliance of Energy Producers, the 3,000-member strong association of independent oil and gas operators in the state. My experience and role in the Alliance helped to provide me with a deep understanding of how common my experiences are, and the extent to which small business ethos are reflected and shared by other small operators in our industry – not just in Texas, but across the nation.

My Small Business – An Introduction

I grew up in rural North Central Texas and went to school, played sports, and worked in the small communities surrounding us – towns the size of 200 to 3,000 people – total. I graduated from Texas A&M University with a degree in petroleum engineering and a minor in business. In my collegiate and post-collegiate career – I have been fortunate to work with the smallest of the small (my family company), large independents (Burlington Resources, EOG Resources) and up to a super major (Chevron). After graduation and working for a few years for EOG Resources, I decided to ask my father if I could join the family business. It has now been 15 years since I have been running our family business – and in the last 10 years – my husband and brother have joined me in that endeavor as well. We are a true mom and pop – my parents started the business themselves over 40 years ago. We have about two hundred wells across Texas and produce about 450 barrels of oil and a million cubic feet of gas (1,000 mcf) a day. A majority of our wells are in the rural areas where I grew up. Our wells are not ones that make headlines for thousands of barrels a day or millions of mcf of natural gas – they very much marginal producers with only five-barrels of equivalent production per day, and usually less.

I am genetically predisposed to have responsible stewardship in my veins, and for the almost 40 years I have been alive it has been a passion that I will pass on to the next generations in my family. Outside of my role as a second-generation mom and pop oil and gas producer, I am a fifth-generation wheat farmer and cattle rancher. These commodities are the only way of life I have known, and I have chosen to make them not only my career, but my passion to steward these natural resources surrounding us.

Across our business, we employ eleven full-time people including myself and have about twenty monthly contract positions. We also employ even more service contractors across Texas in our operations monthly for whom, it is important to note, the entire company payroll is one or two persons. Our small company is one of the large employers in a multi-county area in Texas that offers 401K retirement, health insurance and paid leave and is a vital piece of the survival of this rural area. We have been in business for 40 years and in that time, we have never taken bankruptcy, nor had massive layoffs or nor taken (or been provided) government assistance – outside of the PPP program during COVID.

Our impact on the communities we proudly serve is significant. The foods we produce help feed people across the state and the country. The ad valorem taxes that we pay from our wells contribute directly to the rural hospitals, school districts, and local municipalities in our operating regions, and the community support that we provide is the lifeblood of the area. The royalties we pay are typically to retirees or elderly whose entire income is that of their social security and royalty checks.

In everything I do in both those vital economic and societal endeavors, I am a staunch supporter of clean air, clean water, and doing what is right for our Earth – something I try to teach my two young children daily.

Discussion topics heard in our family are often:

- "This is how we farm this wheat crop responsibly,"
- "This is how we care for these thousands of cattle – all natural, with no steroids or antibiotics – their health, the land they need to graze, and the water they drink,"
- "This is how we hunt, fish, and manage this wild game and their natural habitats," and
- "These are the oil wells that mommy and daddy drilled and produce here in the middle of all of it."

Values of hard work, dedication to community, and good stewardship of our lands and waters have been followed in our industry and businesses for many, many years; we've just never felt the need to advertise it.

We fight against a cyclical market, rising supply and service costs, labor shortages, and more so that our fellow citizens can have the fuels, technologies, schools, and communities that we create and support.

Unfortunately, we did not understand that, as a private industry, we needed to provide greater public information about what we do. We did not realize the massive lack of education about how things are made, touched, and used daily (that are direct and indirect products of our daily toils) and the repercussions of that shortfall to our industry. However, in recent years, we have come to realize that we cannot just sit back and hope the legislators and regulators do what our industry needs to survive and continue to allow us to support our families and communities.

And that is why I am here before you today. To tell my story and hopefully shed some light on the important reality that frequently well-meaning and well-intentioned laws, rules, and regulations, often miss the mark in development and application. But equally important, as you will see from my testimony, much of the regulatory framework at the federal and state level are in place and working.

Are things perfect? Of course not, not in my industries nor any others. However, I am also here to support those in Congress who feel the need to do more for small businesses. We should focus on implementing regulations and policy that will help us do our jobs better and encourage partnership with small operators for the betterment of our nation. That would be a productive and mutually beneficial working relationship between the current administration over what seems to be happening – a never ending effort to pursue an assault of regulations and taxation that are duplicitous and punitive for our small business will do more harm to our company, our employees, and the communities we support with no clearly defined benefit to the environment.

We are a voice that is not heard very often, if at all. And yet we are the leading stewards of our great country's natural resources.

Our Operations – Oversight and Regulation are a Part of Daily Life

Many of the super majors and large independents that are typically heard from in the public forum function on entirely different economic scales than our little mom and pop. The marginal wells we operate cannot support implementation of commercially marketed automated monitoring equipment. However, necessity is the mother of invention they say, and we have

proactively taken steps – with no requirement from any legislation nor regulation – to monitor and maintain the responsible management of our production. My husband created a production monitoring app on his own that our employees and contractors use to allow daily monitoring of all of our operations across Texas. Again, this wasn't required – this was the right thing to do. Our mom and pop is not alone in that thinking – we bootstrap and scrap in economically efficient ways to protect our producing natural resources – it is a point of pride to do it better and cleaner than anywhere else does in the world.

I also want to give you a sense of what regulated life is like in Texas. We are regulated by the popularly elected Texas Railroad Commission, and we have a robust set of regulations that we must abide by to be viable operators – in my company, in "oil and gas friendly Texas", we were inspected 297 times in the calendar year of 2023. Since August 1, 2015, my company has been inspected 1,832 times. I am proud to say that we have remained in good standing with the Texas RRC for the 40 years of our existence. Our record of success speaks for itself, and my company is not alone in that record in a lengthy tenure of business – there are other small operator mom and pops just like mine across the country.

Those initial inspections are conducted without notice or warning – we must be always compliant to protect our products as well as the air and land on which we operate – or face fines, penalties or losing our permitted approval to sell our products or license operate at all in the state of Texas. These records of inspection are public – there is nowhere to hide when it comes to our business operations. Again, we (as other small businesses in our industry) pride ourselves on doing it better and cleaner than anywhere else in the world and support fact-based, cost-benefit proven legislation and regulation for our industry. These regulatory inspections from our state officials maintain not only state-mandated rules and regulations, but federal-delegated standards that have been placed in state agencies, and also equipment-design standards set by API standards – we are required to follow all rules and regulations for clean, safe and responsible production standards across every aspect of our operations, and do so better than anywhere else in the world to deliver a vitally demanded product to market.

Oil and Gas Operators in Texas and the Nation - A Success Story by Any Measure

I and my fellow Alliance members are immensely proud members of a highly technical, ever-advancing, rigorously regulated oil and gas industry.

We produce oil and gas for the world cleaner than any other country in the world. In Texas alone we have sextupled our production outputs and *lowered* our emissions – *without* the federal government intervention. We did this because we are stewards of our resources, not wasters.

It was in Texas that the highly successful combination of horizontal drilling and hydraulic fracturing was perfected and deployed to scale in the Barnett Shale in the 2000s. (The Barnett Shale is a natural gas production region in north Texas). This is where I began my career after college. Those technologies were then put to work in other producing regions around the country, bringing forth significant volumes of crude oil and natural gas production in the Bakken in North Dakota, the Marcellus in Pennsylvania and others.

That also includes the Eagle Ford Shale in South Texas, from which scarcely a barrel of oil was produced until 2008, but by 2015 was adding over 1.7 million barrels per day to U.S. output.

The most impressive producing region in the country, however, is the mighty Permian Basin, contained primarily within Texas. In 2010, the Permian Basin was producing under 1 million barrels per day and is now producing nearly 6 million barrels per day, generating the same or less greenhouse gas volumes now as in 2010.

That said, crude oil and natural gas production take place in every corner of the state. Of the 254 counties in Texas, some measurable, reportable volume of crude oil and/or natural gas is produced in about 85% of them. Though the Eagle Ford was the shiny new rose in 2008 and after, and the Permian Basin is the behemoth, production elsewhere in Texas comes from a number of legacy fields including the East Texas Field, the Panhandle, North Texas, West Central Texas, the Gulf Coast, and others.

The life cycles of these fields and their producing wells look very similar and are characterized by declining production over a long period of time. That is why the majority of wells in Texas are "marginal", or low volume wells, and a sizable chunk of those are "stripper" wells, producing 15 barrels per day or less, and/or 90 mcf per day of natural gas or less.

The only way to grow production, then, is to drill new wells to replace the declining production from existing wells, and, importantly, to increase productivity and efficiency – more crude oil and natural gas with fewer resources deployed to produce them - and that is what has happened in the Permian Basin.

Even though most of the life of crude oil and natural gas wells is spent with production in decline, the useful economic life of those wells is typically decades long, and the majority of a well's productive life may be spent as a low volume well.

The most recent well count data from the Railroad Commission of Texas is from November 2023, and indicates 240,025 active producing wells, of which 162,789 are producing crude oil and 77,236 are producing natural gas.

Of the 162,789 crude oil producing wells, less than 10% (9.5%) are producing more than 100 barrels per day, which means that over 90% of all crude oil producing wells in Texas are producing less than 100 barrels per day.

Just over 25% of all crude oil producing wells are producing between 10 and 100 barrels per day, and over 65% of all crude oil producing wells are pumping out less than 10 barrels per day At some point, the wells producing over 100 barrels per day will fall into the 10-100 bpd range, and many of those will, in turn, ultimately fall into the less than 10 bpd range.

Of the 77,236 gas producing wells, less than 5% (4.6%) of those are producing more than 1,000 mcf/day, only 488 of which are producing more than 5,000 mcf/day. That means that over 95% - over 73,200 wells - of all producing natural gas wells in Texas are producing less than 1,000 mcf/day.

And most of those are producing less than 250 mcf/day. As of November 2023, 66,381 natural gas wells, or 86% of all natural gas wells, are producing less than 250/mcf per day. And a great many of those are producing substantially less than that.

The national production picture looks very similar.

This data makes it clear that the oil and gas industry in Texas (and the U.S.) is an industry characterized by a high number of low-volume wells – and by a high number of smaller to mid-size companies that are operating those wells.

This is an effective and thriving business model under market conditions that are not altered by damaging federal government policies that put these wells and companies at risk.

On every single one of these wells:

- Employees and contractors are paid to service and manage their operation and production on a daily basis.
- Payments are made monthly to working interest and royalty interest owners, and for many, this may be an important addition to monthly household income; further, the spending of these dollars represents an important infusion of activity as it ripples through the local and state economies.
- Ad valorem taxes are paid to municipalities, local school districts, and hospital districts in their areas of operation based on the reserves these wells are producing.
- The state budget is supported by severance tax payments, the sales tax, and other direct tax payments by oil and gas operators in Texas.

The loss of one third to one half of these wells as a result of the EPA's vast regulatory overreach represents an unimaginable negative impact to these regions of the state and the communities within them.

It is true that, while these wells comprise the vast majority of wells in Texas and across the U.S., the volume of production from those wells does not. However, the volumes are not statistically insignificant, and the lost production from one third to one half of those wells would represent a shortage in production that would either raise prices to consumers, have to be replaced with imports, or both.

Virtually irreplaceable, however, are the jobs, direct payments on production, local taxes, and local economic support provided by the ongoing existence and operation of these wells.

Shutting in a massive number of wells in Texas and the U.S. and imperiling a great many of the companies that operate them represents a set of nasty trade-offs for the policies now being put in place by the EPA, and we should not pretend they do not exist.

Conclusion

The regulations being discussed in this hearing would not only be of high cost to my small generational family business and no benefit to the environment, but also detrimental to so many that we uplift with our jobs, contract work, tax dollars, royalties, donations and more in our important, vital, rural but often unheard from and underrepresented communities. Further, it has been touted elsewhere by supports of the IRA tax and the related regulations have industry supported, and that is not quite correct. That support comes from very large super majors that employ thousands and thousands of employees, with vast operations and resources to pass those costs on to consumers.

I can assure you that methane regulations that provide no credible environmental gain and provide certainty of increased operational costs for companies like mine and will hurt all I have discussed today – my small family business, the local rural economy, schools, hospitals and community members. Those regulations will not hurt every major company whose name is on the signs at your corner gas station.

In closing, I and my fellow Alliance members are proud stewards of the lands and waters in which we operate and provide the energy that makes the economy, and the world, go-round. We proudly supply products and byproducts that have given the world a way of life that would not exist otherwise. We understand and support the need and vitally important role of state-based regulation of emissions as well as other facets of our industry. The current successful state-based framework is where oversight and enforcement should remain.

I would be happy to answer your questions.

Thank you.

Written Testimony of Lishan Aklog M.D.

House Committee on Small Business Hearing "Burdensome Regulations: Examining the Impact of EPA Regulations on Main Street"

Wednesday, February 14, 2024

10:00 a.m. ET

Chairman Williams, Ranking Member Velazquez, and members of the committee. Thank you for inviting me to testify today.

My name is Dr. Lishan Aklog. I am a heart surgeon, medical technology innovator, entrepreneur, and small public company chief executive.

Last July, I was honored to testify before the House Energy and Commerce Subcommittee on Health on the importance of transparency and predictability in Medicare coverage of breakthrough medical technologies, including the unique burdens faced by small innovative companies in the current reimbursement landscape.

My testimony today shares many of the same underlying themes but focuses on the challenges companies such as mine will face, and the substantial harm for the patients we serve, if we don't get the rules right surrounding medical device sterilization that EPA is currently proposing.

Industry supports an update to these rules regulating ethylene oxide sterilization, the primary mode of sterilization for the many billions of medical devices produced and used every year. However, these proposals as written, are projected to greatly reduce sterilization capacity for lifesaving and life-enhancing medical devices which means a reduction in patient access to care.

To be clear, the industry supports an update to the rules but it must be done carefully and in close coordination with FDA and medical device experts.

As I did at the prior hearing, I hope to offer an enlightening perspective on the issue at hand, both as a surgeon, who used such critical devices to care for patients every day for over twenty years, and as a medtech chief executive who is developing and commercializing such devices today. Let me note from the onset that I am not an expert on environmental science, toxicology, sterilization technology, or the deeper policy dimensions of this issue. I do, however, have a working understanding of the projected consequences of the proposed regulations, and hope to provide some useful context as a small company executive and heart surgeon.

Let me start with a simple truth: medical technology innovation has provided us with novel devices which reduce the burden of disease, relieve suffering, and save millions of lives each year. That is a fact. I chose to transition from heart surgeon to medical technology innovator and executive precisely because I appreciated that I could apply innovation to impact patients on a

larger scale than I could as an individual practitioner. The majority of medical technology innovation happens at small companies such as mine. Small companies comprise approximately eighty percent of the medical technology industry.

Governmental action can have a significant impact, both positive and negative, on the development of, and access to, innovative medical technology products. For example, governmental funding of basic science research often sows the critical early seeds for innovation. Nondilutive funding from SBIR and STTR grants can offer a lifeline to early stage small companies. I commend the Committee for helping to shepherd reauthorization of these programs in 2022. R&D expensing tax provisions are another important tool to foster innovation. I commend the House for including such provisions in the recently passed tax relief bill and hope the Senate will follow suit.

Finally, legislative reforms which seek to increase transparency and predictability along the path to Medicare coverage of breakthrough devices would be a powerful stimulus to innovation. I was pleased that H.R. 1691, the subject of my testimony last summer, made it out of committee and I am hopeful that it will eventually become law.

Diverse governmental actions have great potential to positively impact innovation and equitable patient access to lifesaving and life-enhancing products. In contrast, today's hearing addresses a proposed governmental action that has just as great, if not greater, potential to have a negative impact for our healthcare system and patients we serve if not done correctly. They could stifle development of new innovative products and adversely impact, in a dramatic way, the supply chain of existing life-saving products, put millions of patients at risk of delayed care and even death. This may sound like hyperbole, but I can assure you that it is not.

The reason that some provisions in this regulation, as well-intended as they might be, have the potential to create such issues is that sterilization lies at the very heart of medical device development and production.

When a company such as mine seeks FDA regulatory clearance of an innovative medical device, it must design, verify and validate the often-complex processes required to manufacture such a device. One of the most time-consuming and costly steps leading up to FDA submission is rigorously documenting that the sterilization process works to perfection for that specific product.

We must show that our final product remains sterile during its rated shelf life, posing zero infectious risk to the patient. We must also show that the process of sterilizing, packaging and storing our product does not damage or impair the function of what are often complex, intricately assembled structures packaged in single-use kits.

This is more difficult than it may sound. Sterilization techniques which use extreme heat or radiation to kill microbes can damage intricate components or fail to penetrate the inner parts of a complex assembly. The anti-microbial gas ethylene oxide, however, can penetrate the

packaging as well as every nook and cranny of the device, sterilizing it without damaging its structure or function. Ethylene oxide sterilization has emerged as the most effective, and in most cases the only, currently available technique to sterilize the majority of medical devices, and the vast majority of complex, life-saving devices.

Let me offer an example from my direct experience as a heart surgeon. Every year, nearly a million patients undergo life-saving heart valve replacement surgery. The implanted artificial valves, designed to open and close hundreds of millions of times over several decades, are marvels of modern medical technology, incorporating metal, plastic, woven fabric and biologic tissue in a complex, intricate structure. The majority of heart valve replacement procedures are now performed using catheter techniques without the need for open surgery, with even more ingenious and complex constructions than surgically implanted valves.

An artificial heart valve infection is a catastrophic, and frequently fatal, complication, so these devices must be perfectly sterile. There is zero margin for error. The only available technique to sterilize artificial heart valves and the kits which are used to implant them is ethylene oxide. The plastic and biologic components of the artificial valve cannot tolerate exposure to heat or radiation. The catheter components have tiny internal channels extending over several feet, called lumens, which accommodate guidewires and fluids. The only currently available sterilizing gas which can penetrate a long catheter lumen is ethylene oxide.

It is my understanding that a large percentage of heart valves are sterilized at a single facility. Any significant disruption in this facility's capacity to sterilize artificial heart valves would have a devastating effect on hundreds of thousands of patients whose lives depend on them. I cannot even fathom the impact that the sudden closure of this facility, even temporarily, would have. There is no question that many patients would die.

Of course, this is just one example that happens to resonate with me as someone who performed heart surgery for many years. Every year, tens of millions of surgical procedures are performed in this country, from relatively simple biopsies to the most complex and intricate open-heart surgeries. The vast majority use devices and/or surgical kits sterilized with ethylene oxide. Step out of the operating room to the intensive care unit, or any patient care area for that matter, and ethylene oxide sterilized devices and kits are literally everywhere.

I would now like to shift to the central role sterilization, and ethylene oxide sterilization in particular, has played, and continues to play, in my role as a medical technology innovator, entrepreneur and chief executive of a small, innovative medical technology company. Fifteen years ago, my partners and I founded our first company while I was still a practicing heart surgeon. We invented, developed and commercialized a life-saving cardiovascular device which has saved many thousands of lives. The device, which was acquired by a larger medical device company ten years ago, is called AngioVac® and is now the standard of care to treat a deadly type of heart valve infection without the need for highly invasive open surgery. It consists of two separately packaged parts, each of which is sterilized using the exact same ethylene oxide

process we meticulously verified and validated many years ago. Any disruptions in access to ethylene oxide sterilization would immediately impact the often gravely ill patients who depend on AngioVac.

Today, I proudly serve as Chairman and Chief Executive of PAVmed (Nasdaq: PAVM), a small diversified commercial-stage medical technology company which I co-founded, and its subsidiaries Lucid Diagnostics Inc. (Nasdaq: LUCD), a cancer prevention company, and privately held Veris Health Inc., a digital cancer care company. PAVmed and its subsidiaries have a portfolio of innovative medical technologies in various stages of development and commercialization which require ethylene oxide sterilization. We will or already have deployed substantial resources, precious financial and human capital for a small company, to complete the verification and validation processes necessary to receive FDA clearance and offer these innovative technologies for the benefit of patients.

Our experience commercializing one of our more impactful and innovative products, Lucid Diagnostics' EsoCheck® Esophageal Cell Collection Device, nicely illustrates the unique challenges small innovative companies face navigating the existing sterilization landscape and the devastating impact acute reductions in sterilization capacity will have on our businesses and the patients we serve. Lucid Diagnostics commercializes the groundbreaking EsoGuard® Esophageal DNA Test—the first and only molecular diagnostic test that can accurately detect an early stage precancer, specifically esophageal precancer, the precursor to highly lethal esophageal cancer which kills over 16,000 Americans a year.

Each of these tragic deaths could have been prevented if esophageal precancer had been detected using our EsoGuard test before cancer develops. This requires collecting cells from the lower esophagus, near the stomach, by some noninvasive means which eliminates the need for complex and invasive upper gastrointestinal endoscopy.

EsoCheck is a deceptively simple but powerfully innovative tool which allows just that—precise targeted collection of lower esophageal cells performed in a doctor's office. The patient swallows a vitamin-sized capsule tethered to a thin catheter. A small balloon gently swabs cells from the target area and the capsule protects the sample as the catheter is withdrawn. The whole thing takes about two minutes and doesn't require any anesthesia or sedation. EsoCheck's gentle approach to noninvasive cell collection is a dramatic and elegant improvement over an older, cruder technology which involves dragging a Brillo pad-like sponge on a string and indiscriminately scraping cells from the stomach, esophagus and mouth in an untargeted fashion.

We licensed the EsoGuard and EsoCheck technologies from a major academic medical center and advanced the EsoCheck cell collection device through FDA clearance and subsequent commercial launch. Over ten thousand patients have undergone EsoCheck cell collection and successful EsoGuard esophageal precancer testing, as part of our early assault on the scourge of esophageal cancer. The FDA clearance required that EsoCheck be delivered as a sterile device to

assure that the sample is not seeded with contaminant DNA which could interfere with the molecular diagnostic test. As a catheter device with a long, tiny lumen, ethylene oxide was and remains EsoCheck's only sterilization option.

We quickly learned that manufacturing a device sterilized with ethylene oxide was uniquely challenging for a small company as a result of limited nationwide sterilization capacity. Large companies can, and often do, bring ethylene oxide sterilization in-house. Small companies do not have that option and are dependent on a small number of third-party sterilization companies, with limited overall capacity. Not surprisingly, small companies such as ours are their lowest priority customers and we began to experience perpetual threats to our supply chain as demand for EsoCheck grew.

We soon realized that as difficult as our supply chain challenges were, there was a real risk of things getting much, much worse as result of potentially dramatic cuts in already limited sterilization capacity. In order to mitigate this risk, we made the difficult decision to proactively deploy precious resources, including capital, to resubmit EsoCheck to the FDA as nonsterile device. This required extensive additional testing to confirm that eliminating the sterilization step did not adversely affect the performance of the device or the EsoGuard molecular test itself. Fortunately, the testing went well and we were eventually granted a new FDA clearance for EsoCheck as a nonsterile device.

All remain at severe risk of encountering supply chain disruptions if the proposed regulations move forward as proposed. We need to get these rules right.

Although, as I noted in my opening, I am neither a policy nor technical expert on ethylene oxide sterilization, I am, as the title of this hearing alludes to, a "Main Street" small company medical technology company executive who has studied the issue in some depth and is alarmed at the likelihood that pending EPA proposals will have a devastating effect on patient care nationwide as they are currently proposed.

I will also note that I am first and foremost a physician and, incidentally, a member of a family recently devastated by a cancer death. No one in this room is more committed than I am to prevent cancer and cancer deaths. It is literally the sole mission of Lucid Diagnostics which occupies the vast majority of my professional time.

As a first-generation American who fled political violence in Ethiopia over forty years ago, I have enormous faith that this great country, which has given me boundless opportunities, can apply technology and common-sense solutions to address its challenges.

Surgeons are known for their bluntness, so let me be blunt. The EPA regulations on device sterilization require the surgical precision of a scalpel. There are a variety of sensible, targeted, and scalable reforms to ethylene oxide sterilization regulation which would not risk patient access or medical device sterilization capacity. We can keep communities safe and lifesaving medical equipment available for patients.

Again, the industry supports an update to the rules, and we appreciate our ongoing collaboration with EPA on a thoughtful rule but these concerns must be addressed before the rules are finalized.

I implore this Committee, and Congress more broadly, to urgently work with the Executive branch and ensure we get this rule right. We all share the same goal—of ensuing patients have access to critical and lifesaving technologies they need.

Thank you very much for this opportunity and for your attention.

HEARING BEFORE THE HOUSE COMMITTEE ON SMALL BUSINESS

February 14, 2024

TESTIMONY OF MICHAEL GREEN, SPECIAL ADVISOR ON CLIMATE AND ENERGY, AMERICAN SUSTAINABLE BUSINESS NETWORK

Chairman Roger Williams, Ranking Member Nydia Velazquez, and fellow Committee Members, I welcome the opportunity to engage with your committee to discuss the nature of regulatory policies coming from the Environmental Protection Agency and their impact on mainstreet business. Today I have the opportunity to represent the American Sustainable Business Network and our hundreds of businesses spread across the country. I also have the opportunity to speak to you from the unique perspective of being a small business owner that is located on our community's main street in Woodstock, Vermont.

I would like to start with sharing the experiences of our community this past summer when a series of irregular weather events caused the second 100-year flooding event in the past 15 years. Between July 10th and 11th 2023, we had 9 inches of rainfall on the Green Mountain Spine. The waters rushed down and inundated our village causing widespread damage to our businesses and homes. My family was fortunate to be spared the devastation experienced by several of my neighbors, but many businesses in our community were impacted by this event. On the morning of the 11th, business owners across the state woke up to complete destruction as several communities were completely cut off from rescue services with roads sucked into the raging rapids.

This experience is not unique to Vermont. This is the same story for small businesses

across the country as we continue to learn to adapt to our ever changing climate. We know that small businesses are disproportionately impacted by the threats of climate change[1] due to their limited resources to absorb financial shocks from catastrophic events. Without the ability to relocate their brick and mortar businesses, being locked into less diversified supply chains, and often unable to compete with larger corporations in the global marketplace, our small businesses experience a heightened vulnerability to the threats of the climate crisis. A study by the Federal Emergency Management Agency (FEMA) highlights that nearly 40% of small businesses never reopen following a disaster[2], underscoring the urgent need for supportive climate regulations.

Businesses are not only feeling the impact of the climate crisis through major flooding events; many businesses are also forced to shutter their doors because of extreme heat and poor air quality. The impacts of unchecked localized air pollutants have an impact on our workforce, customers and communities as a whole. Strong EPA regulations such as the recent final rule on Soot[3] play a crucial role in safeguarding public health, reducing pollution-related illnesses, and lowering healthcare costs. For small businesses, healthier communities translate to reduced sick days, increased productivity, and a stronger consumer base. Research indicates that for every dollar spent on air pollution control, approximately $30[4] in health benefits is realized, demonstrating the economic viability of environmental regulations.

A 2023 report by the American Lung Association found that 36% of Americans—119.6 million people—still live in places with failing grades for unhealthy levels of ozone or particulate pollution[5]. The same report found that the number of people living in counties with

[1] https://hbr.org/2016/11/small-and-young-businesses-are-especially-vulnerable-to-extreme-weather
[2] https://www.cnbc.com/2017/09/16/hurricane-watch-40-percent-of-small-businesses-dont-reopen-after-a-disaster.html
[3] https://www.asbnetwork.org/media-release/statement-american-sustainable-business-network-epa-national-ambient-air-quality
[4] https://www.epa.gov/sites/default/files/2015-07/documents/factsheet.pdf
[5] https://www.lung.org/research/sota/key-findings

failing grades for daily spikes in deadly particle pollution was 63.7 million, the most ever reported under the current national standard. The impact from air pollution on our business community is real, as the workforce in these heavily impacted communities are unable to participate due to sick days, increased pulmonary disease or having to care for a loved one. By fostering a healthier community, small businesses see a direct benefit in the form of a more productive workforce and reduced healthcare expenses. The regulations put forward by the Environmental Protection Agency work to level this playing field and create opportunities for our small businesses to be a part of the solution.

Often, small businesses do not have the ability to force their will on the market like larger corporate competitors might. The EPA has done a good job of taking these matters into consideration when constructing their rulemaking process, engaging with our business leaders[6] and taking their opinions into consideration when drafting final rules and regulations.

Attached to my testimony, I have included testimony and calls to action from the hundreds of businesses that we have worked directly with at ASBN. This demonstrates our small business commitment to working with the EPA and their regulatory process. For almost two decades, we have been active in supporting a robust rulemaking process that supports scientific backed policies. The attachment includes hundreds of small businesses across the nation that have sent letters in support of recent EPA work to regulate dangerous pollution from mercury, carbon, methane and soot. These businesses acknowledge the impact that these pollutants have on their local communities and also recognize that the source of these pollutants is not the small business community but instead the result of business from large out-of-state corporate polluters.

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[6] https://www.epa.gov/newsreleases/epa-reaffirms-commitment-supporting-small-businesses-during-national-small-business-0

Small businesses are smart enough to not pollute the community of which they are an integral part.

EPA regulations often lead to significant shifts in market dynamics, incentivizing companies to develop and adopt cleaner technologies and practices. Small businesses are at the end of the issue and only see the harmful impacts of the unregulated market. These shifts towards cleaner and more efficient outcomes create better outcomes for small businesses by aligning the market with a healthier environment and often more efficient product choices.

There are several examples where EPA regulations have moved markets towards cleaner solutions that yielded economic opportunity. For instance, the The Good Neighbor Plan has guaranteed that companies are not impacted by cross-state pollution and the impact it may have cross state borders. Not only does this support the local community and downwind communities, it also guarantees that neighboring states don't become sacrificed due to lack of regulations from a neighboring state.

One example that is important to many of the communities across New York, New Hampshire and Maine is the Clean Air Act's Acid Rain and Mercury and Toxic Substances (MATS) programs. Through technical support, incentive structures, and a continued updating of these important policies, the EPA has worked with power plants to reduce their SO2 NOX and mercury emissions, a primary cause of acid rain and detriments to public health. These programs have led to significant investments in cleaner technologies and practices. Small businesses are often not implicated by the policy, since they are not large point source emitters but do stand to benefit from the end results.

One example of the ability of EPA regulatory policy moving markets in favor of small businesses is the EPA energy star program. This voluntary scheme promotes energy efficiency in products, homes, and businesses and is a program that I would imagine many of the committee members participate in through purchasing lower cost alternative home and office appliances. It is difficult to find a business or home in America that has not reduced energy costs through investing in things like energy efficient light bulbs. Manufacturers are incentivized to produce more energy-efficient products to receive the Energy Star label, which is recognized by consumers as a mark of energy efficiency. This program has significantly shifted the market towards energy-efficient appliances, lighting, and buildings[7] , reducing costs to small businesses and homes alike.

Another example of the EPA regulatory framework creating markets for small businesses is the Renewable Fuel Standard which requires a certain volume of renewable fuel to replace or reduce the quantity of petroleum-based transportation fuel. This has significantly boosted the biofuel market[8], encouraging the development of bioethanol and biodiesel industries. This has been a critical market for US energy supply and supports the economic opportunity for farmers in states like Ohio, Michigan and Minnisota[9].

EPA regulations have often been a catalyst for innovation, driving both large and small businesses to develop, adopt, and market environmentally friendly technologies and practices. Small businesses, in particular, have benefited from these regulations in several ways, as they can be more nimble and innovative in responding to regulatory requirements.

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[7]https://www.energystar.gov/about/impacts#:~:text=Economic%20Impacts,of%20U.S.%20energy%20efficiency%20jobs.

[8]https://www.epa.gov/environmental-economics/economics-biofuels#:~:text=U.S.%20policy%20approaches%20to%20support%20biofuel%20production,-The%20Energy%20Policy&text=EISA%20expanded%20the%20Renewable%20Fuel,from%20feedstocks%20other%20than%20cornstarch.

[9] https://www.eia.gov/petroleum/ethanolcapacity/

A clear example of this is regulations aimed at reducing waste and promoting energy efficiency which have led to a surge in demand for green building materials. Small businesses specializing in the production of sustainable building materials or offering green construction services have experienced growth as a result. For instance, small businesses that produce low-VOC (Volatile Organic Compound) paints and energy-efficient lighting have tapped into markets created by environmental standards.

EPA's regulations under the Clean Water Act have prompted innovation in water purification and stormwater management. Small businesses that develop and offer advanced filtration systems, rainwater harvesting technologies, and eco-friendly drainage solutions have benefited from the increased demand for technologies that help industries comply with discharge standards.

One of the areas of growth that has been the most beneficial to businesses and communities alike is technologies that support the measurement and reporting of localized air pollutants. This growing industry has helped make regulations smarter through the use of real-time technologies and put more information into the hands of decision makers. Small businesses that invent and manufacture emission control technologies, such as scrubbers for industrial smokestacks or catalytic converters for vehicles, have found new opportunities as a result of strengthening air quality standards. These businesses often lead in providing cost-effective and efficient solutions tailored to the needs of specific industries.

Lastly, no industry may have benefited from this more than the US Energy Industry. Innovation as a response to regulation over dirty fuel types has played an integral role in

creating the cost parity between new energy systems[10] and antiquated fuels that drive the climate crisis. The push towards renewable energy, partly driven by the EPA's performance setting regulation as well as carbon standards, has opened up markets[11] for small businesses involved in solar, wind, and other renewable energy technologies. Additionally, small businesses that offer energy audit services or energy management solutions help other businesses reduce energy consumption and comply with regulations, fostering a market for energy efficiency services.

These examples demonstrate how EPA regulations have not only worked to protect the environment and public health but have also encouraged entrepreneurial activity and innovation among small businesses. By addressing environmental challenges, these businesses not only contribute to sustainability but also create new industries and job opportunities.

Main street businesses are often the backbone of their local economy, especially in small towns and rural communities across the country. Business owners are often compelled to pursue decisions that don't have negative impacts in their own community fabric. EPA regulations aim to address environmental and public health issues by targeting the most significant sources of pollution, which are frequently large industrial facilities and power plants, not main street businesses. By focusing on these major polluters, the regulations can inadvertently level the playing field for small businesses in several ways.

One way in which the EPA manages the regulatory burden and also levels the playing field is setting policy based on the overall amount of pollution, waste or hazardous material in which a company generates. It is often the case that small main street businesses are not the large

[10] https://www.epa.gov/energy/clean-energy-programs
[11]https://energyinnovation.org/wp-content/uploads/2023/11/Maintaining-a-Reliable-Grid-Under-EPAs-Proposed-111-Rules.pdf

industrial sites that host and manage these pollutants. An example of this is how the EPA classifies hazardous waste generators into categories based on the amount of waste they produce, with different regulations applying to each category. Large quantity generators face more stringent regulations and reporting requirements than small quantity or very small quantity generators. This distinction ensures that small businesses generating less waste have fewer regulatory hurdles, reducing the operational and compliance costs compared to those faced by larger companies.

These examples show how EPA regulations are designed to mitigate environmental and health risks by focusing on the largest contributors to pollution, which often results in a regulatory framework that is inherently more focussed on large corporations, not main street businesses. Our main street businesses understand the importance of strengthening our clean air and water standards. We need healthy communities, a dependable workforce, and an environment that allows our businesses to thrive in place. Working with the EPA, we have an opportunity to sit at the table and share the stories and experiences from our first hand knowledge. We appreciate the opportunity that this committee has created to further engage in the process and hope that future conversations will focus on the negative impacts that climate change and public health can have on our business community.

Michael Green Biography:

Michael Green leads ASBN Climate and Energy Working group and assists with the organization's overall strategy on climate policy. Michael lives in Vermont where he works for an environmental services company, Native, A Public Benefit Corporation. In 2016, Michael was presented the Champion of Change Award by President Obama for his commitment to climate change as an equity issue at the White House.

Michael currently serves on several nonprofit boards and acts as an advisor on climate policy for government agencies and nonprofits. His passion for protecting our climate stems from his small mountain community and adoration of the great outdoors. Outside of the office, he can often be found roaming the nearest mountains on his bicycle, skis or in his hiking boots.

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My name is Shanti Holloway and I'm from Durham, NC. I am writing to express my, and my organization, ASBN's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Chad Speight and I'm from Madison, WI. I am writing to express my, and my organization, Chads Design Build's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Kristine Waldren and I'm from Cypress, CA. I am writing to express my, and my organization, ECOS's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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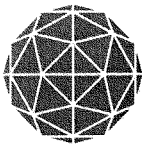
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My name is Richard Lawton and I'm from Point Pleasant Beach, NJ. I am writing to express my, and my organization, NJ Sustainable Business Council's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Michelle Hirons and I'm from San Francisco, CA. I am writing to express my, and my organization, HigherRing's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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My name is Liz Rubin and I'm from New York, NY. I am writing to express my, and my organization, Ecodeo's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Charlie Garlow and I'm from Rehoboth Beach, DE. I am writing to express my, and my organization, DEEVA DE Electric Vehicle Association's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Mark Canright and I'm from Asbury, NJ. I am writing to express my, and my organization, Comeback Farm Organic Produce's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is arielle llewellyn and I'm from Alameda, CA. I am writing to express my, and my organization, EBNG's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Mitch Ratcliffe and I'm from Lakewood, WA. I am writing to express my, and my organization, Earth911 Inc.'s, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Bill McClain and I'm from Bainbridge Island, WA. I am writing to express my, and my organization, Clean & Prosperous American's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Motthida Chin and I'm from Seattle, WA. I am writing to express my, and my organization, Motthida Chin, LLC's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Emily Snyder and I'm from New Orleans, LA. I am writing to express my, and my organization, Urban Conservancy's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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My name is Keyanna Silverman and I'm from Detroit, MI. I am writing to express my, and my organization, Detroit Community Wealth Fund's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Virginia Auster and I'm from Norwalk, CT. I am writing to express my, and my organization, Wilton Quaker Meeting's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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My name is Becky Reimbold and I'm from South Bend, IN. I am writing to express my, and my organization, Just Goods's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Mark Hayduke Grenard and I'm from Phoenix, AZ. I am writing to express my, and my organization, Mark's Bookmark Bookseller's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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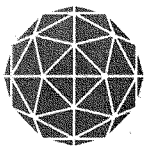
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My name is John Davies and I'm from Buena Park, CA. I am writing to express my, and my organization, Avocado Green Brands's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Jerry Rivers and I'm from Roosevelt, NY. I am writing to express my, and my organization, North American Climate, Conservation and Environment(NACCE)'s, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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My name is Dana Weintraub and I'm from Beaverton, OR. I am writing to express my, and my organization, Evergreen Sustainability, LLC's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Dr. Kakha NADIRADZE and I'm from Tbilsi, GE-TB. I am writing to express my, and my organization, Association for Farmers Rights Defense, AFRD's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is James Costello and I'm from Fairfax, CA. I am writing to express my, and my organization, Green River Financial's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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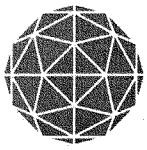
My name is Jared Meyers and I'm from Saint Petersburg, FL. I am writing to express my, and my organization, Salt Palm Development's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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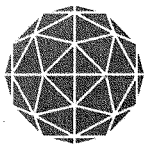
My name is Jared Meyers and I'm from Orlando, FL. I am writing to express my, and my organization, Florida For Good's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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My name is Patricia Miller and I'm from Middletown, NJ. I am writing to express my, and my organization, Middletown for Clean Energy's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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My name is Shannon Bone and I'm from Charlotte, NC. I am writing to express my, and my organization, New Leaf Paper's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines.. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Jenny Morgan and I'm from Seattle, WA. I am writing to express my, and my organization, Tradewater's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Leslie Samuelrich and I'm from Boston, MA. I am writing to express my, and my organization, Green Century Funds's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is James Dawson and I'm from Davis, CA. I am writing to express my, and my organization, James' Solar's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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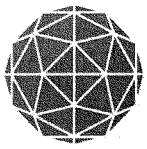
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My name is Sarah Gallagher and I'm from New York, NY. I am writing to express my, and my organization, Upper Green Side's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Fran Aguirre and I'm from Denver, CO. I am writing to express my, and my organization, Unite North Metro Denver's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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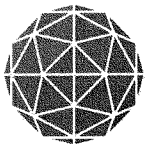
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My name is Maiya Holliday and I'm from Truckee, CA. I am writing to express my, and my organization, Mangrove Web's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Spencer Bruce and I'm from Brooklyn, NY. I am writing to express my, and my organization, Climate Neutral's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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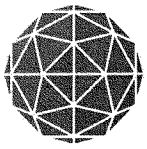
My name is Aaron Ableman and I'm from El Sobrante, CA. I am writing to express my, and my organization, Kindhumans's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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My name is Arielle Llewellyn and I'm from Alameda, CA. I am writing to express my, and my organization, East Bay Natural Grocers's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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My name is Hank Skade and I'm from Bend, OR. I am writing to express my, and my organization, Tiburon Ventures, LLC's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Prasad Jaladi and I'm from Austin, TX. I am writing to express my, and my organization, Suraksha's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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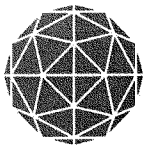
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My name is David Wilcox and I'm from Brookline, MA. I am writing to express my, and my organization, ReachScale's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Alexander Sexsmith and I'm from Tucson, AZ. I am writing to express my, and my organization, Sexsmith Architects's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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My name is George LoCascio and I'm from Gardner, MA. I am writing to express my, and my organization, MWCC's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Miranda Pildes and I'm from Brooklyn, NY. I am writing to express my, and my organization, Joyaux Marisol (Joyaux Corp)'s, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is WILHELM REINDERS and I'm from Forest Hills, NY. I am writing to express my, and my organization, SULA NYC's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Bob Bechtold and I'm from Ontario, NY. I am writing to express my, and my organization, HARBEC's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Monica Dodi and I'm from Los Angeles, CA. I am writing to express my, and my organization, The 22's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Amy Bergman and I'm from Alexandria, VA. I am writing to express my, and my organization, The Apothecary's Daughter's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Steven Adams and I'm from Viroqua, WI. I am writing to express my, and my organization, Chrysalis Farm's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Corinne LaManna and I'm from Washington, DC. I am writing to express my, and my organization, ASBN's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is sidney amster and I'm from Philadelphia, PA. I am writing to express my, and my organization, SVC's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Patrick Hughes and I'm from Dallas, TX. I am writing to express my, and my organization, Pinnacle Coatings Group's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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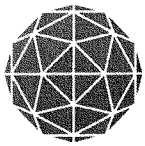
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My name is Sandra Stewart and I'm from San Francisco, CA. I am writing to express my, and my organization, Thinkshift Communications's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Mike Englert and I'm from Washington, DC. I am writing to express my, and my organization, Eighty2degrees LLC's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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My name is Robert Taylor and I'm from Clearlake, CA. I am writing to express my, and my organization, Konocti Senior Support's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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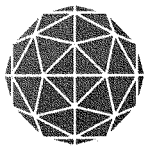
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My name is Daniel OBrien and I'm from Milton, NY. I am writing to express my strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Charles Wolfe and I'm from Sylmar, CA. I am writing to express my, and my organization, C. Wolfe Software Engineering's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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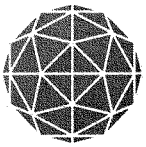
My name is Storm Cunningham and I'm from Arlington, VA. I am writing to express my, and my organization, RECONOMICS Institute's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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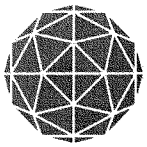
My name is Jean Chagnon and I'm from New York, NY. I am writing to express my, and my organization, udem's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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My name is Lara Pearson and I'm from Incline Village, NV. I am writing to express my, and my organization, Law Office of Lara Pearson Ltd, PBC d/b/a Brand Geek's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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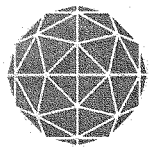
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My name is Adam Goettelman and I'm from Sturgeon Bay, WI. I am writing to express my, and my organization, Healthy Way Market's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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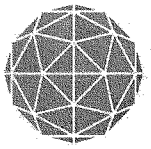
My name is Hannah Lee and I'm from Madison, WI. I am writing to express my strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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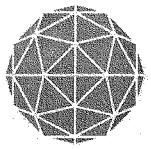
My name is Linda McNeel and I'm from Madison, WI. I am writing to express my, and my organization, Bachman McNeel & Associates's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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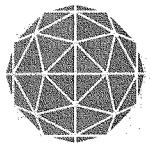
My name is Rachel Duffy and I'm from Morrisville, VT. I am writing to express my, and my organization, Peoples Academy's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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My name is Frank Scarpaci and I'm from San Diego, CA. I am writing to express my, and my organization, Vianova's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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My name is Lynette Miller and I'm from Madison, WI. I am writing to express my strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Mary Weyker and I'm from Racine, WI. I am writing to express my, and my organization, Sisters of St Dominic's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Brian Caneda and I'm from North Charleston, SC. I am writing to express my strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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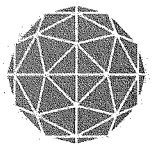
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My name is drkrpelletier@aol.com Pelletier and I'm from San Francisco, CA. I am writing to express my, and my organization, UCSF School of Medicine's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Christopher Overholt and I'm from Brier, WA. I am writing to express my, and my organization, Namu Baru Inc.'s, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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My name is Jill Matteson and I'm from Los Angeles, CA. I am writing to express my, and my organization, Gravender Farms's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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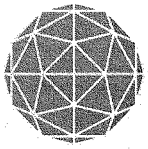
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My name is Emma Jacobs and I'm from Orlando, FL. I am writing to express my, and my organization, Legacy Vacation Resorts's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Cheryl Elkins and I'm from San Diego, CA. I am writing to express my, and my organization, Cheryl Elkins Jewelry's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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My name is Dave Smith and I'm from Columbia, SC. I am writing to express my, and my organization, Senior Express USA's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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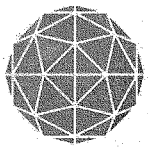
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My name is Jim Loveland and I'm from Saint Petersburg, FL. I am writing to express my strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Alan Peterson and I'm from Quarryville, PA. I am writing to express my, and my organization, PSR's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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My name is Karen Berger and I'm from Montrose, CA. I am writing to express my strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Christopher Horner and I'm from Santa Barbara, CA. I am writing to express my strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Ileana vasquez and I'm from Seattle, WA. I am writing to express my, and my organization, LolitaMoon Productions's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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My name is Saab Lofton and I'm from Seattle, WA. I am writing to express my strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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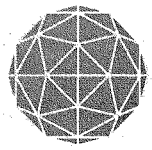
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My name is Michael Londo and I'm from West Chicago, IL. I am writing to express my, and my organization, Just in Time Direction's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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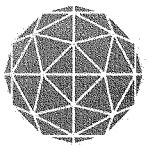
My name is Jarrett Cloud and I'm from Stanhope, NJ. I am writing to express my strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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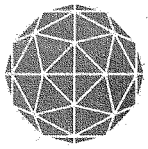
My name is Kaneisha Lewis and I'm from Fort Worth, TX. I am writing to express my, and my organization, Cantey Hanger, LLP's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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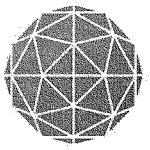
My name is Alysha Schultz and I'm from West Linn, OR. I am writing to express my, and my organization, Intuitive Digital's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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My name is Heather Mason and I'm from Marina del Rey, CA. I am writing to express my, and my organization, Caspian Agency's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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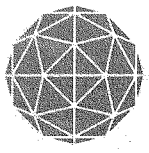
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My name is Paul Wythes and I'm from San Francisco, CA. I am writing to express my, and my organization, Oakdell Capital's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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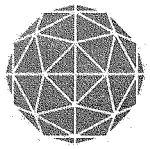
My name is Cheryl Spector and I'm from Denver, CO. I am writing to express my, and my organization, Spector and Associates's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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My name is Gregory Garnant and I'm from New York, NY. I am writing to express my, and my organization, Garnant Computer Services's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants



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My name is Maureen Vagnini and I'm from Windsor, CT. I am writing to express my strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. EPA's proposal is a critically important step forward, providing a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. This proposal would avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. It is critical that in tandem with this standard, the EPA and the entire Biden administration follow through on critical protections for communities that have historically borne the brunt of deadly pollution from power plants and may continue to face power plant pollution. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants

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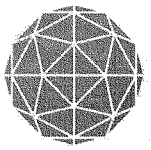
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My name is Anna Sampson and I'm from Gainesville, FL. I am writing to express my, and my organization, We Are Neutral's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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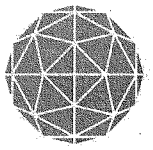
My name is Janet Morgan and I'm from Boulder, CO. I am sending this email to express my, and my organization, Sequent Management Inc.'s, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. Fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. PLEASE, listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you, Janet M. Morgan'



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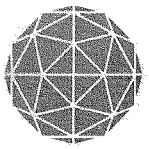
My name is Gina Olson and I'm from Aspen, Colorado I am writing to express my, and my organization, Livable Planet's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'



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My name is Susan Richman and I'm from Durham, New Hampshire. I am writing to express the my strong support, and the support of my organization, New Hampshire Network for Environment, Energy and Climate, for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. The federal government must take a strong leadership role in fighting climate pollution. I live in a state that is reluctant to acknowledge human-caused climate change, and resists setting goals or standards, or promoting helpful initiatives such as energy efficiency or net metering or EV charging. We rely on the federal government to take the brave moves. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'



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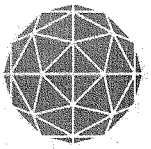
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I am writing to express my strong support for the Biden administration's proposed standards to cut climate pollution from coal and natural gas-fired power plants; begin the conversion to completely renewable energy generation. In the 1960s the LBJ administration received study information warning of the climate change potential from hydrocarbon based fuel burning. Oil and gas company scientists echoed those warning from, at least, the 1970s... So, what did they do? The Carter administration put solar panels on the White House, then the following, Reagan, administration removed them. In the late 1970s Mobil Oil bought Tyco Laboratories, a company that produced solar panels, and did little, to nothing, with the company... shut it down 19 years later. This the shortest list of things done to stall the conversion to renewables, by industries that could have afforded to be on the leading edge of said renewable conversion (see also: Merchants of Doubt by Naomi Oreskes and Erik M. Conway). As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Inertia has ruled the day so far and only significant pressure from government agencies, such as the EPA, can kick start the effort to convert to renewable energy. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is George Chmael II and I'm from Annapolis, Maryland . I am writing to express my, and my organization, Council Fire's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'



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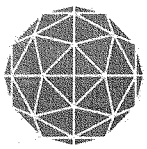
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My name is Diane Keefe and I'm from Norwalk.CT I strongly support the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is Carrie VanWinkle and I'm from Louisville, Kentucky. I am writing to express my strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you, Carrie[1]



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My name is Theodora Skeadas and I'm from Cambridge, MA. I am writing to express my, and my organization, Cambridge Local First's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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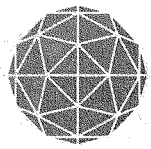
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My name is Mike Brown and I'm from Irvine, California. I am writing to express my, and my organization, Impact Grove's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is Aria McKenna and I'm from Saint Augustine, Florida. I am [writing] to express my, and my organization, Global Cooling Productions', strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. Furthermore, as we move forward with solutions, we must protect our ecosystems and our climate from unintended consequences as new technologies are adopted. The dangers of mining and the warming potential of hydrogen pipelines must not be overlooked as we create a plan for a viable path forward, Technologies exist to do this safely but extreme vetting is required to do so. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'



American Sustainable Business Network

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My name is Katherine DiMatteo and I'm from Leyden, MA. I am writing to express my, and my organization, Wolf & Associates', strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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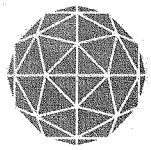
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My name is Heather Burns and I'm from Bethel, Connecticut. I am [writing] to express my, and my organization, Connecticut Sustainable Business Council's strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is Julia Collins and I'm from California I am writing to express my, and my organization, Planet FWD's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'



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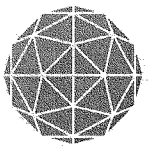
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My name is Kimberlee and I'm from Greenbrae, California. I want to express my, and my company's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants.I would like to add that there is opportunity for impactful climate mitigation and carbon reductions with a focus on the plastic industry - a major contributor. Thank you,'

American Sustainable Business Network

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My name is Nancy Hirshberg and I'm from Wolfeboro, NH. I am writing to express my strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'



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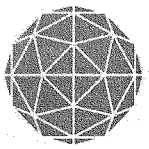
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My name is John Imes and I'm from the Village of Shorewood Hills, Wisconsin. I am writing to express my, and my organization, WEI's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. Wisconsin coal power plants consumed almost 14 million tons of coal in 2020 resulting in over 33 million tons of carbon dioxide (CO2) emissions, not to mention other criteria pollutants including 21 million tons of Nitrogen Oxide (NOx), 14 million tons of Sulfur Dioxide (SO2), plus particulate emissions and other pollutants. Source www.eia.gov If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you, John Imes'

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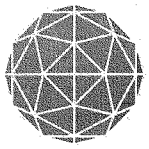
My name isTim Wheeler and I'm fromDurango, CO. I am writing to express my, and my organization, Durango Compost Company's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'



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My name is Carol Phelps and I'm from Middleton, Wisconsin. I'm writing to express my support, and the support of Wisconsin Creation Care Ambassadors (a multi-faith organization which works to care for the Earth and stop climate change), for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution. They have used the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted, the EPA's proposal is expected to allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Please listen to scientists' warnings about the urgent need for climate action, and the voices of those who are living near power plants most impacted by their emissions, which are disproportionately low-income families and communities of color. This critically important step forward provides a pathway to modernize how we produce power in this country. By providing several different opportunities for compliance, and multiple financial incentives, power plants will have what they need to move forward with rapid emissions reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The longer we wait, the more disasters happen, the more people suffer, the more lives are lost, the more communities and ecosystems are impacted. Changes happening today cannot be reversed (no one has a way to refreeze Greenland or Antarctica). Feedback loops (like wildfires, melting permafrost, increased water vapor in the air) are in full swing. If we reach certain "tipping points" (such as major ocean currents changing - e.g. the Gulf Stream no longer carrying warm water to Europe), heaven help us. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'



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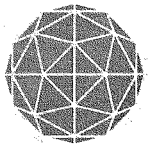
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My name is Kermit Hovey and I'm from Middleton, WI. I am writing to express my, and my organization, Faiths Connect for Climate Action's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. Making money while inflicting the costs of pollution on the rest of us should never be tolerated. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. In the absence of the even more comprehensive Energy Innovation and Carbon Dividend Act, The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is David Kyler and I'm from Saint Simons Island, Georgia. I am submitting this statement to express the strong support of our non-profit organization, Center for a Sustainable Coast, for the Biden administration's proposed standards to decisively reduce climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are among the largest sources of heat-trapping carbon pollution, using the air our communities, ecosystems, and businesses are dependent upon as a dumping ground for far too long. If enacted, the EPA's proposal will enable prevention of at least 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work-days, providing an estimated $85 billion in short-term climate and public-health benefits, and immeasurably more over the long-term. We must honor scientists' warnings about the urgent need for climate action and the voices of those living near power plants who are most harmed by power-plant emissions. These emission victims are disproportionately from low-income groups and communities of color. This critically important step forward provides a clear and worthy target for industry, as well as pathways for modernizing power-production methods in the U.S. By providing several different opportunities for compliance and multiple financial incentives, power-plant owners will have what is required to move ahead with rapid emission reduction. I encourage the EPA to expediently adopt and implement this well-justified proposal and to work to achieve even greater pollution reductions from more sources as quickly as possible. We must not delay in taking this critical action to protect Earth's endangered climate and life-support systems. The EPA must act by early 2024 to finalize the strongest possible standards to minimize climate pollution from power plants. We are depending on your commitment to serving the public interest.'



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My name is Adam Hamilton and I'm from Peterborough, NH. I am writing to express my, and my organization, Clean Simple Foods, Inc's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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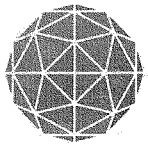
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My name is James Elder and I'm from Manchester, MA. I am writing to express my, and my organization, the Campaign for Environmental Literacy's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is Jenny Davis and I'm writing to express my, and my Denver-based small business', strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'



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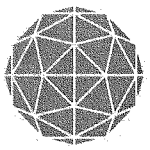
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My name is chris Laszlo and I'm from Great Falls, Virginia. I am writing to express my, and my organization, Sustainable Balue Partners' strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is Kim Craven and I'm from Madison, CT. I want to express my, and my organization, CSG Communications Inc., strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. We need strong and clear leadership to address the effects of climate change as evidenced this summer across the globe. We can no longer afford to wait for everyone to get on board. The EPA needs to lead to finalize the strongest possible standards to cut climate pollution from power plants. Thank you for the work that you do on our behalf.'



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My name is Les Blevins and I'm from Lawrence Kansas. I am writing to express my, and my organization, Advanced Alternative Energy's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid excessive hot weather, numerous flooding events, 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $285 billion dollars in net climate and public health benefits. Please listen to scientists' warnings about the urgent need for climate action and the voices of those living in the United States along with thousands of central power plants that add CO2 to the atmosphere and who are being impacted by their emissions. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid greenhouse emission reductions. I'm writing to encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines and with the least costly measures. Our climate can't wait. The EPA must act to finalize the strongest possible standards to cut climate pollution from power plants all across our land and set an example for China and India and other countries. Thank you, Les Blevins of Advanced Alternative Energy Co. CO2 Emission cuts alone could make the earth much hotter while adding aerosols could cool the earth scientists say. BY SAUL ELBEIN & LES BLEVINS Scientists have recently uncovered a potentially lethal paradox at the heart of efforts to slow human-caused climate change. A series of new studies suggest a stark truth. On the one hand, cutting fossil fuel pollution is necessary for avoiding more severe destruction over the long term. But such cuts will make the earth much hotter in the short term. One recent study cast the well-known declines in air pollution during the COVID-19 pandemic in a darker light. These cuts remain one of the only examples of successful cuts to climate-warming pollution, but the new study found that those pandemic-era cuts in air pollution led to a rise in global temperatures. The findings, published on Wednesday in the journal NPJ Climate and Atmospheric Science, unveil a stark paradox at the heart of human-caused climate change. It suggests that while cutting fossil fuel pollution is necessary for avoiding severe destruction over the long term — such cuts alone will make things noticeably worse in the short term. The pandemic-era economic slowdown led to "a large-scale geophysical experiment," study leader Örjan Gustafsson of Stockholm University said in a statement. That's because the shuttered factories and power plants led to a corresponding crash in emissions. Even so, not all emissions fell in the same way. From a research station in the Maldives, an island archipelago off the coast of India, Gustafsson's team detected that when pollution from smokestacks fell, so did concentrations of aerosols — tiny floating particles that hang in the atmosphere. That fall was an unmistakable boon to public health. According to Our World in

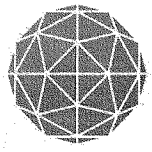
Data, these contaminants — like tiny floating particles of soot or sulfates — cause millions of global deaths per year. But for all the damage they do to human lungs, aerosols also help shade the earth by scattering light particles from the sun that would otherwise warm the planet. After the cuts, the study found that light reaching the surface increased by 7 percent. "While the sky became bluer and the air cleaner, climate warming increased when these cooling air particles were removed," Gustafsson said. While aerosol concentrations fell as the smokestacks shut down, other gases remained stubbornly high. In particular, levels of the most potent climate-warming gases — like carbon dioxide — barely changed. Carbon dioxide and other greenhouse gases warm the planet by trapping heat. The combination of more heat hitting the same amount of carbon dioxide meant a straightforward rise in temperatures. The sudden rise in temperatures led by the pandemic reduction is a stark example of a more general problem — one that has long haunted the drive to cut pollution. A draft study led by Columbia University climate scientist James Hansen suggests that the recent rise in temperatures doesn't come from greenhouse gases at all, but from the reduction in sulfate aerosols since the early-2000s.'



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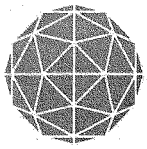
My name is Janine Firpo and I'm from Oakland, California. I am writing to express my, and my organization, Invest for Better's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'



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My name is Keeley and I'm from Boulder, Colorado. I am writing to express my, and my organization, The Alliance for Collective Action's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you, Keeley Stokes'



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My name is Stacia Betley and I'm from New Haven, VT. I am writing to express my, and my organization, MegaFood's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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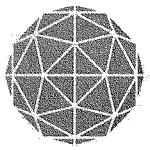
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My name is Tim Redmond and I'm from Dexter, MI. I am [writing] to express my, and my organization, Skinny Farm's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,

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My name is William Nash and I'm from Long Beach, California. I am writing to express my, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'



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My name is Mark Kleinschmit and I'm from Park Ridge, Illinois. I am writing to express my, and my organization, Other Half Processing's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is Lorna Lyons and I'm from Portland OR. I am emailing to express my, and my organization ASBN's strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is Patrick Thompson and I'm from Atlanta, GA. I am writing to express my, and my organization, TerraScale's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is Linda Brent and I'm from Chapel Hill, NC. I am writing to express my, and my organization, Blue Toby's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is Denise and I'm from Spokane WA and I am writing to express my, and my organization, Ganesh Himal Trading's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is Mark Canright. I'm a New Jersey farmer in Asbury NJ. I am writing to express my, and my business's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. It's time to stop burning fossil fuels immediately if we want to survive as a human race. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is Anna Marie Lyles and I'm from Princeton, NJ. I am [writing] to express my, and my organization, [org name]'s, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait and this will improve public health too. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is Joe Magid and I'm from Wynnewood, PA. I am writing to express my, and my organization, Gryphon Solution, LLC's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is Lori and I'm from [Dallas, Tx. I am writing to express my, and my organization,, Conscious Leaders, Inc, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you, Lori Darley'

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My name is Laurie Allan and I'm from Upstate New York new Rochesterwhere the air we breathe has been unhealthy for several days over a period of about 3-4 weeks.. I am writing to express my, and my organization, Laurie Allan & Associates, LLCs, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Our world is quite literally on fire as I write this and it is idiocy to think that it will not get worse, food supply will be affected, and future generations will never forgive out lack of courage to act and remedy global climate change. Thank you,'

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My name is Scott Hill and I'm from Springville, NY. I am writing to express my, and my organization, J. Kraft Microscopy Services', strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. I suffer from asthma, so this proposal could literally be a life-saver for me. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is David J. FERRAN and I'm from SAN Diego Ca. I am email you to to express my, and my organization, Torrey Project]'s, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is Dr.Robert Vinetz, M.D. a pediatrician in Los Angeles, California. I've seen hundreds and hundreds of children with asthma...asthma triggered by and made much worse by the polluted, toxic air we all breathe. The ultra/fine particles in that air get into our blood, bodies and brains...even into those of the unborn. Research shows this causes harm, including (but not limited to) lung and developmental defects. I urge the EPA and the Biden Administration to enact the strongest possible standards to protect children and everyone on earth from the toxic impact of fossil fuels on our climate and our lives. Please, please do not cave in to the fossil fuel industry that for decades knew they were unleashing untold harm on life on our planet, but chose making money over protecting life. The EPA's proposed carbon pollution standards plan provides a clear end-point for where the industry needs to get to, as well as pathways to modernize how we produce power in this country and cut climate pollution from existing coal, gas, and new gas power plants. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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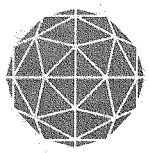
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My name is Sally Malanga and I'm from West Orange, New Jersey. I am writing to express my, and my organization, New Earth, LLC's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is Harry Doull and I'm from Kingston, NY. I am writing to express my, and my organization, Keap Candles', strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'



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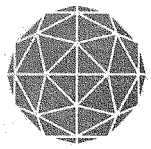
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My name is Brad Brooks and I'm from East Hampton NY. I am writing to express my strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. It also finally has to do a better analysis of methane and its large impact on Climate Change. The EPA is making a mistake by continuing to use a 100-year period to compare its impact versus Co2 - the correct factor would be 84x as powerful than Co2 than the current 28X I believe your agency currently uses. Moreover, new studies are needed that would show that methane is leaking throughout the infrastructure system at a far greater rate than just the 2% assumed by your agency. More realistically the rate is likely 2-3x that, which would make methane a bigger problem than C02 over the next 20-year time period. Methane (natural gas) can also be easily used in our current utility system, so much better regulations and penalties need to finally be implemented to limit the escape of this powerful ghg emission. Thank you, Brad Brooks CFA'

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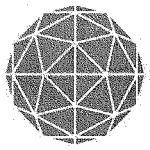
My name is Susan Webb and I'm from Madison, Wisconsin . I am [writing] to express my strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'



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My name is Brittany Phelps and I'm from Waunakee, WI. I strongly support the Biden administration's proposed standards to cut climate pollution from fossil fuel power plants because they are are one of the largest sources of carbon pollution. If enacted, the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'



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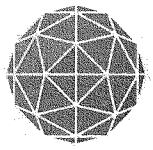
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My name is Dann Carnes and I'm from Chapel Hill, NC. I am writing to express my, and my organization, Fireplace Editions's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is Jennifer Nichols and I'm from Lenni, PA. I am writing to express my, and my organization, GreenWeaver Landscapes's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'



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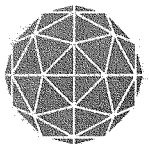
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My name is Dana Davis and I'm from NYC, NY. I am [writing] to express my, and my organization,Mara Hoffman's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you, Dana Davis'

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My name is Renaud des Rosiers and I'm from Sonoma County, CA. I am writing to express my, and my organization, Amy's Kitchen's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'



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My name is Lawrence Garwin and I'm in Palo Alto, California. I am writing to express my strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you, Lawrence Garwin Palo Alto, California'

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My name is Sarah Quinn and I'm from Fairfield, Iowa. I am to express my strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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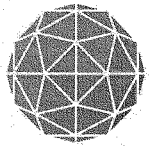
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Enough is enough! My name is Dulanie Ellis-La Barre and I'm from Ojai, C. I am writing to express my, and my organization, Walk Your Talk Productions', strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is Perla Ni and I'm from Menlo Park, CA. I am writing to express my strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you, Perla'



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My name is Terrence McNally, Long Beach, CA. I want to express strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution. EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300K asthma attacks, 38K school absences, and 66K lost work days providing up to $85B in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by emissions, disproportionately low-income and communities of color. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is Deborah Frangquist and I'm from San Francisco, California. I am writing to express my, and my organization, Chosen Futures' strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is George Naumovski and I'm from Melbourne Australia. I am writing to express my, and my organization GNCORP, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is Freek Driesenaar and I'm from Oudheusden in the Netherlands. I am writing to express my, and my offspring's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you, With confidence in your moral compass, Freek Driesenaar'

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My name is David Friedman and I'm from Danbury CT. I am writing to express my, and my organization, Plantissimo LLC's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,[1]

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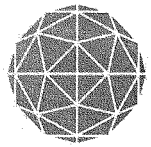
Docket Number: New Source Performance Standards for GHG Emissions from New and Reconstructed EGUs; Emission Guidelines for GHG Emissions from Existing EGUs; and Repeal of the Affordable Clean Energy Rule EPA-HQ-OAR-2023-0072

I am writing to express my, and my organization, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is Leon Miller-Out and I'm from Ithaca, NY. I am writing to express my, and my organization, Singlebrook's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'



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My name is Seth Perlman and I'm from Highmount NY. I am [writing] to express my, and my organization, Perlman & Perlman LLP. strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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I am writing to express my STRONG SUPPORT for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the STRONGEST possible standards to cut climate pollution from power plants. Thank you,'

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My name is Maria Allison and I'm from Philadelphia, PA. I am writing to express my strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you, Maria Allison[1]

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My name is Julien and I'm from Brooklyn, NY I am writing to express my, and my organization, Create The Remarkable's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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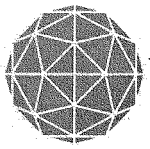
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My name is Neil Donnelly and I'm from Brooklyn, NY. I am writing to express my strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you, Neil'

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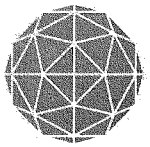
My name is Taj and I'm from Warrenton in Virginia. I am writing to express my, and my small business's, Greenvision Design, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'



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My name is Paul Zeigle and I'm from St. Louis Park, MN. I am writing to express my, and my organization, Quality Bicycle Products, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'



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My name is Elric and I'm from Berkeley, CA. I am writing to express my, and my organization, OLIPOP's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you, Elric Centers'

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My name is Kimberly Heismann and I'm from New York, NY. I am writing to express my, and my organization, Emotiva's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is Reverend Jean-Luc Charles and I'm from Stamford, CT. I am writing to express my and my church's strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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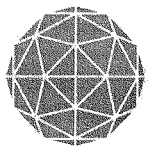
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My name is Janet Kahn and I'm from Burlington, VT. I am writing to express my strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'

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My name is Charles White and I'm from Worton, MD. I am writing to express my strong support and my companies support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you,'



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My name is Leola Specht and I'm from Rhinebeck, NY. I am writing to express my, and my organization,JSA Sustainable Properties's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Just as important, we must immediately move money from funding environmentally destructive farming practices to conversion to regenerative agriculture practices that have a net positive environmental impact vs the detrimental which is the norm now. To avoid a permanently unstable (we can expect more and more severe fire, flood, wind, etc. weather events if we don't act now) climate, we need to reduce methane, refrigerant and CO2 emissions and increase biodiversity and nature soil regeneration now and forward.

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My name is David Way and I'm from Lincoln, RI. I am writing to express my, and my organization,Vanderbilt Financial Group DBA Greenvest's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants.

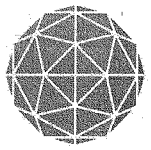
Thank you,

David Way

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My name is gal nahum and I'm from Clearwater, FL. I am writing to express my, and my organization,CLEAN-AIR (electric-filter)'s, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. Thank you, pr. nahum we must act now i got a very radical solution to our CO2 emissions just turn them to O2 by using conducted Direct Current with my electric filter https://youtu.be/qkoPmBPmeCo'



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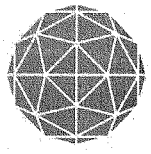
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My name is Lilliane LeBel and I'm from Temple, NH. I am writing to express my, and my organization,LeBel Marketing's, strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Cutting climate pollution is both popular with the public and critical to the success of the United States economy. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants.

American Sustainable Business Network

Docket Number: New Source Performance Standards for GHG Emissions from New and Reconstructed EGUs; Emission Guidelines for GHG Emissions from Existing EGUs; and Repeal of the Affordable Clean Energy Rule EPA-HQ-OAR-2023-0072

My name is Mary Bachhuber and I'm from Middleton, WI. I am writing to express my strong support for the Biden administration's proposed standards to cut climate pollution from coal- and natural gas-fired power plants. As we know, fossil fuel-fired power plants are one of the largest sources of carbon pollution, using the air our communities and businesses are dependent upon as a dumping ground for far too long. If enacted the EPA's proposal will allow us to avoid 1,300 premature deaths, 800 hospital and ER visits, more than 300,000 asthma attacks, 38,000 school absences, and 66,000 lost work days providing up to $85 billion in net climate and public health benefits. Listen to scientists' warnings about the urgent need for climate action and the voices of those living near power plants most impacted by their emissions, which are disproportionately low-income and communities of color. This critically important step forward provides a clear end point for where the industry needs to get to as well as pathways to modernize how we produce power in this country. By providing several different opportunities for compliance and multiple financial incentives, power plants will have what they need to move forward with rapid emission reduction. I encourage the agency to move forward with this proposal and work to achieve greater cuts to pollution from more sources on the fastest possible timelines. Our climate can't wait. The EPA must act by early 2024 to finalize the strongest possible standards to cut climate pollution from power plants. The EPA is sincerely urged to develop policy and standards for businesses to reduce emisions which are found to causeClimate Change.



American Sustainable Business Network

Docket Number: 'Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review' EPA-HQ-OAR-2021-0317-1460

Dear EPA Administrator Regan,

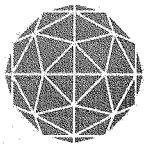
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Taking action to reduce the impacts of methane will:
- Mitigate climate risks
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Thank You,

Tim Greiner



American Sustainable Business Network

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Thank You,

Heidi Sanborn

American Sustainable Business Network

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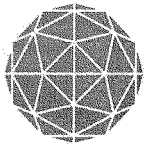
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Thank You,

Dominik Eckenstein



American Sustainable Business Network

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Kris Coperine

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Saab Lofton

American Sustainable Business Network

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Rinaldo Brutoco

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JOHN PAHSSEN

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Thank You,

Martin Wolf

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Adrian Gershom

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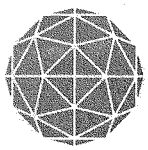
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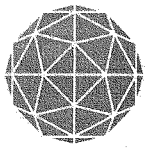
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Bram Kleppner

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Maren Keeley

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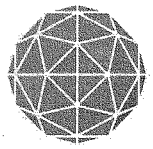
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Thank You,

Abigail Rome



American Sustainable Business Network

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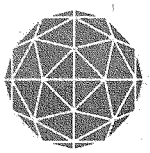
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David Schreiber



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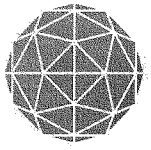
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Jared Meyers



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Gina Weatherup

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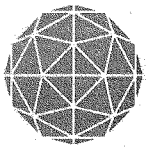
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Stephanie Klotz



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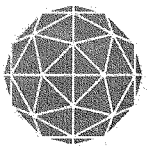
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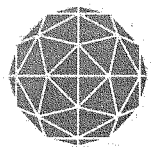
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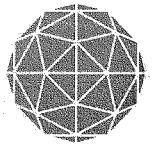
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- Mitigate climate risks
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Thank You,

Lynn Nadeau

American Sustainable Business Network

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Simone Schmidt

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Glenn Schiffbauer

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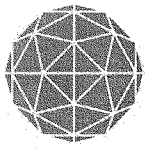
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Nancy Felton



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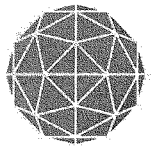
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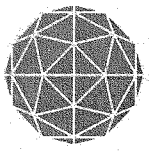
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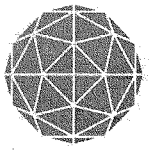
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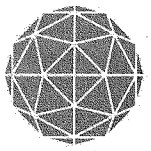
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Thank You,

Amy Bergman



American Sustainable Business Network

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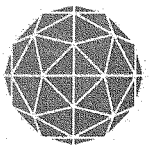
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Thank You,

John Gage



American Sustainable Business Network

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Helen Kessler

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Ashley Duque Kienzle

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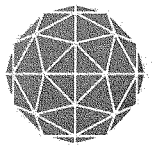
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Deborah Gavrin Frangquist

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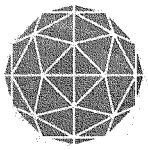
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Thank You,

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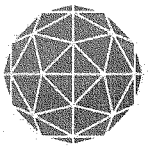
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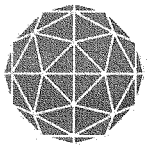
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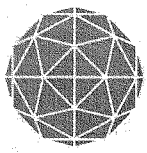
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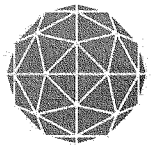
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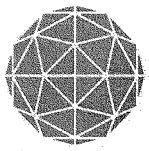
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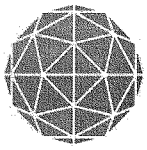
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Karla Kavanaugh

American Sustainable Business Network

Docket Number: 'Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review' EPA-HQ-OAR-2021-0317-1460

Dear EPA Administrator Regan,

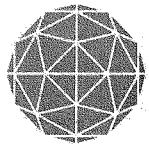
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Thank You,

Mark Canright



American Sustainable Business Network

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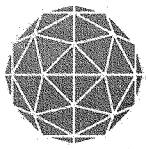
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Michael Peck



American Sustainable Business Network

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Rachel Robillard

American Sustainable Business Network

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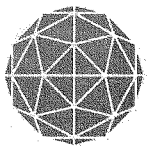
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Thank You,

michele risa



American Sustainable Business Network

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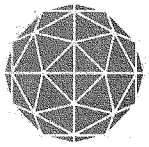
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Thank You,

Linda Romano



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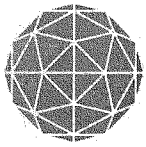
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Stephen Wyman



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Theodora Skeadas

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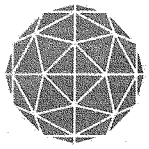
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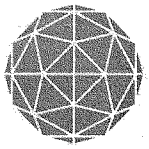
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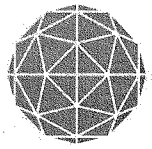
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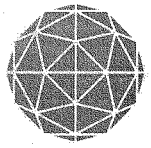
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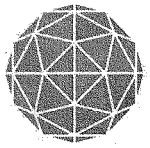
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- Mitigate climate risks
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Thank You,

Dann Carnes



American Sustainable Business Network

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Brian Caneda

American Sustainable Business Network

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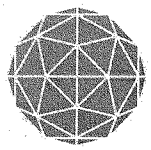
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Brenda Michaels



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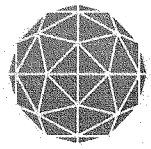
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Thank You,

Terry Gips



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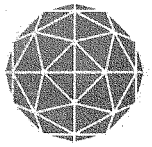
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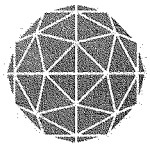
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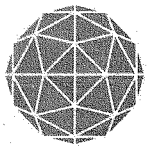
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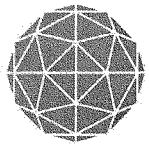
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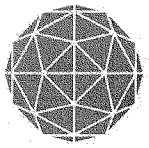
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Thank You,

Jennifer Nichols



American Sustainable Business Network

Docket Number: 'Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review' EPA-HQ-OAR-2021-0317-1460

Dear EPA Administrator Regan,

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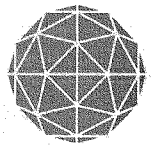
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Martin Wolf



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Chelsea Souter

American Sustainable Business Network

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Bill Russell

American Sustainable Business Network

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American Sustainable Business Network

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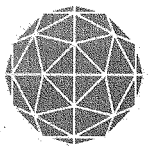
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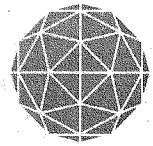
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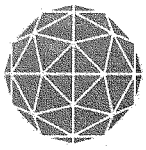
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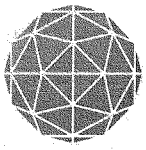
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Thank You,

Cheryl Spector

American Sustainable Business Network

Docket Number: 'Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review' EPA-HQ-OAR-2021-0317-1460

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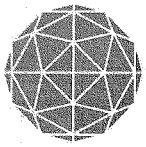
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Dana Weintraub



American Sustainable Business Network

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Katie Lucca

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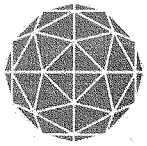
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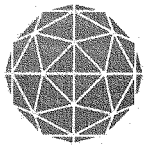
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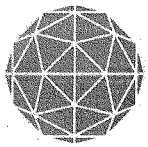
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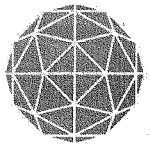
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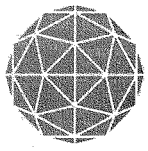
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Thank You,

Reena Gordon



American Sustainable Business Network

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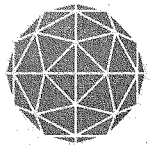
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Thank You,

Tim Wheeler



American Sustainable Business Network

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Justin Overdevest

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Rob Spears

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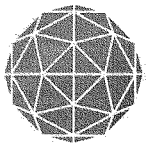
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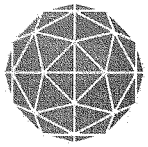
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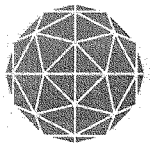
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Thank You,

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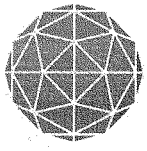
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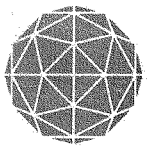
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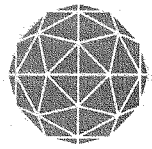
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Thank You,

Zach Bernstein

American Sustainable Business Network

Docket Number: 'Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review' EPA-HQ-OAR-2021-0317-1460

Dear EPA Administrator Regan,

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Adele Mehta

American Sustainable Business Network

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Janis Hallowell

American Sustainable Business Network

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James Elder

American Sustainable Business Network

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Emily Snyder

American Sustainable Business Network

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Margaret Barbero

American Sustainable Business Network

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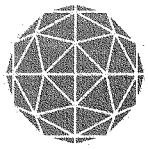
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Amy Hansen



American Sustainable Business Network

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Ruth Brennan

American Sustainable Business Network

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Joseph Pepe

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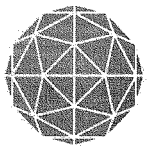
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Thank You,

Susan Witzel



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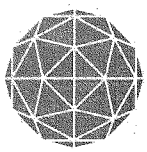
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American Sustainable Business Network

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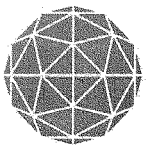
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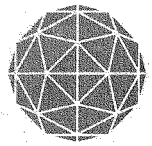
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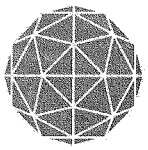
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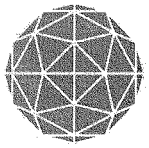
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Thank You,

Alan Johnson

American Sustainable Business Network

Docket Number: 'Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review' EPA-HQ-OAR-2021-0317-1460

Dear EPA Administrator Regan,

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Kaneisha Lewis

American Sustainable Business Network

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Thank You,

Jessica Caron

American Sustainable Business Network

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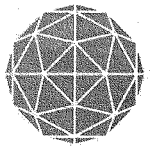
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Thank You,

Tori Wilder



American Sustainable Business Network

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Thank You,

Matt Christianson

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Susanne Hesse & Doug Dyer

American Sustainable Business Network

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Caroline Pryor

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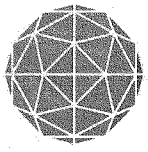
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Fran Aguirre



American Sustainable Business Network

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American Sustainable Business Network

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Tammara Wolfgram

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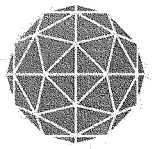
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Thank You,

Cathy Cowan Becker



American Sustainable Business Network

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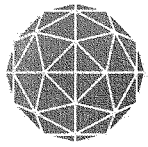
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Peter Kirby



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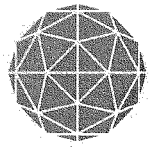
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Sister Joan Agro



American Sustainable Business Network

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American Sustainable Business Network

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Dear EPA Administrator Regan,

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Dear EPA Administrator Regan,

Methane is a major pollutant that threatens life on earth. We need action from the Environmental Protection Agency to pass regulations that protect our planet.

Thank You,

Steve Kaye

American Sustainable Business Network

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Thank you in advance,

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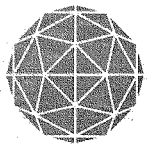
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The development and implementation of meaningful policy that supports control technologies, cleaning up retired extraction sites, an end to harmful and dangerous practices such as routine flaring and supports a just transition to sustainable energy sources will deliver the greatest long-term economic and job creation benefits. Allowing this methane pollution is not only an unfair subsidy to those energy producers, it is a missed opportunity to address emissions. Active and new regulation is one of many efforts that is needed to address climate change. We believe the U.S. must work actively to reduce its greenhouse gas emissions and to transition away from an extractive economy through public policy and strong regulation that will push private investment and foster greater innovation.

Thank You,

Brian Jerose

American Sustainable Business Network

Docket Number: 'Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review' EPA-HQ-OAR-2021-0317-1460

Dear EPA Administrator Regan,

We have very serious air pollution problems in Colorado with oil and gas fracking and methane leaks being very important contributors to our greenhouse gas emissions and the associated volatile organic compounds with our non-attainment status for ozone on the Front Range of Colorado. Methane is a super pollutant that has negative impacts on the environment, the health of people, and businesses and their supply chains. We need action from the Environmental Protection Agency (EPA) to ensure that these regulations are passed to make meaningful action in protecting the planet and the people. We support the EPA draft rule and believe it ensures a meaningful transition towards a clean and sustainable energy future. Business and Supply chains are being directly and negatively impacted by methane pollution and our community supports strong policy action and the investment opportunity it will create for safer alternative systems.

Taking action to reduce the impacts of methane will:
- Mitigate climate risks
- Prevent continued harm to local communities and ecosystems
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Thank You,

Leslie Glustrom

American Sustainable Business Network

Docket Number: 'Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review' EPA-HQ-OAR-2021-0317-1460

Dear EPA Administrator Regan,

I am a pediatrician in California seeing first-hand the impacts of the climate crisis on child health. Methane is a super pollutant that has negative impacts on the environment, the health of people, and businesses and their supply chains. We need action from the Environmental Protection Agency (EPA) to ensure that these regulations are passed to make meaningful action in protecting the planet and the people. We support the EPA draft rule and believe it ensures a meaningful transition towards a clean and sustainable energy future. Business and Supply chains are being directly and negatively impacted by methane pollution and our community supports strong policy action and the investment opportunity it will create for safer alternative systems.

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Thank You,

Amanda Millstein

American Sustainable Business Network

Docket Number: 'Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review' EPA-HQ-OAR-2021-0317-1460

Dear EPA Administrator Regan,

Short term warming will be the key to how much heating we experience before we end CO2 emissions and begin to actively remove CO2. Methane causes 80 times the warming of CO2 when first emitted and along with nitrogen compounds is responsible for half of the actual warming causing climate chaos now. We need to urgently cut the portion of CH4 that we can control, before feedback causes more runaway emissions we can't.

Thank You,

Jim Fournier

American Sustainable Business Network

Docket Number: 'Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review' EPA-HQ-OAR-2021-0317-1460

Dear EPA Administrator Regan,

I live in the fastest climate-warming county in the entire nation, due in part to the extensive and aging oil industry, with methane flaring and leaking wells. I have worked documenting the agricultural industry practices for the last 20 years. The critical need to end or greatly reduce CAFOs has never been greater, due to the methane pools and feedlot pollution, environmental and physical health impacts on human and animal health. Methane is a super pollutant that has negative impacts on the environment, the health of people, and businesses and their supply chains. We need action from the Environmental Protection Agency (EPA) to ensure that these regulations are passed to make meaningful action in protecting the planet and the people. We support the EPA draft rule and believe it ensures a meaningful transition towards a clean and sustainable energy future. Business and Supply chains are being directly and negatively impacted by methane pollution and our community supports strong policy action and the investment opportunity it will create for safer alternative systems.

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Thank You,

Dulanie Ellis-La Barre

American Sustainable Business Network

Docket Number: 'Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review' EPA-HQ-OAR-2021-0317-1460

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Thank You,

David Jaber

American Sustainable Business Network

Docket Number: 'Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review' EPA-HQ-OAR-2021-0317-1460

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The development and implementation of meaningful policy that supports control technologies, cleaning up retired extraction sites, an end to harmful and dangerous practices such as routine flaring and supports a just transition to sustainable energy sources will deliver the greatest long-term economic and job creation benefits. *Finally, the announced regulation would eliminate 36 million tons of *methane emissions from oil and gas operations by 2035 â€" more than the amount of carbon dioxide emitted from all coal-fired power plants in a single year! We believe the U.S. must work actively to reduce its greenhouse gas emissions and to transition away from an extractive economy through public policy and strong regulation that will push private investment and foster greater innovation.

Thank You,

John Imes

American Sustainable Business Network

Docket Number: 'Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review' EPA-HQ-OAR-2021-0317-1460

Dear EPA Administrator Regan,

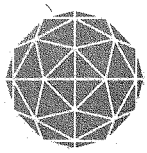
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Thank You,

Robert Kippel



American Sustainable Business Network

Docket Number: 'Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review' EPA-HQ-OAR-2021-0317-1460

Dear EPA Administrator Regan,

All pollution privatizes profits and socializes costs to society and Nature. Pollution means companies fail to believe and operate in a robust market, because the price fails to reflect the actual prices to all stakeholders. It is unacceptable for methane to be leaking from ordinary business of companies along their supply chain and the operation of their facilities. Methane is a super pollutant that has negative impacts on the environment, the health of people, and businesses and their supply chains. We need action from the Environmental Protection Agency (EPA) to ensure that these regulations are passed to make meaningful action in protecting the planet and the people. We support the EPA draft rule and believe it ensures a meaningful transition towards a clean and sustainable energy future. Business and Supply chains are being directly and negatively impacted by methane pollution and our community supports strong policy action and the investment opportunity it will create for safer alternative systems.

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The development and implementation of meaningful policy that supports control technologies, cleaning up retired extraction sites, an end to harmful and dangerous practices such as routine flaring and supports a just transition to sustainable energy sources will deliver the greatest long-term economic and job creation benefits. Why should for-profit companies be able to pollute with impunity? We believe the U.S. must work actively to reduce its greenhouse gas emissions and to transition away from an extractive economy through public policy and strong regulation that will push private investment and foster greater innovation. Thank you. Every step to improve the quality of markets improves the way we all live.'

Thank You,

Graham Sinclair

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

As a business owner in my community, I'm writing today to express my disappointment with EPA's inadequate proposal that doesn't adequately slash soot pollution, protect public health or prevent premature deaths–especially in communities of color and historically overburdened communities. Soot pollution is extremely dangerous and harming our health, environment and the economy, which is why – I am calling on the Biden administration to heed the recommendations of their own scientific advisory panel and to enact the strongest possible standards to limit soot.

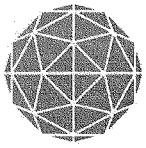
Soot causes haze, which can severely diminish visibility and mar beautiful vistas in our national parks and other scenic areas. While the loss of breathtaking scenery is significant and lowers overall community well-being, haze creates serious economic harm to the tourism and outdoor recreation industries.

Soot is a deadly and dangerous pollutant that millions of Americans are exposed to every day. It is linked to many chronic health conditions, including asthma, heart disease, COPD, and even dementia.

These impacts are directly lowering the productivity of the labor force and lowering the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy.

Thank You,

Saab Lofton



American Sustainable Business Network

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Thank You,

Lara Pearson

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

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Thank You,

Michelle Cortes-Harkins

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

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Thank You,

Lisa Hayles

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

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Thank You,

Susan Schmidt

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

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Thank You,

Seth Eshelman

American Sustainable Business Network

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Thank You,

Andrew Winston

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

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Thomas Witt

American Sustainable Business Network

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American Sustainable Business Network

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American Sustainable Business Network

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Thank You,

Sandra Stewart

American Sustainable Business Network

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Thank You,

karen stickney

American Sustainable Business Network

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Thank You,

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American Sustainable Business Network

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Thank You,

Clay Thompson

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

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Thank You,

Timon Malloy

American Sustainable Business Network

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Thank You,

Barry Benjamin

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

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Maren Keeley

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Stephanie Greenwald

American Sustainable Business Network

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David Schreiber

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Ileana vasquez

American Sustainable Business Network

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Thank You,

Gina Weatherup

American Sustainable Business Network

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L. Christina Cobb

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Pete Dignan

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Charles Wolfe

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mike kappus

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Ray Cooper

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Laura Christina Cobb

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

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These impacts are directly lowering the productivity of the labor force and lowering the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy.

Thank You,

Val Muchowski

American Sustainable Business Network

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Dan Kirslis

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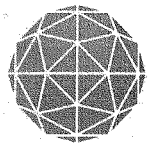
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Thank You,

Edward Savage



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Nancy Black

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Mike Englert

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Justin Green

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Dr Kenneth R Pelletier

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Jerry Rivers

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Deborah Gavrin Frangquist

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Elric Centers

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Leslie Sheridan

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Lorraine Forte

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Russell Donnelly

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Susanne Hesse & Doug Dyer

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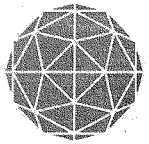
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Karla Kavanaugh

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Dr. Kakha NADIRADZE

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Cheryl Elkins

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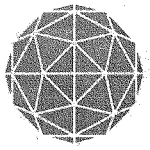
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Thank You,

Stephen Wyman



American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

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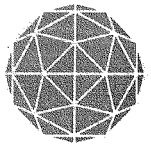
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Aaron Fumarola



American Sustainable Business Network

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P. Alan Thiesen

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Seth Perlman

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Bernardo Alayza Mujica

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Liz Rubin

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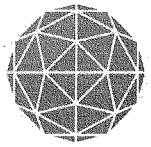
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Jesse Bennett

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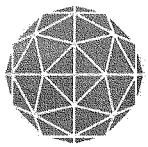
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Siham Khalid-Bloch

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

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Thank You,

Prasad Jaladi

American Sustainable Business Network

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Geoffrey Mazullo

American Sustainable Business Network

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Christopher Loch

American Sustainable Business Network

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Kathryn Kelly

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Stephen Dorage

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Peter Junker

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Martin Wolf

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Chad Speight

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Anna M Lyles

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Scott Henderson

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Monica Meng

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Taj DeHart

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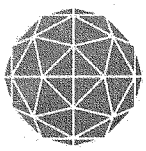
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Kristine Waldren



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Dana Weintraub

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Rudy Arredondo

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

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Mary Walsh

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Katherine DiMatteo

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Dulanie La Barre

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Harvy Simkovits

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Anna Sampson

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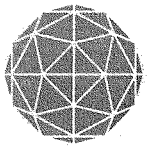
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Tim Wheeler



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Jarrett Cloud

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Phil Williams

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Wallace Mcmullen

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Leslie Sheridan

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Leah Missbach Day

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michelle hoexum

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American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

As a business owner in my community, I'm writing today to express my disappointment with EPA's inadequate proposal that doesn't adequately slash soot pollution, protect public health or prevent premature deaths–especially in communities of color and historically overburdened communities. Soot pollution is extremely dangerous and harming our health, environment and the economy, which is why – I am calling on the Biden administration to heed the recommendations of their own scientific advisory panel and to enact the strongest possible standards to limit soot.

Soot causes haze, which can severely diminish visibility and mar beautiful vistas in our national parks and other scenic areas. While the loss of breathtaking scenery is significant and lowers overall community well-being, haze creates serious economic harm to the tourism and outdoor recreation industries.

Soot is a deadly and dangerous pollutant that millions of Americans are exposed to every day. It is linked to many chronic health conditions, including asthma, heart disease, COPD, and even dementia.

These impacts are directly lowering the productivity of the labor force and lowering the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy.

Thank You,

Jessica Caron

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

As a business owner in my community, I'm writing today to express my disappointment with EPA's inadequate proposal that doesn't adequately slash soot pollution, protect public health or prevent premature deaths–especially in communities of color and historically overburdened communities. Soot pollution is extremely dangerous and harming our health, environment and the economy, which is why – I am calling on the Biden administration to heed the recommendations of their own scientific advisory panel and to enact the strongest possible standards to limit soot.

Soot causes haze, which can severely diminish visibility and mar beautiful vistas in our national parks and other scenic areas. While the loss of breathtaking scenery is significant and lowers overall community well-being, haze creates serious economic harm to the tourism and outdoor recreation industries.

Soot is a deadly and dangerous pollutant that millions of Americans are exposed to every day. It is linked to many chronic health conditions, including asthma, heart disease, COPD, and even dementia.

These impacts are directly lowering the productivity of the labor force and lowering the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy.

Thank You,

Jacquelyn Crema

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

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Soot causes haze, which can severely diminish visibility and mar beautiful vistas in our national parks and other scenic areas. While the loss of breathtaking scenery is significant and lowers overall community well-being, haze creates serious economic harm to the tourism and outdoor recreation industries.

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These impacts are directly lowering the productivity of the labor force and lowering the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy.

Thank You,

michelle le

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

As a business owner in my community, I'm writing today to express my disappointment with EPA's inadequate proposal that doesn't adequately slash soot pollution, protect public health or prevent premature deaths–especially in communities of color and historically overburdened communities. Soot pollution is extremely dangerous and harming our health, environment and the economy, which is why – I am calling on the Biden administration to heed the recommendations of their own scientific advisory panel and to enact the strongest possible standards to limit soot.

Soot causes haze, which can severely diminish visibility and mar beautiful vistas in our national parks and other scenic areas. While the loss of breathtaking scenery is significant and lowers overall community well-being, haze creates serious economic harm to the tourism and outdoor recreation industries.

Soot is a deadly and dangerous pollutant that millions of Americans are exposed to every day. It is linked to many chronic health conditions, including asthma, heart disease, COPD, and even dementia.

These impacts are directly lowering the productivity of the labor force and lowering the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy.

Thank You,

Alyssa Owens

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

As a business owner in my community, I'm writing today to express my disappointment with EPA's inadequate proposal that doesn't adequately slash soot pollution, protect public health or prevent premature deaths–especially in communities of color and historically overburdened communities. Soot pollution is extremely dangerous and harming our health, environment and the economy, which is why – I am calling on the Biden administration to heed the recommendations of their own scientific advisory panel and to enact the strongest possible standards to limit soot.

Soot causes haze, which can severely diminish visibility and mar beautiful vistas in our national parks and other scenic areas. While the loss of breathtaking scenery is significant and lowers overall community well-being, haze creates serious economic harm to the tourism and outdoor recreation industries.

Soot is a deadly and dangerous pollutant that millions of Americans are exposed to every day. It is linked to many chronic health conditions, including asthma, heart disease, COPD, and even dementia.

These impacts are directly lowering the productivity of the labor force and lowering the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy.

Thank You,

Carol Atwood

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

As a business owner in my community, I'm writing today to express my disappointment with EPA's inadequate proposal that doesn't adequately slash soot pollution, protect public health or prevent premature deaths–especially in communities of color and historically overburdened communities. Soot pollution is extremely dangerous and harming our health, environment and the economy, which is why – I am calling on the Biden administration to heed the recommendations of their own scientific advisory panel and to enact the strongest possible standards to limit soot.

Soot causes haze, which can severely diminish visibility and mar beautiful vistas in our national parks and other scenic areas. While the loss of breathtaking scenery is significant and lowers overall community well-being, haze creates serious economic harm to the tourism and outdoor recreation industries.

Soot is a deadly and dangerous pollutant that millions of Americans are exposed to every day. It is linked to many chronic health conditions, including asthma, heart disease, COPD, and even dementia.

These impacts are directly lowering the productivity of the labor force and lowering the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy.

Thank You,

Derek Meadows

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

As a business owner in my community, I'm writing today to express my disappointment with EPA's inadequate proposal that doesn't adequately slash soot pollution, protect public health or prevent premature deaths–especially in communities of color and historically overburdened communities. Soot pollution is extremely dangerous and harming our health, environment and the economy, which is why – I am calling on the Biden administration to heed the recommendations of their own scientific advisory panel and to enact the strongest possible standards to limit soot.

Soot causes haze, which can severely diminish visibility and mar beautiful vistas in our national parks and other scenic areas. While the loss of breathtaking scenery is significant and lowers overall community well-being, haze creates serious economic harm to the tourism and outdoor recreation industries.

Soot is a deadly and dangerous pollutant that millions of Americans are exposed to every day. It is linked to many chronic health conditions, including asthma, heart disease, COPD, and even dementia.

These impacts are directly lowering the productivity of the labor force and lowering the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy.

Thank You,

Hacah Goggin

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

As a business owner in my community, I'm writing today to express my disappointment with EPA's inadequate proposal that doesn't adequately slash soot pollution, protect public health or prevent premature deaths–especially in communities of color and historically overburdened communities. Soot pollution is extremely dangerous and harming our health, environment and the economy, which is why – I am calling on the Biden administration to heed the recommendations of their own scientific advisory panel and to enact the strongest possible standards to limit soot.

Soot causes haze, which can severely diminish visibility and mar beautiful vistas in our national parks and other scenic areas. While the loss of breathtaking scenery is significant and lowers overall community well-being, haze creates serious economic harm to the tourism and outdoor recreation industries.

Soot is a deadly and dangerous pollutant that millions of Americans are exposed to every day. It is linked to many chronic health conditions, including asthma, heart disease, COPD, and even dementia.

These impacts are directly lowering the productivity of the labor force and lowering the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy.

Thank You,

Sister Joan Agro

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

As a business owner in my community, I'm writing today to express my disappointment with EPA's inadequate proposal that doesn't adequately slash soot pollution, protect public health or prevent premature deaths–especially in communities of color and historically overburdened communities. Soot pollution is extremely dangerous and harming our health, environment and the economy, which is why – I am calling on the Biden administration to heed the recommendations of their own scientific advisory panel and to enact the strongest possible standards to limit soot.

Soot causes haze, which can severely diminish visibility and mar beautiful vistas in our national parks and other scenic areas. While the loss of breathtaking scenery is significant and lowers overall community well-being, haze creates serious economic harm to the tourism and outdoor recreation industries.

Soot is a deadly and dangerous pollutant that millions of Americans are exposed to every day. It is linked to many chronic health conditions, including asthma, heart disease, COPD, and even dementia.

These impacts are directly lowering the productivity of the labor force and lowering the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy.

Thank You,

Nina Laboy

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

You know how bad soot is for human health -- it makes people sick, and it kills people. And it's soooo easy to prevent! We owe it to ourselves, especially for those of us who live in communities of color and historically overburdened communities, to get rid of soot and all the human and economic harm soot does. Your own scientific advisory panel recognized the problem and recommended better standards. I'm a business leader in Vermont, and tourism is a major economic driver here. The more we allow our vistas to get obscured by soot-caused haze, the worse our economy will be.

Soot is a deadly and dangerous pollutant that millions of Americans are exposed to every day. It is linked to many chronic health conditions, including asthma, heart disease, COPD, and even dementia.

These impacts are directly lowering the productivity of the labor force and lowering the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy. The vehicles and smokestacks that emit soot will in fact be cheaper to operate once soot production is eliminated. Come on now! Together, let's make America healthier, lower our health care costs, improve our air quality and outdoor recreation, and generally make everyone happier.

Thank You,

Bram Kleppner Middlebury, Vermont

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

As a business owner in my community, I'm writing today to express my disappointment with EPA's inadequate proposal that doesn't adequately slash soot pollution, protect public health or prevent premature deaths–especially in communities of color and historically overburdened communities. Soot pollution is dangerous and as it finds its way into water sources causing pollutes both water and soil systems. Soot pollutes the air and thus our health, environment and the economy, which is why I am calling on the Biden administration to heed the recommendations of its own scientific advisory panel and to enact the strongest possible standards to limit soot pollution.

Soot also causes haze, which diminishes visibility and mars beautiful vistas in our national parks and other scenic areas. While the lessening of breathtaking scenery is significant and lowers overall community well-being, haze creates serious economic harm to the tourism and outdoor recreation industries.

Soot is a deadly and dangerous pollutant that millions of Americans are exposed to every day. It is linked to many chronic health conditions, including asthma, heart disease, COPD, and even dementia.

These impacts are directly lowering the productivity of the labor force and lowering the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy. Healthy clean air, water, and soil are the underpinnings of life for US citizens. Without these, we perish.

Thank You,

Tim Redmond

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

As involved members in our community, We're writing today to express our disappointment with EPA's inadequate proposal that doesn't adequately slash soot pollution, protect public health or prevent premature deaths–especially in communities of color and historically overburdened communities. Soot pollution is extremely dangerous and harming our health, environment and the economy, which is why – we are calling on the Biden administration to heed the recommendations of their own scientific advisory panel and to enact the strongest possible standards to limit soot.

Soot causes haze, which can severely diminish visibility and mar beautiful vistas in our national parks and other scenic areas. While the loss of breathtaking scenery is significant and lowers overall community well-being, haze creates serious economic harm to the tourism and outdoor recreation industries.

Soot is a deadly and dangerous pollutant that millions of Americans are exposed to every day. It is linked to many chronic health conditions, including asthma, heart disease, COPD, and even dementia.

These impacts are directly lowering the productivity of the labor force and lowering the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy.

Thank You,

Fran Aguirre

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

As a business owner in my community, I'm writing today to express my disappointment with EPA's inadequate proposal that doesn't adequately slash soot pollution, protect public health or prevent premature deaths–especially in communities of color and historically overburdened communities. Soot pollution is extremely dangerous and harming our health, environment and the economy, which is why – I am calling on the Biden administration to heed the recommendations of their own scientific advisory panel and to enact the strongest possible standards to limit soot.

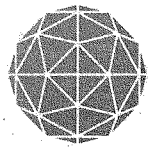
Soot causes haze, which can severely diminish visibility and mar beautiful vistas in our national parks and other scenic areas. While the loss of breathtaking scenery is significant and lowers overall community well-being, haze creates serious economic harm to the tourism and outdoor recreation industries. My green roofs capture and sequester particulate matter from the air--I am doing my part, and I ask you to do yours.

Soot is a deadly and dangerous pollutant that millions of Americans are exposed to every day. It is linked to many chronic health conditions, including asthma, heart disease, COPD, and even dementia.

These impacts are directly lowering the productivity of the labor force and lowering the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy.

Thank You,

Jeanne Weber



American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

We need to take aggressive actions to protect our environment and to protect the health of our citizens. Please do everything possible to reduce soot.

Thank You,

Steve Kaye

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

EPA's inadequate proposal doesn't adequately slash soot pollution, protect public health, or prevent premature deaths–especially in communities of color and historically overburdened communities. Soot pollution is extremely dangerous and harms our health, environment and the economy. I call on the Biden administration to follow their scientific advisory panel and enact the strongest possible standards to limit soot. Haze creates serious economic harm to the tourism and outdoor recreation industries. Soot is linked to many chronic health conditions, including asthma, heart disease, COPD, and even dementia.

These impacts are directly lowering the productivity of the labor force and lowering the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy.

Thank You,

Terrence McNally

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

As a business owner and environmental justice advocate in my community, I'm writing today to express my disappointment with EPA's inadequate proposal that doesn't adequately slash soot pollution, protect public health or prevent premature deaths–especially in communities of color and historically overburdened communities. Soot pollution is extremely dangerous and harming our health, environment and the economy, which is why – I am calling on the Biden administration to heed the recommendations of their own scientific advisory panel and to enact the strongest possible standards to limit soot.

Soot causes haze, which can severely diminish visibility and mar beautiful vistas in our national parks and other scenic areas. While the loss of breathtaking scenery is significant and lowers overall community well-being, haze creates serious economic harm to the tourism and outdoor recreation industries.

Soot is a deadly and dangerous pollutant that millions of Americans are exposed to every day. It is linked to many chronic health conditions, including asthma, heart disease, COPD, and even dementia.

These impacts are directly lowering the productivity of the labor force and lowering the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy.

Thank You,

Ona Porter

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

As a business owner in my community, I'm writing today to express my disappointment with EPA's inadequate proposal that doesn't adequately slash smoke pollution, protect public health or prevent premature deaths–especially in communities of color and historically overburdened communities. Smoke pollution is extremely dangerous and harming our health, environment and the economy, which is why – I am calling on the Biden administration to heed the recommendations of their own scientific advisory panel and to enact the strongest possible standards to limit smoke pollution. Smoke causes haze, which can severely diminish visibility and mar beautiful vistas in our national parks and other scenic areas. While the loss of breathtaking scenery is significant and lowers overall community well-being, haze creates serious economic harm to the tourism and outdoor recreation industries. See https://phys.org/news/2022-08-dangerous-combination-extreme-affected-million.html Soot is a deadly and dangerous pollutant that millions of Americans are exposed to every day. It is linked to many chronic health conditions, including asthma, heart disease, COPD, and even dementia.

These impacts are directly lowering the productivity of the labor force and lowering the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy.

Thank You,

Bruce Preville

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

As a business owner in my community in North Carolina and a retired economist I know how important it is for the EPA to provide adequate guardrails and guidelines for business to act in the best interest of our communities. I am disappointed with EPA's proposal that doesn't adequately slash soot pollution, protect public health or prevent premature deaths–especially in communities of color and historically overburdened communities. Soot pollution is extremely dangerous and harming our health, environment and the economy, which is why – I am calling on the Biden administration to heed the recommendations of their own scientific advisory panel and to enact the strongest possible standards to limit soot.

Soot causes haze, which can severely diminish visibility and mar beautiful vistas in our national parks and other scenic areas. While the loss of breathtaking scenery is significant and lowers overall community well-being, haze creates serious economic harm to the tourism and outdoor recreation industries. These industries are especially important to our community in western North Carolina.

Even more importantly, soot is a deadly and dangerous pollutant that millions of Americans are exposed to every day. It is linked to many chronic health conditions, including asthma, heart disease, COPD, and even dementia.

These impacts are directly lowering the productivity of the labor force and lowering the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy. I urge you to act providing the guardrails to protect out communities and the guidelines for business to make choices in their and our communities best interests.

Thank You,

Susan Kask

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

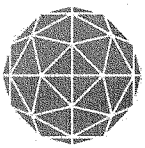
Dear EPA Administrator Regan,

As an academic physician specializing in respiratory medicine, I'm writing today to express my disappointment with EPA's inadequate proposal that doesn't adequately slash soot pollution, protect public health, and prevent premature deaths–especially in communities of color and historically overburdened communities. Scientific research in recent years has strengthened the evidence that airborne soot is hazardous to human health at lower concentrations than previously recognized, besides its deleterious effects on the environment/biosphere generally and on the economy. I therefore urge the Biden administration to heed the recommendations of their own scientific advisory panel and to enact the strongest possible standards to limit pollution by soot. Aerosolized soot, measured as PM10 and esp. as PM2.5, is an injurious pollutant that millions of Americans (and billions globally) are exposed to every day. At the global scale particulate air pollution is among the leading causes of remediable excess mortality (WHO). It is linked to many chronic health conditions, including asthma, cardiovascular disease, COPD, and even dementia.

These impacts decrease the productivity of the labor force, shorten lifespans, and reduce the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy. Moreover, soot causes haze, which can severely diminish visibility and mar beautiful vistas in our national parks and other scenic areas. While the loss of breathtaking scenery is significant and lowers overall community well-being, haze creates serious economic harm to the tourism and outdoor recreation industries.

Thank You,

A. Ross Hill, M.D.



American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

The EPA has failed to go far enough to protect the air we breathe. Avoiding open air is not an option. Unlike avoiding polluted water which, in emergencies, can be distributed in bottles, the air we have is the air we breathe. So, stating the obvious, we need the EPA to set livable standards for air pollution. I'm very disappointed with EPA's inadequate proposal that fails to adequately slash soot pollution, protect public health or prevent premature deaths–especially in communities of color and historically overburdened communities. Soot pollution is not only extremely dangerous and harmful to our health, it also affects the environment and the economy. For example, haze creates serious economic harm to the tourism and outdoor recreation industries. Haze and pollution diminish the value of open space to the overall community they are designed to improve. Soot is a deadly and dangerous pollutant that millions of Americans are exposed to every day. It is linked to many chronic health conditions, including asthma, heart disease, COPD, and even dementia.

These impacts are directly lowering the productivity of the labor force and lowering the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy. We respectfully request that the Biden administration heeds the recommendations of its own scientific advisory panel and enacts the strongest possible standards to limit soot.

Thank You,

Ann Woll

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

This physician protests EPA's inadequate proposal that doesn't adequately slash soot pollution, protect public health or prevent premature deaths–especially in communities of color and historically overburdened communities. Soot pollution is extremely dangerous and harming our health, environment and the economy, which is why – I am calling on the Biden administration to heed the recommendations of their own scientific advisory panel and to enact the strongest possible standards to limit soot.

Soot causes haze, which can severely diminish visibility and mar beautiful vistas in our national parks and other scenic areas. While the loss of breathtaking scenery is significant and lowers overall community well-being, haze creates serious economic harm to the tourism and outdoor recreation industries.

Soot is a deadly and dangerous pollutant that millions of Americans are exposed to every day. It is linked to many chronic health conditions, including asthma, heart disease, COPD, and even dementia.

These impacts are directly lowering the productivity of the labor force and lowering the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy.

Thank You,

B Dudney MD

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

As the Executive Director of the Coalition of Large Tribes, I'm writing today to express my disappointment with EPA's inadequate proposal that doesn't adequately slash soot pollution, protect public health or prevent premature deaths–especially in communities of color and historically overburdened communities. Soot pollution is extremely dangerous and harming our health, environment and the economy, which is why – I am calling on the Biden administration to heed the recommendations of their own scientific advisory panel and to enact the strongest possible standards to limit soot.

Soot causes haze, which can severely diminish visibility and mar beautiful vistas in our national parks and other scenic areas. While the loss of breathtaking scenery is significant and lowers overall community well-being, haze creates serious economic harm to the tourism and outdoor recreation industries.

Soot is a deadly and dangerous pollutant that millions of Americans are exposed to every day. It is linked to many chronic health conditions, including asthma, heart disease, COPD, and even dementia.

These impacts are directly lowering the productivity of the labor force and lowering the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy.

Thank You,

Oliver Semans

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

As a business owner in my community, I'm writing today to express my disappointment with EPA's inadequate proposal that doesn't adequately slash soot pollution, protect public health or prevent premature deaths–especially in communities of color and historically overburdened communities. We must put credence behind the findings of science iin order to keep us all safe. Soot pollution is extremely dangerous and harming our health, environment and the economy, which is why – I am calling on the Biden administration to heed the recommendations of their own scientific advisory panel and to enact the strongest possible standards to limit soot.

Soot causes haze, which can severely diminish visibility and mar beautiful vistas in our national parks and other scenic areas. While the loss of breathtaking scenery is significant and lowers overall community well-being, haze creates serious economic harm to the tourism and outdoor recreation industries.

Soot is a deadly and dangerous pollutant that millions of Americans are exposed to every day. It is linked to many chronic health conditions, including asthma, heart disease, COPD, and even dementia.

These impacts are directly lowering the productivity of the labor force and lowering the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy.

Thank You,

Jim Epstein

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

As a business owner in my community, I'm writing today to express my disappointment with EPA's inadequate proposal that doesn't adequately slash soot pollution, protect public health or prevent premature deaths–especially in communities of color and historically overburdened communities. Soot pollution is extremely dangerous and harming our health, environment and the economy, all for the benefit of wealthy executives and corporations for whom any regulation is anathema, no matter how little of an impact it could have on their bottom lines. This is why I am calling on the Biden administration to heed the recommendations of their own scientific advisory panel and to enact the strongest possible standards to limit soot.

Soot causes haze, which can severely diminish visibility and mar beautiful vistas in our national parks and other scenic areas. While the loss of breathtaking scenery is significant and lowers overall community well-being, haze creates serious economic harm to the tourism and outdoor recreation industries, weakening our economy as a whole in favor of select well-connected companies and executives. Soot is a deadly and dangerous pollutant that millions of Americans are exposed to every day. It is linked to many chronic health conditions, including asthma, heart disease, COPD, and even dementia.

These impacts are directly lowering the productivity of the labor force - and causing long-term health problems that will add further burdens to families and taxpayers down the road - as well as the value of outdoor industries. The current standards for soot pollution haven't been updated since 2012 and are insufficient to protect our health, the environment, and the economy. It is time to bring them up to date with the most current science.

Thank You,

Zach Bernstein

American Sustainable Business Network

Docket Number: Reconsideration of the National Ambient Air Quality Standards for Particulate Matter — EPA-HQ-OAR-2015-0072

Dear EPA Administrator Regan,

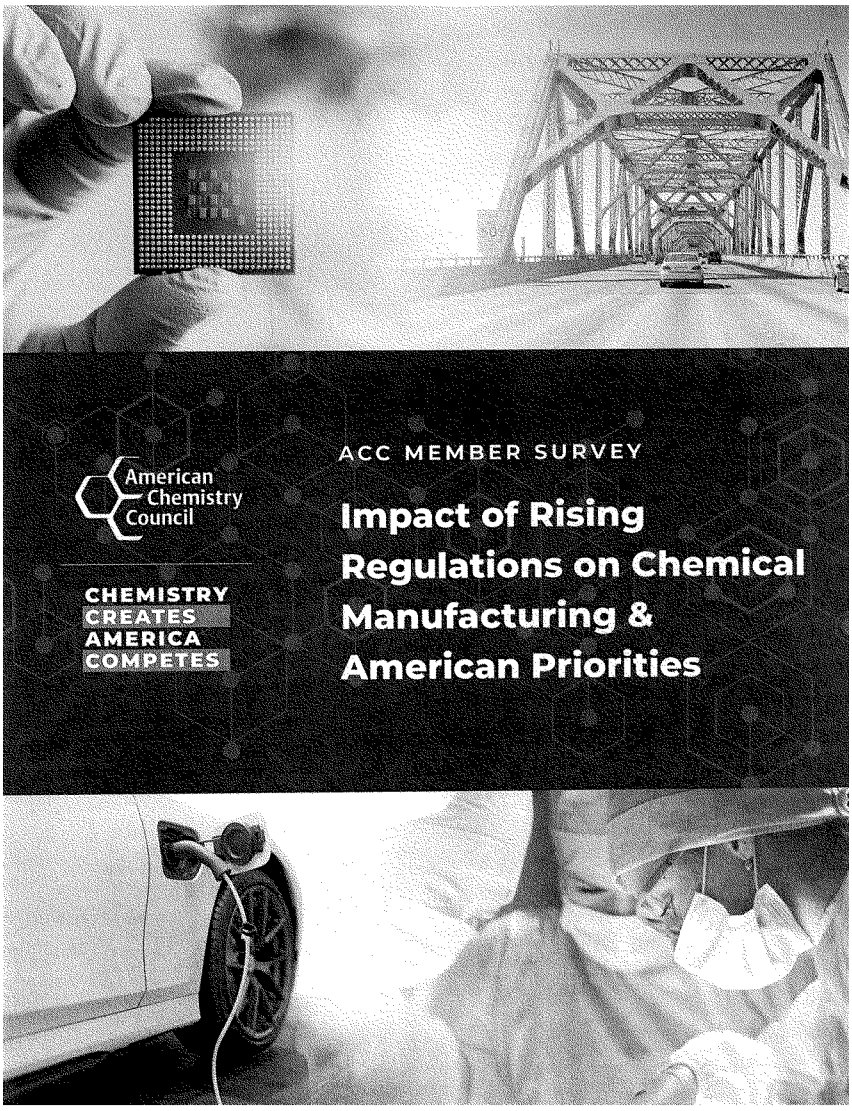
As a former EPA employee, I'm writing today to express my disappointment with EPA's inadequate proposal that doesn't adequately slash soot pollution, protect public health or prevent premature deaths–especially in communities of color and historically overburdened communities. Soot pollution is extremely dangerous and harming our health, environment and the economy, which is why – I am calling on the Biden administration to heed the recommendations of their own scientific advisory panel and to enact the strongest possible standards to limit soot.

Soot causes haze, which can severely diminish visibility and mar beautiful vistas in our national parks and other scenic areas. While the loss of breathtaking scenery is significant and lowers overall community well-being, haze creates serious economic harm to the tourism and outdoor recreation industries.

Soot is a deadly and dangerous pollutant that millions of Americans are exposed to every day. It is linked to many chronic diseases.

Thank You,

Wendi Shafir


American Chemistry Council
CHEMISTRY CREATES AMERICA COMPETES
ACC MEMBER SURVEY
Impact of Rising Regulations on Chemical Manufacturing & American Priorities

A Message from Chris Jahn, President & CEO of the American Chemistry Council:

This report provides valuable insight into the impact of the tremendous rise in chemical regulations and how they adversely impact national priorities and American manufacturing. The findings are the result of a survey of ACC member companies doing business in the U.S.

The chemical industry supports a vast supply chain and creates economic activity across the country. With $639 billion worth of shipments in 2022, the United States accounts for 11% of the world's total chemical production. American chemistry comprises 1.1% of the U.S. GDP and provides more than half a million jobs, with an average pay of more than $97,000 per year. For every chemistry industry job, more than six jobs are supported elsewhere in the economy.

Chemical manufacturing is also the backbone of products and innovations ranging from computer chips to high-tech automotive parts and electric vehicles. It also helps build smart devices, affordable housing, modern healthcare technology, and climate and energy technologies, all critical components of our supply chain.

Despite tremendous growth in recent years, the United States is second to China in global chemical production. U.S. chemical manufacturers continue to face challenges from persistent inflation, competition overseas, and a dramatic increase in regulations at home.

In fact, chemical manufacturing is the most heavily regulated subsector of manufacturing with the total number of regulations that apply to the industry doubling in the past 20 years. Adding to this growing regulatory burden there are a great number of planned rules targeting chemical manufacturing that will increase compliance costs by 50%

Some aim to outright ban certain chemistries. Others may regulate important chemicals to levels where manufacturing becomes unviable or impossible. If enacted, these restrictions could have a detrimental impact that extends beyond the chemical industry. They could harm the supply chains for vital technologies, including semiconductors, clean energy solutions like electric vehicles, and many modern healthcare applications.

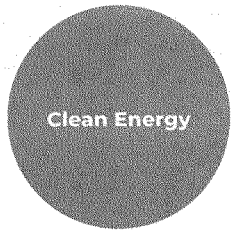
Not only is there a huge rise in the number of regulations that may negatively impact the chemical industry, but 30 percent fewer regulations are being reviewed by the Office of Management and Budget (OMB) compared to the last Democratic administration. The dramatic increase in the volume of regulations along with a decrease in quality control is a troubling one-two punch for U.S. innovation and manufacturing.

Unless policymakers take a different approach to how they develop and apply regulations, critical chemistries will suffer along with the important products supported by chemistry.

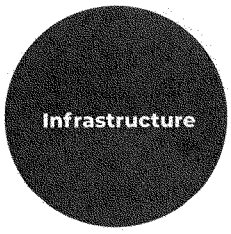


Chris Jahn
President and CEO
American Chemistry Council

Chemistry Contributes to Supporting National Priorities



72% of chemical manufacturers report producing a chemical input used in clean energy. They produce chemicals and synthetic materials used in batteries, hydrogen fuel cells and electrolyzers, wind turbines, solar panels, and carbon capture and sequestration.



62% of chemical manufacturers report producing a chemical input used in infrastructure. They produce chemicals and synthetic materials used in road construction, large infrastructure projects (i.e., bridges, dams), water treatment and distribution, energy-efficient buildings, and EV charging stations.



Health Care

62% of chemical manufacturers report producing a chemical input used in health care. They produce chemicals and synthetic materials used in lifesaving pharmaceuticals and vaccines, medical devices, and implants. They also produce chemistries used in high-purity air cleaning and biocides to improve patient safety.

Semiconductors

52% of chemical manufacturers report producing a chemical input used in making semiconductors. They produce chemicals, gases, and synthetic materials used in the production of semiconductors used throughout the modern economy. Advanced manufacturing of semiconductors includes multiple steps that require chemistry, including the creation of silicon crystals, wafer cutting, and polishing, and chemicals to etch complex circuitry.

Biotechnology/ Biomanufacturing Products

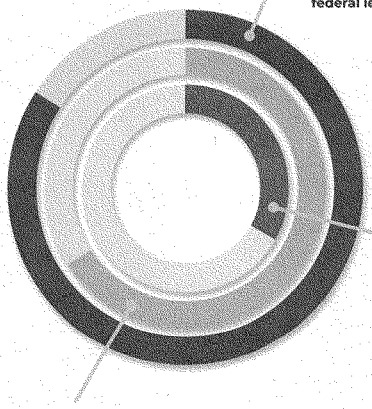
34% of chemical manufacturers report producing a chemical input used in biotechnology/ biomanufacturing products. They produce chemicals and synthetic materials used in vaccines, bio-based materials used across the economy, seed, crop protection, crop nutrition, and animal feed products for the farm sector.

Chemical manufacturers also contribute important products to support National Defense and Transportation.

Growing Regulatory Burden

Most chemical manufacturers report that overall regulatory burden has increased across all levels of government. And they expect the number of regulations to continue to increase over the next year.

NOW

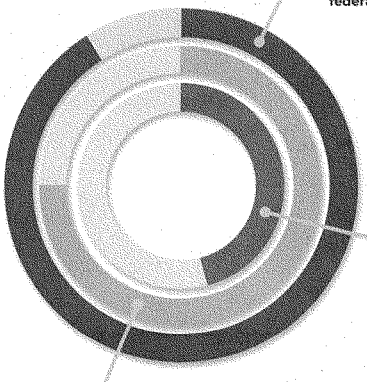


84% report the level of regulatory burden has increased on the **federal level**

33% report the level of regulatory burden has increased on the **local level**

66% report the level of regulatory burden has increased on the **state level**

FUTURE



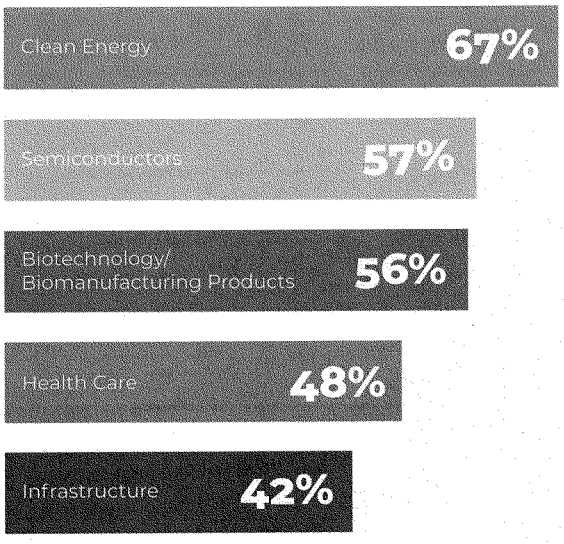
91%
anticipate the level of regulatory burden to increase on the **federal level**

46%
anticipate the level of regulatory burden to increase on the **local level**

75%
anticipate the level of regulatory burden to increase on the **state level**

Impact of Regulations on National Priorities

Many of the chemical manufacturers that produce chemical inputs to products/industries prioritized by the Administration reported that the current and/or forthcoming regulatory burden negatively impacts their ability to competitively produce the chemical input(s) in the U.S. Across chemical manufacturers participating in the survey, this was found to be the case for:



% of producers reporting current and/or forthcoming regulatory burden negatively impacts ability to competitively produce chemical input(s) in U.S.



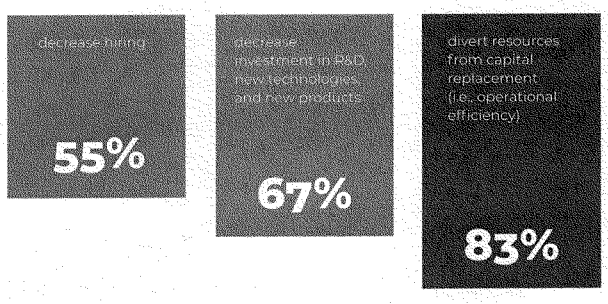
Impact of Regulations on Manufacturing

Over the past year, about 2/3 of chemical manufacturers reported having been adversely affected due to government delay in making a regulatory decision and/or taking a regulatory action on a permit, license, or product approval in the United States.

Companies said new regulatory policies:

- 43% Impacted ability to obtain permits
- 12% Led company not to expand U.S. operations
- 9% Led company to move operations out of the U.S.

Asked to consider a scenario where existing regulatory compliance costs were **suddenly and permanently increased** significantly, manufacturers report they would:



Chemical Manufacturers Say:

"By not acting in a timely manner, EPA is effectively keeping new and innovative chemistries out of commerce. This affects not only our company but US consumers and, in many cases, the environment by foreclosing newer, more sustainable chemistries from approval or approving them only with significant restrictions unappealing to customers. Ironically, this results in older chemistries remaining on the market while newer, more effective, more sustainable, or otherwise better ones are available to replace them."

"Our products are essential in the production of semiconductors and are used in applications such as solar cells, LEDs, smartphones, and other electronics. Increased cost of compliance, inconsistent and aggressive enforcement, and delayed permitting/decision-making at regulatory agencies all make it more challenging to be competitive with outside markets."



"We develop and produce essential materials for the production of medical supplies. Such materials can be sourced from overseas. As regulatory costs rise, we become less competitive."



"Unexpected delays in PMN [Pre-manufacture Notice] approvals will impact the Administration's intent for 100% production of key ingredients of the EV Battery Supply Chain in the US."

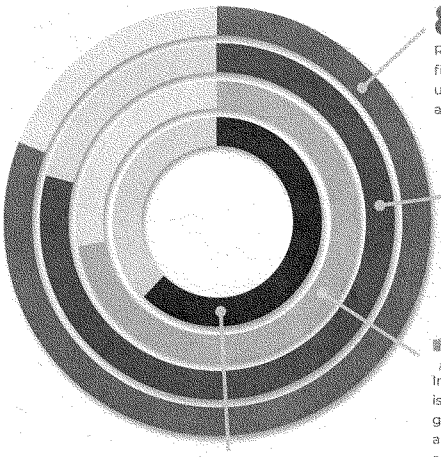
"At the federal level, EPA's misguided actions on PFAS [per- and polyfluoroalkyl substances] that are not tied to science-based outcomes (e.g., MCLs, HALS, CERCLA designations) are creating significant regulatory uncertainty and dramatically increasing the risk profile of necessary large (capex intensive) manufacturing capacity expansions designed to meet exponential demand for specific fluoropolymers for battery, hydrogen and semiconductor supply chains. Make no mistake, Chinese competitors are trying to take advantage of this uncertainty by scaling up production in China in an effort to meet global demand (not just Chinese demand), engaging in predatory pricing to drive out global chemical players, and infringing on IP [Intellectual Property]."

An earlier survey of ACC members examining EPA's New Chemicals Program exposed its stifling impact on U.S. innovation.

The survey found that **70% of chemical manufacturers decided to introduce new chemicals outside the U.S.** given the uncertainties and challenges of EPA's New Chemicals Program, including systemic delays, disregarded company-submitted data, and inconsistent reviews.

Regulatory Challenges and Issues

Chemical manufacturers reported that the most challenging regulations to comply with are due to:



81%
Regulatory agencies writing a final rule absent an adequate understanding of my business and my compliance challenges.

79%
Regulatory agencies using their legal discretion to set a standard that is more stringent than it should be.

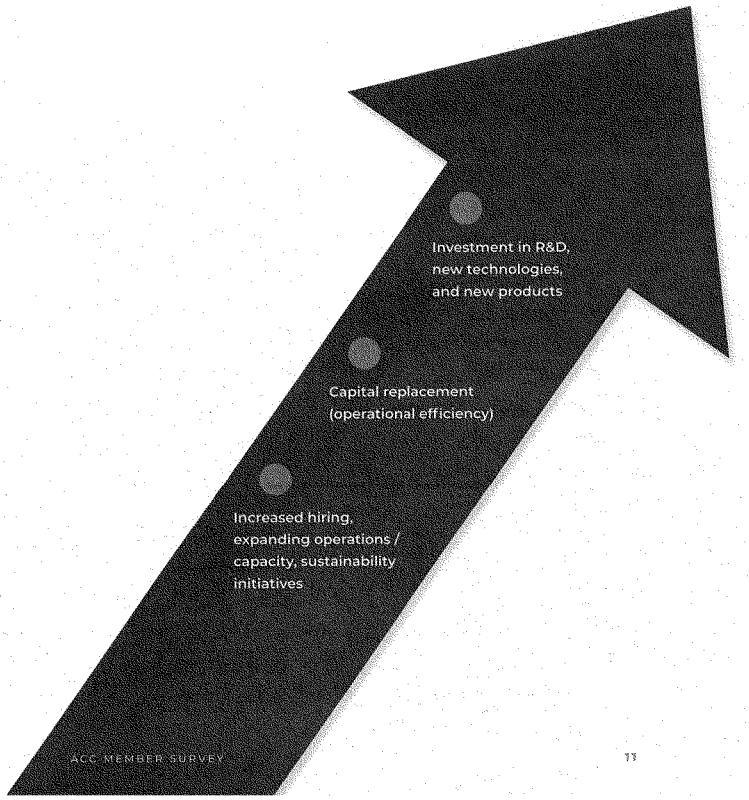
72%
Inconsistency between regulations issued by different levels of government (i.e., between USA and another country, between federal and state regulatory agencies, etc.).

62%
Regulatory agencies enforcing ambiguous requirements inconsistently or inappropriately.

And companies mentioned other reasons, including decision timelines that are inconsistent or delayed; slow responses to regulatory permits; new substance PMN is expensive and takes too long to approve; regulations and reporting burdens that do not reflect the risk to human health and the environment; and regulations based on improper or inadequate science.

Big Return on Fixing Regulations

Asked to consider a scenario where existing regulatory compliance costs were **suddenly and permanently reduced significantly**, chemical manufacturers said saved resources would be diverted towards:



ACC MEMBER SURVEY



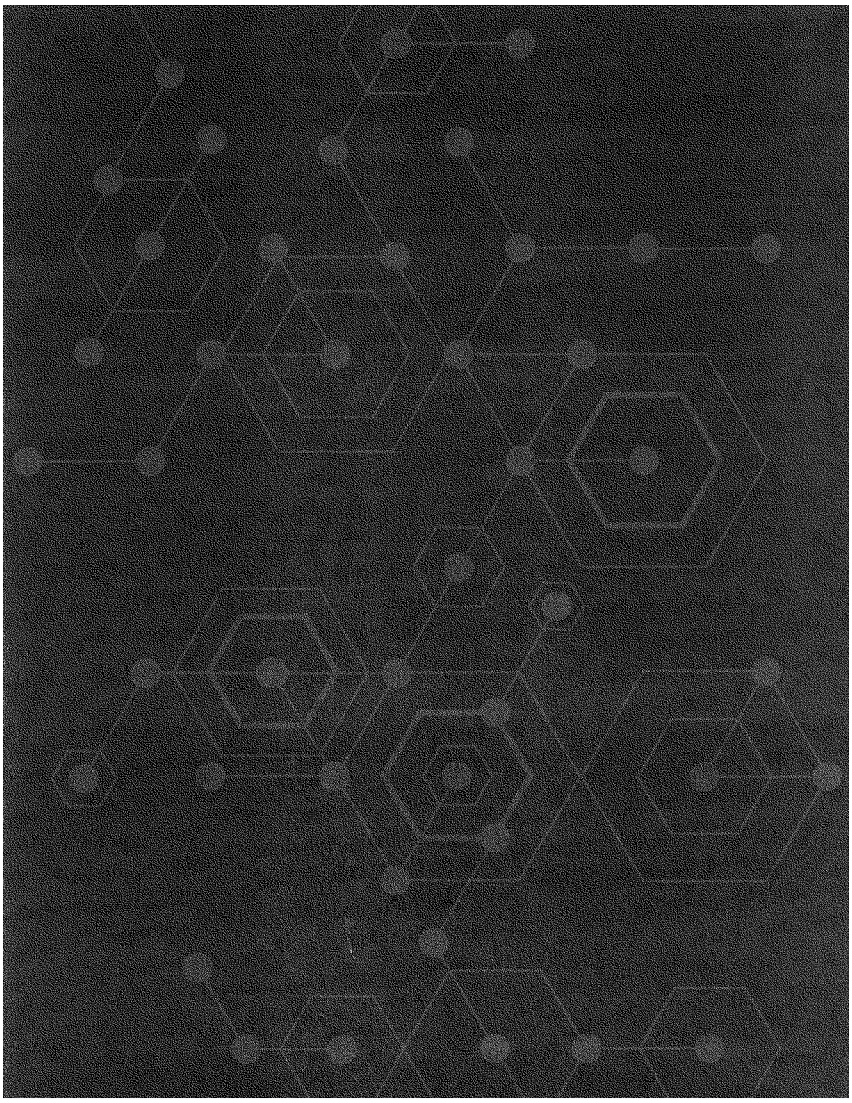
Methodology

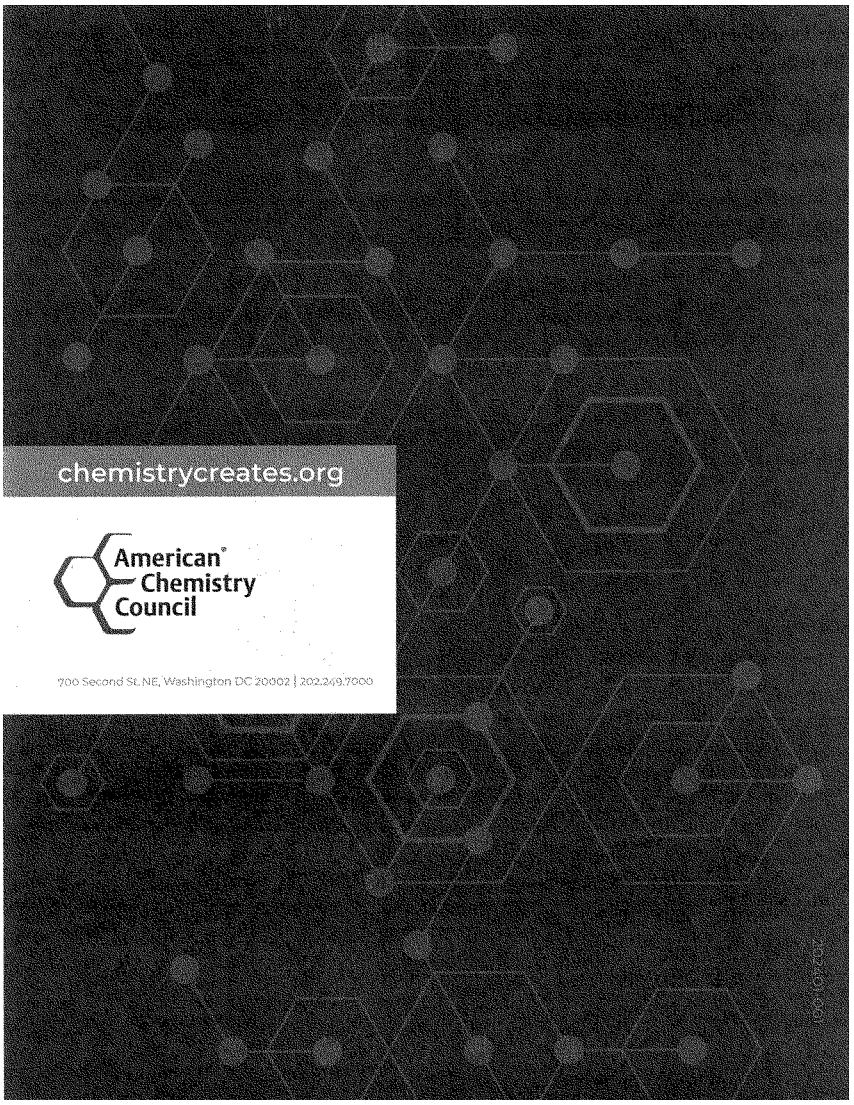
In September of 2023, the American Chemistry Council (ACC) conducted a survey of member companies doing business in the U.S. to better understand how they are being impacted by regulations. 58 companies participated in the survey. 38% of the companies surveyed are "small businesses" employing 550 or less full-time equivalents (FTEs).

Every effort has been made in the preparation of this publication to provide the best available information. However, neither the American Chemistry Council, nor any of its employees, agents, or other assigns, makes any warranty, expressed or implied, or assumes any liability or responsibility for any use, or the results of such use, of any information or data disclosed in this material.

This report was prepared by ACC's Economics and Statistics Department. Questions about the survey and findings may be directed to:

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Environmental Protection Agency
EPA Docket Center (EPA/DC)
Mail Code 28221T
1200 Pennsylvania Ave. NW
Washington, DC 20460

Subject: Comments for National Emission Standards for Hazardous Air Pollutants (NESHAP): Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review

Docket ID No. EPA-HQ-OAR-2019-0178

Submitted: June 27, 2023

Dear EPA Staff,

The undersigned legislative members of the Texas House and Senate are concerned about the communities in our state affected by Ethylene Oxide (EtO) sterilization facilities. We welcome the opportunity to comment on the proposed EPA rule to curb the hazardous emissions these sterilization plants pose to our Texas workers and neighboring families.

We understand the proposed rule is estimated to cut both fugitive and stack emissions of EtO from these plants by as much as 80 percent when the rule is implemented. Though we appreciate this projected goal, we would like the following measures included in the rule to help ensure the end results of this action meet its intended outcome:

1. **Require Fenceline Monitoring:** Fenceline monitoring is a reliable and useful tool to understand the amount of fugitive, controlled and uncontrolled emissions coming from commercial sterilizers. Both the workers within the plants and the communities surrounding the facilities need to be assured that they are protected. Fenceline monitoring is a proven method, as evidenced in other facilities, for verifying the effectiveness of emission control equipment in detecting fugitive emissions.

2. **Inclusion of Off-site Storage Warehouses:** The proposed rule covers EtO emissions from commercial sterilizers and their on-site warehouses and other on-site storage areas. The proposed rule, however, does not cover **off-site** warehouses and/or storage areas. We are concerned that off-site warehouses, not included in the rule, could be used as a secondary aeration area for off-gassing sterilized equipment, skirting the health-protective emission controls and monitoring that is to be required at the primary facilities. High levels of fugitive emissions have been discovered in off-site warehouses in other parts of the country. Many, if not all, off-site warehouses are not regulated by the Clean Air Act and do not contain the emissions controls systems necessary to capture residual EtO that is off-gassed from newly sterilized equipment. Evidence suggests that off-site storage warehouses can generate significant hazardous EtO emissions. For example, in 2019, the Georgia Environment Protection Division issued a notice of violation to Beckon, Dickinson and Company, a medical sterilization company, for operating an off-site warehouse in Covington without an air quality permit.[1] Therefore, we request that off-site storage facilities be included in the rule.

[1] Statement from Georgia EPD Regarding BD Notice of Violation. (2019, December 20). Environmental Protection Division. https://epd.georgia.gov/press-releases/2019-12-20/statement-georgia-epd-regarding-bd-notice-violation

3. **Shorten the Implementation and Compliance Timeline:** Communities have long awaited the development of this new EtO rule, having faced decades of hazardous and carcinogenic pollution from these facilities. The EPA has proposed an 18-month timeline for the installation of pollution controls once the final rule is issued. Every month these controls are not installed poses an increased risk to plant workers and surrounding communities. We would like to propose an expedited timeline of no more than 6 months for implementation to protect the public's health and safety.

4. **EPA must continue to require that all EtO commercial sterilizers be covered in the final rule:** We are grateful that EPA requires both major and area source commercial sterilizers to comply with the requirements of the proposed rule. It is especially important for states like Texas, since the Texas Commission on Environmental Quality's (TCEQ) cancer risk estimate for EtO is far below EPA's. We urge EPA to keep this requirement in the final rule in order to protect the health and safety of communities like ours.

Finally, since many of these facilities are located in underserved communities of color where English is not spoken as a first language, we would request that multilingual information on the facilities and surrounding risks to neighboring communities be made available.

We thank the EPA for considering our comments on this important rule to tighten the emissions standards for EtO sterilization facilities. We look forward to seeing the finalization of this rule and its implementation to protect the families and communities of Texas.

Sincerely,

Texas State Senators:

Senator Carol Alvarado, District 6

Senator José Menéndez, District 26

Senator Sarah Eckhardt, District 14

Senator Judith Zaffirini, District 21

Senator Roland Gutierrez, District 19

Senator Nathan Johnson, District 16

Texas State Representatives:



Representative Salman Bhojani, District 92



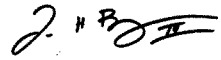
Representative Neave Criado, District 107



Representative John Bryant, District 114



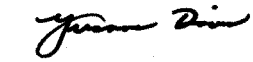
Representative Mihaela Plesa, District 70



Representative John Bucy III, District 136



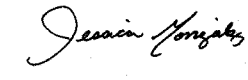
Representative Ana-Maria Ramos, District 102



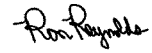
Representative Yvonne Davis, District 111



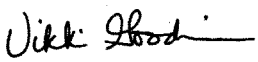
Representative Richard Raymond, District 42



Representative Jessica González, District 104



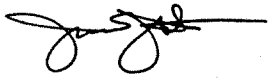
Representative Ron Reynolds, District 27



Representative Vikki Goodwin, District 47



Representative Toni Rose, District 110



Representative Julie Johnson, District 115



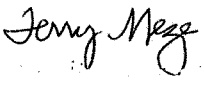
Representative Chris Turner, District 101



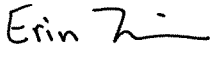
Representative Venton Jones, District 100



Representative Gene Wu, District 137

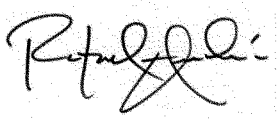


Representative Terry Meza, District 105

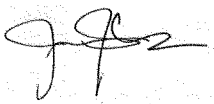


Representative Erin Zwiener, District 45

Additional Texas State Representatives:



Representative Rafael Anchia, District 103



Representative Jarvis Johnson, District 139



Analysis of an Estimate of the Total Costs of Federal Regulations

name redacted
Specialist in American National Government

April 6, 2011

Congressional Research Service
7-....
www.crs.gov
R41763

CRS Report for Congress
Prepared for Members and Committees of Congress

Summary

Some policy makers have expressed an interest in measuring total regulatory costs and benefits (e.g., the Congressional Office of Regulatory Analysis Creation and Sunset and Review Act of 2011, H.R. 214, 112th Congress), and estimates of total regulatory costs have been cited in support of regulatory reform legislation (e.g., H.R. 10, the Regulations from the Executive In Need of Scrutiny (REINS) Act, H.R. 10, 112th Congress). However, measuring total costs and benefits is inherently difficult. This report examines one such study to illustrate the complexities of this type of analysis.

A September 2010 report prepared by Nicole V. Crain and W. Mark Crain for the Office of Advocacy within the Small Business Administration (SBA) stated that the annual cost of federal regulations was about $1.75 trillion in 2008. This cost estimate was developed by adding together the estimated costs of four categories or types of regulation: economic regulations (estimated at $1.236 trillion); environmental regulations ($281 billion); tax compliance ($160 billion); and regulations involving occupational safety and health, and homeland security ($75 billion). Some commenters have raised questions about the validity and reliability of this estimate.

For example, Crain and Crain's estimate for economic regulations (which comprises more than 70% of the $1.75 trillion estimate) was developed by using an index of "regulatory quality." One of the authors of the regulatory quality index said that Crain and Crain misinterpreted and misused the index, resulting in an erroneous and overstated cost estimate. Other commenters have also raised concerns about using the index to estimate regulatory costs, and about the regression analysis that the authors used to produce the cost estimate. Crain and Crain said that they believe they interpreted and used the regulatory quality index correctly.

Crain and Crain's estimates for environmental, occupational safety and health, and homeland security regulations were developed by blending together academic studies (some of which are now more than 30 years old) with agencies' estimates of regulatory costs that were developed before the rules were issued (some of which are now 20 years old). Although the agency estimates were typically presented as low-to-high ranges, Crain and Crain used only the highest cost estimates in their report. The Office of Management and Budget has said that estimates of the costs and benefits of regulations issued more than 10 years earlier are of "questionable relevance."

Crain and Crain's estimate for the cost of tax paperwork was based on data from the Internal Revenue Service and the Tax Foundation, but OMB data indicate that the number of hours of tax paperwork may be much higher than Crain and Crain's estimate. On the other hand, the authors' assumptions regarding the cost of completing the paperwork may be too high. A threshold question, however, is whether tax paperwork should be considered in the same category as regulatory costs. OMB does not include tax paperwork in its annual reports to Congress.

Crain and Crain said they did not provide estimates of the benefits of regulations, even when the information was readily available, because the SBA Office of Advocacy did not ask them to do so. OMB's reports to Congress have generally indicated that regulatory benefits exceed costs. Crain and Crain said their report was not meant to be a decision-making tool for lawmakers or federal regulatory agencies to use in choosing the "right" level of regulation. This report will not be updated.

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Introduction

Regulation, like taxing and spending, is a basic function of government. Each year, federal agencies issue between 3,000 and 4,000 final rules on topics ranging from the timing of bridge openings to the permissible levels of arsenic and other contaminants in drinking water. Unlike taxing and spending, however, the costs that nonfederal entities pay to comply with federal regulations are not accounted for in the federal budget process. Some policy makers have expressed an interest in measuring total regulatory costs and benefits. For example, the Congressional Office of Regulatory Analysis Creation and Sunset and Review Act of 2011 (H.R. 214, 112th Congress) would require the newly created office to issue "an annual report including estimates of the total costs and benefits of all existing Federal regulations." As discussed later in this report, for nearly 14 years, Congress has required the Office of Management and Budget (OMB) to prepare a report each year on the aggregate costs and benefits of federal rules.[1]

However, measuring total regulatory costs and benefits is inherently difficult. For example, researchers must determine the baseline for measurement (i.e., what effects would have occurred in the absence of the regulation) and aggregating the results of studies conducted years earlier with different methodologies and quality can be highly problematic. Some observers, including OMB, currently doubt whether an accurate measure of total regulatory costs and benefits is possible.

The Crain and Crain Report

In September 2010, the Office of Advocacy within the Small Business Administration (SBA) released a report prepared for the office by Nicole V. Crain and W. Mark Crain entitled "The Impact of Regulatory Costs on Small Firms."[2] Among other things, the report stated that the annual cost of federal regulations in 2008 was about $1.75 trillion. The September 2010 report was the fourth such report prepared for the SBA Office of Advocacy in the previous 15 years:

- In 1995, Thomas D. Hopkins estimated annual federal regulatory costs that year to be between $416 billion and $668 billion.[3]
- In 2001, W. Mark Crain and Hopkins estimated the annual cost of regulations in the year 2000 at $843 billion.[4]

[1] The current requirement is in Section 624 of the Treasury and General Government Appropriations Act, 2001, (31 U.S.C. § 1105 note), sometimes referred to as the "Regulatory Right-to-Know Act."

[2] See http://www.sba.gov/sites/default/files/rs371tot.pdf to view a copy of this report. Hereafter, this report is referred to as "Crain and Crain." In addition to estimating the annual cost of federal regulations, the report also provided information indicating that regulatory costs fall particularly hard on small businesses. The report was developed under a contract with the SBA Office of Advocacy (contract number SBAHQ-08-M0466). Although the report cover states that it "contains information and analysis that was reviewed and edited by officials of the Office of Advocacy," it also says that the "final conclusions of the report do not necessarily reflect the views of the Office of Advocacy."

[3] Thomas D. Hopkins, "Profiles in Regulatory Costs," available at http://www.sba.gov/sites/default/files/files/rs1995hoptot.pdf.

[4] W. Mark Crain and Thomas D. Hopkins, "The Impact of Regulatory Costs on Small Firms," available at http://www.sba.gov/sites/default/files/files/rs207tot.pdf. For an analysis of this estimate, see CRS Report RL32339, *Federal Regulations: Efforts to Estimate Total Costs and Benefits of Rules*, by (name redacted).

- In 2005, W. Mark Crain estimated annual regulatory costs in 2004 at about $1.1 trillion.[5]

The $1.75 trillion estimate of regulatory costs has been widely quoted in the press,[6] by witnesses at congressional hearings,[7] and by Members of Congress,[8] and it has been cited as evidence of the need for regulatory reform legislation and congressional oversight actions.[9] Other observers, however, have criticized the estimate, saying that it overstates the total cost of federal regulations.[10]

This report examines how Crain and Crain developed the $1.75 trillion estimate of federal regulatory costs in 2008. It also compares the $1.75 trillion estimate for 2008 with the $1.1 trillion estimate for 2004, and with OMB's estimates of regulatory costs in 2008.

How Crain and Crain Developed the $1.75 Trillion Estimate of Regulatory Costs

Crain and Crain developed their $1.75 trillion estimate of total regulatory costs by adding together cost estimates for each of four categories or types of regulation: economic regulations ($1.236 trillion); environmental regulations ($281 billion); tax compliance ($160 billion); and

[5] W. Mark Crain, "The Impact of Regulatory Costs on Small Firms," available at http://www.sba.gov/sites/default/files/files/rs264tot.pdf.

[6] See, for example, Chad Moutrey, "To cure the economy, fix the business environment," *Washington Post*, January 10, 2011, available at http://www.washingtonpost.com/wp-dyn/content/article/2011/01/07/AR2011010705681.html; "Obama's reformer disguise; Accountability is the solution to government red tape," *Washington Times*, January 26, 2011, p. B2; and Mark Tapscott, "Washington is the Reason the Economy Is Not Growing," *The Examiner*, December 2, 2010, p. 39.

[7] See, for example, testimony of Thomas M. Sullivan, before the House Committee on Education and Workforce, Subcommittee on Workforce Protections, February 15, 2011, available at http://edworkforce.house.gov/UploadedFiles/02.15.11_sullivan.pdf; and testimony of Karen Harned, before the House Committee on the Judiciary, Subcommittee on Courts, Commercial and Administrative Law, February 10, 2011, available at http://judiciary.house.gov/hearings/pdf/Harned02102011.pdf.

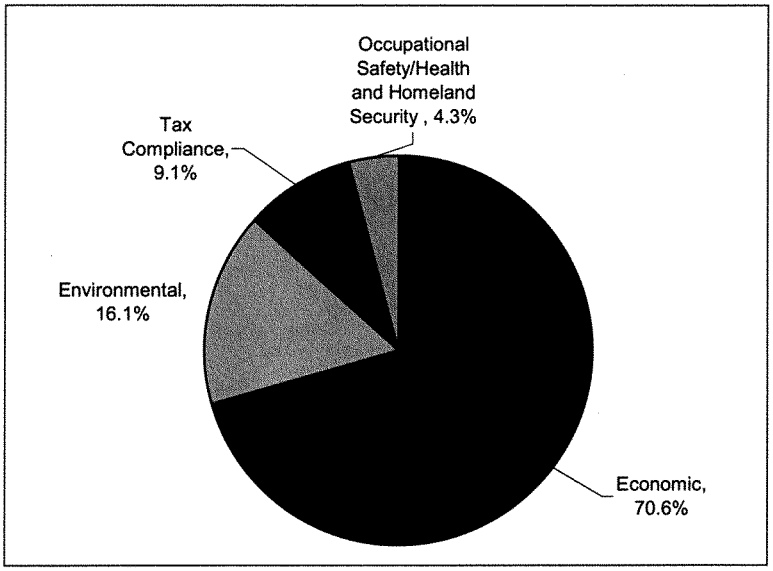
[8] See, for example, Senator Dan Coats, "Coats Says Excessive Regulation is Hindering Private Sector Job Growth," Press Statement in support of S. 358, February 16, 2011, available at http://coats.senate.gov/newsroom/press/release/?id=F6E06668-FE12-460E-9D04-4ED611EAB111; Opening statement of Representative Sam Graves, Chairman, House Committee on Small Business, February 16, 2011, available at http://smbiz.house.gov/UploadedFiles/2011.02.16_State_of_SmBiz_Opening.pdf; and a letter to President Barack Obama by four House committee chairmen, available at http://geoffdavis.house.gov/UploadedFiles/POTUS_Letter_031011.pdf.

[9] See, for example, http://www.geoffdavis.house.gov/Legislation/reins.htm, and http://www.geoffdavis.house.gov/News/DocumentSingle.aspx?DocumentID=208463, in support of the "Regulations from the Executive In Need of Scrutiny (REINS) Act," H.R. 10 in the 112th Congress; http://snowe.senate.gov/public/index.cfm/pressreleases?ContentRecord_id=49fe01bb-b475-4ff1-b9e1-7ea6eda50b7e&ContentType_id=ae7a6475-a01f-4da5-aa94-0a98973de620&Group_id=2643ccf9-0d03-4d09-9082-3807031cb84a&MonthDisplay=3&YearDisplay=2011, in support of the Small Business Regulatory Freedom Act of 2011, S. 474 in the 112th Congress; and H.Rept. 112-6, "Directing Certain Standing Committees to Inventory and Review Existing, Pending, and Proposed Regulations and Orders from Agencies of the Federal Government, Particularly With Respect to Their Effect on Jobs and Economic Growth," Report to accompany H.Res. 72, February 8, 2011.

[10] Carl Bialik, "The Numbers Guy: Small Business Regulatory 'Burden' Is Tough to Quantify," *Wall Street Journal*, January 29, 2011, p. A2; and Sidney A. Shapiro, Ruth Ruttenberg, and James Goodwin, "Setting the Record Straight: The Crain and Crain Report on Regulatory Costs," Center for Progressive Reform White Paper #1103, February 2011, available at http://www.progressivereform.org/articles/SBA_Regulatory_Costs_Analysis_1103.pdf ("CPR report").

regulations involving occupational safety and health, and homeland security ($75 billion). As **Figure 1** below illustrates, the estimated cost of economic regulations was more than 70% of the authors' estimate of total regulatory costs.

Figure 1. Economic Regulations Were More Than 70% of Crain and Crain's Estimate of Total Regulatory Costs



Source: CRS, based on data from Crain and Crain, September 2010.

Note: Due to rounding, the individual segments total 100.1%.

Economic Regulations

According to the Crain and Crain report, "[e]conomic regulations include a wide range of restrictions and incentives that affect the way businesses operate—what products and services they produce, how and when they produce them, and how products and services are priced and marketed to consumers."[11] They said such regulations affect both domestic and international business operations, and include quotas and tariffs on foreign imports that "limit competition from outside the United States, restrict production and employment, raise prices, and generally curtail U.S. economic activities."[12] To develop an estimate of the cost of economic regulations, Crain and Crain used a Worldwide Governance Index (WGI) of "regulatory quality" that was developed by Aart Kraay and Massimo Mastruzzi of the World Bank, and Daniel Kaufmann of

[11] Crain and Crain, p. 17.

[12] Ibid.

the Brookings Institution.[13] According to Crain and Crain, the WGI regulatory quality index "measures perceptions of the ability of governments to formulate and implement sound policies and regulations that permit and promote private sector development."[14] Crain and Crain said the index was calibrated to range between -2.5 and +2.5, and that +2.5 represented "the minimal amount of regulation."[15] In 2008, the WGI regulatory quality index score for the United States was +1.579.

Crain and Crain used regression analysis[16] in an effort to determine the impact of changes in the regulatory quality index on real Gross Domestic Product (GDP) per capita, holding constant four other variables that they said the literature suggests explain differences in economic development across countries and over time: country population, primary education as a share of the eligible population, foreign trade as a share of GDP, and fixed broadband subscribers per 100 people. Using this approach, Crain and Crain concluded that a one-unit change in the WGI regulatory quality index (e.g., a change from +1.5 to +2.5 on the scale) represented a 9.4% change in real GDP per capita. Because the regulatory quality index for the United States in 2008 was +1.579, Crain and Crain said that the 0.921 difference between that value and the +2.5 maximum represented an 8.7% reduction in GDP (0.094 times 0.921) because of economic regulations. Because GDP in the United States was about $14.2 trillion in 2008, Crain and Crain concluded that the types of economic regulations included in the regulatory quality index reduced real GDP per capita in the United States by about $1.236 trillion ($14.2 trillion times 0.087).[17]

Composition of the Regulatory Quality Index

According to Kaufmann, Kraay, and Mastruzzi, the WGI index of regulatory quality for the United States in 2008 was determined by aggregating six expert-based measures and two surveys, each of which was scored on a 0 to 1 scale.[18] The six expert-based measures, their scores, and the particular factors considered in each measure were as follows:

- Economist Intelligence Unit (scored at 0.70), a commercial business information provider headquartered in London, England. The score is based on its experts' judgment of 16 factors, including "protectionism in the country negatively affects the conduct of business," "access to capital markets (foreign and domestic) is easily available," "real corporate taxes are non distortionary," "labor regulations hinder business activities," and "easy to start a business."

[13] In addition to "regulatory quality," the WGI indices include five other governance indicators: "voice and accountability," "political stability and absence of violence," "government effectiveness," "rule of law," and "control of corruption." The WGI methodology is described in Kaufmann, Kraay and Mastruzzi (2010). "The Worldwide Governance Indicators: Methodology and Analytical Issues" World Bank Policy Research Working Paper No. 5430, http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1682130.

[14] Crain and Crain, p. 19.

[15] Ibid., p. 24.

[16] Regression analysis is used to understand how the value of a dependent variable (e.g., real GDP per capita) changes when one of the independent variables is varied (e.g., the index of regulatory quality), while the other independent variables (e.g., country population) are held fixed.

[17] Here, and elsewhere in the Crain and Crain report, cost estimates are provided for 2008 in 2009 dollars. It is unclear why Crain and Crain used 2009 dollars to present cost estimates for 2008.

[18] See http://info.worldbank.org/governance/wgi/pdf/rq.pdf. Documentation for each individual source is available at http://info.worldbank.org/governance/wgi/sources.htm.

- Global Insight Business Conditions and Risk Indicators (scored at 0.94). Global Insight is a commercial business information provider headquartered in Boston, Massachusetts. The score is based on its experts' assessment of two factors: (1) "tax effectiveness," defined as "how efficient the country's tax collection system is"; and (2) "legislation," defined as "whether the necessary business laws are in place, and whether there any outstanding gaps."
- Global Insight Global Risk Service (scored at 0.95). Global Risk Service is a commercial business information provider headquartered in Boston, Massachusetts. The score is based on its experts' judgment of five factors: (1) "export regulation," (2) "import regulation," (3) "other business regulation," (4) "nonresident business ownership restrictions," and (5) "nonresident equity ownership restrictions."
- Heritage Foundation Index of Economic Freedom (scored at 0.73). The Heritage Foundation is described by the WGI index as a "nongovernmental research and educational institute headquartered in Washington, United States, advocating conservative public policies." The index score is based on its experts' judgment of two factors: (1) "foreign investment" and "banking/finance."
- Institutional Profiles Database (scored at 0.89), which is provided by the French government's Ministry of the Economy. The score is based on its experts' judgment of four factors: (1) "ease of starting a business," (2) "administered prices and market prices," (3) "competition: productive sector: ease of market entry for new firms," and (4) "competition between businesses: competition regulation arrangements."
- Political Risk Services International Country Risk Guide (scored at 1.00). Political Risk Services is a commercial business information provider headquartered in Syracuse, New York. The score is based on their experts' judgment of one factor entitled "investment profile," summarizing the investment environment.

The two surveys used to develop the regulatory quality index, their values, and the particular factors considered in each survey were as follows:

- Institute for Management and Development World Competitiveness Yearbook (scored at 0.50). The Institute for Management Development is an educational and research organization headquartered in Lausanne, Switzerland. The score is based on a survey of business people working in the United States, who are asked to comment on the same 16 factors used by the Economist Intelligence Unit mentioned above (e.g., "protectionism in the country negatively affects the conduct of business," "access to capital markets (foreign and domestic) is easily available," "real corporate taxes are non distortionary," "labor regulations hinder business activities," and "easy to start a business").
- World Economic Forum Global Competitiveness Report (scored at 0.62). The World Economic Forum is an international organization based in Switzerland. Its survey asked domestic and foreign-owned firms their views regarding seven statements: (1) "administrative regulations are burdensome," (2) "tax system is distortionary," (3) "import barriers/cost of tariffs as obstacle to growth," (4) "competition in local market is limited," (5) "it is easy to start company," (6)

> "anti-monopoly policy is lax and ineffective," and (7) "environmental regulations hurt competitiveness."

Some observers have questioned whether WGI indices, such as the regulatory quality index, "measure what they purport to measure,"[19] and the authors of the WGI have responded to those concerns.[20] Crain and Crain noted in their report that the World Bank Development Research Group published a detailed description of how the WGI indices were developed,[21] and noted that the WGI indices were correlated with an index of economic regulations developed by the Organization for Economic Cooperation and Development (OECD) that Crain had used in his 2005 study of federal regulatory costs.[22] Crain and Crain said they used the WGI regulatory quality index in their 2010 study because it covered more countries for a longer period of time than the OECD index, and because it used a variety of sources and dimensions.

In a "Frequently Asked Questions" page on the World Bank's website, the WGI authors indicated that indices such as the regulatory quality index are "useful as a first tool for broad cross-country comparisons and for evaluating broad trends over time," but cautioned that they are "often too blunt a tool to be useful in formulating specific governance reforms in particular country contexts." They went on to say that such reforms "need to be informed by much more detailed and country-specific diagnostic data that can identify the relevant constraints on governance in particular country circumstances."[23]

Comments Regarding the Estimate of the Cost of Economic Regulations

The validity and accuracy of Crain and Crain's estimate of the cost of economic regulations depends on at least two factors: (1) whether the WGI index of "regulatory quality" can be used as part of a formula to measure the cost of economic regulations, and (2) whether the authors interpreted the regulatory quality index in the way it was intended. Several commenters on the Crain and Crain study have addressed one or both of these issues.

Comments from Aart Kraay of the World Bank

On January 27, 2011, Aart Kraay, a lead economist in the Development and Research Group at the World Bank, and one of the authors of the WGI regulatory quality index, contacted Crain and Crain by e-mail and provided his views on their use of the index in their September 2010 report on regulatory costs.[24] Kraay said that although "in principle an exercise like this could make

[19] See, for example, M.A. Thomas, "What Do the Worldwide Governance Indicators Measure? *European Journal of Development Research*, vol. 22 (2010), pp. 31-54.

[20] Daniel Kauffman, Aart Kraay, and Massimo Mastruzzi, "Response to 'What Do the Worldwide Governance Indicators Measure?'" *European Journal of Development Research*, vol. 22 (2010), pp. 55-58.

[21] Daniel Kaufman, Aart Kraay, and Massimo Mastruzzi, "Governance Matters VIII: Aggregate and Individual Governance Indicators 1996 – 2008," World Bank Development Research Group, Macroeconomics and Growth Team, Policy Research Working Paper 4978, June 2009.

[22] See G. Nicoletti, Scarpetta, and O. Boylaud, "Summary Indicators of Product Market Regulation and Employment Protection Legislation for the Purpose of International Comparisons," OECD Economics Department Working Paper No. 226 (2000).

[23] World Bank, "World Governance Indicators: Frequently Asked Questions," available at http://info.worldbank.org/governance/wgi/faq.htm.

[24] Kraay provided CRS with a copy of his January 27, 2011, e-mail to Crain and Crain on March 4, 2011.

sense," he said that he believed there were two "basic problems with how you use our data." First, he said that although Crain and Crain interpreted higher values of regulatory quality as "less stringent regulations," "[t]his isn't a good characterization of what the [regulatory quality, or RQ] index measures—rather RQ seeks to measure perceptions of the overall quality of the regulatory environment, which is very different from simply measuring whether it is 'stringent' or not." Kraay noted that the United States came in at about the 90th percentile of all countries in the world, and that countries like Finland and Sweden rank ahead of the United States on regulatory quality. "So by this standard," he said, "it is hard to say that the RQ measure 'rewards' deregulation." He also said that he and the other WGI authors had "indicated throughout that the WGI indicators are not literally true and have non-trivial margins of error, indicating that there is of course imprecision in how countries are ranked."[25]

The second major issue that Kraay noted was that Crain and Crain "may be misinterpreting the units of the WGI" by comparing the United States' score of +1.579 to +2.5—what the authors referred to in the report as "the minimal amount of regulation,"[26] and what Nicole V. Crain had referred to in a *Wall Street Journal* article as a "conceptual regulatory environment."[27] In his e-mail to the authors, Kraay said the following:

> You claim that 2.5 is the "best possible" score on the WGI. But this isn't really correct as the WGI are measured in units which don't have a fixed upper or lower boundary (technically the units are those of a standard normal random variable). It would make a lot more sense for you to compare the US score on RQ with that of a country whose regulatory environment you prefer, and then use that difference in score to calibrate the costs of regulations. So for example the highest numbers we see on WGI-RQ in 2009 are around 1.8 for countries like Singapore, followed closely by Denmark (!). The US comes in at around 1.4. So a more relevant comparison would be between the US and Denmark, rather than between the US and 2.5. This of course would mean that your estimated costs of regulation would be a lot smaller, since the distance between the US and Denmark is much smaller than the distance between the US and 2.5.[28]

(Kraay told CRS that the WGI authors periodically make minor revisions to WGI data for previous years, thus explaining the difference between the +1.579 regulatory quality index that Crain and Crain cited, and the "around 1.4" value that he noted in his e-mail to Crain and Crain.)[29] Using the same 2008 data that Crain and Crain used in their study, the nation with the highest regulatory quality index was Ireland, with a value of +1.915.[30] Subtracting the United States' regulatory index value from that of Ireland yields a difference of 0.336 (1.915 minus 1.579). As noted earlier, Crain and Crain used regression analysis to conclude that a one-unit change in the regulatory quality index represented a 9.4% change in real GDP per capita. If this

[25] In his comments to Crain and Crain, Kraay continued by saying that "one should not make a big deal of the fact that Sweden and Finland come in a bit ahead of the US, as the difference is not statistically significant (the margins of error overlap). But this does give you a good indication that WGI-RQ is not just measuring 'less regulation' as you seem to interpret it."

[26] Crain and Crain, p. 24.

[27] Carl Bialik, "The Numbers Guy: Small Business Regulatory 'Burden' Is Tough to Quantify," *Wall Street Journal*, January 29, 2011, p. A2.

[28] E-mail from Aart Kraay to Crain and Crain, January 27, 2011.

[29] E-mail to the author from Aart Kraay, World Bank, March 4, 2011.

[30] To view the data, see http://www-wds.worldbank.org/external/default/WDSContentServer/IW3P/IB/2009/06/29/000158349_20090629095443/Rendered/PDF/WPS4978.pdf. Two other jurisdictions had higher scores than Ireland in 2008, but they are technically not countries (Hong Kong, at 1.998, and Singapore, at 1.918).

measure is correct, the 0.336 difference between the Ireland and United States regulatory quality indices suggests a 3.16% reduction in GDP (0.094 times 0.336 equals 0.0316) in the United States compared with Ireland, the country with the least "stringent" regulatory climate. Therefore, the monetary "cost" of this GDP reduction would be about $448 billion (0.0316 times $14.2 trillion GDP in 2008), or about $788 billion less than the $1.236 trillion that Crain and Crain calculated. However, all of the above calculations assume that higher values on the regulatory quality index reflect "less stringent regulations," which Kraay indicated it does not.

Kraay also told CRS that he had concerns about the quality of Crain and Crain's regression analysis. He said "The problem is simply that high scores on regulatory quality are correlated with a lot of other good policies and institutions which also matter for GDP per capita. And so it is hard to sort out how much of the correlation between RQ and GDP per capita is due to the regulatory environment per se, and how much is due to other stuff."[31] He also said that "unless one can perfectly control for all these other factors (which is nearly impossible), the econometric estimates [that Crain and Crain] provide will reflect not just the effects of regulation on output, but also of all those other policies that are correlated with regulation."

When contacted by CRS for comment, Crain and Crain said that they understood Kraay's conceptual argument that the regulatory quality index might not reflect changes in the "stringency" of regulation, but they said that "the empirical evidence indicates that it does in practice." They said the index captures the extent of regulation from a variety of stakeholders' perceptions, and noted the nature of the questions used to construct the index (e.g., "How problematic are labor regulations for the growth of your business?" and "How problematic are customs and trade regulations for the growth of your business?"). Crain and Crain also said they did not compare the United States to another country (e.g., Denmark) because to estimate the cost of regulations to small and large businesses (what they contracted with SBA to do), they needed to estimate the total cost of all regulations. They also said they do not believe that they misinterpreted the WGI measure because the documentation provided by the WGI authors indicates that the index values range from about -2.5 to +2.5, and they selected +2.5 as the "best approximation of the regulatory environment that we were trying to capture in our estimate."[32]

Other Commenters

Before publishing the Crain and Crain report, the SBA Office of Advocacy had the study peer reviewed by two economists—Bob Litan of the Kauffman Foundation,[33] and Richard Williams of the Mercatus Center[34] at George Mason University.[35] Litan's complete comments were "I looked it over and it's terrific. Nothing to add." Williams's comments were more extensive. Overall, he said that the study was a "great project," and he hoped his comments would make it stronger. In relation to the estimate of the costs of economic regulations, he said the use of the index of

[31] E-mail to the author from Aart Kraay, World Bank, March 4, 2011.

[32] E-mail to the author from Nicole V. Crain and W. Mark Crain, March 7, 2011.

[33] The Ewing Marion Kauffman Foundation is described on its website as one of the largest foundations devoted to entrepreneurship. See http://www.kauffman.org/.

[34] The Mercatus Center is described on its website as the world's premier university source for market-oriented ideas. See http://mercatus.org/.

[35] According to a March 7, 2011, e-mail to the author from Radwan Saade of SBA's Office of Advocacy, the study was sent to the two peer reviewers "that identified as credible researchers and contributors to the discussion on regulatory costs." He said other researchers were contacted but were unavailable to serve as peer reviewers.

regulatory quality was an "innovative idea," but said he was "concerned that the index may not measure what the authors say it measures, and even if it does, it may overstate the costs of regulation when used in conjunction with the other measures."[36] Among other things, he said that the study "might over-estimate the total costs of regulation because the effect of the Regulatory Quality Index on GDP may also capture some or all of the effects of environmental, workplace, security, and tax regulations." On the other hand, Williams also said that "there are reasons to believe that [the index] may underestimate costs."[37] He said some of the problems "could perhaps be solved simply with a better and more careful explanation of what the Regulatory Quality Index really measures. To guard against over-estimating costs, however, the authors would either need to control for the effects of other types of regulation on GDP, or refrain from adding some or all of the costs that are estimated via other methods."

In February 2011, the Center for Progressive Reform (CPR) issued a report criticizing the Crain and Crain study, and has requested that SBA's Office of Advocacy withdraw its sponsorship of the report.[38] In relation to the estimate of economic regulatory costs, CPR said (among other things) that (1) the WGI authors did not intend the regulatory quality index to be a proxy measure for regulatory burden, or as a tool for critiquing a particular country's regulatory stringency; (2) the lack of a clear definition of "economic regulations" raises the possibility that it includes other types of regulatory costs, which could lead to double counting; (3) the regression analysis used in the report assumes a simplistic relationship between regulatory "stringency" and GDP; and (4) the report gives the false impression that the index of regulatory quality in the United States is low, even though the United States ranked 11th out of more than 200 countries.[39]

CRS Analysis of Crain and Crain's Linear Regression[40]

The Crain and Crain report analyzed data for 25 OECD countries in order to assess the effect of economic regulation on GDP per capita, a common measure of the standard of living.[41]

[36] Comments of Richard Williams, Mercatus Center, George Mason University, available at http://www.sba.gov/sites/default/files/files/TheImpactofFederalRegulatoryCostsonSmallFirmsPRFY2010.pdf.

[37] Williams said "You can start with the fundamental idea of opportunity costs. Resources that are devoted to complying with regulations are not used to produce GDP that responds to normal market forces (demand). Both activities, complying with regulations and normal market activities add to GDP. What has been estimated here is the difference between the two, GDP with resources that would have been devoted to normal market forces minus GDP with resources devoted to complying with regulation. That difference is, I think, one component of the cost of regulation. However, that may leave, (if I am thinking about this correctly) the cost of complying with regulation that is picked up by GDP. That is, a person can produce 10 widgets that comply with regulation and 15 widgets if employed normally by the market, and this model would estimate the costs of the regulation at 5 widgets (the difference in GDP). But that doesn't count the original 10 widgets of expenditure that adds to GDP and is also a cost and must be weighed against the benefits."

[38] Sidney A. Shapiro, Ruth Ruttenberg, and James Goodwin, "Setting the Record Straight: The Crain and Crain Report on Regulatory Costs," February 2011, available at http://www.progressivereform.org/articles/SBA_Regulatory_Costs_Analysis_1103.pdf. See http://www.progressivereform.org/articles/SBA_Letter_020811.pdf for a copy of the letter requesting that SBA's Office of Advocacy withdraw its sponsorship of the Crain and Crain report. In a March 11, 2011, letter to CPR, the Chief Counsel of SBA's Office of Advocacy said that he disagreed with CPR's assessment, and stood behind the findings of the Crain and Crain report.

[39] Ibid., pp. 4-6.

[40] This section of the report was written by (name redacted), Analyst in Economic Policy, Congressional Research Service.

[41] The OECD has 34 member states. Chile, Slovenia, and Israel joined in 2010, and Estonia is in the final stages of formal accession. Some historical data for those new entrants is unavailable. See OECD website (http://www.oecd.org) for details.

Economists generally believe that a country's standard of living is affected by a variety of factors, including the availability of (1) land and natural resources, (2) labor and human capital, (3) capital and infrastructure, (4) the level of technology and sophistication of business practices, and (5) opportunities to trade with other countries.[42] Most economists also believe that government interventions in the economy (e.g., through taxes, spending, and regulation) can affect a country's standard of living.[43]

As noted previously in this report, Crain and Crain used linear regression analysis to examine the relationship between GDP per capita and the regulatory quality index, controlling for the effects of four other independent variables: country population; foreign trade as a share of GDP; primary education as a share of the eligible population; and fixed broadband subscribers per 100 people.[44] These four control variables may not capture all of the factors that affect GDP per capita, and other measures of those factors may be more appropriate. For example, "fixed broadband subscribers per 100 people" may or may not capture all aspects of capital investment, and may also partially reflect other factors (e.g., the state of information technology investment, population density, and per capita income levels).[45] The Crain and Crain report did not discuss how the authors selected the control variables used in their analysis.

Crain and Crain also used an estimation strategy that appears non-standard. Like many researchers, Crain and Crain analyze data for several countries over multiple years, known as a cross-country panel data set. Linear regressions on panel data often include country-specific control variables (fixed effects) to take into account national idiosyncrasies that do not vary over time and year-specific control variables to account for shocks that affected all countries in the sample in a given year.[46] Crain and Crain, however, reported that year-specific control variables that were estimated to be statistically insignificant in an unreported first-stage regression were then omitted from the reported second-stage regression results.[47] The statistical properties of this two-stage estimation strategy, which appears to be novel, has apparently not been explored in peer-reviewed journals.

CRS asked Crain and Crain to provide us with a copy of the data that they used in their study, but the authors did not do so. In an effort to assess the sensitivity of their results, CRS ran a linear regression using similar, but somewhat different, data and methods.[48] The results indicated that the regulatory quality index had no discernable independent effect on GDP per capita, suggesting

[42] Rudiger Dornbusch, Stanley Fischer, and Richard Startz, *Macroeconomics* (10th ed.), (New York: McGraw-Hill, 2008), ch. 1 and 2.

[43] Randall G. Holcombe, *Public Finance*, (Minneapolis: West, 1996).

[44] For details on the linear regression model and its statistical properties, see Peter Kennedy, *A Guide to Econometrics* (4th Edition), (Cambridge, Massachusetts: MIT Press, 1998), ch. 3, "The Classical Linear Regression Model."

[45] In another study, Crain and Crain used a measure of equipment investment in an article that example determinants of GDP per capita for a sample of 99 countries. See Nicole V. Crain and W. Mark Crain, "Terrorized Economies," *Public Choice*, vol. 128, pp.317-349.

[46] Badi Baltagi, *Econometric Analysis of Panel Data* (4th ed.), (New York: Wiley, 2008). If certain technical conditions hold, this approach can generate estimates with desirable statistical properties. See William H. Greene, *Econometric Analysis* (New York: Prentice Hall, 2003), ch. 13, "Models for Panel Data."

[47] See notes to Table 2 in Crain and Crain (2010).

[48] The primary education variable was replaced with two demographic variables: the proportion of the population under age 14, and the proportion of the population over age 65. The data were for 30 OECD countries for the same time period as the Crain and Crain study (2002 – 2008). The analysis used a standard fixed-effects panel estimator with year dummy variables.

that the analysis is highly sensitive to the choice of control variables and measures. **Appendix** of this report discusses this sensitivity analysis and the results in greater detail.

While most economists believe that economic regulation, like other forms of government intervention, can affect a country's standard of living, those effects may be too subtle for a seven-year cross-country panel to pick up. A country's regulatory environment may evolve slowly, and may interact with social and political conditions, other instruments of public policy such as taxation. Understanding the relationship between a measure of regulatory quality and GDP per capita (or other measures of economic well being) may require more focused empirical tools.

Environmental Regulations

Crain and Crain said they developed their cost estimates for environmental regulations by following the same basic approach as used by OMB in its annual reports to Congress. For environmental regulations issued through the first quarter of the year 2000, the authors used OMB's estimate of environmental costs from its 2001 report to Congress[49] (which was drawn in part from a study by Robert W. Hahn and John A. Hird),[50] which the authors converted into 2001 dollars.[51] For environmental regulations issued from April 1999 through September 2001, Crain and Crain used the estimate of the cost of major environmental rules from OMB's 2002 report.[52] For each subsequent fiscal year (October through September), the authors used estimates of the cost of major environmental rules from the subsequent OMB report. By adding together all of these cost estimates and converting the estimates from 2001 dollars to 2009 dollars, the authors concluded that environmental regulations cost between $175 billion and $280 billion in 2009. However, to develop the cumulative cost of all regulations, Crain and Crain used only the $280 billion estimate. The authors said their use of only the upper-end estimate "reflects a judgment that cost estimates are absent for important environmental regulations and that government agencies tend to be conservative in estimating regulatory costs."[53]

The data that Crain and Crain used to estimate the costs of environmental rules represent a mix of academic estimates of the cost of all rules prior to 1988, agency estimates of the costs of all rules issued between 1987 and the first quarter of 2000, and agency estimates of the costs of major rules (e.g., those with a $100 million or more annual impact on the economy) issued from April

[49] See http://www.whitehouse.gov/sites/default/files/omb/assets/omb/inforeg/costbenefitreport.pdf for OMB's 2001 report.

[50] Robert W. Hahn and John A. Hird, "The Costs and Benefits of Regulation: Review and Synthesis," *Yale Journal of Regulation,* vol. 8 (1991), pp. 233-278. Hahn and Hird provided estimates for all rules issued prior to 1988. The estimate for rules issued from 1987 through the first quarter of 2000 were from agencies' estimates of all rules.

[51] In its 2001 report, OMB estimated environmental costs as of the first quarter of 2000 at between $96 billion and $170 billion, in 1996 dollars. In 2001 dollars, Crain and Crain said the costs were between $108.359 billion and $191.887 billion.

[52] See http://www.whitehouse.gov/sites/default/files/omb/assets/omb/inforeg/2002_report_to_congress.pdf for OMB's 2002 report. In this and all subsequent reports, OMB's estimates were in 2001 dollars. As used in this report, the term "major rule" includes all rules meeting the definition in the Congressional Review Act (5 U.S.C. § 804(2) (e.g., an annual effect on the economy of $100 million or more). For a discussion of "major rules," see CRS Report R41651, *REINS Act: Number and Types of "Major Rules" in Recent Years*, by (name redacted) and (name redacted).

[53] Crain and Crain, p. 27. In a March 7, 2011, e-mail to the author, Crain and Crain noted that the OMB data do not include regulations whose costs are expected to be below $100 million, or costs that are not monetized. Therefore, they said, using the upper bound is an attempt to correct for this omission in a systemic and reasonable way. They also said that agency cost estimates are unlikely to include costs associated with negotiated enforcement.

1999 through September 2008. Therefore, the unit of analysis is not the same for all of the years (i.e., all rules prior to the year 2000 versus major rules starting in April 1999), and the methodologies differ (i.e., academic studies prior to 1988, and agencies' ex ante estimates of regulatory costs after 1988). In its 2000 report to Congress, OMB said that summarizing the total costs and benefits of regulations by adding together diverse sets of individual studies was an "inherently flawed approach" because the studies vary in quality and methodology, use differing assumptions, and seldom analyze the interaction effects among tens of thousands of regulations.[54]

Also, the time periods covered by the cost estimates that Crain and Crain used overlap in some years, raising the possibility of double counting. For example, both the Hahn and Hird estimate and the agency estimates cover rules that were issued in calendar year 1987. In addition, the baseline estimates of rules issued through the first quarter of 2000 overlap with the estimates for the period April 1, 1999, to September 30, 2001 (i.e., both cover the period April 1, 1999, through March 31, 2000).

In two of the one-year periods covered by the Crain and Crain analysis, the authors appear to have incorrectly recorded the information on environmental regulatory costs from the OMB reports:

- For the period October 2002 through September 2003, the authors said that OMB's estimate was $335 million (in 2001 dollars). Actually, OMB reported those costs as $360 million (in 2001 dollars).[55]
- For the period October 2003 through September 2004, the authors said that OMB's estimate was $3,840 million to $4,073 million (in 2001 dollars). Actually, OMB reported those costs as $3,060 million to $3,211 million (in 2001 dollars).[56]

Also, Crain and Crain did not report any of OMB's estimates of the benefits of environmental regulations. As discussed later in this report, the authors indicated that regulatory benefits were not included because they researched the topic as required by the Office of Advocacy.[57] **Table 1** below shows both the estimated costs and estimated benefits of environmental rules from OMB's reports. Overall and in eight of the nine time periods covered by the table, the average estimated benefits were higher than the average estimated costs. In six of the nine time periods covered by the table, the lowest estimated benefits were higher than the highest estimated costs. The highest estimated benefits were lower than the lowest estimated costs in only one of the time periods (October 1, 2002, to September 30, 2003).

[54] See http://www.whitehouse.gov/sites/default/files/omb/assets/omb/inforeg/2000fedreg-report.pdf, p. 15.

[55] See http://www.whitehouse.gov/sites/default/files/omb/assets/omb/inforeg/2004_cb_final.pdf, p. 7, Table 1.

[56] See http://www.whitehouse.gov/sites/default/files/omb/assets/omb/inforeg/2005_cb/final_2005_cb_report.pdf, Table 1-3. The $3,840 million to $4,073 million cost estimate in this report is for rules issued by the Departments of Health and Human Services and Transportation, and the Environmental Protection Agency.

[57] E-mail to the author from Nicole V. Crain and W. Mark Crain, March 7, 2011.

Table 1. Estimates of Costs and Benefits of Environmental Rules in OMB Reports to Congress

Years Rules Were Issued	Estimated Costs (millions of 2001$)	Estimated Benefits (millions of 2001$)	Source
Through 03/31/2000	$108,359 to $191,887	$109,490 to $1,817,280	OMB, 2001, Table 2
04/01/1999 to 09/30/2001	$11,380 to $12,812	$25,338 to $56,141	OMB, 2002, Table 7
10/01/2001 to 09/30/2002	$192	$1,250 to $4,818	OMB, 2003, Table 1
10/01/2002 to 09/30/2003	$360	$204 to $355	OMB, 2004, Table 1
10/01/2003 to 09/30/2004	$3,060 to $3,211	$10,935 to $100,703	OMB, 2005, Table 1-3
10/01/2004 to 09/30/2005	$2,609 to $3,373	$14,512 to $161,708	OMB, 2006, Table 1-3
10/01/2005 to 09/30/2006	$2,720 to $2,965	$5,113 to $42,109	OMB, 2007, Table 1-3
10/01/2006 to 09/30/2007	$7,475 to $7,584	$21,143 to $170,391	OMB, 2008, Table 1-3
10/01/2007 to 09/30/2008	$7,591 to $8,780	$7,475 to $37,810	OMB, 2008, Table 1-3
Total	$143,746 to $228,274	$195,460 to $2,391,315	OMB, 2001 to 2008

Source: OMB's annual reports on the costs and benefits of regulations, available at http://www.whitehouse.gov/omb/inforeg_regpol_reports_congress/.

Notes: The estimates of rules issued "Through 03/31/2000" includes all rules. All of the other time periods include only major rules.

Comments Regarding the Estimate of the Cost of Environmental Regulations

Crain and Crain said their report "assumes that OMB's coverage of environmental regulations has been relatively complete."[58] Peer reviewer Richard Williams's only comment about the estimate of environmental regulatory cost was that this statement should be noted as an assumption.

As noted earlier, Crain and Crain said they used only OMB's upper estimate of environmental costs because they believed cost estimates were absent for some important environmental regulations, and "government agencies tend to be conservative in estimating regulatory costs."[59] The authors stated in a footnote that several regulatory experts have drawn a similar conclusion about OMB environmental cost estimates, but also noted that "considerable debate continues."[60] Crain and Crain cited studies indicating that government agencies systematically overestimate benefits and underestimate costs, but also cited one study by Winston Harrington and others that reportedly concluded that overestimation of unit costs occurs about as often as underestimation.[61]

[58] Crain and Crain, p. 25.

[59] Crain and Crain, p. 27.

[60] Ibid.

[61] Ibid, footnote 27. Actually, the Harrington study concluded that agencies' estimates of direct costs appeared to be too (continued...)

In its analysis of the Crain and Crain report, the Center for Progressive Reform said that agencies' estimates of environmental costs tend to be too high, reflecting estimates provided to them by industry, whom CPR said have an incentive to overstate costs. CPR also said that industry cost estimates (and therefore the agency estimates) do not take into account technological innovations that reduce the cost of compliance. To support its position on this issue, CPR cited four studies indicating that agencies' initial cost estimates tended to be too high.[62] CPR also questioned Crain and Crain's use of the Hahn and Hird study to estimate the cost of environmental regulations prior to 1988, noting that the study was more than 20 years old, synthesized other estimates developed by a small group of economists, and some of those studies used data that are now more than 30 years old.

In responding to comments on one of its reports to Congress on the costs and benefits of regulations, OMB noted the "theory that agency estimates, upon which many but not all of our estimates are based, systematically understate costs and overstate benefits because agency self-interest lies in regulation." OMB went on to say the following:

> Although this view of agency behavior enjoys widespread support among academics as a theoretical matter, there is little documentation available to support it—perhaps because there are several potentially offsetting factors. For example, much of the data that agencies use to make their estimates of costs comes from the regulated entities who generally have the opposite incentives—namely, they will likely overstate costs to help convince decision makers not to issue the regulation. Also, as noted in our report, competitive firms over time frequently find more cost-effective ways, including new technologies, to comply with regulations than had been envisioned ex ante. Some commenters pointed to a set of case studies that is about to be published to support this contention. On the other hand, there is a large body of literature that shows that agencies tend to overestimate the benefits of their programs because, over time, technological progress—in communications to energy exploration to infectious disease—has reduced the long run expected benefits of earlier regulations.[63]

Tax Compliance

To estimate the costs associated with complying with federal tax paperwork, Crain and Crain said they compiled data from the Internal Revenue Service (IRS), and in some cases the Tax Foundation,[64] on the amount of time required to complete each type of tax form, and the number of filings per form. The authors concluded that businesses, individuals, and nonprofits devoted about 4.3 billion burden hours to completing tax paperwork in 2008 (about 2.28 billion burden hours for business and about 2.02 billion burden hours for individuals and nonprofits). To

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(...continued)

high in 12 rules, and too low in 6 rules. The authors' conclusions regarding per-unit abatement costs only applied to EPA and OSHA regulations. See Winston Harrington, et al., "On the Accuracy of Regulatory Cost Estimates," available at http://www.rff.org/documents/RFF-DP-99-18.pdf.

[62] Sidney A. Shapiro, Ruth Ruttenberg, and James Goodwin, "Setting the Record Straight: The Crain and Crain Report on Regulatory Costs," p. 7.

[63] Office of Management and Budget, "Appendix: Summary of Public Comments," available at http://www.whitehouse.gov/omb/inforeg_appendix.

[64] The Tax Foundation is a nonpartisan tax research group based in Washington, D.C. For more information, see http://www.taxfoundation.org/about/. Crain and Crain said they used information from the Tax Foundation's 2005 report, but did not provide a citation for that report.

monetize that burden, Crain and Crain estimated the cost of completing business paperwork at $49.77 per hour for businesses (which they said was the average hourly rate for "human resources professionals" in 2009 from the Bureau of Labor Statistics website) and $31.53 per hour for individuals and nonprofits (which they said was the average hourly rate for "accountants and auditors" in 2009), for a total cost of about $159.6 billion.

Crain and Crain did not indicate in their report how they "compiled" data from the IRS website and the Tax Foundation to arrive at the estimated 4.3 billion hours of tax paperwork in 2008. According to the Information Collection Budget that OMB develops annually, the government-wide paperwork burden in FY2008 was about 9.71 billion burden hours, of which the Department of the Treasury accounted for about 7.78 billion burden hours.[65] Although the Information Collection Budget did not separately identify the number of burden hours for the IRS, in May 2009, the IRS represented about 77.8% of the government-wide estimate, and about 99.5% of the Treasury estimate.[66] If those same ratios applied in 2008, IRS paperwork would have been about 7.5 billion burden hours—about 3.2 billion hours higher than in the Crain and Crain report.

Certain aspects of how Crain and Crain monetized IRS burden hours are also unclear. For example, it is unclear why the authors assumed that "human resources professionals" would be completing all business tax paperwork, that all individuals and nonprofits would have their returns prepared by "accountants and auditors," or where on the "Bureau of Labor Statistics website" the hourly rates for human resources professionals ($49.77 per hour) and accountants and auditors ($31.53) were derived. According to the Bureau of Labor Statistics' Occupational Employment Statistics, in May 2009, tax preparers received an average salary of $17.34 per hour (median salary was $14.45 per hour).[67] Even if one assumed that total compensation (including benefits and overhead) was one-third higher, the average compensation for tax preparers would still be just over $23 per hour ($17.34 times 1.33). Using this figure for all tax compliance may balance out those businesses and individuals who prepare their returns themselves and those who use more expensive preparers.[68] Therefore, multiplying 7.5 billion burden hours times $23 per hour yields a total cost of about $172.5 billion—about $12.9 billion higher than the Crain and Crain estimate.

A threshold issue, however, is whether tax paperwork should be included in estimates of regulatory costs at all. OMB does not include tax paperwork in its annual reports to Congress on the costs and benefits of federal regulations. In one of the first of those reports, OMB said that "filling out tax forms is not the result of 'regulations' but rather of the tax code itself, with most regulations merely providing interpretations and clarifications of tax law."[69] Also, in testimony before the House Committee on Government Reform in July 2003, John D. Graham, administrator of the Office of Information and Regulatory Affairs (OIRA) within OMB, said the following:

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[65] Office of Management and Budget, *Information Collection Budget: 2009* (reporting on FY2008), available at http://www.whitehouse.gov/sites/default/files/omb/assets/inforeg/icb_2009.pdf.

[66] See CRS Report R40636, *Paperwork Reduction Act (PRA): OMB and Agency Responsibilities and Burden Estimates*, by (name redacted) and (name redacted).

[67] See http://www.bls.gov/oes/current/oes132082.htm for these data.

[68] For example, BLS data indicated that accountants and auditors were paid an average of $32.42 per hour in May 2009. See http://www.bls.gov/oes/current/oes132011.htm.

[69] Office of Management and Budget, *Report to Congress on the Costs and Benefits of Federal Regulations*, September 30, 1997, available at http://www.whitehouse.gov/omb/inforeg_rcongress/.

> To a greater extent than for other agencies and programs, IRS paperwork burden is driven by a statute (the Tax Code), and in particular the complexities of the Code. To ensure taxpayer compliance with our tax laws, IRS must collect a tremendous amount of information. This task is complicated by a massive, complex Tax Code that is subject to continuous revision. In the 15 years following the 1986 overhaul of the Code, Congress passed 84 tax laws. These laws required IRS to create and/or revise reporting and recordkeeping requirements, which in turn increased taxpayer burden. The Internal Revenue Service also had to make several changes to the 1040 schedules to implement the Economic Growth and Tax Relief Reconciliation Act of 2001. These statutorily driven revisions increased the burden on taxpayers by 47 million hours. Moreover, there are other factors totally outside the control of IRS—most notably increases in the number of tax filings due to economic and population growth over the years—that increase the aggregate IRS burden hours but not—and this is important—the average burden on individual taxpayers.[70]

Occupational Safety and Health and Homeland Security Regulations

Because the "economic regulations" category included many types of workplace regulations, Crain and Crain said that their final category of regulatory costs included only workplace regulations that deal with safety and health, primarily those issued by the Occupational Safety and Health Administration (OSHA) within the Department of Labor, as well as regulations related to homeland security. To estimate the cost of occupational safety and health regulations prior to 2001 (estimated at more than $64.3 billion in 2009 dollars), the authors used information from a 2005 study by Joseph M. Johnson that reportedly synthesized and evaluated other studies of workplace regulations.[71] Crain and Crain said they then added data from OMB's 2009 report to Congress on regulatory costs and benefits on (1) 2001 to 2008 occupational safety and health regulatory costs (estimated at $471 million in 2009 dollars), and (2) all homeland security costs through 2008 (estimated at about $10.4 billion in 2009 dollars). Adding these elements together, the authors concluded that the total cost for occupational safety and health and homeland security regulations in 2008 was about $75.2 billion.

Crain and Crain said they obtained the estimate for occupational safety and health regulatory costs between 2001 and 2008 from Table 1-2 in OMB's 2009 report to Congress. That table reports the estimated costs and benefits of major federal rules within selected programs from October 1, 1998, through September 30, 2008. One of the programs was labeled "Occupational Safety and Health Administration," with the costs associated with four rules estimated at between $362 million and $389 million (in 2001 dollars). Several of those years (October 1998 through December 2000) appear to overlap with estimates provided in Johnson's study of costs prior to 2001, raising the issue of possible double counting.[72] Also, converting the OMB estimate to 2009 dollars yields a range of $440 million to $471 million. Therefore, although the authors did not explicitly say so, it appears that Crain and Crain only used the upper-end of OMB's estimated cost range for these regulations (as they did for environmental regulations).

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[70] See http://www.whitehouse.gov/omb/legislative_testimony_graham_030722_graham/ for a copy of this testimony.

[71] Cited by Crain and Crain as Joseph M. Johnson, "A Review and Synthesis of the Cost of Workplace Regulations, in *Cross-Border Human Resources*, Labor International: Netherlands, 2005, pp. 433-467.

[72] Although Crain and Crain said (in Table 5 on p. 30 of their report) that they only used rules issued between 2001 and 2008, the 2009 OMB report does not identify when the four Occupational Safety and Health Administration rules were issued. Also, conversion of OMB's upper-end estimate for all four rules ($389 million in 2001 dollars) into 2009 dollars yields an estimate of $471 million—the same figure used in Crain and Crain's report.

Crain and Crain said they obtained their estimate for homeland security costs from page 18 of OMB's 2009 report. There, OMB reported that since the Department of Homeland Security was created, "agencies have finalized 17 major homeland security regulations that impose a total annual cost on the economy of between $4.2 billion to $8.6 billion. Converting these estimated costs in 2001 dollars to 2009 dollars yields a range of $5.1 billion to $10.4 billion. Therefore, although they did not say so in their report, it appears that Crain and Crain again only used OMB's upper-end of the estimated cost range. As noted earlier in this report, the authors said that their use of the upper-end of OMB's estimates for environmental rules reflected a judgment that cost estimates were absent for important regulations and that government agencies tend to be conservative in estimating regulatory costs.[73] On the other hand, OMB has said that there is little evidence that agencies' cost estimates are too conservative.[74]

The Center for Progressive Reform's analysis of the Crain and Crain report stated that the cost estimates that the authors used for occupational safety and health costs (both the Joseph M. Johnson study and the agency estimates of costs before the rules are published) likely overstate true compliance costs because they are based on information provided by regulated industries. CPR also said that the Johnson study inflates OSHA's original cost estimates by multiplying them by 5.5, which was reportedly done to take into account non-major rules for which costs were not estimated, and for fines imposed for violations of OSHA standards. CPR said it saw no justification for counting such fines as "regulatory costs." "Under this logic," CPR said, "mass lawbreaking raises regulatory costs, enabling regulatory opponents to argue that we need to reduce regulations because of these regulatory costs."[75]

Comparison of Crain and Crain's 2008 Estimate to Crain's 2004 Estimate

As noted previously and as shown below in **Table 2**, in 2005, W. Mark Crain estimated total federal regulatory costs in 2004 at about $1.11 trillion. In 2010, Crain and Crain estimated those costs in 2008 at about $1.75 trillion—an increase of about $639 billion (57.4%) in four years. Some of this increase is due to inflation,[76] but the authors said that the main reason for the increase was a change in the methodology used in developing their estimate of the cost of economic regulations.[77] As **Table 2** below indicates, were it not for the increase in the cost

[73] Crain and Crain, p. 27. In a March 7, 2011, e-mail to the author, Crain and Crain noted that the OMB data do not include regulations whose costs are expected to be below $100 million, or costs that are not monetized. Therefore, they said, using the upper bound is an attempt to correct for this omission in a systemic and reasonable way. They also said that agency cost estimates are unlikely to include costs associated with negotiated enforcement.

[74] Office of Management and Budget, "Appendix: Summary of Public Comments," available at http://www.whitehouse.gov/omb/inforeg_appendix.

[75] CPR, p. 9.

[76] Crain and Crain said that the $1.1 trillion estimate of regulatory costs in 2004 would be $1.26 trillion in 2009 dollars.

[77] Crain and Crain, p. 20. The authors said that the 2005 study used an index of economic regulations developed by the Organization for Economic Cooperation and Development (OECD), supplemented by information from the International Trade Commission and other sources. Crain and Crain said they used the World Bank index of regulatory quality because it was a more comprehensive index of economic regulations. Had the 2005 study used the methodology used in the 2010 study, the authors said that the total cost would have been $1.7 trillion, an increase of $43 billion between 2004 and 2008 after adjusting for inflation.

estimate for economic regulations, the total estimated cost of the three other types of regulations would have decreased by about $6 billion between 2004 and 2008.

Table 2. Changes in Estimates of the Costs of Federal Regulations: 2004 to 2008

Type of Regulation	2004	2008	Increase/Decrease (%)
Economic	$591 billion	$1,236 billion	$645 billion increase (+109.1%)
Environmental	$221 billion	$281 billion	$60 billion increase (+27.1%)
Workplace	$106 billion	$75 billion	$31 billion decrease (-29.2%)
Tax Compliance	$195 billion	$160 billion	$35 billion decrease (-17.9%)
Total	$1,113 billion	$1,752 billion	$639 billion increase (+57.4%)

Source: The 2004 data are from Crain (2005), and the 2008 data are from Crain and Crain (2010).

Notes: In Crain and Crain's 2010 report, "workplace" regulations were termed "occupational safety and health, and homeland security" regulations.

Comparison of Crain and Crain's 2008 Estimate to OMB's Estimates

For nearly 15 years, Congress has required OMB to submit annual reports on the costs and benefits of federal regulations. The first such requirement was in Section 645 of the Treasury, Postal Service and General Government Appropriations Act, 1997 (P.L. 104-208), which required the director of OMB to submit a report by September 30, 1997, that provided (among other things) "estimates of the total annual costs and benefits of federal regulatory programs, including quantitative and nonquantitative measures of regulatory costs and benefits." Similar requirements were contained in other appropriations bills in subsequent years.

In 2001, Section 624 of the Treasury and General Government Appropriations Act, 2001, (31 U.S.C. § 1105 note), sometimes known as the "Regulatory Right-to-Know Act," put in place a permanent requirement for an OMB report on regulatory costs and benefits. Specifically, it requires OMB to prepare and submit with the President's budget an "accounting statement and associated report" containing an estimate of the total costs and benefits (including quantifiable and nonquantifiable effects) of federal rules and paperwork, to the extent feasible, (1) in the aggregate, (2) by agency and agency program, and (3) by major rule. The accounting statement is also required to contain an analysis of the impacts of federal regulation on state, local, and tribal governments, small businesses, wages, and economic growth.

OMB's Early Estimates of Total Regulatory Costs and Benefits

For the first several years, OMB provided estimates of total regulatory costs and benefits, and those estimates (particularly the benefits estimates) varied substantially from year to year.

- In its 1997 report, OMB estimated total federal regulatory costs in 1997 at $279 billion, and estimated the benefits of federal regulations at $298 billion.[78]
- In its 1998 report, OMB estimated federal regulatory costs at between $170 billion and $230 billion (in 1996 dollars as of 1998), and estimated regulatory benefits at between $260 billion and $3.5 trillion.[79] The dramatic increase in the benefits estimate (by a factor of 12) was almost entirely due to the inclusion of an Environmental Protection Agency (EPA) estimate of the benefits associated with the Clean Air Act. Many observers had serious questions regarding the use of this EPA estimate, and EPA itself said it had only a small probability of being correct.
- In its 2000 and 2001 reports, OMB estimated the cost of all social regulations at between $146 billion and $229 billion (in 1996 dollars as of 1999), and estimated benefits at between $254 billion and nearly $1.8 trillion.[80] The nearly 50% drop in the upper-bound benefits estimate (from $3.5 trillion to $1.8 trillion) was primarily caused by a significant drop in the previously mentioned EPA estimate of the benefits of the Clean Air Act (from $3.2 trillion to $1.45 trillion).

Each year, OMB presented its aggregate cost and benefit estimates with strong caveats. For example, in its first report in 1997, OMB said "it is extremely difficult, if not impossible, to estimate the actual total costs and benefits of all existing Federal regulations with any degree of precision."[81] The next year OMB said "there is not yet a professional consensus on methods that would permit a complete, consistent accounting of total costs and benefits of Federal regulation."[82] Some of the methodological problems that OMB pointed out in these and other reports included the following:

- The baseline for measurement is often not clear (i.e., what costs and benefits would have occurred in the absence of the regulation). Regulatory requirements sometimes become standard business practice (e.g., requirements to remove lead from gasoline or to put air bags in automobiles), so cost or benefit reductions would be unlikely to occur if the rules were eliminated entirely.
- It is difficult to attribute costs or benefits to federal regulations as opposed to state or local rules, voluntary standards organizations, insurance requirements, or the tort system.
- Technological change can make previous estimates of benefits and costs extremely inaccurate.
- Aggregating the results of different studies is highly problematic, as the studies vary in the quality, methodology, and types of regulatory impacts they include.[83]

[78] See http://www.whitehouse.gov/omb/inforeg_rcongress/ for a copy of this report.

[79] See http://www.whitehouse.gov/sites/default/files/omb/assets/omb/inforeg/costbenefitreport1998.pdf, Table 3.

[80] See http://www.whitehouse.gov/sites/default/files/omb/assets/omb/inforeg/costbenefitreport.pdf, Table 2.

[81] See http://www.whitehouse.gov/omb/inforeg_chap2.

[82] See http://www.whitehouse.gov/sites/default/files/omb/assets/omb/inforeg/costbenefitreport1998.pdf, p. 1.

[83] Specifically, in its 1997 report, OMB said "studies that have attempted to tote up the total costs and benefits of Federal regulations have basically added together a diverse set of individual studies. Unfortunately, these individual studies vary in quality, methodology, and type of regulatory costs included. Thus we have an apples and oranges problem, or, more aptly, an apples, oranges, kiwis, grapefruit, etc., problem." See http://www.whitehouse.gov/omb/ (continued...)

- It is unclear which rules should be included in any tabulation of regulatory costs and benefits (e.g., "transfer" regulations such as crop subsidy payments).

In developing its estimates of total regulatory costs, OMB did not include "transfer" rules (which OMB said were about $140 billion in costs and benefits in 1997) because it considered them to be payments that reflect a redistribution of wealth rather than social costs to society as a whole. OMB also excluded the costs associated with filling out tax paperwork (which OMB estimated were about $140 billion in 1997) because it did not consider filling out income tax forms "regulations" in the traditional sense. Neither did it include estimates for rules published after 1987 for which agencies did not conduct cost-benefit analyses (e.g., rules with less than a $100 million impact on the economy).

OMB's Reports Since 2001

OMB's "Regulatory Right-to-Know Act" reports since 2001 have differed from the office's previous reports in that they have not presented cost or benefit estimates for all rules in existence. Instead, OMB has presented information for all regulations that it reviewed within a particular time-frame that (1) had costs or benefits of at least $100 million annually and (2) the costs and benefits had been monetized by either the rulemaking agency or OMB. Specifically:

- OMB's report for 2002 presented information on the costs and benefits of all regulations meeting those criteria that it reviewed for a six-and-one-half year period from April 1, 1995, to September 30, 2001. OMB said the total cost of those rules was about $50 billion to $53 billion (in 2001 dollars), and the benefits ranged from $48 billion to $101 billion.[84]
- In its 2003 report, OMB provided estimates of the costs and benefits of 107 regulations meeting the above criteria that it reviewed during the 10-year period from October 1992 through September 2002. OMB estimated that the total costs of these rules ranged from nearly $37 billion to nearly $43 billion (in 2001 dollars), with benefits ranging from $146 billion to $230 billion. OMB noted that four rules issued by EPA accounted for a substantial fraction of the aggregate benefits for all 107 rules.[85]

Each report since 2003 has provided information for rules meeting the above criteria during the previous 10 years. In its 2002 report, OMB said its decision to present data for only certain rules during a limited time-frame was driven by the inconsistent and increasingly aged nature of many of the studies used to develop aggregate estimates. OMB went on to say that "we do not believe that the estimates of the costs and benefits of regulations issued over ten years ago are reliable or

(...continued)

inforeg_chap2.

[84] Office of Management and Budget, Office of Information and Regulatory Affairs, Stimulating Smarter Regulation: 2002 Report to Congress on the Costs and Benefits of Regulations and Unfunded Mandates on State, Local, and Tribal Entities, 2002, available at http://www.whitehouse.gov/sites/default/files/omb/assets/omb/inforeg/2002_report_to_congress.pdf.

[85] Office of Management and Budget, Office of Information and Regulatory Affairs, Informing Regulatory Decisions: 2003 Report to Congress on the Costs and Benefits of Federal Regulations and Unfunded Mandates on State, Local, and Tribal Entities, 2003, available at http://www.whitehouse.gov/sites/default/files/omb/assets/omb/inforeg/2003_cost-ben_final_rpt.pdf.

very useful for informing current policy decisions."[86] Therefore, OMB said that "in keeping with the spirit of OMB's new information-quality guidelines, we have decided not to reproduce the aggregate estimates that were contained in Appendix C of the draft report."[87] The report went on to say that the total costs and benefits of all federal rules then in effect "could easily be a factor of ten or more larger." In its 2003 report, OMB said that estimates prepared for rules adopted prior to the 10-year period "are of questionable relevance now."[88]

This point was elaborated by John D. Graham, former administrator of OIRA, in testimony before the House Committee on Government Reform in July 2003:

> The fact that attempts to estimate the aggregate costs of regulations have been made in the past, such as the Crain and Hopkins estimate of $843 billion..., is not an indication that such estimates are appropriate or accurate enough for regulatory accounting. Although the Crain and Hopkins estimate is the best available for its purpose, it is a rough indicator of regulatory activity, best viewed as an overall measure of the magnitude of the overall impact of regulatory activity on the macro economy. The estimate, which was produced in 2001 under contract for the Office of Advocacy of the Small Business Administration, is based on a previous estimate by Hopkins done in 1995, which itself was based on summary estimates done in 1991 and earlier, as far back as the 1970s. The underlying studies were mainly done by academics using a variety of techniques, some peer reviewed and some not. Most importantly, they were based on data collected ten, twenty, and even thirty years ago. Much has changed in those years and those estimates may no longer be sufficiently accurate or appropriate for an official accounting statement. Moreover, the cost estimates used in these aggregate estimates combine diverse types of regulations, including financial, communications, and environmental, some of which impose real costs and others that cause mainly transfers of income from one group to another. Information by agency and by program is spotty and benefit information is nonexistent. These estimates might not pass OMB's information quality guidelines. In particular, many of the studies they relied upon for these aggregate estimates are not sufficiently transparent about the data and methods to facilitate the reproducibility of the information by qualified third parties. That is why we have opted in the most recent Reports to Congress to report just the costs and benefits of major regulations prepared by agencies and reviewed by OMB over the last ten years.[89]

Later that year, testifying on the Paperwork and Regulatory Improvements Act of 2004 (H.R. 2432, 108th Congress), Graham said that requiring agencies to submit annual estimates of the cost and benefits of all their rules, and mandating preparation of a complete inventory of the costs and benefits of all federal rules and paperwork requirements, was "not workable."[90]

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[86] See http://www.whitehouse.gov/sites/default/files/omb/assets/omb/inforeg/2002_report_to_congress.pdf, p. 40.

[87] Ibid., p. 41. Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001, generally known as the "Data Quality Act" or the "Information Quality Act," amended the Paperwork Reduction Act and directed OMB to issue government-wide guidelines that "provide policy and procedural guidance to Federal agencies for ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information) disseminated by Federal agencies."

[88] See http://www.whitehouse.gov/sites/default/files/omb/assets/omb/inforeg/2003_cost-ben_final_rpt.pdf, p. 7. In its 2010 report to Congress, OMB continues to say that estimates that are more than 10 years old are of "questionable relevance." See http://www.whitehouse.gov/sites/default/files/omb/legislative/reports/2010_Benefit_Cost_Report.pdf, p. 11.

[89] Testimony of John D. Graham before the House Committee on Government Reform, July 22, 2003, available at http://www.whitehouse.gov/omb/legislative_testimony_graham_030722_graham.

[90] "Chief of OMB Regulatory Review Opposes Ose Bill on Regulatory Accounting, Budgeting," *BNA Daily Report for Executives*, July 23, 2003, p. A-43.

OMB's 2009 Report to Congress

OMB's 2009 report to Congress provided estimates of the total annual benefits and costs of 98 regulations reviewed by OMB during the 10-year period from October 1, 1998, to September 30, 2008. The 98 rules were those that (1) were estimated to generate benefits or costs of approximately $100 million in any one year; and (2) a substantial portion of the benefits and costs were quantified and monetized by the agency or, in some cases, monetized by OMB. As **Table 3** below shows, OMB said that the estimated costs of these rules ranged from nearly $51 billion to nearly $60 billion, and the benefits were estimated to be between about $126 billion and about $663 billion (in 2001 dollars). Because the estimates were provided for only 98 rules meeting the above criteria, and because not all benefits and costs for even those rules could be assessed, OMB noted that the estimates were "not a complete accounting of all of the benefits and costs of all regulations issued during this period."[91]

Table 3. Estimates of the Total Benefits and Costs of Major Rules by Agency: October 1, 1998 – September 30, 2008

(in millions of 2001 dollars)

Agency	Number of Rules	Benefits	Costs
Department of Agriculture	6	$906 – $1,315	$1,014 – $1,353
Department of Education	1	633 – 786	349 - 589
Department of Energy	6	4,954 – 5,391	3,067 – 3,118
Department of Health and Human Services	18	20,522 – 32,426	3,879 – 4,387
Department of Homeland Security	1	20 – 29	13 – 99
Department of Housing and Urban Development	1	190	150
Department of Justice	1	275	108 – 118
Department of Labor	6	481 – 1605	320 347
Department of Transportation	18	11,256 – 19,098	5,218 – 8,968
Environmental Protection Agency	40	87,042 – 601,469	36,853 – 40,851
Total	98	126,277 – 662,584	50,973 – 59,978

Source: OMB's 2009 Report to Congress, Table 1-1.

As in its previous reports, OMB said it presented information only for a 10-year period because "pre-regulation estimates prepared for rules adopted more than ten years ago are of questionable relevance today."[92] OMB also said the following:

[91] OMB's 2009 report to Congress, p. 9.

[92] Ibid.

> Aggregating benefit and cost estimates of individual regulations—to the extent they can be combined—provides significant insight about the effects of regulations. But the resulting estimates are neither precise nor complete. Individual regulatory impact analyses vary in rigor and rely on different assumptions, including baseline scenarios, methods, and data. Summing across estimates involves the aggregation of analytical results that are not strictly comparable. [93]

How OMB's and Crain and Crain's Estimates Differ

It is difficult to compare OMB's estimates of regulatory costs and Crain and Crain's estimates because they were constructed in very different ways, and because the presentation categories were different (e.g., by agency in OMB's study, and by type of regulation in the Crain and Crain study). For several reasons, Crain and Crain's estimates of annual regulatory costs in 2008 were much larger than the estimates provided by OMB.

- Crain and Crain included estimates of costs associated with all rules for certain periods, and major rules for other periods. Their estimates attempt to measure the cumulative costs of all rules. OMB's estimates included only major rules that met certain criteria that had been issued during a 10-year period.
- Crain and Crain included estimates of the cost of "economic regulations," whereas OMB's estimate did not include economic regulations.[94]
- Crain and Crain included costs associated with tax paperwork, whereas OMB's estimate did not include tax paperwork.

Concluding Observations

Although accurate measures of the costs and benefits of all federal rules would be useful, decision makers using studies of aggregate regulatory costs and benefits to guide public policy need to be aware of those studies' conceptual and methodological underpinnings. The validity and reliability of Crain and Crain's $1.75 trillion estimate of total federal regulatory costs in 2008 depends on the validity and reliability of its individual elements. More than 70% of the overall estimate ($1.236 trillion) is based on the WGI index of regulatory quality for the United States, with the authors determining the extent to which economic regulations reflected in that index reduces per capita real GDP in the United States. However, one of the authors of the regulatory quality index has said that Crain and Crain misinterpreted the index, and that higher values on the index cannot be interpreted as "less stringent regulations." Even if it could, he said that the index for the United States should be compared to a country with a preferable index, not to an idealized "best possible" score on the index. Comparing the United States' regulatory quality index in 2008 to the country with the highest index that year (Ireland) would have reduced Crain and Crain's estimate of the cost of economic regulations by nearly two-thirds. Other commenters (including one of the peer reviewers of the Crain and Crain study) raised similar concerns about whether the

[93] Ibid., p. 8.

[94] OMB's report did, however, provide some information on rules issued by certain independent regulatory agencies (e.g., the Board of Governors of the Federal Reserve System and the Securities and Exchange Commission) as provided to OMB by the Government Accountability Office. The agencies typically did not provide information on costs and benefits.

regulatory quality index could be used to measure the cost of economic regulations, and about the regression analysis used to produce the cost estimate. Responding to these criticisms, Crain and Crain said that they continue to believe that the regulatory quality index indicates the stringency of a country's economic regulations, and believe that it was appropriate for them to compare the index for the United States to a "conceptual regulatory environment" represented by a 2.5 score rather than to another country with a somewhat higher index score. The World Bank indicates on its website that measures like the regulatory quality index are "often too blunt a tool to be useful in formulating specific governance reforms in particular country contexts."

Crain and Crain's estimates for environmental, occupational safety and health, and homeland security regulations were developed by mixing together academic studies (some of which were more than 30 years old) with agencies' estimates of regulatory costs that were developed before the rules were issued (some of which are now 20 years old). OMB has said that adding together diverse sets of individual studies to develop a summary measure of regulatory costs is an "inherently flawed" approach. The agency estimates that Crain and Crain used were drawn from OMB reports to Congress on the estimated costs and benefits of regulations, which were typically presented as low-to-high ranges. However, Crain and Crain used only the highest cost estimates from these reports, stating that they did so because the OMB estimates did not cover all regulations, and because they believe "government agencies tend to be conservative in estimating regulatory costs." OMB has said that there is little documentation to support this view, and empirical studies of agencies' regulatory cost estimates have not resolved the issue. Also, OMB has concluded that estimates of the costs and benefits of regulations issued more than 10 years earlier are of "questionable relevance." Since 2003, OMB's annual "Regulatory Right-to-Know Act" reports to Congress have only included information on the costs and benefits of major rules issued during the previous 10 years. Although OMB has recognized that this approach understates total regulatory costs and benefits, OMB has said it does not believe older estimates are reliable or useful in informing policy decisions.

In one of its first reports to Congress on this issue, OMB also said that the incremental costs of regulations (i.e., over and above what businesses and individuals would have done in the absence of regulations) tend to decrease over time, as companies' business practices and consumers' expectations change.

> Thus, although the National Highway Traffic Safety Administration has significantly increased the safety of automobiles, it is not likely that if the agency's regulations were eliminated the automobile companies would discontinue the safety features that had been mandated. Consumers demand safer cars than they used to and automobile companies are concerned about product liability. This same phenomenon exists with the environment, although probably to a lesser extent. Environmentally responsible behavior has become good for the bottom line.... Over time, this "rising baseline" phenomenon reduces the true costs and benefits of health, safety, and environmental regulations. Estimates of the aggregate costs and benefits of regulation that include unadjusted estimates from aging studies are thus likely to be over estimates of the current costs and benefits of those regulations.[95]

[95] Office of Management and Budget, *Report to Congress on the Costs and Benefits of Federal Regulations*, September 30, 1997, available at http://www.whitehouse.gov/omb/inforeg_rcongress/.

OMB went on to say that "it does not seem implausible that, for environmental and other social regulations over ten years old, no more than half of compliance costs would likely be saved if these Federal regulations magically disappeared over night."[96]

Crain and Crain's estimate for the cost of tax paperwork was reportedly based on data from the IRS and the Tax Foundation, but data in OMB's annual Information Collection Budget suggests that the number of hours of tax paperwork may be much higher than the authors used in their report. On the other hand, Crain and Crain's assumptions regarding the per hour cost of completing the paperwork may be too high (e.g., the assumption that "human resources professionals" paid at nearly $50 per hour would be completing all business paperwork). However, a threshold question is whether tax paperwork should be considered in the same category as regulatory costs. OMB does not include tax paperwork in its annual reports to Congress on regulatory costs and benefits.

Regulatory Benefits

Although Crain and Crain attempted to determine all of the costs associated with federal regulations, their report did not discuss the benefits of those regulations—even when information on regulatory benefits was readily available in the OMB reports that they used to determine regulatory costs. In their report, the authors said that it "does not address the benefits of regulation, an important challenge that would be a logical next step toward achieving a rational regulatory system."[97] Crain and Crain told CRS that they did not include regulatory benefits in their study "because we researched the topic as required by the Office of Advocacy."[98] The SBA Office of Advocacy confirmed that Crain and Crain "were not asked to look at benefits, as the task for this last iteration was to update the previous study, which also looked at costs and the disproportionality between small and large businesses."[99]

Executive Order 12866 requires covered agencies to "assess both the costs and the benefits of the intended regulation and, recognizing that some costs and benefits are difficult to quantify, propose or adopt a regulation only upon a reasoned determination that the benefits of the intended regulation justify its costs."[100] It also says that agencies should generally select regulatory approaches that "maximize net benefits." OMB's reports to Congress on the aggregate costs and benefits of federal regulations have generally indicated that the estimated benefits exceed the estimated costs. For example, see the following:

- In the report for 2010 covering major rules reviewed by OMB from October 1999 through September 2009 for which benefits and costs were monetized, the aggregate costs were estimated to be between $43 billion and $55 billion, and the aggregate benefits were estimated to be between $128 billion and $616 billion. Of the 16 major rules issued during FY2009 for which benefits and costs were

[96] Ibid.

[97] Crain and Crain, p. 10.

[98] E-mail to the author from Nicole V. Crain and W. Mark Crain, March 7, 2011.

[99] E-mail to the author from Radwan Saade, SBA Office of Advocacy, March 7, 2011. See https://www.fbo.gov/?s=opportunity&mode=form&tab=core&id=8ffd890376c03038eb0e7f3fa657f7c1&_cview=1 to view the solicitation for this study.

[100] Executive Order 12866, "Regulatory Planning and Review," 58 *Federal Register* 51735, Oct. 4, 1993.

monetized, the costs were estimated at between $3.7 billion and $9.5 billion, and the benefits were estimated at between $8.6 billion and $28.9 billion.[101]

- In the draft report for 2011 covering major rules reviewed by OMB from October 2000 through September 2010 for which benefits and costs were monetized, the aggregate costs were estimated to be between $44 billion and $62 billion, and the aggregate benefits were estimated to be between $136 billion and $651 billion. Of the 18 major rules issued during FY2010 for which benefits and costs were monetized, the costs were estimated at between $6.5 billion and $12.5 billion, and the benefits were estimated at between $23.3 billion and $82.3 billion.[102]

Each year, however, there were a number of rules in which the agencies only quantified or monetized benefits or costs, but not both. Most commonly, the agencies quantified or monetized only costs.

Policymaking and the Crain and Crain Estimate

As noted at the beginning of this report, Crain and Crain's estimate that federal regulations cost $1.75 trillion in 2008 has been cited as evidence of the need for regulatory reform legislation. However, Crain and Crain told CRS that their report was "not meant to be a decision-making tool for lawmakers or federal regulatory agencies to use in choosing the 'right' level of regulation. In no place in any of the reports do we imply that our reports should be used for this purpose. (How could we recommend this use when we make no attempt to estimate the benefits?)"[103]

As Crain and Crain suggest, information on regulatory costs alone, whether for individual rules or for all rules in the aggregate, provides only one piece of information that Congress and other policymakers can use in determining how to proceed. For example, even if all federal regulations did cost $1.75 trillion in 2008 (which at least some commenters believe may not be correct), if the monetized benefits of those regulations were determined to be greater than those costs, then policymakers may conclude that those costs were (in the words of Executive Order 12866) "justified." On the other hand, if the monetized benefits of federal regulations were estimated to be less than the estimated costs, policymakers may reach another conclusion, or may decide to examine any non-monetized costs and benefits of those rules. But a valid, reasoned policy decision can only be made after considering information on both costs and benefits.

[101] See http://www.whitehouse.gov/sites/default/files/omb/legislative/reports/2010_Benefit_Cost_Report.pdf for a copy of this report.

[102] See http://www.whitehouse.gov/sites/default/files/omb/legislative/reports/Draft_2011_CBA_Report_AllSections.pdf for a copy of this report.

[103] E-mail to the author from Nicole V. Crain and W. Mark Crain, March 7, 2011.

Appendix. CRS Sensitivity Analysis

In an effort to assess the sensitivity of Crain and Crain's results, CRS ran a linear regression using similar, but somewhat different, data and methods.[104] Specifically, CRS compiled a dataset for 30 OECD countries over the period 2002-2008 using the same dependent variable (GDP per capita in constant 2000 dollars) and four of the five independent variables that were used by Crain and Crain. The four identical independent variables were (1) the World Governance Indicators regulatory quality index, (2) broadband penetration rates, (3) country population, and (4) foreign trade as a percentage of GDP. Data for these four variables were obtained from the OECD website (http://www.oecd.org).

Crain and Crain also included one other variable in their analysis: primary school enrollment as a share of the eligible population. In their analysis, the associated coefficient had an unexpected negative sign (indicating that as primary school enrollment went up, GDP per capita went down). Crain and Crain told CRS that the negative coefficient could be due to "aging pyramid" demographic effects. In the CRS analysis, two variables were added to account for such demographic effects: the proportion of the population under 14 and the proportion of the population over 65. These variables were calculated from data obtained from the U.S. Census Bureau international population statistics.[105] These demographic measures may capture "aging pyramid" effects more directly than the primary education variable.

CRS ran a cross-country fixed effects panel estimator with year indicator variables. Natural logarithms of all variables except the regulatory quality index were used in the regression. Estimation results using Stata 11 xtreg procedure, using robust (White) standard errors that are used by most empirical researchers. Estimation results run with conventional standard errors, which are very similar, are available upon request.

The estimation output is shown in **Table A-1** below. The estimated coefficient on the World Governance Indicators regulatory quality index is very small and is not significantly different from zero. The coefficient on population is also statistically insignificant, although other estimated coefficients have expected signs and are statistically significant at conventional levels of confidence.

[104] This appendix was written by (name redacted), Analyst in Economic Policy, Congressional Research Service.

[105] The U.S. Census Bureau International Population Data Base is available at http://www.census.gov/ipc/www/idb/informationGateway.php. The regulatory quality index was taken from the World Bank's World Governance Indicators website, available at http://info.worldbank.org/governance/wgi/index.asp. The OECD data were taken from data portal available at http://www.oecd.org.

Table A-1. CRS Regression Analysis

Estimated determinants of log real GDP per capita

Independent Variables	Estimated Marginal Contribution	Robust Standard Error	t-statistic	P>|t|	95% Confidence Interval	
Regulatory Quality Index	.0001609	.0217325	0.01	0.994	-.0442871	.0446089
Population (log)	.2132556	.2595086	0.82	0.418	-.317499	.7440102
Broadband Penetration Rate (log)	.0233723	.0035276	6.63	0.000	.0161575	.0305872
Percent Population Under 14 (log)	-1.449251	.1967557	-7.37	0.000	-1.851661	-1.04684
Percent Population Over 65 (log)	-.3208979	.1686001	-1.90	0.067	-.6657239	.0239281
Foreign Trade as % of GDP (log)	.1051034	.0493794	2.13	0.042	.0041111	.2060957
sigma_u	.6039017	sigma_e .0206743				
Rho	.99882937	(fraction of variance due to u_i)				

Source: CRS.

Notes: Estimated using fixed-effects ordinary least squares regression with year dummies. Huber/White robust standard errors are reported.

Number of observations = 210. Number of groups = 30. Observations per group: 7. F(12,29) = 86.57.

R-square: within = 0.9003; between = 0.0521; overall = 0.0409. Corr(u_i, Xb) = -0.7610.

The point estimate of the coefficient regulatory quality index (.0001609) can be used to estimate the economic effect of shifting the United States from the 2008 regulatory quality index value (1.508) to the 2008 level of Ireland (1.856). According to that calculation which presumes that the regression specification reflects the true structure of the economy, that shift would result in an increase of $2.14 in per capita GDP (measured in year 2000 dollars). Because the point estimate of the effect of the regulatory quality index is so imprecise, however, the calculated effect of a hypothetical shift of U.S. regulatory quality to the Irish level is also imprecise.

One test statistic (rho, a measure of intercountry correlation) indicates that 99.9% of the variance in the model results from differences among countries, rather than time-series variation within countries. This could suggest that estimating the effects of variables that generally change slowly over time, such as the regulatory environment in economically advanced countries, may be challenging using panel estimation methods the employ highly aggregated country-level data. Other econometric approaches that focus on more specific changes in regulatory environment may provide a better path for understanding the effects of regulation on economic activity.

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Methods of Estimating the Total Cost of Federal Regulations

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CRS REPORT
Prepared for Members and
Committees of Congress

Summary

Federal agencies issue thousands of regulations each year under delegated authority from Congress. Over the past 70 years, Congress and various Presidents have created a set of procedures agencies must follow to issue these regulations, some of which contain requirements for the calculation and consideration of costs, benefits, and other economic effects of regulations. In recent years, many Members of Congress have expressed an interest in various regulatory reform efforts that would change the current set of rulemaking requirements, including requirements to estimate costs and benefits of regulations. As part of this debate, it has become common for supporters of regulatory reform to comment on the total cost of federal regulation.

Estimating the total cost of regulations is inherently difficult. Current estimates of the cost of regulation should be viewed with a great deal of caution.

Scholars and governmental entities estimating the total cost of regulation use one of two methods, which are referred to as the "bottom-up" and the "top-down" approach. The bottom-up approach aggregates individual cost and benefit estimates produced by agencies, arriving at a government-wide total. In 2014, the annual report to Congress from the Office of Management and Budget estimated the total cost of federal regulations to range between $68.5 and $101.8 billion and the total benefits to be between $261.7 billion and $1,042.1 billion. The top-down approach estimates the total cost of regulation by looking at the relationship of certain macroeconomic factors, including the size of a country's economy and a proxy measure of how much regulation the country has. This method estimates the economic effect that a hypothetical change in the amount of regulation in the United States might have, considering that economic effect to represent the cost of regulation. One frequently cited study estimated the total cost of regulation in 2014 to be $2.028 trillion, $1.439 trillion of which was calculated using this top-down approach.

Each approach has inherent advantages and disadvantages. The bottom-up approach relies on agency estimates of the effects of specific regulations and can also be used to estimate benefits, because agencies typically estimate both costs and benefits under current requirements so that they may be compared and evaluated against alternatives. The bottom-up approach does not, however, include estimates of costs and benefits of *all* rules, nor does it include costs and benefits of regulations that are not monetized—meaning that the bottom-up approach is likely an underestimate of the total cost of regulation. Furthermore, the individual estimates produced by agencies and used in the bottom-up approach may not always be accurate.

The top-down approach can be used to estimate effects of rules that are not captured by the bottom-up approach—such as indirect costs and costs of rules issued by independent regulatory agencies, which are not included in the bottom-up approach—thus theoretically capturing the whole universe of regulatory costs. Its results are, however, entirely reliant upon a number of methodological challenges that are difficult, if not impossible, to overcome. The biggest challenge may be finding a valid proxy measure for regulation: proxy measures of the total amount of regulation in a country are inherently imprecise and cannot be reliably used to estimate macroeconomic outcomes. Because of this difficulty in identifying a suitable proxy measure of regulation, even if the total cost of regulation is substantial, it cannot be estimated with any precision. The top-down method is intended to measure only costs; measuring costs without also considering benefits does not provide the complete context for evaluating the appropriateness of a country's amount of regulation.

For these and other reasons, both approaches to estimating the total cost of regulation have inherent—and potentially insurmountable—flaws. The discrepancy between the two approaches

and their associated estimates raises the question of the utility of using such figures in the regulatory reform debate.

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Estimating the Total Costs and Benefits of Federal Regulation

Federal agencies issue thousands of regulations every year. These regulations are often the means through which various government policies and programs are implemented. Many of these regulations are administrative or routine in nature and have little or no compliance cost associated with them.[1] A number of these regulations can, however, have a substantial effect on the economy in the form of costs, benefits, and transfer payments. Over the past 70 years, Congress and various Presidents have created a set of procedures agencies must follow to issue these regulations, some of which contain requirements for the calculation and consideration of costs, benefits, and other economic effects of regulations.[2]

Federal regulations are the product of delegated legislative authority from Congress—agencies may promulgate regulations only with the authority from Congress to do so. As such, Congress has shown an interest in conducting oversight of those regulations, both on the individual level for particular regulations and also for the regulatory system as a whole. One way for Congress to conduct oversight of the regulatory system as a whole, some say, is to monitor the total cost and benefits of federal regulation. Comparing the estimated costs against the benefits would provide some insight into the potential tradeoffs of regulation.

In recent years, many Members of Congress have expressed interest in various regulatory reform efforts that would change the rulemaking process.[3] Proponents of these efforts argue that the system under which agencies currently issue federal regulations is outdated, and that federal agencies should be required to conduct more rigorous economic analysis of their regulations.[4] Opponents of these regulatory reform efforts argue that adding to federal rulemaking requirements could cause fewer regulations to be issued by federal agencies or could create delays in the issuance of federal regulations.[5] As part of this debate, it has become common for supporters of regulatory reform to comment on the total cost of federal regulation.

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[1] See CRS Report R43056, *Counting Regulations: An Overview of Rulemaking, Types of Federal Regulations, and Pages in the Federal Register*, by Maeve P. Carey for a more detailed discussion of the nature and quantity of regulations issued each year.

[2] For an overview of the federal rulemaking process, see CRS Report RL32240, *The Federal Rulemaking Process: An Overview*, coordinated by Maeve P. Carey.

[3] For example, in January 2015, the House of Representatives passed H.R. 185, the Regulatory Accountability Act of 2015, which would make several changes to the current rulemaking process, including instituting more extensive cost-benefit analysis requirements.

[4] For example, see U.S. Congress, House Committee on the Judiciary, Subcommittee on Courts, Commercial and Administrative Law, *APA at 65: Is Reform Needed to Create Jobs, Promote Economic Growth, and Reduce Costs?*, 112th Cong., 1st sess., February 28, 2011, 112-17 (Washington: GPO, 2011); and Business Roundtable, *Using Cost-Benefit Analysis To Create Smart Regulation: A Primer and Key Considerations for Congress and Federal Agencies*, December 2014, http://businessroundtable.org/sites/default/files/reports/BRT%20Cost-Benefit%20Analysis.pdf.

[5] See, for example, the debate over rulemaking "ossification," which suggests that the addition of analytical requirements—along with other procedural requirements—has slowed the rulemaking process. See Thomas O. McGarity, "Some Thoughts on 'Deossifying' the Rulemaking Process," *Duke Law Journal*, vol. 41, no. 6 (June 1992), pp. 1385-1462; Jason Webb Yackee and Susan Webb Yackee, "Administrative Procedures and Bureaucratic Performance: Is Federal Rule-making 'Ossified'?" *Journal of Public Administration Research and Theory*, vol. 20 (2010), pp. 261-282; and Richard J. Pierce, Jr., "Rulemaking Ossification Is Real: A Response to *Testing the Ossification Thesis*," *George Washington Law Review*, vol. 80, no. 5 (July 2012), pp. 1493-1503.

Estimating the total cost of regulations is inherently difficult. Current estimates of the cost of regulation should be viewed with a great deal of caution.

Scholars attempting to identify an estimate for the total cost of regulation have taken two primary approaches that lead to radically different conclusions about the total economic effect of regulation. In this report, these two approaches are referred to as the "bottom-up" and the "top-down" approaches or methods. In short, the bottom-up approach aggregates individual cost estimates produced by federal agencies. The top-down approach relies on macroeconomic modeling to find a causal relationship between larger economic factors, such as gross domestic product (GDP), and a proxy measure intended to represent the overall amount of regulation.[6]

The two approaches use entirely different methods and produce radically different results. In 2014, the most frequently cited cost estimates resulting from each of these studies ranged from $57-$87 billion (using the bottom-up method) to $2 trillion (the majority—almost $1.5 trillion—of which was arrived at using the top-down method).[7]

This report analyzes these two approaches for estimating the total cost of federal regulations. In discussing each approach, the report provides an overview of the advantages, a brief case study, and an analysis of the potential issues or inherent problems using the case study to illustrate the concepts.

The objective of this report is not to provide an estimate of the total costs and benefits of federal regulations, but rather, to inform the broader regulatory reform debate by identifying the difficulties in providing such estimates and potential problems inherent in the methods that exist.

"Bottom-Up" Method: Aggregating Existing Cost Estimates

The first approach to aggregating the total costs and benefits of federal rules is generally referred to as a "bottom-up" approach.

What Is the Bottom-Up Approach?

This method relies on estimates of costs and benefits that agencies produce during the rulemaking process, pursuant to several requirements.[8] The bottom-up approach aggregates these estimates of costs and benefits that agencies calculate in individual rulemakings, using the sum as a government-wide total. Understanding the requirements under which agencies conduct these estimates—specifically, knowing *when* agencies are required to estimate costs and benefits, and when they are not—is important for understanding the advantages and disadvantages of the bottom-up approach.

The primary requirement for most agencies to calculate estimates of costs and benefits when issuing rules is under Executive Order 12866.[9] That executive order requires covered agencies to

[6] A proxy measure is a figure that is used to represent the value of something in a calculation or a model.

[7] To compare these figures, CRS adjusted the bottom-up numbers to be in 2014 dollars.

[8] For a detailed explanation of these requirements, see CRS Report R41974, *Cost-Benefit and Other Analysis Requirements in the Rulemaking Process*, coordinated by Maeve P. Carey.

[9] Executive Order 12866, "Regulatory Planning and Review," 58 *Federal Register* 51735, October 4, 1993. For more detailed information about this and other cost-benefit analysis requirements in the rulemaking process, see CRS Report R41974, *Cost-Benefit and Other Analysis Requirements in the Rulemaking Process*, coordinated by Maeve P. Carey.

assess costs and benefits for "economically significant" rules at the proposed and final rule stage.[10] Economically significant rules are defined in the executive order as those that may "have an annual effect on the economy of $100 million or more or adversely affect in a material way the economy, a sector of the economy, productivity, competition, jobs, the environment, public health or safety, or State, local, or tribal governments or communities."[11] The term "effect on the economy" means that a rule may be considered economically significant if it has costs *or* benefits of over $100 million.[12] Other provisions of Executive Order 12866 encourage agencies to consider costs and benefits during the rulemaking process for all rules, although those other provisions do not require a complete, detailed cost-benefit analysis for non-economically significant rules.[13] Executive Order 12866, issued by President Clinton, has remained in effect since 1993, and it was reaffirmed in 2011 by President Obama in Executive Order 13563.[14] The estimates that agencies produce under Executive Order 12866 are subject to review by the Office of Management and Budget (OMB). Specifically, agencies submit their rules and cost-benefit analyses to OMB's Office of Information and Regulatory Affairs (OIRA), the agency within OMB responsible for reviewing regulations and cost-benefit analyses. OMB has issued a number of guidance documents agencies are required to follow when estimating costs and benefits of regulations.[15]

In addition to these executive order requirements, certain statutory requirements for cost-benefit analysis, or other types of regulatory impact analysis, sometimes require agencies to calculate costs, benefits, and other economic effects of rules. The Regulatory Flexibility Act (RFA) requires regulatory impact analyses for proposed and final rules that will have a "significant economic impact on a substantial number of small entities."[16] Title II of the Unfunded Mandates Reform Act (UMRA) requires agencies to analyze and reduce costs associated with federal mandates

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[10] This requirement for cost-benefit analysis in Executive Order 12866 does not extend to the independent regulatory agencies listed at 44 U.S.C. § 3502(5), which includes, for example, the Federal Reserve and the Securities and Exchange Commission. For more information about the exclusion of the independent regulatory agencies from this cost-benefit analysis requirement, see CRS Report R42821, *Independent Regulatory Agencies, Cost-Benefit Analysis, and Presidential Review of Regulations*, by Maeve P. Carey and Michelle D. Christensen.

[11] Executive Order 12866 § 3(f)(1).

[12] This phrase also includes transfer rules that transfer sums of over $100 million. For a more detailed analysis of the definition of "major" rules, see CRS Report R41651, *REINS Act: Number and Types of "Major Rules" in Recent Years*, by Maeve P. Carey and Curtis W. Copeland.

[13] For example, Section 1(b)(6) requires agencies to "assess both the costs and the benefits of the intended regulation and, recognizing that some costs and benefits are difficult to quantify, propose or adopt a regulation only upon a reasoned determination that the benefits of the intended regulation justify its costs." Section 1(b)(11) requires agencies to "tailor [their] regulations to impose the least burden on society," while "obtaining the regulatory objectives, taking into account, among other things, and to the extent practicable, the costs of cumulative regulations." These provisions are considered to be more like guiding principles, however, rather than specific requirements for cost-benefit analysis.

[14] Executive Order 13563, "Improving Regulations and Regulatory Review," 76 *Federal Register* 3821, January 21, 2011.

[15] For example, in 2003, OMB issued Circular A-4 to provide guidance to agencies on how to conduct cost-benefit analysis. See Office of Management and Budget, Circular A-4, "Regulatory Analysis," September 17, 2003, at http://www.whitehouse.gov/omb/assets/regulatory_matters_pdf/a-4.pdf. This guidance provides information such as what discount rates agencies should use, how to choose a time period for estimating future costs and benefits, etc. Since 2003, OMB has issued several additional guidance documents to provide instruction to agencies on complying with regulatory analysis requirements.

[16] The phrase "small entities" is considered in the RFA to include small businesses, local governments, and not-for-profit organizations. 5 U.S.C. §§601-612. For more information about requirements of the Regulatory Flexibility Act, see CRS Report RL34355, *The Regulatory Flexibility Act: Implementation Issues and Proposed Reforms*, coordinated by Maeve P. Carey.

upon state, local, and tribal governments and the private sector.[17] However, in practice, the RFA and UMRA apply to a fairly small number of rules. Finally, agencies may be required under their own authorizing statutes to calculate and/or consider the costs and benefits of their rules.

The bottom-up approach for estimating costs and benefits aggregates the estimates produced under these requirements, producing a total, government-wide figure for the costs and benefits of regulation.

Why Use the Bottom-Up Approach?

The bottom-up approach to estimating the costs and benefits of federal regulation has several potential benefits. First, this approach sums up actual estimates of costs and benefits that agencies have calculated for individual regulations, and, as described above, most of these estimates have undergone review from OMB.

Second, under the requirements discussed above, agencies estimate both costs and benefits, which allows the bottom-up approach to compare total estimated costs to total estimated benefits. Such information can be valuable for evaluation of cost-effectiveness of regulation generally (i.e., what the benefits received are for the costs invested) and it allows for calculation and evaluation of a ratio of costs to benefits.

Third, the components of the bottom-up approach to measuring costs and benefits could be validated by conducting analysis *ex post*, or after the fact, of what the costs and benefits of specific regulations actually turned out to be.[18] This could be done, for example, as part of agencies' retrospective review process, in which agencies reanalyze existing rules and may consider making amendments to those rules in light of the *ex post* analysis. Agencies do not always conduct retrospective review of their regulations, however, and a retrospective review does not necessarily include a reevaluation of the initial cost-benefit analysis to test its accuracy.[19] But some such studies have been conducted in recent years by scholars and observers of the regulatory process.[20]

Despite these and other potential advantages of using a bottom-up approach to aggregating costs and benefits, certain issues—and potential caveats—should be taken into consideration. To help illustrate some of these issues, this report first introduces a case study: the most well-known and widely cited bottom-up study of the total costs and benefits of regulation. The report then uses the case study to analyze and discuss some of the problems with a bottom-up study.

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[17] 2 U.S.C. §§1532-1538. For more information about UMRA, see CRS Report R40957, *Unfunded Mandates Reform Act: History, Impact, and Issues*, by Robert Jay Dilger and Richard S. Beth.

[18] *Ex ante* estimates are those conducted by agencies prior to a regulation being issued or taking effect, and they reflect the agency's prediction of what the effects of the regulation will be. *Ex post* estimates are done retrospectively—that is, after the regulation has been issued and taken effect—and they are used to evaluate the accuracy of the initial estimate and/or the effectiveness of the regulation.

[19] Government-wide retrospective reviews have been required since the Carter Administration, and most recently have been required by the Obama Administration in Executive Order 13563.

[20] See the section below entitled "Questions Over Accuracy of Individual Cost and Benefit Estimates" for an overview of this literature.

Case Study: The Annual OMB Report on the Total Costs and Benefits of Federal Rules

The most well-known bottom-up study is the report to Congress on the benefits and costs of federal rules, which OMB compiles annually.[21]

Background on the OMB Report to Congress

Since the 1990s, OMB has estimated the total costs and benefits of federal regulations pursuant to various federal requirements. The initial requirement was in Section 645 of the Treasury, Postal Service and General Government Appropriations Act, 1997,[22] which required the Director of OMB to submit a report by September 30, 1997, that provided—among other things—"estimates of the total annual costs and benefits of federal regulatory programs, including quantitative and nonquantitative measures of regulatory costs and benefits." Similar requirements were contained in other appropriations bills in subsequent years; as of 2015, the current requirement for OMB to report on the total annual costs and benefits of federal regulations is under the Regulatory Right-to-Know Act, which was enacted in 2000 as part of the Treasury and General Government Appropriations Act for FY2001.[23] That provision required OMB to submit to Congress each year, along with the President's budget,

> An accounting statement and associated report containing-
>
> (1) an estimate of the total annual costs and benefits (including quantifiable and nonquantifiable effects) of Federal rules and paperwork, to the extent feasible- (A) in the aggregate; (B) by agency and agency program; and (C) by major rule;
>
> (2) an analysis of impacts of Federal regulation on State, local, and tribal government, small business, wages, and economic growth; and
>
> (3) recommendations for reform.

OMB has submitted a report to Congress each year with a total of the costs and benefits produced by federal agencies pursuant to the requirements discussed above.

Summary of 2014 OMB Report on Costs and Benefits

The 2014 report to Congress on the costs and benefits of federal regulations was published in June 15, 2015.[24] The principal findings of the 2014 report were as follows:[25]

- The estimated annual benefits of major federal regulations reviewed by OMB from October 1, 2003, to September 30, 2013, for which agencies estimated and monetized both benefits and costs, are in the aggregate between $281.0 billion

[21] These reports are available on OMB's website. See http://www.whitehouse.gov/omb/inforeg_regpol_reports_congress/.

[22] P.L. 104-208.

[23] P.L. 106-554, §1(a)(3) [title VI, §624], 114 Stat. 2763.

[24] The Draft 2015 report was released in October 2015, but had not yet been finalized as of the time of writing of this report.

[25] Office of Management and Budget, *2014 Report to Congress on the Benefits and Costs of Federal Regulations and Unfunded Mandates on State, Local, and Tribal Entities*, available at https://www.whitehouse.gov/sites/default/files/omb/inforeg/2014_cb/2014-cost-benefit-report.pdf.

and $1,119.0 billion, while the estimated annual costs are in the aggregate between $73.6 billion and $109.3 billion.[26] These ranges reflect uncertainty in the benefits and costs of each rule at the time that it was evaluated (prior to promulgation).

The OMB reports demonstrate that agencies do not provide quantified and/or monetized information for every rule. For example, below is information on how frequently agencies provided quantified and/or monetized estimates of costs and benefits:

- During FY2013, executive agencies promulgated 54 major rules, of which 30 were "transfer" rules.[27] Transfer rules usually implement federal budgetary programs as required or authorized by Congress, such as rules associated with the Medicare Program and the Federal Pell Grant Program, and are categorized differently by OMB because they cause income transfers from federally collected tax dollars to program beneficiaries—meaning they "may not impose significant regulatory costs on the private sector."[28] In all but one of the 30 transfer rules listed in the report, the issuing agencies quantified and monetized the transfer amounts.
- In 7 of the remaining 24 major rules issued in FY2013, the agencies quantified and monetized both benefits and costs. Those seven rules were estimated to result in a total of $33.2 billion to $87.4 billion in annual benefits, and $2.6 billion to $3.2 billion in annual costs.[29]
- In two of the major rules, the agency was able to quantify and monetize only benefits. For these two rules, the agencies estimated annual benefits of $500 million to $655 million.[30]
- In 11 major rules, the agencies quantified and monetized only costs, and in one case only partially. For these 11 rules, the agencies estimated total annual costs of about $1.6 billion to $2.3 billion.[31]
- In four major rules, the agencies did not quantify or monetize costs or benefits.

Quantification vs. Monetization

Quantification of costs and benefits involves identifying quantitative effects of regulations, such as identifying a number of persons or businesses likely to be affected by a rule. Monetization involves turning effects of rules specifically into dollar amounts so that they may be aggregated and compared.

In some cases, a rule's effects may be easy to quantify but difficult to monetize.

[26] The numbers cited here in this CRS report are inflation-adjusted to 2014 dollars. OMB reported the totals in both 2001 and 2010 dollars.

[27] As explained by OMB in the report, "budgetary transfer rules are rules that primarily cause income transfers usually from taxpayers to program beneficiaries" (p.8). Examples listed in the 2014 report included various education loan programs administered by the Department of Education, major capital investment projects administered by the Department of Transportation, and rules implementing the Supplemental Nutritional Assistance Program administered by the Department of Agriculture (see pp. 29-31 for a complete list of the major transfer rules).

[28] 2014 OMB Report, p. 8.

[29] The numbers cited here were inflation-adjusted by CRS to 2014 dollars. OMB reported the numbers in 2001 and 2010 dollars (see p. 24).

[30] It appears, though it is not entirely clear, that these numbers are reported in 2001 dollars (see p. 2). Adjusted for inflation to 2014 dollars, the estimated range of benefits for these two rules would be $648.8 million to $850.0 million.

[31] It appears, though it is not entirely clear, that these numbers are reported in 2001 dollars (see p. 2). Adjusted for inflation to 2014 dollars, the estimated range of costs for these 11 rules would be $2.1 billion to $3.1 billion.

Analysis of Bottom-Up Approach to Aggregating Costs and Benefits

A bottom-up approach, such as that taken by OMB, is likely to result in an underestimate of the total cost of federal regulations. Agencies are not required to conduct a cost-benefit analysis for every rule, and the bottom-up approach can only include costs and benefits that have actually been estimated. Furthermore, estimates of costs and benefits that agencies produce are primarily intended to inform decisionmakers about an individual rule, but aggregating the information causes the context and understanding of potential uncertainties in each individual estimate to be lost. Finally, a decision must be made about how many years' worth of rules to include in the aggregated estimate of costs and benefits, but this is likely to leave out costs and benefits of rules that were issued prior to the period included.

Costs Not Estimated for Every Rule

One of the main challenges to calculating accurately the total costs and benefits of federal regulations is that agencies are not required to estimate costs and benefits for all regulations. Without an estimated cost or benefit for every rule, it is impossible to arrive at a total dollar amount for all rules—the aggregated costs and benefits will only include those rules for which a monetized estimate exists.

Independent Regulatory Agencies Are Often Not Required to Estimate Costs and Benefits

First, not all agencies are subject to cost-benefit analysis requirements. The cost-benefit analysis requirement does not apply to independent regulatory agencies, a class of agencies that were created by Congress to have various characteristics of independence from the President.[32]

Although some of the independent regulatory agencies have agency-specific instructions in statute to consider certain effects of their regulations, others are not specifically required to conduct cost-benefit analysis or monetize costs and benefits.[33] According to OMB's 2014 report on costs and benefits, the independent regulatory agencies issued 18 major rules in FY2013. Of those 18 rules, the agencies appear to have provided some information on either costs or benefits in 12 rules.[34]

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[32] These agencies are listed at 44 U.S.C. 3502(5). When he issued Executive Order 12866, President Clinton chose not to include those agencies in the order's requirements for OMB review and cost-benefit analysis. President Reagan had made the same decision—to exclude the independent regulatory agencies—when he issued the predecessor order in 1981. See Executive Order 12291, "Federal Regulation," 46 *Federal Register* 13193, February 19, 1981. For more discussion of this decision, see CRS Report R42821, *Independent Regulatory Agencies, Cost-Benefit Analysis, and Presidential Review of Regulations*, by Maeve P. Carey and Michelle D. Christensen. For a discussion of characteristics of agency independence more generally, see CRS Report R43391, *Independence of Federal Financial Regulators*, by Henry B. Hogue, Marc Labonte, and Baird Webel, and CRS Report R43562, *Administrative Law Primer: Statutory Definitions of "Agency" and Characteristics of Agency Independence*, by Jared P. Cole and Daniel T. Shedd.

[33] For a more detailed discussion about what agency-specific requirements may apply to these agencies, see CRS Report R42821, *Independent Regulatory Agencies, Cost-Benefit Analysis, and Presidential Review of Regulations*, by Maeve P. Carey and Michelle D. Christensen, and Curtis W. Copeland, *Economic Analysis and Independent Regulatory Agencies*, report prepared for the consideration of the Administrative Conference of the United States, April 30, 2013, https://www.acus.gov/sites/default/files/documents/Copeland%20Final%20BCA%20Report%204-30-13.pdf.

[34] Office of Management and Budget, 2014 Report to Congress on the Benefits and Costs of Federal Regulations and Unfunded Mandates on State, Local, and Tribal Entities, available at https://www.whitehouse.gov/sites/default/files/

Because most cost-benefit analysis requirements do not extend to the independent regulatory agencies, the bottom-up approach to estimating the costs and benefits of regulation does not include costs and benefits of regulations issued by those agencies. This includes, for example, many of the financial regulations issued pursuant to the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, which are primarily issued by the financial regulators—most of which are excluded from the cost-benefit requirement of Executive Order 12866.[35] The exclusion of certain types of agencies from cost-benefit analysis requirements is a weakness in the annual OMB reports and presents a challenge to bottom-up approaches of estimating costs and benefits. The OMB reports generally identify the number of rules issued by independent regulatory agencies that provide some information on some costs and/or benefits, but they do not typically have information about the magnitude of those costs or benefits.

Costs and Benefit Estimates Only Required for Economically Significant Rules

Second, the agencies that are subject to cost-benefit analysis requirements are not required to conduct a cost-benefit analysis for every rule—only those rules that are deemed economically significant, as defined by Executive Order 12866. Specifically, the order defines economically significant rules as those that have an annual effect on the economy of at least $100 million.[36] Rules that are significant, but not economically significant, are subject to requirements for OIRA review and may have a less formal assessment of costs and benefits, but agencies are not generally required to conduct a complete cost-benefit assessment for those rules.[37] As such, the rules included in the OMB reports' total estimates of costs and benefits are only economically significant rules.[38]

Monetizing Costs Can Be Challenging

Third, quantifying and monetizing certain costs and benefits can be very difficult, and agencies do not often monetize all of the expected effects of their regulations. The bottom-up approach, however, is limited to totaling only those costs and benefits that are actually monetized. Under current rulemaking requirements, agencies are encouraged, but not necessarily required, to monetize costs and benefits.[39] For example, Executive Order 12866 states that agencies should provide a quantification of costs and benefits "to the extent feasible."[40]

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omb/inforeg/2014_cb/2014-cost-benefit-report.pdf. In the table, the report indicates that seven rules have monetized costs and benefits, but it appears that the table may have added the numbers incorrectly.

[35] P.L. 111-203.

[36] Economically significant rules are those that may "have an annual effect on the economy of $100 million or more or adversely affect in a material way the economy, a sector of the economy, productivity, competition, jobs, the environment, public health or safety, or State, local, or tribal governments or communities" (Executive Order 12866 §3(f)(1)).

[37] Rules that are "significant" but not "economically significant" are required to undergo OMB review under Executive Order 12866. OMB's website, www.Reginfo.gov, provides data on the number of "significant" rules that OMB reviews each year (but not on the number of those rules that agencies issue each year). The data on OMB reviews show that the number of such rules reviewed each year is approximately in the range of 100-250; this is likely very similar to the number of such final rules issued each year.

[38] These rules are referred to in the OMB reports as "major" rules. Although the definitions of "major" rules and "economically significant" rules contain slight differences, the two terms are often used interchangeably.

[39] Under Executive Order 12866, the term "significant" rule encompasses a much broader number of rules than those considered "economically significant." For "significant" rules, agencies are asked to conduct an initial assessment of costs and benefits, but not a complete cost-benefit analysis.

[40] Executive Order 12866 §6(a)(3)(C)).

Monetizing the effects of regulations involves converting expected effects, such as costs to consumers or changes to a population's health or behavior, into dollar terms. Monetizing the effects of regulations involves turning costs and benefits into a common unit—dollars—so that they can be compared against one another. This can allow for an evaluation of the cost-effectiveness of a rule, such as a calculation of the cost of each life expected to be saved by a rule, or the cost-benefit ratio of a rule.

Although some of the effects of a rule can be measured fairly easily in dollar terms, such as certain types of equipment or technologies for which a market value can be easily identified, other effects are more difficult to monetize. In cases in which dollar amounts are not readily available, agencies often rely on economic techniques that attempt to simulate market exchanges. One method agencies use to monetize certain concepts is based on a formula that includes monetized values known as "willingness-to-pay" or "willingness-to-accept" to measure the value that individuals place on the change resulting from a particular regulation.[41] This allows an agency to assign a dollar value to a regulatory outcome that may not otherwise have an easily identifiable value, and then the estimate can be compared against the costs of obtaining that benefit. For example, agencies sometimes use the "value of a statistical life" or "VSL" to assign a monetized amount to the benefits per life saved from certain types of regulations.[42] The agency can then compare this monetized estimate of benefits against the costs of the rule to see whether the rule's costs were justified by its benefits.

The executive orders and OMB guidance documents recognize that quantification and monetization can be difficult in some cases and allow agencies some flexibility in determining when effects can be quantified and monetized:

- Executive Order 12866 instructs agencies to provide information on the quantified costs of the anticipated costs and benefits of regulations "to the extent feasible."[43]
- OMB Circular A-4, which OMB issued in 2003 to provide guidance to agencies on how to conduct cost-benefit analysis, states that agencies "should develop quantitative estimates and convert them to dollar amounts if possible. In many

[41] In recent decades, as the use of cost-benefit analysis has increased, a debate has emerged about the appropriateness of monetizing certain costs and benefits in regulation. While economists generally favor the notion of assigning a monetized value to certain things like risks to life and health, others have opposed the monetization of certain effects of regulation. See, for example, W. Kip Viscusi, "Monetizing the Benefits of Risk and Environmental Regulation," *Fordham Urban Law Journal*, vol. 33, no. 4 (2005); W. Kip Viscusi, "What's to Know? Puzzles in the Literature on the Value of a Statistical Life," *Journal of Economic Surveys*, vol. 26, no. 5 (2011); and Robert W. Hahn, *In Defense of the Economic Analysis of Regulation*, (AEI Press, 2005). Others argue against this type of valuation; see Frank Ackerman and Lisa Heinzerling, *Priceless: On Knowing the Price of Everything and the Value of Nothing* (New York: The New Press, 2004).

[42] The VSL is calculated based upon a willingness-to-pay model. For example, if 100,000 people are willing to pay $60 to eliminate a 1 in 100,000 risk of a certain event, such as dying from a particular type of disease, then an agency will multiply the $60 payment times the number of individuals in the population (100,000), yielding a total of $6 million. If a rule is expected to save 100 lives, then the total benefits that can be expected to come from the rule would include $600 million in lives saved (100 lives times $6 million). According to a 2011 OMB guidance document, current agency practice uses a VSL ranging from "roughly $5 million to $9 million per statistical life." Office of Management and Budget, "Regulatory Impact Analysis: A Primer," August 15, 2011, p. 10. See also CRS Report R41140, *How Agencies Monetize "Statistical Lives" Expected to Be Saved By Regulations*, by Curtis W. Copeland. The author of that report is no longer at CRS; congressional clients with questions about its content may be directed to the author of this report.

[43] Executive Order 12866 §6(a)(3)(C).

cases, quantified estimates are readily convertible, with a little effort, into dollar equivalents."[44]

- Executive Order 13563, which President Obama issued in January 2011, stated that "Where appropriate and permitted by law, each agency may consider (and discuss qualitatively) values that are difficult or impossible to quantify, including equity, human dignity, fairness, and distributive impacts."[45]
- OMB's 2011 guidance document, "Regulatory Impact Analysis: A Primer," instructs agencies to quantify the costs and benefits in terms of units—for example, the number of premature deaths avoided each year or the number of prevented nonfatal illnesses—as well as monetizing the costs and benefits associated with each of these effects, to the extent possible.[46]

As OMB explained in its 2014 report,

> When agencies have not quantified or monetized the primary benefits or costs of regulations, it is generally because of conceptual and empirical challenges, including an absence of relevant information. Many rules have benefits or costs that cannot be quantified or monetized with existing information, and the aggregate estimates presented here do not capture those non-monetized benefits and costs. In some cases, quantification of various effects is highly speculative. For example, it may not be possible to quantify the benefits of certain disclosure requirements, even if those benefits are likely to be large, simply because the impact of some of these requirements cannot be specified in advance.[47]

Practitioners or observers of the rulemaking process do not necessarily agree on what effects are appropriate to monetize. For example, the Obama Administration has placed greater emphasis than earlier Administrations on the value of qualitative benefits such as equity and dignity.[48] Debates in the literature have raised questions over when it may be appropriate to quantify or monetize certain qualitative effects of rules. For example, questions have been raised as to whether dignity and other psychological effects of rules, such as fear and anxiety, should be monetized in regulatory impact analyses.[49]

In sum, to achieve an accurate assessment of the total costs and benefits of regulations in dollar terms using a bottom-up method, one would have to monetize all possible effects of regulation, and such an undertaking is not consistent with current rulemaking requirements or practice. OMB did state in its 2014 report, however, that OMB believes "the benefits and costs of major rules,

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[44] Office of Management and Budget, Circular A-4, "Regulatory Analysis," September 17, 2003. The circular is available at http://www.whitehouse.gov/omb/assets/regulatory_matters_pdf/a-4.pdf.

[45] Executive Order 13563, "Improving Regulations and Regulatory Review," 76 *Federal Register* 3821, January 21, 2011.

[46] See Office of Management and Budget, "Regulatory Impact Analysis: A Primer," August 15, 2011, at http://www.whitehouse.gov/sites/default/files/omb/inforeg/regpol/circular-a-4_regulatory-impact-analysis-a-primer.pdf.

[47] 2014 OMB Report, pp. 1-3.

[48] For a discussion of this and other differences between the Obama, George W. Bush, and Clinton Administrations' priorities for cost-benefit analysis and OIRA review, see Art Fraas and Richard Morgenstern, "Identifying the Analytical Implications of Alternative Regulatory Philosophies," *Journal of Benefit Cost Analysis*, vol. 5, no. 1 (2014), pp. 137-171.

[49] See Rachel Bayefsky, "Dignity as a Value in Agency Cost-Benefit Analysis," *Yale Law Journal*, vol. 123, no. 6 (April 2014), pp. 1732-1782, at http://www.yalelawjournal.org/pdf/1732.Bayefsky.1782_u52fptmb.pdf; and Matthew D. Adler, "Fear Assessment: Cost-Benefit Analysis and the Pricing of Fear and Anxiety," *Chicago-Kent Law Review*, vol. 79, no. 3 (January 2004), pp. 977-1053, at http://scholarship.kentlaw.iit.edu/cgi/viewcontent.cgi?article=3459&context=cklawreview.

which have the largest economic effects, account for the majority of the total benefits and costs of all rules subject to OMB review."[50]

Given that agencies do not estimate cost and benefits for every rule issued in every year, estimates that use the bottom-up approach are likely under-reporting costs and benefits. On the other hand, as discussed more below, some of the literature evaluating the quality and accuracy of cost-benefit analyses has suggested that costs and benefits for rules evaluated are overestimated by agencies.

Potential Uncertainties in Individual Cost-Benefit Analyses

Cost-benefit estimates are produced by agencies to assist with decisionmaking in individual rules, and the estimates often contain some uncertainty from not knowing precisely the potential effects of rules. For example, consider a rule in which an agency conducts a risk assessment, such as an airline safety rule intended to lower the risk of a terrorist attack on the United States. The estimate of costs and benefits for this rule would contain a great deal of underlying uncertainty, because precisely estimating the projected decrease in the risk of a terrorist attack and the precise cost of the rule is likely impossible. On the other hand, a rule that would result in changes that can be more easily predicted and measured, such as a rule requiring the purchase of new safety equipment for a vehicle fleet, is likely to contain less uncertainty.

To attempt to reduce uncertainty and produce high-quality, robust estimates, current requirements and guidance documents encourage agencies to base their estimates on the best reasonable obtainable scientific, technical, and economic information. With regard to uncertainties, agencies are instructed to analyze and present them as part of the overall regulatory analysis.[51] This generally results in the agencies producing a range of estimates of costs and benefits and using certain types of analytical techniques (e.g., sensitivity analysis) to identify how benefits and costs of a rule would change due to changes in key variables.

As stated in a 1996 article outlining the challenges of uncertainty in cost-benefit analysis (also referred to as benefit-cost analysis),

> Benefit-cost analysis can help decision-makers better understand the implications of decisions by identifying and, where appropriate, quantifying the favorable and unfavorable consequences of a proposed policy change, even when information on benefits and costs, is highly uncertain. In some cases, however, benefit-cost analysis cannot be used to conclude that the economic benefits of a decision will exceed or fall short of its costs, because there is simply too much uncertainty.[52]

In adding the results of all the individual studies together, however, the context and uncertainties of each individual study may be lost. As OMB stated in its first report on costs and benefits,

> Studies that have attempted to total up the total costs and benefits of Federal regulations have basically added together a diverse set of individual studies. Unfortunately, these individual studies vary in quality, methodology, and type of regulatory costs included. Thus

[50] 2014 OMB report, p. 23.

[51] See, for example, Office of Management and Budget, "Regulatory Impact Analysis: A Primer," August 15, 2011, p. 14.

[52] Kenneth J. Arrow, Maureen L. Cropper, George C. Eads, Robert W. Hahn, Lester B. Lave, Roger G. Noll, Paul R. Portney, Milton Russell, Richard Schmalensee, V. Kerry Smith, and Robert N. Stavins, "Is There a Role for Benefit-Cost Analysis in Environmental, Health, and Safety Regulation?" *Science*, April 12, 1996, vol. 272, pp. 221-222.

> we have an apples and oranges problem, or, more aptly, an apples, oranges, kiwis, grapefruit, etc., problem.[53]

Adding together existing estimates of costs and benefits treats the individual estimates as though they are precise estimates, but they may be imprecise estimates. "CBA can sometimes produce an illusion of certainty," as one former OIRA Administrator stated. This illusion of certainty can be misleading in individual cost and benefits estimates, and it becomes even more so when such estimates are aggregated.[54] In any individual estimate of costs and benefits, "numerous technical judgments must be made, and technical analysts might well disagree."[55] Aggregating all of the bottom-up estimates that agencies have produced can cause the context and any important caveats or reflections of uncertainty in each regulatory impact analysis to be lost.

Questions Over Accuracy of Individual Cost and Benefit Estimates

Uncertainty in how best to estimate costs and benefits leads to the question of whether the results are *accurate*—i.e., whether agencies overestimate or underestimate costs and benefits. Proponents of regulation tend to argue that agencies overestimate costs of regulation.[56] On the other hand, opponents of regulations tend to argue that agencies underestimate costs—agencies may have incentives to underestimate the costs of regulations and overestimate the benefits, which would help to make the case for promulgating a regulation because of its positive net benefits.[57] To address this important question, a number of studies have examined the accuracy of agency estimates of costs and benefits. One academic study published in 2000 compared *ex ante* studies to ex *post* studies and found that agencies frequently overestimated both costs and benefits of regulations.[58] In 2010, the same authors performed a similar *ex post* study of several cost-benefit estimates that had been produced by agencies subsequent to their 2000 study. Again, they concluded that regulatory agencies tended to overestimate the total costs of regulations, explaining that "a variety of factors contribute to initial government agency cost estimates that may differ from the realized results, although in some cases this is coincident with differences in benefits produced by regulations."[59]

In its 2005 report to Congress on the costs and benefits of regulations, OMB included a chapter on "validation" of cost estimates.[60] OMB examined a number of *ex ante* cost-benefit estimates

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[53] Office of Management and Budget, *Report to Congress on the Costs and Benefits of Federal Regulations*, September 30, 1997, ch. 2, at https://www.whitehouse.gov/omb/inforeg_chap2.

[54] Cass R. Sunstein, "The Arithmetic of Arsenic," *Georgetown Law Journal*, vol. 90, no. 7 (July 2002), p. 2258.

[55] Cass R. Sunstein, "Financial Regulation and Cost-Benefit Analysis," *Yale Law Journal Forum*, January 22, 2015, p. 266, at http://www.yalelawjournal.org/pdf/SunsteinPDF_4nf1d4ar.pdf.

[56] See, for example, Thomas O. McGarity, "CPR Perspective: Estimating Regulatory Costs," Center for Progressive Reform, at http://www.progressivereform.org/perspestimatingReg.cfm.

[57] See, for example, Stuart Shapiro, "How Much Is That Regulation In the Window?", *The Hill*, July 31, 2014, at http://thehill.com/blogs/pundits-blog/213538-how-much-is-that-regulation-in-the-window, stating that "agencies have clear motivations when it comes to making the assumptions that will determine their assessment of the cost of their regulations. They don't want a regulation to appear too costly or they risk losing political support for the regulation."

[58] Winston Harrington, Richard D. Morganstern, and Peter Nelson, "On the Accuracy of Regulatory Cost Estimates," *Journal of Policy Analysis and Management*, vol. 19, no. 2 (Spring 2000), pp. 297-322.

[59] Winston Harrington, Richard D. Morganstern, and Peter Nelson, "How Accurate Are Regulatory Cost Estimates?" Resources for the Future, March 5, 2010.

[60] Office of Management and Budget, Validating Regulatory Analysis: 2005 Report to Congress on the Benefits and Costs of Federal Regulations and Unfunded Mandates on State, Local, and Tribal Entities, available at https://www.whitehouse.gov/sites/default/files/omb/assets/omb/inforeg/2005_cb/final_2005_cb_report.pdf.

and compared them with *ex post* estimates, when they were available.[61] OMB's conclusions were that the costs of regulations were more often overestimated by the agency, but that the benefits were sometimes overestimated as well.

A primary reason observers have given for the overestimation of costs is that agencies tend to underestimate industry's ability to innovate, and therefore compliance with regulations sometimes turns out to be less costly than expected. The ability to adapt to regulatory requirements and identify more cost-effective methods of meeting compliance targets can result in lower compliance costs than initially anticipated by the agency. For example, consider the Environmental Protection Agency's acid rain (sulfur dioxide) program in the 1990s. Mandated under the Clean Air Act Amendments of 1990, the EPA issued regulations aimed at reducing sulfur dioxide emissions. Studies suggest that the EPA's initial cost estimates for these regulations were too high due to EPA's underestimation of how industry would adapt and find less costly means of achieving the reduction targets. In sum, as stated in one retrospective study, "When forecasting the costs of new environmental regulations, economic analysts have routinely ignored a primary economic lesson: Markets will cut costs through innovation."[62]

A number of other reasons may contribute to inaccuracies in agency estimates of costs. For example, delays in implementation of regulations can help lower the compliance costs as it can allow industry more time to identify cost-effective solutions.[63] Over- or under-estimating certain effects of regulations can also result in inaccuracies, such as compliance rates among regulated entities. Finally, agencies first estimate costs and benefits while writing the proposed regulation, but the regulation may change in response to comments received during the public comment period.[64] As regulations are revised in response to comments, cost-benefit estimates are not always updated. Changes made in the rule after it has been proposed and before it is finalized could affect the likely costs and benefits of the rule—for example, if the final rule sets a standard that is less stringent as compared to the proposed rule, it will probably be less costly to comply.

In short, the accuracy of the bottom-up approach relies heavily on the precision of the individual cost and benefit estimates, but the accuracy of these estimates is likely to vary.

Measuring Costs over Time

Another issue in aggregating the costs and benefits of individual regulations is identification of the appropriate time period. In other words, how many years' worth of regulations should be included in the total? Regulations issued many years ago typically still have some compliance costs, although the cost of complying with regulations is generally thought to decrease over time. For example, if compliance with a new regulation requires industry to invest in new types of technology, once these investments have been made, the majority of the costs may already have been incurred, and the ongoing costs will be less. The time frame under which these compliance costs are distributed varies among rules. Similarly, the distribution of benefits can vary widely as

[61] As mentioned above, *ex post* estimates of costs and benefits are not frequently conducted under current rulemaking requirements or practice.

[62] Gabriel Chan, Robert Stavins, Robert Stowe, and Richard Sweeney, "The SO2 Allowance Trading System and the Clean Air Act Amendments of 1990: Reflections on Twenty Years of Policy Innovation," Cambridge, Mass.: Harvard Environmental Economics Program, January 2012, pp. 7-8, at http://www.hks.harvard.edu/m-rcbg/heep/papers/SO2-Brief_digital_final.pdf. See also Eban Goodstein, *The Trade-Off Myth: Fact and Fiction about Jobs and the Environment* (Washington, D.C.: Island Press, 1999), pp. 26-30.

[63] See Winston Harrington, Richard D. Morganstern, and Peter Nelson, "On the Accuracy of Regulatory Cost Estimates," *Journal of Policy Analysis and Management,* vol. 19, no. 2 (Spring 2000), p. 310.

[64] Agencies are generally required to accept public comments on proposed rules under the Administrative Procedure Act (5 U.S.C. §553).

well, and benefits of regulations often are not realized until the regulation has been in place for some time. For example, this is typically the case with regulations that have health benefits, such as environmental regulations that are intended to improve air quality.

Individual cost estimates of regulations are calculated by comparing the anticipated effects of a regulation against what would be expected to happen in a world without the regulation. These *ex ante* estimates that are conducted prior to the issuance of the regulation are usually the sole source of information on regulations' costs. Under current requirements and practice, an ongoing monitoring of the costs and benefits of rules is not required once a regulation has been issued.

The annual OMB reports have typically included 10 years' worth of cost and benefit estimates. According to the 2014 report, "OMB chose a ten-year period for aggregation because pre-regulation estimates prepared for rules adopted more than ten years ago are of questionable relevance today."[65] Similar reasons are cited in earlier versions of the OMB reports.

In its 2014 report, OMB acknowledges this weakness in its approach, stating that because the estimates do not include non-major rules or rules issued more than 10 years ago, the total costs and benefits currently in effect are like to be "significantly larger" than the totals in the report.[66] Over time, however, measuring the effects of those rules issued more than 10 years ago will become increasingly difficult. As stated in a 2006 study that discussed OMB's practice of including 10 years' worth of costs and benefits in its annual reports,

> If the regulation only requires small changes in behavior over a small time interval, then analysts feel confident of estimating the cost, hypothetical or not. But as the size or time interval increases, the shadow of the hypothetical looms ever larger. To take an extreme example, how would be begin to estimate the cost of federal child labor laws that were enacted during the 1930s?[67]

It is certainly the case that some rules that are more than 10 years old still impose a cost, and therefore this 10-year rule may result in a lower estimate of total costs over time because it excludes those rules. However, some cutoff probably should be made, as including estimates for costs of regulations made more than 10 years ago becomes less practicable.

These potential flaws have led some to attempt to use an entirely different approach to estimating the effects of regulations: the top-down method, which is discussed next.[68]

"Top-Down" Method: Estimating Costs Using Macroeconomic Modeling

Some scholars have adopted an approach to estimating the costs of rules that is referred to as a top-down approach. This section explains and analyzes the top-down approach, using a case study as an illustration for several of the concepts discussed.

[65] 2014 OMB Report, p. 9.

[66] 2014 OMB Report, p. 18.

[67] Winston Harrington, "Grading Estimates of the Benefits and Costs of Federal Regulation: A Review of Reviews," Resources for the Future Discussion Paper, September 2006.

[68] In the Crain and Crain report discussed in detail below, the authors state that "In summary, the constraints under which OMB operates yield cost estimates for only a small proportion of regulations... The measurement challenges lead us to adopt techniques in this study that facilitate reasonable approximations of regulatory costs that have been omitted in estimates by OMB and other studies" (pp. 5-6).

What Is the Top-Down Approach?

The top-down approach uses macroeconomic variables and modeling techniques to measure the effect of regulation on the economy as a whole. Rather than aggregating existing cost estimates, the top-down method uses the results of an economic model that has been used to measure the relationship between the size of an economy, or economic growth, and some proxy of the level of regulation in a country, to measure the economic effects of regulation. This method typically compares the U.S. economy, as measured by some variable such as gross domestic product (GDP), to a hypothetical scenario in which the U.S. has less regulation. The approach takes the difference in the GDP under these two scenarios—the status quo and the scenario with less regulation—and calculates the change in GDP that might occur were the U.S. to reduce its overall amount of regulation. This potential change in GDP is considered to be the cost of regulation under the top-down approach and is explained in further detail below.

Why Use the Top-Down Approach?

The benefits of using a top-down approach, in many ways, are opposite from the bottom-up approach described above. Because the top-down approach uses measurements of various economic factors, it incorporates broader, more indirect effects that are not included in the bottom-up approach. This could include indirect economic effects, as well as direct effects that are not monetized.

Case Study: Crain and Crain Report

A commonly cited study using the top-down approach to totaling the cost of regulation is entitled "The Cost of Federal Regulation to the U.S. Economy, Manufacturing and Small Business," by W. Mark Crain and Nicole V. Crain, and it was most recently released in September 2014.[69]

The Crain and Crain report estimates the total cost of regulation and also explores the distribution of those regulatory costs among regulated entities. The component of the report that is most discussed in the debate over regulatory reform is the estimate of the total cost of regulation.[70] Hence, this CRS report focuses primarily on the components of the studies that describe the total cost of regulation, and not on the portion of the report exploring the distribution of costs among different types of firms.[71]

The Crain and Crain estimate of the total cost of regulation is not a purely top-down measure of the cost of regulations. It combines a top-down estimate—their estimate of the cost of economic regulation—with a bottom-up estimate of environmental, tax compliance, occupational safety, and homeland security regulation. However, the estimate of the cost of economic regulation resulting from their top-down methodology is almost 75% of the total estimate, totaling $1.439

[69] W. Mark Crain and Nicole V. Crain, *The Cost of Federal Regulation to the U.S. Economy, Manufacturing and Small Business*, A Report for the National Association of Manufacturers, September 10, 2014, at http://www.nam.org/CostofRegulation/.

[70] See, for example, Cheryl Bolen, "Study Commissioned by NAM Finds Regulations Cost $2 Trillion," *BNA Daily Report for Executives*, September 10, 2014.

[71] For example, earlier versions of the report written for the Small Business Administration's Office of Advocacy focused on the disproportionate cost of regulations on small businesses. The 2014 version, which was prepared for the National Association of Manufacturers, intended to fill an "information gap by quantifying the costs of regulatory compliance on firms, particularly manufacturers in the United States, and to extend some of the previous efforts to measure the aggregate regulatory costs." Crain and Crain 2014, p. 1.

trillion out of $2.028 trillion in the 2014 study. This report only discusses that portion of their estimate, as it is the most widely cited top-down study in the regulatory reform debate, and therefore serves as a useful example for discussion.

Background on the Crain and Crain Report

The 2014 Crain and Crain report can be traced back to a report originally published in 1995 by Thomas D. Hopkins for the Small Business Administration's (SBA's) Office of Advocacy entitled "Profiles of Regulatory Costs."[72] Each of the studies from 1995 through 2010 was prepared for the Office of Advocacy.

In the 1995 study, Hopkins estimated annual federal regulatory costs to be in the range of $416 billion to $668 billion in 1995. Six years later, in 2001, W. Mark Crain and Hopkins issued a follow-up to the 1995 Hopkins study, estimating the total annual cost of regulations to be $843 billion in 2000.[73] In 2005, Crain estimated annual regulatory costs to be about $1.1 trillion in 2004.[74] In 2010, Nicole V. Crain and W. Mark Crain issued another version of the study, which estimated the total cost of regulation to be $1.75 trillion in 2008. They explained the increase from $1.1 trillion in the 2005 report to $1.75 trillion as being, in part, the result of "new methodological techniques," meaning that "direct comparisons to the results in their prior studies should be made with caution."[75]

A number of concerns were raised about the methodology used in the 2010 report—and primarily the methods used to arrive at the $1.75 trillion of the total cost of regulation. Some of the entities raising concerns included the Office of Advocacy itself, the entity that had granted the contract under which the study was conducted. For example, the Office of Advocacy posted a number of caveats on its website where the report was linked, stating that "the findings of the study have been taken out of context and certain theoretical estimates of costs have been presented publicly as verifiable facts."[76] A 2011 CRS report called into question the methods used in the report to arrive at the total estimate of the cost of federal regulation.[77] A 2014 Government Accountability

[72] Thomas D. Hopkins, "Profiles in Regulatory Costs: Report to the U.S. Small Business Administration," November 1995, available at http://www.sba.gov/sites/default/files/files/rs1995hoptot.pdf.

[73] The authors explained that "subsequent regulatory developments and the availability of new data clarify and in some cases amplify the basic 1995 findings: regulatory burdens continue to climb, and to disadvantage small businesses." W. Mark Crain and Thomas D. Hopkins, "The Impact of Regulatory Costs on Small Firms: A Report for the Office of Advocacy, U.S. Small Business Administration," 2001, available at http://www.sba.gov/sites/default/files/files/rs207tot.pdf.

[74] Again, the increase over the earlier estimate appeared to be primarily due to a change in methodology from the 2005 report. W. Mark Crain, "The Impact of Regulatory Costs on Small Firms," available at http://www.sba.gov/sites/default/files/files/rs264tot.pdf.

[75] Crain and Crain re-estimated the numbers for 2004—which were presented in the 2005 report—using the methodology from the 2014 study. After the methodological adjustment, the estimate for 2005 increased by $445 billion to a total of $1.7 trillion, converted into 2009 dollars.

[76] These included the following: "The study is a top-down analysis of regulatory costs that uses certain assumptions to estimate totals. The study is not a bottom-up precise accounting of the overall cost of regulations. The overall figure of $1.75 trillion in costs is derived from a number of different assumptions and sources to create an estimate. As with almost any academic methodology, it was not intended to be considered a precise finding. The study demonstrated that small businesses bear a larger burden from regulations than large businesses. It was not intended to do more than provide an estimate of this disparity." See https://www.sba.gov/advocacy/impact-regulatory-costs-small-firms for these and other caveats about the study.

[77] CRS Report R41763, *Analysis of an Estimate of the Total Costs of Federal Regulations*, by Curtis W. Copeland. The author of that report is no longer at CRS; congressional clients with questions about its content can be directed to the author of this report, Maeve P. Carey.

Office (GAO) report also raised issues with the study related to federal data quality standards, asserting that the Office of Advocacy failed to uphold those standards.[78]

Summary of the 2014 Crain and Crain Report

The 2014 Crain and Crain study estimated the total cost of federal regulation to be $2.028 trillion in 2012 (in 2014 dollars), an amount equal to 12% of U.S. GDP. This section summarizes the methodology used to arrive at this estimate, so that the estimate may be used as an illustration throughout the rest of the discussion of the top-down methodology.[79]

As mentioned above, economic regulation is the majority of the total cost of the Crain and Crain estimate: $1.448 trillion.[80] According to Crain and Crain, economic regulations are those that "govern decision-making in market transactions. These include markets for final goods and services; markets for physical and human resources; credit markets; and markets for the transport and delivery of products and factors of production."[81]

To arrive at this estimate of the total cost of economic regulation, Crain and Crain conducted a cross-country comparison of 34 Organization for Economic Cooperation and Development

[78] Specifically, GAO said that Advocacy did not retain the underlying information for the Crain and Crain study, making it "much more difficult to assess the quality of that work, including its objectivity." When GAO asked to speak with Crain and Crain to ask them "a set of questions related to the criticisms of the methodologies, data, and models used," Crain and Crain "would not speak with us, stating that they were no longer contractually obligated to respond to our requests for information." U.S. Government Accountability Office, *Small Business Administration: Office of Advocacy Needs to Improve Controls over Research, Regulatory, and Workforce Planning Activities*, GAO-14-525, July 2014, http://gao.gov/assets/670/665104.pdf; see especially pp. 13-16.

[79] The NAM study included other elements not discussed at length here because they were not part of the estimate of the total cost of regulation and therefore are not the focus of this report. For example, the study included a survey of NAM members given over a period of two weeks in 2014 that reported a number of finings, including, for example, (1) 88% of respondents said that federal government regulations were a challenge that affected their businesses in the prior year or that their businesses would face in the future; (2) 72% of respondents indicated that their organizations employed outside advisers to ensure that their operations comply with federal rules—most of these advisers consisted of attorneys, accountants, and consultants; and (3) 48% of manufacturing firms incurred operations and maintenance expenses for capital equipment and other tangible items purchased to comply with federal government requirements during the 12 months prior to the survey.

[80] As previously described, the remaining $580 billion in the Crain and Crain estimate is due to the remaining three categories—environmental, occupational safety and health and homeland security, and tax compliance regulation. Because they use the bottom-up approach to estimate each of these types of regulation, they are not discussed in this report.

First, Crain and Crain arrive at a total estimate of the cost of environmental regulations using two sources: the OMB annual report to Congress on the costs and benefits of regulations, and a study from 1991 by Hahn and Hird that provides an estimate of the total costs of environmental regulations prior to 1988. See Robert W. Hahn and John A. Hird, "The Costs and Benefits of Regulation: Review and Synthesis," *Yale Journal on Regulation*, vol. 8, no. 1 (Winter 1991), pp. 233-278. Using these measures, they arrived at a total of $330 billion for environmental regulations. Second, to measure the occupational safety and health and homeland security regulations, they added the regulations promulgated by the Department of Homeland Security and the Occupational Safety and Health Administration (OSHA) in the Department of Labor, plus some additional calculations to measure and include the effects of passenger delays tied to Transportation Security Administration screening. Using these measures and calculations, they arrived at a total of $92 billion for occupational safety and health and homeland security regulations. Third, Crain and Crain measure the cost of compliance with the federal tax code. To do so, they relied on the number of hours required to comply with tax requirements provided by the Internal Revenue Service. They multiplied that number of hours times an hourly wage rate of individuals who would be preparing the tax paperwork—accountants and auditors for individuals and human resources professionals for businesses. Using this method, they arrived at a total estimate of $159 billion for tax compliance. It is not exactly clear what the calculations for these figures were, because Crain and Crain did not appear to provide in their report the calculations or the hourly wages for these types of professionals.

[81] Crain and Crain 2014, p. 28.

(OECD) countries, including the United States. Specifically, they looked at the relationship between each country's economy and a proxy measure of the amount of regulation in each country over eight years. The data Crain and Crain used for this proxy measure were derived from the World Economic Forum's Global Competitiveness Report.[82]

Crain and Crain used three components of the Global Competitiveness Index, a component of the Global Competitiveness Report that measures various aspects of the institutions, policies, and factors that determine a country's level of productivity. These types of measures are sometimes referred to as governance indicators. The report uses an "Executive Opinion Survey," which captures the opinions of business leaders around the world to construct a number of its indicators. Crain and Crain selected three indicators, each of which was constructed using the survey, to represent the amount of economic regulation in each country. The three indicators were

- burden of government regulation;
- efficiency of legal framework in challenging regulation; and
- regulation of securities exchanges.[83]

The survey respondents provided a value for each of these indicators ranging from one to seven. As Crain and Crain explained in their report, "higher values correspond to improvements in regulatory quality—that is, reductions in the regulatory burden on product, factor and credit markets."[84] To construct their measure for each country and each year, Crain and Crain used the mean value of these three factors. The regulation index that Crain and Crain used combined these three factors into a single measure for each of the countries in each of the years for which the data were available—2006 to 2013.

Using the mean value for the 34 countries over their eight-year period, Crain and Crain estimated a regression model in which they measured the effect of a number of variables—with their primary variable of interest being the measure of regulatory quality—on GDP per capita. The other variables, or "control" variables, were foreign trade as a share of GDP, population over 65 relative to population aged 19 to 65 (the "dependency ratio"), new capital investment as a share of GDP, size of the labor force, and tax revenues as a share of GDP.[85]

Based on the results of the regression model, Crain and Crain concluded that the effect of their purported proxy of economic regulation on GDP per capita was statistically significant. Further, they used the results of the regression model to estimate the total cost of the index on the GDP per capita in the United States. To do so, they compared the U.S. score on the regulation index with the average score of the five top performing (i.e., highest ranked) countries on the scale, which they referred to as the "benchmark countries." They used this "benchmark" measure as a hypothetical measurement of what a lower level of regulation in the United States could be. The difference between the U.S. score and the benchmark countries' average score was 26%.

Crain and Crain concluded that this 26% difference in the regulation index in the United States "implies an impact on GDP equal to $1.439 trillion. In other words, if the burden of economic

[82] Klaus Schwab, World Economic Forum, *The Global Competitiveness Report 2013-2014, Full Data Edition*, Geneva, 2013, at http://reports.weforum.org/the-global-competitiveness-report-2013-2014/.

[83] According to Crain and Crain, not all three variables had observations for every year in their sample. For the years available, they used the average of the three components that were available.

[84] Crain and Crain 2014, p. 32.

[85] Each of these independent variables was lagged by one year. Crain and Crain also included tax revenues as a share of GDP squared to allow for a nonlinear effect of tax policy. This choice of independent variables was different from previous models they used, though they do not make clear why they chose different variables this time.

regulation in the United States matched the benchmark countries, U.S. GDP would be $1.439 trillion higher than it was in 2012."[86] To the $1.439 trillion estimate, Crain and Crain added another $8.3 billion, which was the estimated cost of import restrictions from the U.S. International Trade Commission.[87] The total estimate of the cost of economic regulation they arrived at using this methodology was $1.448 trillion.

Analysis of Top-Down Approach to Estimating Costs and Benefits

A number of issues have been raised with the top-down approach, some of which are explained below using the Crain and Crain study as an illustration.

Importance of Accurate Measures of Regulation in Top-Down Approach

One challenge for the top-down approach to estimating the cost of regulation is that the accuracy of the findings is dependent on the validity of the proxy measure of regulation. The proxy is used to model the relationship between the size of the economy and amount of regulation, and then the parameter estimates resulting from the model are used to calculate the total cost of economic regulation.

Identifying an accurate measure of regulation, however, is a challenge. As explained in a report by the Council on Foreign Relations (CFR) on federal rulemaking policy in the United States and other countries, as well as in previous CRS reports, quantifying the total amount of regulation is an inherently difficult task.[88] As stated in the CFR report,

> Economists have not settled on a good way to measure overall regulatory burden ... Because of these data limitations, the best empirical studies take on a specific regulation rather than the full stock of regulations. Largely unknown is how the average business is affected by the cumulative set of regulations, or whether certain regulations harm or help different kinds of business activity, such as innovation or entrepreneurship.[89]

Obtaining an accurate proxy measure of regulation is key in any economic model that uses regulation as an explanatory variable, because an inaccurate measure can introduce serious uncertainty into the model's results. The term economists use to refer to whether a measure of a construct correctly represents what it purports to represent is "content validity." To illustrate the importance of content validity in the top-down approach of measuring the cost of regulation, this section will more closely examine the measure of "regulatory quality" used by Crain and Crain.

Crain and Crain referred to their measure of regulatory quality as the "Economic Regulation Index." They created the index from data from the World Economic Forum's (WEF's) annual Global Competitiveness Report—specifically, the report's Executive Opinion Survey.[90] In that survey, the WEF captured the opinions of over 13,000 business leaders in 148 different economies during a five-month period. Most of the survey questions, including the three used in

[86] Crain and Crain 2014, p. 33. This value appears to be adjusted to 2014 dollars.

[87] Crain and Crain do not explain why they added the cost of import restrictions. It appears they may have added it because they did not believe it would be captured in their measure of economic regulation.

[88] Rebecca Strauss, *Quality Control: Federal Regulation Policy*, Council on Foreign Relations, Renewing American Progress Report and Scorecard, New York, NY, March 2015, http://www.cfr.org/corporate-regulation/quality-control-federal-regulation-policy/p36110?cid=oth-partner_site-Reg_Blog-Renewing_America_Regulation_Policy-031015; and CRS Report R43056, *Counting Regulations: An Overview of Rulemaking, Types of Federal Regulations, and Pages in the Federal Register*, by Maeve P. Carey.

[89] *Quality Control: Federal Regulation Policy*, p. 3.

[90] For a more complete discussion of how Crain and Crain constructed this variable, see Appendix C of the 2014 report.

the Crain and Crain study to measure regulation, involved rating on a scale of one to seven a particular aspect of the operating environment in the respondent's country. The questions covered such topics as innovation and technology infrastructure, education and human capital, and tourism. To create a measure of regulation from this survey, Crain and Crain selected three questions, each of which included an explicit reference to regulation (which appears to be how they selected them): (1) burden of government regulation, (2) efficiency of legal framework in challenging regulation, and (3) regulation of securities exchanges.

Are these three questions from the Executive Opinion Survey measuring this type of specific regulation—in other words, can the responses to these three questions be considered a useful proxy of the burden of economic regulation? This may be difficult to answer, but it is crucial to the validity of the study's conclusions. Crain and Crain state that "the reach of economic regulations is vast. This means that an encompassing methodology is required to derive an estimate of these costs."[91] While their statement about the vastness of economic regulation is certainly true, whether their measurement and methodology measures it accurately is difficult to validate.[92]

Proxy measures of governance indicators are inherently imprecise, and they cannot be reliably used to estimate macroeconomic outcomes. A recent article examining a similar cross-country set of indicators illustrates the difficulty in identifying an accurate measure for certain inherently abstract concepts related to governance, such as the "rule of law," or, in this case, regulation.[93] The article specifically focused on the World Bank's "Worldwide Governance Indicators" (WGI), though it argued that "the concerns raised here about the WGI apply equally to other current governance indicators."[94] The article stated that "both researchers and policymakers should require evidence that governance indicators are valid before employing them. In the absence of such evidence, research results obtained using such indicators are uninterpretable and should not survive peer review. For policymakers, reliance on such indicators would be arbitrary."[95] It could be argued that the use of such indicators in the top-down model of total cost of regulation may suffer from this problem of questionable measurement.

Specific concerns over this issue as it relates to top-down studies involving regulation were raised in 2010 over the Crain and Crain report and arguably still apply to the 2014 report as well, due to the similarities of their measures. For example, economist Art Kraay, one of the creators of the World Bank's Regulatory Quality Index, the measure of regulation that Crain and Crain used in their 2010 study, commented in response to their study that the measure of regulatory quality they created measured the perceptions of various regulatory environments, rather than the stringency of those environments.[96] The index used in the 2014 study uses a different proxy, although its

[91] Crain and Crain 2014, p. 28.

[92] Furthermore, an incorrectly measured variable may cause some of the other estimates to be biased as well.

[93] M. A. Thomas, "What Do the Worldwide Governance Indicators Measure?" *European Journal of Development Research*, vol. 22 (2010), p. 37, stating that "A proposed measure of a construct, an inherently abstract concept like the 'rule of law', is like a proxy measure in that it is a hypothesis about measurement. The hypothesis is that the proposed measure correctly measures the construct. Like proposed proxy measures, not all proposed measurements of constructs are equally valid."

[94] The WGI were part of the 2010 Crain and Crain study, and, although they used a different measure in 2014, are similar in construct to the 2014 measure described above. M. A. Thomas, "What Do the Worldwide Governance Indicators Measure?" *European Journal of Development Research*, vol. 22 (2010), p. 47.

[95] M. A. Thomas, "What Do the Worldwide Governance Indicators Measure?" *European Journal of Development Research*, vol. 22 (2010), p. 51.

[96] For a summary of Kraay's comments, see CRS Report R41763, *Analysis of an Estimate of the Total Costs of Federal Regulations*, by Curtis W. Copeland.

construction was similar—it measures business leaders' *perceptions* of the regulatory environment in various countries.[97] Some research suggests that there may be key differences between perceptions of something and actual levels of it, however:

> There is a substantial difference between measuring a thing and measuring perceptions of it. In the context of governance, for example, perceptions of crime risk have been shown to be quite different than actual crime levels (see, for example, Forgas, 1980; Pfeiffer, 2005); perceptions of corruption have been shown to differ from actual corruption levels (see, for example, Olken, 2006; Seligson, 2006); and trust in government has been shown to differ from administrative performance (Van de Walle and Bouckaert, 2007).[98]

In sum, this question of whether a measurement based on survey responses of business leaders or other individuals, such as the Executive Opinion Survey, is measuring what it purports to measure, is an important one. With any top-down model of the economic effects of regulation, the validity of a proxy for regulation is essential—and measuring an inherently abstract concept like the stringency of regulation in a country is difficult. Without a valid proxy, which is difficult to identify for the reasons discussed above (and possibly others), the findings of any top-down study could be brought into question.

Questions About Proper Model Specification

Setting aside the question of how to undertake the difficult task of measuring regulation, and assuming that the measure of regulation is a valid measurement, another crucial question remains for the top-down approach to measuring the cost of regulation: how should one select the right model?

In a regression model, such as the one used by Crain and Crain, a researcher is attempting to explain a relationship between variables by analyzing the extent to which the dependent variable can be explained by changes in the independent variables. Proper selection of all variables in the model is important, as discussed below.

Selecting Independent Variables

Selecting and including the proper independent and control variables in an econometric analysis is crucial to the validity of the model's results. For example, a researcher must include all variables that are thought to be theoretically relevant and take care not to omit variables that may help explain the outcome.[99] Explaining and theoretically justifying the components of economic

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[97] Crain and Crain did not explain why they used this different index as their main indicator in the 2014 study. They did, however, use the World Bank measurement that they had used in 2010 as an alternative proxy for the amount of regulation. The conclusions they reached with this alternative measurement were similar; see p. 71.

[98] M. A. Thomas, "What Do the Worldwide Governance Indicators Measure?" *European Journal of Development Research*, vol. 22 (2010), p. 36. Referenced articles include Joseph P. Forgas, "Images of Crime: A Multidimensional Analysis of Individual Differences in Crime Perception," *International Journal of Psychology*, vol. 15, no. 1 (1980), pp. 287-299; Christian Pfeiffer, Michael Windzio, and Matthias Kleimann, "Media Use and its Impacts on Crime Perception, Sentencing Attitudes and Crime Policy," *European Journal of Criminology*, vol. 2, no. 3 (July 2005), pp. 259-285; Benjamin A. Olken, "Corruption Perceptions vs. Corruption Reality," NBER Working Paper No. 12428, 2006; Mitchell A. Seligson, "The Measurement and Impact of Corruption Victimization: Survey Evidence from Latin America," *World Development*, vol. 34, no. 2 (2006), pp. 381-404; and Steven Van de Walle and Geert Bouckaert, "Perceptions of Productivity and Performance in Europe and the United States," *International Journal of Public Administration*, vol. 30, no. 11 (2007), pp. 1123-1140.

[99] See A.H. Studenmund, *Using Econometrics: A Practical Guide*, 6th ed. (New York: Addison-Wesley, 2011), p. 167, stating that "the primary consideration in deciding whether an independent variable belongs in an equation is whether the variable is essential to the regression on the basis of theory."

models, including all independent variables, is important: "It is critical that researchers explain and justify the assumptions that underlie their model, which are presumed to be informed by theory."[100]

Failure to include all relevant variables in an economic model can result in omitted variable bias. Omitted variable bias can occur when one of the explanatory variables—those variables in the model that are helping to explain changes in the dependent variable—has its effects overstated because a variable that is related to that variable has been left out of the model. In other words, the omitted variable's explanatory power will be attributed to the variable that is included in the model, as long as the two variables are correlated. As explained in one study,

> Because top-down methods [of estimating the cost of regulation] associate indicators of regulatory activity with changes in macroeconomic variables, they risk attributing to regulation the effects of other variables that are not considered in the analysis but that may be correlated with regulatory activity. There is a strong chance of omitted variable bias, in other words.[101]

In sum, were a top-down model of regulation to leave out some relevant variables, the effect of regulation could be overstated.

Selecting a Dependent Variable

Furthermore, identifying a theoretically sound dependent variable is crucial to the validity of a model's results. Crain and Crain used GDP per capita as their dependent variable, rather than GDP growth rate. Measuring GDP per capita does provide an indication of the size of a country's economy. However, it can potentially be problematic because it ignores the historical circumstances that have led each country's economy to its current size, and therefore it presumes to explain the current size of each economy only based upon the factors in the model. Using the rate of GDP growth instead of GDP per capita would presume that the *changes* in the size of each country's economy are explained by the independent variables, not the actual size of the economy itself—which could be considered more likely.

Selecting the Correct Form

Another important issue related to model specification is whether the nature of the relationship between the dependent variable and the independent variables is properly specified: in other words, is the relationship linear or nonlinear? A linear relationship in expressed on a graph with a straight line and assumes that the *rate* of change in the dependent variable does not vary—hence the straight line on a graph. A non-linear relationship can also be expressed on a graph but does not have a straight line, and it assumes that the rate of change in the dependent variable *can* change. These concepts are discussed more below in the context of the top-down approach. Notably, however, identifying the form of the relationship between dependent and independent variables is important—"the consequences of an incorrect functional form for interpretation and forecasting can be severe."[102]

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[100] M. A. Thomas, "What Do the Worldwide Governance Indicators Measure?" *European Journal of Development Research*, vol. 22 (2010), p. 41.

[101] Winston Harrington, "Grading Estimates of the Benefits and Costs of Federal Regulation: A Review of Reviews," Resources for the Future Discussion Paper, September 2006, p. 12.

[102] A.H. Studenmund, *Using Econometrics: A Practical Guide*, 6th ed. (New York: Addison-Wesley, 2011), p. 207.

Crain and Crain ran a linear regression, which is based upon the assumption that the relationship is of direct proportionality and is expressed on a graph with a straight line.[103] Whether this is the type of relationship between regulation and size of a country's economy, or its economic growth generally, is an important question. Crain and Crain did not appear to provide a theoretical basis for assuming the relationship is linear, and some scholars have suggested that the relationship between regulation and economic growth is nonlinear. A 2012 working paper from the George Washington University Regulatory Studies Center suggested that "perhaps... up to a point, increasing the size of government may tend to increase GDP, but that the relationship reverses after a certain threshold."[104] That paper examined whether a measure of the on-budget costs of federal regulation in the United States had an effect on GDP growth, which is a different objective than a top-down model of the cost of regulation, but it illustrates the important point that some effects on GDP can be nonlinear. If such model misspecification did occur in the Crain and Crain model, the results of their model could be held in question.

In sum, these three issues related to model specification—selection of independent variables, selection of dependent variables, and selection of the correct functional form for the model—are highly important to the reliability and validity of conclusions made based upon a top-down estimate of the cost of regulation.

Other Potential Methodological Issues

There are several additional methodological issues that may be of concern in the top-down approach, including unclear directions of causality and insufficient sample size in the model.

Questions of Causality

The first issue, which is linked to the question of identification of a dependent variable, relates to questions of causality in a top-down approach that uses a measure of regulation to explain the health of a country's economy: does the amount of regulation affect the economy, or could the economy also have an effect on the amount of regulation? This uncertainty about the direction of the causality between different components of a model is referred to by economists as "endogeneity." The presence of endogeneity can cause bias in the parameter estimates resulting from the model. As mentioned earlier in this report, it is crucial that researchers using a top-down approach explain the theory behind all of the components of their models. Having a solid theoretical foundation related to the causality question can reduce or eliminate the likelihood that a model will suffer from endogeneity.

In the case of top-down studies of regulation like Crain and Crain, the parameter estimates are used to calculate the potential difference in GDP, which is the estimate that Crain and Crain provide for the cost of economic regulation. As explained in the section above summarizing their methodology, Crain and Crain assert that the GDP per capita is a direction function of the amount

[103] There may be additional econometric issues with the linear regression that are beyond the scope of this report. For example, linear regression models rely on several other assumptions that are not discussed here; for a more detailed discussion of these assumptions, see Jeffrey M. Wooldridge, *Introductory Econometrics: A Modern Approach*, 5th ed. (South-Western - Cengage Learning, 2012).

[104] Tara M. Sinclair and Kathryn Vesey, *Regulations, Jobs, and Economic Growth: An Empirical Analysis*, George Washington University Regulatory Studies Center, Working Paper, Washington, DC, March 2012, p. 27, http://regulatorystudies.columbian.gwu.edu/files/downloads/032212_sinclair_vesey_reg_jobs_growth.pdf. That paper examined whether there was a relationship between changes in the on-budget costs of federal regulation in the United States and macroeconomic outcomes, and it concluded that "we found basically no evidence that the regulators' budget has anything other than a zero effect on GDP and employment."

of regulation in a country. They do not explore the possibility that the causality could also go in the other direction. The presence of such endogeneity can cause the results of the model to be incorrect.

The issue of correctly identifying the causal relationship is a challenge for scholars examining the relationship between regulation and other macroeconomic factors. For example, a recent study of the "regulatory volume" in states across the United States "looked at the relationship between regulatory output and a series of indicators described above meant to represent the economic health of the state." The study concluded that "citizens in more prosperous states may very well demand more regulation than citizens in less prosperous states."[105] A similar concern could potentially be raised about the direction of causality between the volume of regulation and the economy.

Sample Size

The second is an issue of sample size, particularly for a top-down study that uses a cross-country comparison of industrialized economies. A small sample size can have detrimental effects on the precision of the model's results: a smaller sample size makes the estimate less precise and therefore less reliable. Researchers who examine cross-country comparisons of regulation face some potential problems, including the small number of fully industrialized countries and the fairly short length of time over which regulatory measures have been constructed.

The Crain and Crain study uses 34 countries and a time period of eight years: 2006 to 2013. This is a relatively small sample size, especially given that the measures of regulation and other variables in the model are unlikely to change very much from one year to the next in just an eight-year period.[106] In addition, this specific eight-year period is not necessarily a typical one, as it is the period leading up to and immediately following the Great Recession.[107] Therefore, conclusions made based upon this narrow time period may not be generalizable to other years or other periods.[108]

Potential for Double-Counting Costs

In the top-down approach, another potential problem is whether costs may be double-counted. Crain and Crain separate their total estimate of the cost of regulations into four categories, as described above, although it appears that this approach may be double-counting the cost of some regulations for at least two reasons.

The first reason is an econometric one: as mentioned above, the potential for omitted variable bias exists in any econometric model. If Crain and Crain omitted a variable that is highly correlated with their measure of "economic" regulations—such as a measure of environmental or other types of regulations, which are almost undoubtedly correlated with their measure of economic regulation—then the explanatory power of the omitted variable becomes attributed to the coefficient on the economic regulation measure. In other words, the explanatory strength of that

[105] Stuart Shapiro and Debra Borie-Holtz, *The Politics of Regulatory Reform* (New York: Taylor & Francis, 2013), pp. 65-66.

[106] The R-squared in the table for "within" the countries in their sample is .01, meaning that their model is not a very good fit to explain the changes within countries over that period.

[107] Crain and Crain included dummy variables for two years, 2008 and 2009, but did not explain why.

[108] The Crain and Crain data appear to have other issues related to sample size as well. For example, their sample appears to be missing some observations—34 countries times eight years should yield 272 observations, but they report their number of observations in Table 3 to be 219. They do not provide an explanation for why these observations are missing.

measure is inflated by the omission of other variables that are not included. By adding other measures of regulation, including environmental regulations, to the total cost they estimate for economic regulation, Crain and Crain may therefore be double-counting the effects of these other types of regulations.

Second, the potential for double-counting exists because of the nature of the questions asked to business leaders that comprise the regulatory quality measure. The questions themselves do not necessarily measure *only* economic regulation, although Crain and Crain imply that to be the case. Rather, as discussed above, they measure potentially very broad effects of all types of regulation by measuring the overall regulatory environment. Because Crain and Crain is a hybrid study that also employs a bottom-up methodology to measure certain types of regulation, they add an estimate of the cost of other types of regulation to their estimate of the cost of economic regulation. As a result, their overall number of roughly $2 trillion could include some double counting.[109]

No Discussion of Benefits of Regulations

To date, it appears that the top-down approach has not been used to estimate benefits of regulation—only costs. It is not clear whether the method *could* be used to measure benefits, because the approach measures cost in terms of potential economic growth that has not occurred due to the amount of regulation. A parallel approach does not seem to be applicable to benefits, which, as discussed above, are often not easily measured in dollar amounts or economic effects, and therefore may not be able to be estimated in this same way.

Although the top-down method does not appear to be intended to measure costs *and* benefits, having an estimate of costs without an estimate of benefits does not provide the complete context for evaluating whether a country's amount of regulation is appropriate. Such a comparison of costs against benefits has been institutionalized in the regulatory process in the United States since the early 1980s. Specifically, one of the underlying components of the current regulatory system, which was formally put into place by President Ronald Reagan in 1981 when he issued Executive Order 12291, is that agencies should consider the costs of individual regulations and compare them against the benefits, and that "regulatory action shall not be undertaken unless the potential benefits to society for the regulation outweigh the potential costs to society."[110] This general approach of comparing costs against benefits has been upheld since the Reagan Administration formalized it in 1981, and the shift to become more reliant on estimates of costs and benefits in informing regulatory decisions over the past several decades has been well documented.[111]

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[109] Furthermore, it is worth noting that the portion of their model that covers the non-economic regulation—$580 billion—may contain some of the same potential problems as those identified above for other bottom-up estimates.

[110] Executive Order 12291, "Federal Regulation," 46 *Federal Register* 13193, February 17, 1981, § 2(b).

President William Clinton maintained this general principle of weighing costs against benefits when he issued his executive order on rulemaking, which replaced Executive Order 12291. Executive Order 12866 § 1(b)(6). In his executive order, President Clinton arguably took a slightly more lenient approach by changing the wording to require that the benefits to society *justify* the costs of the regulation, rather than *outweigh*.

President Barack Obama continued to uphold the practice of comparing costs against benefits when he issued Executive Order 13563 in 2011, emphasizing, among other things, that agencies must "propose or adopt a regulation only upon a reasoned determination that its benefits justify its costs (recognizing that some benefits and costs are difficult to quantify)." Executive Order 13563 § 1(b).

[111] See CRS Report R41974, *Cost-Benefit and Other Analysis Requirements in the Rulemaking Process*, coordinated by Maeve P. Carey, and CRS Report RL32240, *The Federal Rulemaking Process: An Overview*, coordinated by Maeve P.

In sum, the notion that costs and benefits must be compared to one another has remained a crucial component of the regulatory process in the United States over the past several decades. Under current rulemaking requirements, agencies are responsible for measuring costs against benefits in individual regulations, and because of the nature of the bottom-up method and its reliance on those estimates, it can be used to make overall comparisons between total costs and benefits. Such a comparison does not seem possible, however, at the macroeconomic level.

Summary: Advantages and Disadvantages of Two Approaches

Each of the two main approaches taken to estimate the total costs and benefits of regulations have pros and cons, which tend to mirror one another. This final section briefly compares the two approaches and provides some perspective on why this issue is of potential interest to Congress.

The bottom-up approach to estimating the total costs and benefits of regulations, such as the approach taken by OMB in its annual report to Congress, has several advantages. The bottom-up approach involves adding up actual cost estimates calculated by agencies pursuant to rulemaking requirements. These estimates are conducted on an individual basis for certain regulations, and, although they often contain some uncertainty, are based upon specialized information the agency has regarding expected costs and benefits.

Notably, current requirements for agencies to estimate costs and benefits of their rules are intended to assist with agency decisionmaking in *individual* regulations by more fully informing decisionmakers of the likely outcomes and providing a means of evaluating and comparing regulatory alternatives. The potential utility of that information when taken out of the context of individual rules and aggregated, however, is greatly reduced.

An individual cost-benefit analysis conducted by an agency and included in the bottom-up aggregated estimate could also suffer from econometric problems similar to those described above in the context of the top-down approach. However, the individual estimates used in the bottom-up approach can be validated by comparing the *ex ante* estimates of costs and benefits to *ex post* estimates. Some such studies exist and are discussed above. In addition, agencies may—though they are not explicitly required to—revisit the original cost-benefit estimate when conducting a retrospective review of their regulations.[112] This provides a potential means of validating the results of the bottom-up method, whereas the top-down method does not have a similar opportunity for *ex post* validation.

The biggest potential problem with the bottom-up approach, however, is that the aggregated estimate is unlikely to represent the costs and benefits of all rules. Not all rules are included in the aggregate, because cost-benefit estimates are not currently conducted or required for all regulations. Furthermore, even for rules in which a cost-benefit analysis is required, monetizing

Carey, and Eric A. Posner, "Controlling Agencies with Cost-Benefit Analysis: A Positive Political Theory Perspective," *University of Chicago Law Review*, vol. 68, no. 4 (Fall 2001), pp. 1137-1199, describing the "entrenchment of cost-benefit analysis in American government" in recent decades (pp. 1139-1140).

[112] A government-wide retrospective review is currently required under the Obama Administration, and similar reviews have been required by previous administrations. It is unclear, however, the extent to which agencies re-examine or recalculate their *ex ante* cost-benefit estimates. For more information on the current retrospective review initiative under the Obama Administration, see Joseph E. Aldy, *Learning from Experience: An Assessment of the Retrospective Reviews of Agency Rules and the Evidence for Improving the Design and Implementation of Regulatory Policy*, report prepared for the consideration of the Administrative Conference of the United States, November 17, 2014, at http://www.hks.harvard.edu/fs/jaldy/img/aldy_retrospective.pdf.

certain types of costs and benefits can be challenging, and any effects of regulations that are not monetized are not able to be included in a bottom-up aggregate.

Because of these limitations about what may be missing from the bottom-up estimate, a top-down approach may be more likely to capture fully the overall cost of regulations, as the top-down approach could conceivably provide a way to include in its estimate of indirect costs and effects of regulations that are not included in the bottom-up approach. However, the top-down approach has several potential problems when it comes to implementation, most of which are conceptual and methodological. Any estimates of the cost of regulation resulting from a top-down approach are entirely reliant on the validity of the model, identification of its components and structure, and the theory behind it. The validity of an estimate is especially reliant upon the validity of the proxy measure of regulation. In practice, overcoming these conceptual and methodological hurdles is difficult, if not impossible, meaning that the results of a top-down approach should be treated with a great deal of caution.

Finally, the top-down approach does not make a comparison of costs to benefits. Such a comparison appears to be outside the purpose of the top-down approach, but having both estimates of costs and benefits can provide a more complete representation of the cost-effectiveness of a country's regulation.

Issues for Congress

Because of the role Congress plays in delegating legislative authority to federal agencies to issue regulations, Congress has shown an interest in conducting oversight of those regulations, both for individual regulations and the regulatory system generally. One way for Congress to conduct oversight of the regulatory system as a whole is to monitor the total cost and benefits of federal regulation.

Inaccuracies in cost-benefit estimates conducted by agencies could have the effect of undermining public confidence in the regulatory process.[113] So, too, could a misunderstanding or over-reliance on estimates of the total cost of regulation that are not intended to be considered precise findings. For the reasons discussed throughout this report, both approaches to estimating the total cost of regulation have inherent—and potentially insurmountable—flaws. The true cost of regulation is incredibly difficult to estimate for the many reasons discussed in this report, and perhaps others as well. The discrepancy between the two approaches and their associated estimates raises the question of the utility of using such figures in the regulatory reform debate.

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[113] Winston Harrington, Richard D. Morganstern, and Peter Nelson, "On the Accuracy of Regulatory Cost Estimates," *Journal of Policy Analysis and Management*, vol. 19, no. 2 (Spring 2000), p. 298.

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United States Government Accountability Office

GAO

Report to the Chairman, Subcommittee on Financial Services and General Government, Committee on Appropriations, United States Senate

July 2014

SMALL BUSINESS ADMINISTRATION

Office of Advocacy Needs to Improve Controls over Research, Regulatory, and Workforce Planning Activities

GAO-14-525

GAO Highlights

Highlights of GAO-14-525, a report to the Chairman, Subcommittee on Financial Services and General Government, Committee on Appropriations, United States Senate

Why GAO Did This Study

Congress created Advocacy within SBA in 1976 as an independent voice for small businesses. Questions have recently been raised about Advocacy's efforts to represent small businesses in regulatory activities and some of its research on small business issues. In light of these questions, GAO was asked to review Advocacy's activities.

This report examines Advocacy's (1) research, (2) regulatory activities, and (3) workforce planning efforts. GAO analyzed Advocacy's research, comment letters, and other regulatory information for fiscal years 2008-2013; assessed Advocacy's policies and procedures against federal standards for internal control and information quality; and interviewed agency officials, and small business and industry representatives. GAO also analyzed the applicability of the Federal Advisory Committee Act to Advocacy roundtables.

What GAO Recommends

GAO makes several recommendations to improve the Office of Advocacy's controls over the quality of its research, the documentation of its regulatory activities, and workforce planning. In commenting on a draft of this report, Advocacy agreed with our recommendations and noted some steps it will take to address them.

View GAO-14-525. For more information, contact Cindy Brown Barnes at (202) 512-8678 or brownbarnesc@gao.gov.

July 2014

SMALL BUSINESS ADMINISTRATION

Office of Advocacy Needs to Improve Controls over Research, Regulatory, and Workforce Planning Activities

What GAO Found

The Office of Advocacy (Advocacy) within the Small Business Administration (SBA) fulfills its mission by researching small business issues and providing input into federal rulemaking and related regulatory activities. However, GAO identified key areas in Advocacy's system of internal control that could be improved.

- *Research.* GAO found that Advocacy did not ensure that its staff monitored the quality of the information the office disseminated, as required. GAO reviewed 20 selected research products and found that in 16 cases a required quality review had not been documented. Advocacy recently established a review policy for its research, but it does not include procedures for selecting the reviewers or documenting that a review occurred and how reviewer comments are addressed. GAO also found that Advocacy staff had not followed federal information quality guidelines to retain data and could not substantiate the quality of information in two cost-estimation reports—a research product it has contracted for every 5 years. Without better controls over its quality review process and efforts to substantiate the information it disseminates, Advocacy cannot ensure the validity of one of its core activities—research in support of small businesses.
- *Regulatory activities.* Advocacy recently updated procedures for its regulatory activities, but these could be strengthened. GAO found the extent to which individual staff maintained records varied, in part, because the procedures lacked policies for documentation. For instance, the procedures state that when staff decide to intervene in the rulemaking process, they must follow up as appropriate with the interested groups to ensure that Advocacy has sufficient information and data to support its case. However, there is no policy that these interactions be documented. Federal internal control standards state that documentation and records should be maintained. If key procedures are not being documented, managers do not have an institutional record that agency goals and objectives in this area are being met. GAO also found that the Federal Advisory Committee Act's transparency and other requirements do not apply to Advocacy's meetings with stakeholders to get input on regulations (roundtables).
- *Workforce planning.* Advocacy's workforce efforts include training and mentoring for new staff, but do not include succession planning, which is recommended by the Office of Personnel Management. According to federal internal control standards, effective management of a workforce is essential to achieving program results. Officials told GAO that Advocacy was a small office and that additional staff were hired on an as-needed basis. However, some key staff have been with Advocacy for many years and their experience will be difficult to replace. If Advocacy does not incorporate succession planning strategies into its workforce planning efforts, it is at risk of not having the skills and expertise to meet its mission when key staff leave or retire.

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Abbreviations

ADA	Americans with Disabilities Act
AAPS	Association of American Physicians and Surgeons
APA	Administrative Procedure Act
BATF	Bureau of Alcohol, Tobacco, and Firearms
CFPB	Consumer Financial Protection Bureau
EPA	Environmental Protection Agency
FACA	Federal Advisory Committee Act
FOIA	Freedom of Information Act
GSA	General Services Administration
HCAAF	Human Capital Assessment and Accountability Framework
HEW	Department of Health, Education, and Welfare
JAG	Judge Advocate General of the Army
OIRA	Office of Information and Regulatory Affairs
OMB	Office of Management and Budget
OPM	Office of Personnel Management
OSHA	Occupational Safety and Health Administration
OST	Executive Office of the President's Office of Science and Technology
RFA	Regulatory Flexibility Act
SBA	Small Business Administration
SBREFA	Small Business Regulatory Enforcement Fairness Act of 1996

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GAO U.S. GOVERNMENT ACCOUNTABILITY OFFICE
441 G St. N.W.
Washington, DC 20548

July 22, 2014

The Honorable Tom Udall
Chairman
Subcommittee on Financial Services and General Government
Committee on Appropriations
United States Senate

Dear Senator Udall:

Congress created the Office of Advocacy (Advocacy) within the Small Business Administration (SBA) in 1976 as an independent voice for small businesses within the federal government.[1] The Chief Counsel for Advocacy, appointed by the President and confirmed by the U.S. Senate, directs the office and is tasked with representing the views and interests of small businesses to other federal agencies, including during rulemaking and related regulatory activities. Advocacy's mission is to encourage the development and growth of America's small businesses by

- producing research to keep policymakers and other stakeholders informed about the impact of federal regulatory burdens on small businesses, document the role of small businesses in the economy, and explore and explain issues of concern to the small business community;
- intervening early in federal agencies' regulatory development process on proposals that affect small businesses and providing training in complying with the Regulatory Flexibility Act (RFA) to agency policymakers and regulatory development officials; and
- fostering two-way communication between federal agencies and the small business community.

Questions have recently been raised about Advocacy's efforts to represent small businesses. For example, some stakeholders questioned how Advocacy staff gather and use information to develop comment letters on proposed regulations and whether that information actually conveys the views of small businesses. Also, some parties have expressed concerns that Advocacy's information-gathering events ("roundtables") are not fully transparent and open to the public, and

[1]P. L. No. 94-305, §201, 90 Stat. 668 (1976).

others have criticized the methodology of some of the research conducted by contractors hired by Advocacy.

You asked us to review the Office of Advocacy. This report examines Advocacy's (1) research activities; (2) regulatory activities, including the applicability of the Federal Advisory Committee Act's (FACA) transparency and other requirements to Advocacy's roundtables; and (3) workforce planning efforts.

To understand Advocacy's mission, operations, and participation in the rulemaking process, we interviewed Advocacy officials, and reviewed Advocacy documents, including its policies and procedures, budget and strategic planning documents, annual reports to Congress on the RFA, and other publications. To evaluate Advocacy's research activities, we selected a nonprobability sample of 20 of its products and assessed them against Advocacy's review process for its research ("peer review"), the Office of Management and Budget's (OMB) Peer Review guidance, and OMB and SBA's Information Quality Guidelines.[2] Our sample was designed to include a variety of topics and report types and focused on more recent publications in order to maximize the possibility that the research staff involved would be available for interviews. In addition, we evaluated three of Advocacy's most recent external studies on the economic costs of regulation and assessed the studies against OMB and SBA Information Quality Guidelines. We also reviewed peer reviewers' comments and other external reviews on the studies to understand questions that had been raised about the studies. Lastly, we interviewed the Advocacy officials responsible for this research to obtain information on the steps taken to substantiate the quality of these studies.

[2]OMB, *Final Information Quality Bulletin for Peer Review*, December 16, 2004. This Bulletin established government-wide guidance aimed at enhancing the practice of peer review of government science documents. OMB. *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies*. 67 Fed. Reg. 8452 (Feb. 22, 2002). OMB's information quality guidelines implement section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (P. L. No. 106-554). Section 515 directed OMB to issue government-wide guidelines that "provide policy and procedural guidance to Federal agencies for ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information) disseminated by Federal agencies." Agencies were required to issue their own implementing guidelines by October 1, 2002. For SBA's guidelines, accessed April 24, 2014, see http://www.sba.gov/about-sba/sba_performance/open_government/information_quality/information_quality_guidelines. Advocacy officials told us they follow SBA's information quality guidelines.

To evaluate Advocacy's regulatory activities, we analyzed comment letters and information-gathering events (roundtables) from fiscal years 2009 through 2013 as well as relevant policies and procedures. We interviewed Advocacy staff who were responsible for these activities and reviewed supporting documentation to understand their origins and purposes. In addition, we attended three roundtables. To analyze whether FACA (5 U.S.C. App. II) applies to Advocacy's roundtables, we reviewed relevant statutes, case law, regulations, and guidance. We also considered Advocacy's views on the issue. Lastly, we interviewed officials from the entities that interact with Advocacy in rulemaking—the Environmental Protection Agency (EPA), Occupational Safety and Health Administration (OSHA), Bureau of Consumer Financial Protection, also known as the Consumer Financial Protection Bureau (CFPB), and OMB's Office of Information and Regulatory Affairs (OIRA). Also, we interviewed officials from six industry associations that represent small and large businesses; one large corporation; and two nonprofit organizations whose missions relate to policies or rules under consideration, to understand their perspectives on Advocacy's roundtables and other work. We made our selections to include representatives from a variety of sources, and while the results from our interviews cannot be projected to all entities that interact with Advocacy, the information we gathered provides insights into how the selected groups view Advocacy and its work in representing small businesses to federal policymakers.

To assess Advocacy's workforce planning efforts, we interviewed senior management to discuss any workforce planning efforts that were in place. We evaluated those efforts and any related documents against applicable federal standards for internal control and the Office of Personnel Management's Human Capital Assessment and Accountability Framework (HCAAF).[3]

We conducted this performance audit from August 2013 to July 2014 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that

[3]Human Resources Management in Agencies, HCAAF and HCAAF Systems, Standards, and Metrics, 73 Fed. Reg. 23012 (Apr. 28, 2008).

the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Under legislation that established Advocacy in its current form in 1976, Advocacy' duties are to

- serve as a focal point for small businesses' concerns about the federal government's policies and activities;
- advise small businesses on how to interact with the federal government;
- develop proposals for federal agencies on behalf of small businesses;
- represent the views and interests of small businesses before federal agencies;
- enlist the cooperation and assistance of public and private agencies, businesses, and other organizations in disseminating information about the federal government's programs and services that benefit small businesses.[4]

Since its establishment, a series of laws and executive orders has increased Advocacy's roles and responsibilities. First, in 1980 the White House Conference on Small Business made recommendations that led directly to the passage of the RFA, which requires government agencies to consider the effects of their regulatory actions on small entities and, where possible, mitigate them.[5] Under the RFA, agencies provide a small business impact analysis, known as an initial regulatory flexibility analysis, with every proposed rule published for notice and comment and a final regulatory flexibility analysis with every final rule.[6] The Chief Counsel for Advocacy was charged with monitoring federal agencies' compliance with the act and with submitting an annual report to Congress.

[4]Prior to establishing a separate Office of Advocacy within SBA in 1976, Congress created the position of Chief Counsel for Advocacy within SBA. See Pub. L. No. 93-386, § 10, 88 Stat. 749 (1974).

[5]Under the RFA, the term "small entity" includes small businesses, small governments, and small organizations. 5 U.S.C. § 601(6). For the purposes of this report, we use the term "small businesses" since that is our focus.

[6]When an agency can determine that the rule would not have a "significant economic impact on a substantial number of small entities," the head of the agency may certify to that effect and forego the regulatory flexibility analysis requirements. (5 U.S.C. § 605).

Second, in 1996 the Small Business Regulatory Enforcement Fairness Act (SBREFA) provided for the judicial review of agency compliance with key sections of the RFA. It also established a requirement that EPA and OSHA convene panels whenever these agencies are developing a rule for which an initial regulatory flexibility analysis would be required (SBREFA panels).[7] These panels consist of the agency, OIRA, and Advocacy. The 2010 Dodd-Frank Act added the newly created CFPB to the agencies required to convene SBREFA panels.[8] The SBREFA panels meet with representatives of the affected small businesses to review the agencies' draft proposed rules, identify alternative approaches to the rules, and provide insight on the anticipated impact of the rules on small entities. The panels issue a report, including any recommendations for minimizing the economic impact of the rule on small entities.

Third, Advocacy's responsibilities were further expanded by Executive Order 13272, which was issued in 2002. The order required each agency to establish procedures and policies to promote compliance with the RFA and to publish a response in the Federal Register to any written comment received from Advocacy on rules published.[9] This requirement was codified by the Small Business Jobs Act of 2010.[10] Executive Order 13272 also directs Advocacy to provide training to federal agencies on how to comply with the RFA.

Until 2010, Advocacy's budget was part of SBA's. As of fiscal year 2010, however, Advocacy was given statutory line-item funding in a Treasury account separate from other SBA funding, with Congress setting the amount available for Advocacy's direct costs.[11] In fiscal year 2014, Advocacy's enacted budget was $8.75 million. Its fiscal year 2015 budget request was $8.46 million. Of that amount, $7.75 million (92 percent) is to be used to fund compensation and benefits for Advocacy's professional staff, with the balance of Advocacy's budget split almost equally between

[7]The Small Business Regulatory Enforcement Fairness Act of 1996 (P. L. No. 104-121, title II).

[8]The Dodd-Frank Wall Street Reform and Consumer Protection Act (P. L. No. 111-203).

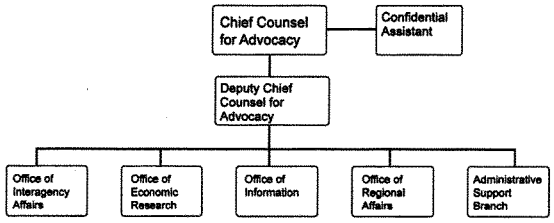
[9]Executive Order 13272, *Proper Consideration of Small Entities in Agency Rulemaking,* 2002.

[10]Pub. L. No. 111-240, § 1601(4), 124 Stat. 2504, 2551 (codified at 5 U.S.C. § 604(a)(3)).

[11]*See* Pub. L. No. 111-240, sec. 1602(b)

external research and all other direct expenses.[12] Advocacy is organized in five offices, as shown in figure 1.

Figure 1: Office of Advocacy Organizational Chart, Fiscal Year 2014



Source: Office of Advocacy. | GAO-14-525

Research Activities

Advocacy's Office of Economic Research produces both internal and external research, which is publicly disseminated, on a variety of small-business issues. More specialized research—requiring proprietary data or econometric analysis—typically is conducted by contractors (external). SBA handles the contracting process for Advocacy. The contracts generally last for 1 year. Advocacy economists act as the official contracting officers' representatives (contracting officer) overseeing and coordinating the work of the contractors. The contracting officers maintain a contract file for each external research product. Each year the Office of Economic Research solicits research topics from Advocacy staff and small business stakeholders, such as associations comprised of small businesses. In addition, Congress requests studies, either formally (by putting the requirement into a law), or informally (through discussions with Advocacy staff). A final list of potential research is presented to the Chief Counsel before the beginning of the fiscal year, and the counsel chooses the topics for the year. In fiscal year 2013, Advocacy produced 22

[12]Under Public Law 111-240, SBA must provide support to Advocacy, including office space and equipment, communication and IT services, and equipment and facilities maintenance. Therefore any costs of those services, as well as centralized indirect expenses shared with other SBA offices, would appear in SBA's budget request, not Advocacy's.

research products on topics that included access to capital, small business exporters, entrepreneurship, and minority- and women-owned businesses. Other Advocacy research addresses the concerns highlighted in Advocacy's authorizing statute, such as examining the role of small business in the American economy, assessing the effectiveness of existing federal subsidies and assistance programs for small businesses, and evaluating efforts to assist small veteran-owned small business concerns.[13]

Advocacy follows a peer review process that was revised and formalized in 2013 and applies to all internal and external research products. Advocacy staff, including the Director of the Office of Economic Research, conduct peer reviews for internal products. For external research products, the peer review is initiated when Advocacy receives the first draft of the product, typically 6 to 8 months after the contract has been awarded, and generally includes external reviewers. In addition to the peer review process, all of Advocacy's research products are required to pass Advocacy's internal clearance process, which involves review by the Director of Economic Research, editors in Advocacy's Office of Information, and individuals in Advocacy's Office of Chief Counsel (Senior Advisor, Deputy Chief Counsel, and Chief Counsel).

Regulatory Activities

Advocacy's Office of Interagency Affairs oversees the office's regulatory activities, which aim to convey the views of small businesses on the impact of federal regulations and related costs. These activities generally fall into three categories—developing and issuing comment letters, convening information roundtables, and providing RFA training.[14] Attorneys in this office ("regulatory attorneys") are expected to become experts in the policy areas they oversee and to establish and maintain broad and effective networks of small business experts (e.g., trade associations) in their policy area. The regulatory attorneys are encouraged to go to trade association and other industry meetings in order to maintain and expand those networks. In addition to maintaining working relationships with industry members and experts, the staff are to

[13]P. L. No. 94-305, §202, 90 Stat. 668 (1976), as amended.

[14]The regulatory attorneys also engage with rulemaking agencies through the interagency review process, which is run by OMB's Office of Information and Regulatory Affairs (OIRA). However, OIRA and its operations are outside the scope of this report.

establish and maintain relationships with the regulatory staff within each agency who write the rules.

One of the primary ways Advocacy provides input to agencies that are issuing rules and regulations of concern to small businesses is through public comment letters. Our review of comment letters from fiscal years 2009 through 2013 found that they covered a wide range of rulemakings on issues such as food labeling, designations for critical habitat, and emission standards. Advocacy made a number of recommendations in its comment letters that included creating an exemption for small businesses or strengthening economic analyses required by the RFA. Advocacy also issued "nonrule" letters that involved the agencies' other activities, such as agencies' scientific research. These letters constitute a small proportion of Advocacy's comment letters. Table 1 below shows the number of comment letters on rulemakings by fiscal year.

Table 1: Advocacy Comment Letters by Policy Area, Fiscal Years 2009-2013

Policy area	Fiscal year 2009	Fiscal year 2010	Fiscal year 2011	Fiscal year 2012	Fiscal year 2013	Total
Environment	11	9	10	6	7	**43**
Natural resources and agriculture	6	4	8	5	3	**26**
Safety and transportation	5	9	6	2	3	**25**
Banking and economic regulation	1	2	7	3	5	**18**
Food, drug, and health	3	4	6	0	3	**16**
Labor and immigration	1	3	6	1	1	**12**
Procurement and small business	1	4	1	3	1	**10**
Rulemaking issues (no specific policy area)	2	1	3	3	0	**9**
Telecommunications and energy	3	2	2	2	0	**9**
Taxes, pensions, and securities	2	0	4	1	1	**8**
Intellectual property	0	1	0	0	2	**3**
Not applicable	0	0	0	2	0	**2**
Total	**35**	**39**	**53**	**28**	**26**	**181**

Source: GAO analysis of Advocacy data. | GAO-14-525

Regulatory attorneys also convene information-gathering roundtables to discuss the regulatory concerns of small businesses. Roundtables are convened on a regular basis in two policy areas—environment and labor safety—while events covering other areas are convened on an ad hoc basis, depending on which regulatory or rulemaking issues might be forthcoming. According to the regulatory attorneys, the most typical reason for convening a roundtable was an upcoming rule or legislation

that would impact small businesses. The regulatory attorneys use the information gathered from the roundtables, together with other information, to inform Advocacy's positions on the issues involved, and to give Advocacy direction on proposed rules' economic impacts and possible regulatory alternatives. The attorneys also told us roundtable discussions help them set priorities, and broaden their knowledge base. The roundtables sometimes resulted in a comment letter, although not always. Table 2 shows the number of roundtables by policy area for fiscal years 2009 through 2013.

Table 2: Number of Roundtables by Policy Area, Fiscal Years 2009-2013

Policy area[a]	Fiscal year 2009	Fiscal year 2010	Fiscal year 2011	Fiscal year 2012	Fiscal year 2013	Total
Safety and transportation	11	9	9	9	8	**46**
Environment	7	10	11	9	7	**44**
Taxes, pensions, and securities	2	7	6	6	2	**23**
Banking and economic regulation	0	1	0	4	1	**6**
Labor and immigration	1	1	3	1	0	**6**
Veteran issues	1	1	3	0	0	**5**
Intellectual property	0	1	1	1	0	**3**
Natural resources	0	1	0	1	1	**3**
Labor safety/environment	0	0	0	2	0	**2**
Rulemaking issues (no specific policy area)	1	0	0	1	0	**2**
Procurement and small business	0	1	0	0	0	**1**
Telecommunications	0	0	1	0	0	**1**
Total	**23**	**32**	**34**	**34**	**19**	**142**

Source: GAO analysis of Advocacy data. | GAO-14-525

[a]There are more policy areas for the roundtables since there are instances where Advocacy hosted roundtables in areas that did not have comment letters, such as veteran issues.

As discussed previously, Executive Order 13272 requires Advocacy to provide training to the agencies on how to comply with the RFA. According to data provided by Advocacy officials, in 2013, Advocacy staff provided training on the RFA to 159 officials at nine agencies and to 22 congressional staff. In addition to the formal training sessions, regulatory attorneys told us they were encouraged to interact regularly with the relevant rulemaking officials at the agencies as rules were developed in order to communicate the concerns of the small business advocates.

Advocacy's Internal Controls Do Not Ensure the Quality of Its Research and That Required Information Quality Practices Are Followed

Producing research products, both internally and externally, on issues of importance to small businesses is one of Advocacy's primary responsibilities. However, we found that Advocacy's quality review process lacked some key controls to substantiate the quality of the research and did not take steps to ensure that staff were adhering to existing controls.

Advocacy's Peer Review Process Lacks Guidance for Identifying Reviewers

According to Advocacy officials, peer review is the main quality control over the research it disseminates. Advocacy's current Chief Counsel recently directed the office to strengthen its peer review process with the intent to make it more rigorous and consistent. As a result, during the course of our review, Advocacy finalized a written peer review process. We found that the written guidance discussed the various levels of review for internal and external products as well as a process for initiating peer review. However, it did not specify how the economists who managed the research products were to identify peer reviewers. Instead, Advocacy officials told us that they relied on their own expertise and professional contacts to identify appropriate peer reviewers and provide recommendations through the Director of Research and to the Chief Counsel for Advocacy. The officials told us that within a specific subject matter there is often a small group of available peer reviewers, in part because their expertise is specialized and there are not many other alternatives.

OMB's peer review guidance calls on agencies to select peer reviewers with the appropriate knowledge and expertise and to take into account their independence and lack of conflicts of interest.[15] Advocacy managers told us that, in practice, the economists recommend peer reviewers based on knowledge and experience in both subject matter and databases—as discussed in the OMB guidelines. However, they did not provide specific written guidance to the economists on how to identify peer reviewers. Federal internal control standards state that internal control activities help ensure that management's directives are carried out and in implementing

[15] OMB, *Final Information Quality Bulletin for Peer Review*, December 16, 2004.

those standards management is responsible for developing the detailed policies, procedures and practices for their agency's operations.[16] With additional guidance, Advocacy would be in a better position to help ensure that the economists fully understand how best to identify qualified peer reviewers and carry out the Chief Counsel's directive to improve the peer review process.

Advocacy Has Not Consistently Documented Peer Reviews

Advocacy does not have consistent documentation showing whether a peer review occurred for all of its research products. Our review of 20 recent research products—10 internal and 10 external—revealed that 16 did not have documented peer reviews in the research files.[17] According to interviews with Advocacy economists who managed the research, all of the 20 products underwent some form of peer review. The economists said that the type of review was commensurate with the methodological complexity of each product, among other factors. However, the Advocacy officials were unable to produce any documentation that peer reviews occurred for these 16 products. According to Advocacy's peer review guidance, the economists who manage the research should document all correspondence pertaining to the peer review and maintain this documentation in the research file. In addition, federal internal control standards require all transactions and significant events be documented and that the documentation be readily available.

Advocacy officials do not have procedures to review the external research files to ensure that the peer reviews were documented. Furthermore, they noted that for some of the less in-depth internal research products—typically 2 to 5 pages—such documentation would be administratively burdensome.[18] However, we note that the documentation could be likewise concise, such as a checklist, or a form that reviewers sign,

[16]GAO, *Standards for Internal Control in the Federal Government*, GAO/AIMD-00-21.3.1 (Washington, D.C.: November 1999). These internal control standards, first issued in 1983, present the internal control standards for federal agencies for both program and financial management.

[17]Of the 10 external products we reviewed, 6 did not contain documentation on whether a peer review occurred. Of the 10 internal products we reviewed, none contained documentation on whether a peer review occurred.

[18]According to our analysis, of the 70 internal research products produced from fiscal years 2008 through 2012, approximately 54 percent were shorter products, between 1 to 5 pages.

similar to the one currently used by Advocacy for its internal clearance process. Otherwise, absent written documentation, Advocacy managers are limited in their ability to conduct oversight and ensure that this key quality control activity is happening. For example, for one of the internal research products we selected for review, the study author no longer worked at Advocacy, and therefore no one could tell us with any certainty whether the required peer review had occurred, or who had participated in it. Without adequate documentation—a key internal control—of its peer reviews, Advocacy does not have an institutional record of its activities and cannot demonstrate that it is following its own peer review process.

In addition, Advocacy has not consistently documented how peer reviewers' comments were addressed by the authors of its external research products. Of the 10 external research files we reviewed, 4 had documentation that a peer review occurred, and 1 file included evidence that the peer reviewer comments were incorporated into the final report. Advocacy officials told us that the economists who managed external research consolidated the peer reviewers' comments and forwarded to the author those that needed to be addressed, including methodological and data issues and other comments, but not those that might change the scope of the contracted research.[19] They also told us that they did not typically maintain documentation showing which comments had been addressed and why, but included the final report in the research file. However, Advocacy's peer review process states that the economist managing the research will analyze and incorporate, as needed, peer reviewers' suggestions and maintain all related documentation in the research file. However, since the economists are not keeping records and documenting that comments have been considered and addressed, management does not have an institutional record to provide reasonable assurance that its quality control process is being followed.

[19]According to Advocacy officials, it is not permissible to expand the scope of the research or change the nature of the deliverables specified in the contract after an award has been made. Therefore, if the peer reviewer's comments discuss changes that would result in expanding the scope of the research (e.g., analyzing data from additional time periods), those comments could not be accommodated.

Advocacy Has Not Followed Some Required Elements of Information Quality Guidelines

While Advocacy has quality review policies for its peer review process, it does not have policies and procedures that reflect the federal information quality guidelines on retaining data for influential studies or taking other steps to substantiate the quality of information in such studies when they have not retained the data. Advocacy officials told us that they did not retain the original data or underlying computer codes for three external studies on the costs of regulation as required by the information quality guidelines.[20] We focused on external studies on estimating the costs of regulation because it is a key research area for Advocacy, according to its originating statute and the mission statement of its Office of Economic Research. The OMB Information Quality Guidelines require that all agencies producing and disseminating "influential statistical information" help ensure a high degree of transparency about data and methods to facilitate the reproducibility of such information by qualified third parties. The SBA guidelines implement this standard for transparency by requiring that the underlying data be stored and made available for public review for as long as the agency-disseminated information based on the data are valid. The guidelines also state that all formulas, calculations, matrixes, and assumptions used in processing the data should be available. Because Advocacy classified two of the regulatory cost studies as "influential" according to the OMB guidelines, those data should have been maintained.[21]

Advocacy officials said that they did not maintain the data or models for influential external research because there might be a cost associated with obtaining such data, which would raise the costs of the studies, possibly making them prohibitively expensive. However, in the case of two of the studies, the original data were from publicly available sources and involved a relatively small dataset, suggesting the cost would not

[20]Andy Bollman, E. H. Pechan & Associates, *Evaluation of Barrier Removal Costs Associated with the 2004 Americans with Disabilities Act (ADA) Accessibility Guidelines*, prepared for SBA Office of Advocacy, under contract SBAHQ-03C0020 (Washington, D.C.: 2007); W. Marc Crain, *The Impact of Regulatory Costs on Small Firms*, prepared for SBA Office of Advocacy, under contract SBHQ-03-M-0522 (Washington, D.C.: 2005); and Nicole V. Crain and W. Mark Crain, *The Impact of Regulatory Costs on Small Firms*, prepared for SBA Office of Advocacy, under contract SBAHQ-08-M-0466 (Washington, D.C.: 2010). We refer to the latter two studies as "the Crain studies."

[21]The study by Andy Bollman and E. H. Pechan & Associates was also classified as "influential."

have been prohibitive.[22] The OMB guidelines state that sufficient transparency—achieved in part by storing the relevant data—results in analyses that can be substantially reproduced. Not retaining the underlying information for these influential research papers makes it much more difficult to assess the quality of that work, including its objectivity—a key goal of the information quality guidelines.

We also found that Advocacy staff had not taken additional steps, in the absence of retaining the underlying data, to substantiate the quality of the regulatory cost estimates in two of the studies that it sponsored and disseminated.[23] The OMB guidelines state that when data and methods are not retained and made available to the public because of other compelling interests such as privacy, trade secrets, intellectual property, and other confidentiality protections, the agency shall apply rigorous checks to the analytical results and document what checks were undertaken. Because Advocacy had not retained data on the two cost estimation studies that had been criticized, we interviewed senior Advocacy officials, including the Director of its Office of Economic Research, about the information and methodologies used in the studies. We asked them a set of questions related to criticisms of the methodologies, data, and models used in the studies that were identified in our evaluation and the work of other researchers. Advocacy staff declined to answer many of our questions and instead directed us to the authors, stating that they, not Advocacy economists, were the experts on

[22]In the case of the 2010 Crain study, the original underlying data for the economic regulation cost regression were publicly available from the World Bank and the Organisation for Economic Co-operation and Development, and the study's regressions contained only 118 records and 6 explanatory variables. Furthermore, since the regression models employed in the studies consisted of one equation each, we do not believe there would have been significant costs associated with requiring the Crains to provide Advocacy the data and computer coding written to produce the estimates. While Advocacy did not classify the 2005 Crain study as "influential" according to the OMB and SBA criteria, because the 2005 study used similar methodologies, we examined them together.

[23]We asked Advocacy officials how they substantiated the two Crain studies. We did not ask the Advocacy officials to verify the quality of the third regulatory cost study (*Evaluation of Barrier Removal Costs Associated with the 2004 Americans with Disabilities Act (ADA) Accessibility Guidelines*) because our work did not reveal the same level of methodological weaknesses that we identified in the Crain studies.

the issues covered in the studies.[24] However, the authors would not speak with us, stating that they were no longer contractually obligated to respond to our requests for information.

During our discussions with Advocacy officials, they stated that the purpose of the studies was not to estimate the overall costs of regulations, but rather to estimate the disproportionate share borne by small businesses. They also noted that, as with all contract research, the external research reports contain a disclaimer indicating that the views presented did not necessarily represent those of Advocacy. In addition, Advocacy added language to the 2010 report's cover page about the uncertainty of the authors' estimates of the costs of regulation.[25] Advocacy officials noted that the majority of the research it conducts is not classified "influential" according to the OMB and SBA guidelines, and that they have no plans to engage in such work in the near future. However, given Advocacy's mission, it may do influential research in the future as it has in the past even if on a limited basis. We acknowledge that these reports may not necessarily be representative of all Advocacy's research efforts, but not substantiating the quality of the information in even one study could call into question the credibility of Advocacy's research program. Thus, establishing policies and procedures that reflect the federal information quality guidelines on retaining data for influential studies or when such data are not retained because of certain compelling interests, and requiring additional steps to substantiate the quality of the information, would put Advocacy in a better position to provide reasonable assurance about the quality of its research program.

OMB Information Quality Guidelines require that agencies develop policies to ensure that managers be able to substantiate the quality of information they disseminate. The guidelines also discuss narrow

[24]Advocacy officials also provided us with rebuttals the Crains published in response to earlier criticisms by others of the studies. However, the rebuttals do not directly address important criticisms.

[25]This one-page statement notes, among other things, that "The study is a top-down analysis of regulatory costs that uses certain assumptions to estimate totals, and is not a bottom-up precise accounting of the overall cost of regulations." Also, the statement says: "The overall figure of $1.75 trillion in costs is derived from a number of different assumptions and sources to create an estimate. As with almost any academic methodology, it was not intended to be considered a precise finding." For the full statement, see the report, available on Advocacy's website, accessed on April 24, 2014, www.sba.gov/advocacy/7540/49291.

circumstances under which an agency does not have to substantiate the quality of the information that resulted from a research project of one of its contractors or grantees. In those circumstances, the researcher is to make clear with an appropriate disclaimer that the views expressed in the research are his or her own and do not necessarily reflect those of the agency. However, OMB cautions that "if an agency, as an institution, disseminates information prepared by an outside party in a manner that reasonably suggests that the agency agrees with the information, this appearance of having the information represent agency views makes agency dissemination of the information subject to these guidelines."[26]

As we noted previously, Advocacy placed a disclaimer on the two studies, but its actions indicate its agreement with the information in the studies. First, Advocacy made the two studies available on its website, where they continue to be available. Second, Advocacy's disclaimer that appeared on the 2010 study noted that it contained information and analysis that was reviewed and edited by Advocacy. Advocacy's description of its review role suggests that the agency contributed to the content, if not the conclusions of the study. Finally, several Advocacy comment letters have cited the 2005 study's regulatory cost estimates in support of their arguments.[27] Because Advocacy's actions raise, at the least, an appearance of agreement with the information contained in the studies, we believe that the office was required to substantiate the quality of the estimates of the economic costs contained in the studies.

[26]OMB. *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies.* 67 Fed. Reg. 8452 (Feb 22, 2002).

[27]*See* Advocacy letter to Environmental Protection Agency, dated November 28, 2008, *Re: Comments on EPA's Advance Notice of Proposed Rulemaking "Regulating Greenhouse Gas Emissions under the Clean Air Act," Docket ID No. EPA-HQ-OAR-2008-0318;* Advocacy letter to Environmental Protection Agency, dated June 23, 2009, *Re: Docket ID No. EPA-HQ-OAR-2009-0171, Comments on EPA's "Proposed Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act";* Advocacy letter to National Marine Fisheries Services, Department of Commerce, dated October 30, 2009, *Re: RIN 0648-AW18 Magnuson-Stevens Fishery Conservation and Management Act: Regional Fisheries Management Councils; Operations.*

Documentation of Key Regulatory Activities is Inconsistent and Roundtables Are Not Publicized According to Advocacy's Policies

Advocacy has practices and procedures ("policies") for its regulatory activities—comment letters and roundtables—however, documentation of these key regulatory activities is inconsistent. Furthermore, while we determined that transparency and other requirements in FACA do not apply to Advocacy's roundtables, Advocacy is not following its internal policies meant to ensure its roundtables are as open to the public as they could be. As a result Advocacy cannot demonstrate that it is always fully meeting its mission to foster two-way communication between small businesses and federal policymakers.

Advocacy's Documentation for Key Regulatory Activities Is Inconsistent

Our review of Advocacy's key regulatory activities—developing and issuing comment letters and convening information roundtables—found that Advocacy staff are inconsistently maintaining documentation of key decisions and events. In April 2014, Advocacy provided us with a "practices and procedures guide" for the Office of Interagency Affairs, dated March 2014. The guide covers staff activities related to initiating comment letters and convening roundtables, among other things. Advocacy management told us that they update the guidance periodically, including amending it during the course of our review to make it clear that the decision to issue a public letter or hold a roundtable rests with the Chief Counsel for Advocacy. However, our review found that the updated guide continued to lack policies for documenting key decisions and activities. For example, the guide stated that when regulatory attorneys decide to intervene in the rulemaking process, they must follow up, as appropriate, with the interested associations to ensure that Advocacy has sufficient information and data to make its case for intervening. But there is no policy to document these interactions. The following are other instances where we found a lack of policies to document key activities.

- *Small Business Input into Comment Letters.* Advocacy does not have any policies requiring that the regulatory attorneys retain documentation showing which entities provided input into comment letters, and we found that the attorneys do not consistently do so. Our analysis of Advocacy's comment letters found that about 57 percent of the letters referenced small business input or concerns. But when we interviewed seven regulatory attorneys about how they developed comment letters generally, some told us that they maintained a record of the entities providing input for specific letters, but others said that they did not. Further, when we asked Advocacy staff for documentation on the sources of the small business input referred to

in a nonrepresentative sample of 11 comment letters, they were unable to provide specific emails or notes of conversations.[28]

- *Reasons for Convening Roundtables.* Advocacy's practices and procedures guide states that the Chief Counsel must approve the proposed agenda, speakers, and discussion topics for all proposed roundtables before participants are invited. But the guide contains no policy that this step be documented. We interviewed seven regulatory attorneys responsible for the roundtables and their management and were told that the attorneys set agendas and selected speakers based on their own assessment of the issues and, in some cases, with suggestions from small businesses or interested industry parties. Advocacy officials emphasized that they only held roundtables when there is sufficient interest or need on the part of small businesses.
- *Roundtable Discussions and Participants.* Information gathered from the roundtables is used to inform Advocacy's positions on issues related to small businesses and in comment letters, but Advocacy's guidance contains no policies to document roundtable discussions. Our content analysis of Advocacy's comment letters showed 19 percent of them referred to roundtable discussions. However, staff did not routinely take and maintain notes of the discussions, according to the interviews we conducted with the regulatory attorneys. In addition, not all staff take attendance at the events. In most cases, Advocacy staff keep an "RSVP list" of those who have indicated that they will attend. However, some of the staff noted that the RSVP lists may not include all participants, including those on the phone. As a result it is difficult to determine the extent to which small businesses and related entities were represented at these events.

Advocacy officials told us that they did not have guidance on maintaining documentation on the sources of input to comment letters or on roundtable discussions because they did not feel that setting such standards was required to fulfill their duties under Advocacy's statute. Furthermore, they noted that, in the case of roundtables, keeping records in a manner that identified specific speakers would inhibit discussion and limit their ability to gain valuable input. They also cited logistical challenges in taking accurate attendance at larger events. We acknowledge that specific parties might not want to be publicly named, but federal standards for internal control call for agencies to document

[28]We selected a nonrepresentative sample of recently published comment letters—published from 2011 through 2013—weighting our choices of letters to reflect the distribution of policy areas listed in table 2.

significant events. Taking steps to balance the need for privacy so individuals can speak freely, with a commitment to maintain a basic level of documentation of these events—that is, documenting which entities provided input into its comment letters and roundtables—could help Advocacy demonstrate that it is meeting its mission to represent the interests of small businesses.

Advocacy's Policy for Publicizing Information on Roundtable Events Is Not Followed

Key documents for Advocacy's roundtables—agendas and presentation materials—are not made available to the public at-large after the fact. The regulatory attorneys cultivate email lists of relevant stakeholders who are invited to roundtable events, and these lists are continually updated. It is Advocacy's policy to add any interested parties to the invitation list, if asked, and several of the attorneys we interviewed said they did so. They also told us they made agendas and presentations available to any interested parties who requested them after the roundtable. However, the agendas and presentations are not posted to the website or made publically available in any systematic way and if small businesses and other interested parties do not know about the roundtables, they cannot request information from the events.

Advocacy's policies and procedures state that agendas and presentations should be posted on Advocacy's website. Advocacy officials stated they had been unable to post roundtable materials to the website, which SBA maintains, because of difficulties in meeting certain readability and accessibility requirements in the Americans with Disabilities Act.[29] However, a variety of other Advocacy reports and publications are posted on its website that also must meet these requirements, and Advocacy officials did not explain why information on the roundtables could not be likewise included. Making the roundtable materials available on its website would strengthen Advocacy's efforts to inform small businesses and other interested parties about its efforts to represent their interests to federal decision makers.

[29] 42 U.S.C. § 12101 et seq.

Federal Advisory Committee Act Requirements Do Not Apply to Advocacy's Roundtables

In addition to evaluating whether Advocacy publicizes and conducts its roundtables in accordance with its internal policies and procedures, we also analyzed whether Advocacy's roundtable groups constitute "advisory committees" subject to the public notice and other transparency requirements of FACA.[30] We found that the roundtables are not advisory committees, and thus Advocacy is not required by law to follow these rules. We first determined that Advocacy is an "agency" covered by FACA. It is an "authority of the Government of the United States, whether or not it is within or subject to review by another agency."[31] In addition, Advocacy possesses the type of "substantial independent authority" required by the courts. While located within SBA, Advocacy is independent of SBA, and it has distinct statutory authorities and responsibilities, a separate statutory charter, and an appropriation account that is separate from the rest of SBA. Furthermore, its duties and authorities under statute and Executive Order are substantial and its recommendations made in furtherance of small entities' concerns must, by law, be given considerable weight by other agencies.

While we found that Advocacy is a FACA "agency," we concluded that its roundtable groups are not "advisory committees" as defined by the statute and interpreted by the courts and implementing regulations. A covered advisory committee is a panel, task force, or similar group created or used by an agency for the purpose of providing advice or recommendations on particular matters. Participants' input must be sought as a group, not as a collection of individuals. The formality and fixed structure of the group also is an important factor in determining coverage under FACA. Advocacy does not seek roundtable participants' input as a group, however; rather, attendees provide their individual perspectives on the agency rule or policy under discussion, do not significantly interact with one another, and no attempt is made to reach a consensus. Advocacy's roundtables also do not have the requisite organized or fixed structure; rather, as noted, Advocacy's policy is to extend roundtable invitations to anyone who expresses a desire to attend. Finally, according to Advocacy, it is the agency itself, not the roundtable participants, that develops policy advice and recommendations, albeit based in part on the data and information provided by roundtable participants (as well as obtained elsewhere). Our detailed legal analysis

[30] 5 U.S.C. App. II.

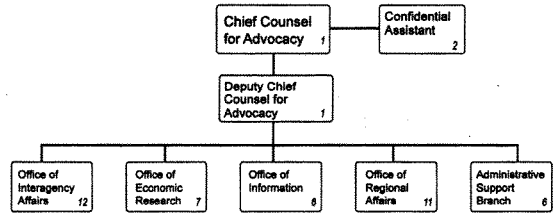
[31] 5 U.S.C. App. II, § 3(3), incorporating 5 U.S.C. § 551(1) (Administrative Procedure Act).

of the applicability of FACA to Advocacy's roundtables is contained in appendix III.

Advocacy's Workforce Planning Efforts Lack Succession Planning

Workforce planning presents some challenges for Advocacy, in part because the office is small and has a large number of positions, which, according to Advocacy officials, typically are replaced with each new administration. While the office currently does some workforce planning, its efforts do not include the long-term strategic plans that would help ensure that it maintains the expertise and skills needed to fulfill its mission. While Advocacy now has responsibility for developing its own budget, goals, and performance measures, our review of its strategic plan and goals did not find goals or objectives that discussed workforce issues such as staff development and succession planning. Advocacy officials told us that they used their organizational chart as the basis for their workforce planning efforts and discussed workforce issues with staff and managers at meetings as needed (see fig. 2). Advocacy officials said that because Advocacy was a small office with only 46 staff, the organizational chart and meetings to discuss staffing issues met their workforce planning needs. Advocacy officials told us that to develop staff they provided training to regulatory attorney and economist staff, had established a mentoring program for newer staff, and were implementing a knowledge-sharing database to help staff develop expertise in specialized policy areas.

Figure 2: Office of Advocacy Organizational Chart, Fiscal Year 2014



Source: Office of Advocacy. | GAO-14-525

When we asked Advocacy officials about succession planning and their plans for addressing the departure of senior or experienced staff, the officials told us that most of the turnover in staff occurred during changes

in administration. For example, according to Advocacy officials, the change of administration in 2009 resulted in the turnover of at least 15 of 20 senior officials. Among these were the 10 regional advocates, who are located in each of SBA's regional offices across the country, and make up the Office of Regional Affairs. Turnover tends to be low among the economists and regulatory attorneys, some of whom have been with the office for years. Advocacy officials said that because rulemaking often took so long, they generally had enough time to hire or realign any staff as needed.

According to federal internal control standards, effective management of a workforce is essential to achieving program results. Our body of work on workforce planning has demonstrated the importance of such planning and the need to develop long-term strategies—such as training and succession planning—for acquiring, developing, and retaining staff to achieve programmatic goals.[32] OPM's Human Capital Assessment and Accountability Framework states that agencies and offices with workforce planning are better able to manage their staff by, for example, ensuring that systematic processes are in place for identifying and addressing any gaps between current and future workforce needs. Further, OPM recommends that succession planning is needed to ensure continuity in leadership positions. In addition, workforce planning can help management determine the type of training and other strategies that are needed to address factors such as projected retirements and succession planning. In past work on succession planning, we have found that in addition to focusing on replacing individuals, succession planning strategies can also strengthen current and future organizational capacity.[33]

Given the length of time some attorneys and economists have been with Advocacy, the loss of their expertise through retirement, among other things, could leave significant gaps in needed skills and knowledge, according to Advocacy officials. Yet Advocacy has not incorporated

[32]GAO, *Human Capital: Key Principles for Effective Workforce Planning*, GAO-04-39 (Washington, D.C.: Dec. 11, 2003), and *Securities and Exchange Commission: Improving Personnel Managements is Critical for Agency's Effectiveness*, GAO-13-621 (Washington, D.C.: July 18, 2013).

[33]GAO, *Human Capital: Selected Agencies Have Opportunities to Enhance Existing Succession Planning and Management Efforts*, GAO-05-585 (Washington, D.C.: June 30, 2005).

succession planning into its workforce planning efforts, such as its training and mentoring initiatives. Further, Advocacy officials told us that they discussed future staffing needs and various options for addressing them, including training, but these efforts are not documented in a manner that would ensure consistent implementation. However, ensuring that activities such as staff training are consistently implemented is particularly important when senior management can change significantly every 4 or 8 years. Without incorporating long-term succession planning into its workforce planning efforts, Advocacy is not in the best position to ensure that it has qualified staff to fill leadership and other key positions and a skilled workforce able to meet the demands of its mission on behalf of small businesses.

Conclusions

Effective internal controls are critical for the Office of Advocacy if it is to achieve program outcomes and minimize operational problems. Recognizing this, Advocacy recently has taken action to improve some of its guidance and controls. However, Advocacy's research, regulatory, and workforce planning functions could be improved by strengthening its internal controls as follows:

- *Research activities.* In its research operations, Advocacy has taken some initial steps toward establishing stronger control policies by, for example, formalizing its peer review process for internal and external research products. However, the guidance provided did not include information on how to select appropriate peer reviewers—the experts whom Advocacy relies on to assess the quality of the research that it disseminates. The guidance also lacks policies for documenting that a peer review occurred and how reviewer comments were addressed for its external research products. Such guidance would help ensure that Advocacy research staff fully understand how best to identify the most qualified peer reviewers, and how to document and incorporate reviewer comments. In addition, Advocacy did not follow federal guidelines for information quality for influential studies that set out requirements for retaining data and taking additional steps to substantiate the quality of information it disseminates when it has certain compelling reasons to not retain the data. Improving policies and procedures for its research activities would help support Advocacy's mission to provide quality research on small business issues that decision makers and the public can rely on.
- *Regulatory activities.* Advocacy's lack of documentation and transparency of the regulatory activities we reviewed made it difficult to validate Advocacy's efforts to represent small businesses.

Specifically, weaknesses exist in Advocacy's documentation of both the sources of the small business input in comment letters and the views of small businesses discussed and conveyed at its roundtables. As a result, the extent to which the small businesses' views on regulations were being obtained and communicated is unknown. Improving its guidance to staff on its regulatory activities and emphasizing the importance of documentation would enable Advocacy to more effectively demonstrate to decision makers that it was obtaining and communicating the interests of small businesses. In addition, Advocacy is not following its internal policy to post materials from roundtables on its website. As a result, it is missing an opportunity to reach out more broadly to small businesses and other interested parties and increase the transparency of its activities.

- *Workforce planning activities.* While Advocacy's workforce planning efforts help in managing its current staff, these efforts do not include any strategies to plan for succession, even though several staff have been with the office for many years and will eventually need to be replaced. Without this important element of workforce planning, Advocacy could be in a vulnerable position when critical staff leave the agency or staff face new demands. Although Advocacy is a relatively small office, having a skilled workforce is critical to meeting its mission. Succession planning would help ensure that Advocacy was better prepared to maintain qualified staff to conduct its research and regulatory activities in support of small businesses.

Recommendations for Executive Action

To improve Advocacy's system of internal control, and help to provide reasonable assurance that the office is meeting its mission, we recommend that the Chief Counsel of Advocacy take the following five actions:

- Strengthen the accountability of its research activities by taking the following two actions:
  - Enhance its peer review policies and procedures by including written guidance on selecting peer reviewers and documenting all steps of the peer review process—whether a peer review occurred and how and to what extent peer reviewer comments were addressed.
  - Develop policies and procedures that reflect the federal information quality guidelines on retaining data for influential studies, and when not retaining data, taking additional steps to substantiate the quality of information disseminated.
- Strengthen the accountability of its regulatory activities by developing policies and procedures to ensure that key elements of that work—

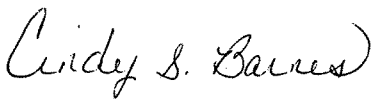
such as sources of input for comment letters and roundtable discussions—are consistently documented.
- Coordinate with SBA officials who oversee website administration to comply with Advocacy's roundtable policy to make information on the events—agendas, presentation materials—publicly available on its website so that its regulatory activities are more transparent to the public.
- Improve its workforce planning efforts to be better prepared to meet its future workforce needs by incorporating succession planning.

Agency Comments

We provided a draft of this report to Office of Advocacy for its review and comment. In its written comments (reproduced in app. II), Advocacy agreed with our recommendations. Advocacy stated that for its research activities, its current effort to further formalize procedures for the peer review process will include steps for additional documentation and that it also plans to develop written guidelines for determining which research products are considered influential, which will clarify when Advocacy needs to take additional information quality steps. Advocacy also said that as it develops how it will disseminate information about its regulatory activities, it will incorporate approaches that are responsive to our recommendations. Finally, Advocacy agreed that workforce planning is important for ensuring that the office maintains the skills and resources needed to fulfill its mission and noted that the office is developing a Leadership Succession Plan in response to our recommendation.

We are sending this report to the Office of Advocacy and interested congressional committees. The report also will be available at no charge on the GAO website at http://www.gao.gov. If you or your staff have any questions about this report, please contact Cindy Brown Barnes at (202) 512-8678 or brownbarnesc@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix V.

Sincerely yours,



Cindy Brown Barnes
Acting Director, Financial Markets and
Community Investment

Appendix I: Objectives, Scope, and Methodology

This report examines Advocacy's (1) research activities; (2) regulatory activities, including the applicability of the Federal Advisory Committee Act (FACA) to Advocacy's roundtables; and (3) workforce planning efforts. The scope of our work covered key activities conducted from fiscal year 2008 to fiscal year 2013, although in some cases, we broadened that scope to include fiscal years 2005 through 2008, as noted below.

To understand Advocacy's mission, operations, and participation in the rulemaking process, we reviewed relevant laws and regulations, Advocacy documents, including its annual reports to Congress on the Regulatory Flexibility Act (RFA), budget and strategic planning documents, and other publications.

To assess Advocacy's research activities, we determined: how Advocacy staff chose its research topics; how they conducted the research; and what controls they had in place to ensure quality products. We analyzed Advocacy's research products produced in the 5 most recent fiscal years—2008 through 2012—and interviewed relevant Advocacy officials on the processes by which they assess the quality of its research products.[1] To evaluate Advocacy's research activities, we analyzed a nonprobability sample of research, which included 10 research products authored by Advocacy staff (internal), and 10 products produced by its contractors (external). To select a sample of internal research products that best represented the variety of internal research, we reviewed the 58 research products issued from fiscal years 2008 through 2012, and categorized each as either "routine" (meaning published either quarterly or semi-annually, and relying on the same underlying data set), or as "nonroutine." Within the routine category, we selected the mostly recently published product from each of the following routine publications: (1) *Small Business Profiles of the States and Territories*, (2) *Small Business Quarterly Bulletin*, (3) *Quarterly Lending Bulletin*, (4) *Small Business Lending*, and (5) *The Small Business Economy*. For the nonroutine products, we created five categories, such as "analysis" and "fact sheets." We selected, from each of those five categories, the most recently published report. Then, for each of the 10 selected internal research products, we used a data collection instrument and interviewed the

[1]For the period we conducted our audit, not all the internal research publications for fiscal year 2013 were available in all cases, so we focused on internal research published from fiscal years 2008 through fiscal year 2012.

Advocacy staff who wrote the products in order to see to what extent the products adhered to Information Quality Guidelines issued by the Office of Management and Budget (OMB) and the Small Business Administration (SBA) and Advocacy's internal quality review process ("peer review").[2] To assess the quality of the peer review used for Advocacy's external research, we reviewed the contract files for the 10 most recently published external research products, as of year-end 2013, and compared how the work was produced, including Advocacy's peer review process, against the OMB Peer Review Guidance and OMB and SBA information quality guidelines, and applicable federal internal control standards.[3] The results from our reviews cannot be projected to all Advocacy studies, but they provide an indication of how Advocacy staff conducted or oversaw the research and what controls were in place to ensure quality products.

We also assessed Advocacy's contract studies that focused on the economic costs of regulation. We focused on external studies in these areas because they are key research areas for Advocacy, according to its originating statute and the mission statement of its Office of Economic Research. For the economic costs studies, we assessed them against OMB and SBA Information Quality Guidelines, and examined Advocacy's compliance with related data retention policies therein.[4] We also reviewed peer reviewers' comments and other external reviews on the studies as part of our assessment. Lastly, we interviewed Advocacy officials to obtain information on steps they took to substantiate the quality of information for influential studies when data are not retained.

[2]OMB, *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies* (Washington, D.C.: February 2002). 67 Fed. Reg. 8452 (Feb. 22, 2002). Agencies were required to issue their own implementing guidelines by October 1, 2002. For SBA's guidelines, accessed on April 24, 2014, see http://www.sba.gov/about-sba/sba_performance/open_government/information_quality/information_quality_guidelines.

[3]OMB, *Final Information Quality Bulletin for Peer Review*, December 16, 2004. This Bulletin established government-wide guidance aimed at enhancing the practice of peer review of government science documents.

[4]Advocacy's studies examining total costs of regulation to the U.S. economy have been conducted approximately every 5 years, according to Advocacy officials. For this reason, we broadened the scope to fiscal year 2005, whereas in other research work, we focused on fiscal years 2008 through 2012.

To evaluate Advocacy's regulatory activities, we assessed: how and why Advocacy decides to issue comment letters and convene roundtables; the policies and practices in place that pertain to those activities; how Advocacy staff solicit input from small businesses and other parties. We interviewed relevant staff, as described below; reviewed relevant policies and procedures, and analyzed comment letters produced and roundtables convened from fiscal years 2009 through 2013.[5] Specifically, we performed a content analysis on the 181 comment letters issued during that period, using NVivo software, to analyzed and categorize the content of the letters and the nature and source of the small business input provided.[6] We also interviewed Advocacy staff who are responsible for rulemaking and related activities, weighting our choices of interviewees to reflect the distribution of comment letters by policy area, and reviewed supporting documentation for comment letters to understand how Advocacy staff develop and issue comment letters, and compared this information to federal internal control standards.

Similarly, we reviewed available information on the 142 roundtables convened during the same 5-year period and interviewed the responsible Advocacy staff, weighting our choices of interviewees to reflect the distribution of roundtables by policy area. We reviewed Advocacy's policies for roundtables to understand their origin, purpose, and documentation requirements, and compared this information to federal internal control standards. In order to understand the perspective of those who attended the roundtables, we attended three of the events. In addition, we selected and interviewed a nonprobability sample of past participants from email lists provided by Advocacy's regulatory attorneys. Specifically, we talked to the following representatives: five from industry associations that represent small and large businesses; one from a large corporation; and one nonprofit organization whose mission relates to policies or rules under consideration.[7] We made our selections to include

[5]Similar to our approach in assessing Advocacy's research work, we wanted to focus on the five most recent fiscal years. In the case of the regulatory activities—comment letters and roundtables—information was available through the end of fiscal year 2013.

[6]NVivo is a qualitative data analysis software system that allows organization and analysis of information from a variety of sources including complex nonnumeric or unstructured data.

[7]Separate from interviewing the officials selected from the roundtable invitation lists, we interviewed representatives from an association that represents small businesses and a nonprofit whose mission relates to transparency in government. We discussed roundtables and other Advocacy activities with these parties.

representatives from a variety of sources, and while the results from our interviews cannot be projected to all entities that interact with Advocacy, the information we gathered does provide insights into how the selected groups view Advocacy and its work in representing small businesses to federal policymakers.

We also reviewed Advocacy's training to agency staff in how to comply with the RFA and interactions with agency rulemaking officials. In addition, we interviewed officials from the entities that interact with Advocacy in rulemaking—the Environmental Protection Agency (EPA), Occupational Safety and Health Administration (OSHA), Bureau of Consumer Financial Protection, also known as the Consumer Financial Protection Bureau (CFPB), and Office of Management and Budget's (OMB) Office of Information and Regulatory Affairs (OIRA).

To analyze whether FACA (5 U.S.C. App. II) applies to Advocacy's roundtables, we reviewed relevant statutes, case law, regulations, and guidance. In addition, we reviewed and considered Advocacy's written views on the issue. See appendix III for more information on the legal analysis we conducted.

Finally, we reviewed Advocacy's workforce efforts. To understand Advocacy's workforce planning, we reviewed Advocacy's strategic goals and other planning and budget documents and interviewed senior management to determine what, if any, policies and procedures were in place related to workforce and succession planning. We assessed any such policies and procedures against applicable federal standards for internal control and the Office of Personnel Management's (OPM) Human Capital Assessment and Accountability Framework (HCAAF).[8] We also reviewed GAO reports on workforce and succession planning to gain insights about key practices and how agencies have used them.

We conducted this performance audit from August 2013 to July 2014 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that

[8]Human Resources Management in Agencies, HCAAF and HCAAF Systems, Standards, and Metrics, 73 Fed. Reg. 23012 (Apr. 28, 2008).

the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Comments from the Office of Advocacy, Small Business Administration

SBA Office of Advocacy
www.sba.gov/advocacy

SBA Office of Advocacy
409 3rd Street, SW
Washington, DC 20416

Advocacy: the voice of small business in government

July 11, 2014

Ms. Cindy Brown Barnes
Acting Director, Financial Markets and Community Investment
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Barnes:

Thank you for providing the SBA Office of Advocacy with a copy of the Government Accountability Office (GAO) draft report entitled *Office of Advocacy Needs to Improve Controls Over Research, Regulatory, and Workforce Planning Activities.* We have reviewed GAO's recommendations and welcome the opportunity to comment. In addition, Advocacy appreciates the time and effort GAO took to understand how we fulfill the unique mission of our office.

The following statements reference recommendations put forth by GAO:

- **Research Activities**

  Advocacy appreciates GAO's recommendations regarding our research activities. As GAO states, Advocacy is currently working on guidance to further formalize procedures for the peer review process, which will include additional documentation. Advocacy also plans to develop written guidelines for determining what Advocacy research products would be considered "influential," which will further clarify needed information quality checks. Advocacy agrees with GAO that such steps will strengthen our ability to provide robust and quality economic research for small businesses and policymakers.

- **Regulatory Activities**

  Advocacy's use of comment letters and roundtables is central to our mission to advocate for small businesses, and we appreciate GAO's recommendation to improve our documentation of these activities. Advocacy will continue to develop how we disseminate information about our regulatory activities in ways that are both responsive to the GAO recommendations and in furtherance of Advocacy's mission.

- **Advocacy's Workforce Planning Activities**

  GAO recommends that Advocacy improve our workforce planning efforts by incorporating succession planning. Advocacy agrees that workforce planning is an

important part of ensuring that our office maintains the skills and resources needed to fulfill our important mission. As a result of this GAO recommendation, Advocacy is developing a Leadership Succession Plan that will formalize existing and future workforce planning efforts.

Also, GAO agreed with SBA and Advocacy that Federal Advisory Committee Act requirements do not apply to Advocacy's roundtables. Advocacy values the thorough investigation that GAO performed. As mentioned before, our roundtables are an invaluable tool to hear from small businesses and these findings will help our office to continue this important part of our outreach.

The SBA Office of Advocacy is committed to continuing to fulfill our mission as the independent voice for small business by researching small business issues and providing input into federal rulemaking and related regulatory activities.

Sincerely,

Claudia R. Rodgers

Claudia Rayford Rodgers
Deputy Chief Counsel
SBA Office of Advocacy

Appendix III: Legal Analysis of the Applicability of the Federal Advisory Committee Act to the Office of Advocacy's Roundtables

Introduction and Summary of Conclusions

As part of our review of the Small Business Administration Office of Advocacy's (Advocacy) activities in identifying and communicating the concerns of small businesses and other small entities as agencies develop regulations and policies, we analyzed whether the Federal Advisory Committee Act (FACA), 5 U.S.C. App. II, applies to "roundtable" groups that Advocacy convenes for the purpose of conveying and soliciting information and viewpoints about agency rules and policies. Based on our review of relevant statutes and legislative history, case law, regulations, and guidance, and consideration of Advocacy's views, and for the reasons detailed below, we conclude that these roundtable groups are not "advisory committees" within the meaning of FACA and thus Advocacy is not required to comply with the provisions of that statute.[1]

Background on Advocacy's Duties and Use of Roundtables

Advocacy is an office established by statute within the Small Business Administration (SBA). 15 U.S.C. § 634a. The office has a separate statutory charter[2] and, as of 2010, the President must include a separate line-item appropriation request for Advocacy designated in a separate Treasury account.[3] Advocacy is headed by a Chief Counsel who, among other things, has statutory authority to appear as an official "friend of the court" (amicus curiae) in all court challenges to agency regulations in order to "present his or her views with respect to compliance with [the Regulatory Flexibility Act, discussed below], the adequacy of the rulemaking record with respect to small entities and the effect of the rule on small entities." 5 U.S.C § 612(c). According to recent testimony, Advocacy is not required to obtain clearance of its comment letters, publications, and testimony as are other executive branch agencies.[4]

[1]Our practice when rendering opinions is to contact the relevant agency and obtain its legal views on the subject of the request. GAO, *Procedures and Practices for Legal Decisions and Opinions*, GAO-06-1064SP (Washington, D.C.: Sept 2006), available at www.gao.gov/legal/resouces.html. We contacted the Chief Counsel for Advocacy who, through Advocacy's Director of Interagency Affairs, provided us with the agency's views. Letter from Advocacy to Managing Associate General Counsel, GAO, April 24, 2014 (Advocacy Letter to GAO).

[2]Pub. L. No. 94-305, Title II (1976), codified as amended at 15 U.S.C. §§ 634a *et seq.*

[3]Pub. L. No. 111-240 (2010).

[4]Testimony of Dr. Winslow Sargeant, Chief Counsel for Advocacy, U.S. Small Business Administration, before the Senate Committee on Small Business and Entrepreneurship (Apr. 17, 2013).

Among Advocacy's duties are serving as "a focal point for the receipt of complaints, criticisms, and suggestions" concerning federal policies affecting small businesses; developing proposals for changes in the policies and procedures of federal agencies that further small business interests and communicating those proposals to the appropriate federal agencies; and "represent[ing] the views and interests of small businesses before other Federal agencies whose policies and activities may affect small business." 15 U.S.C. § 634c. Advocacy also has key responsibilities and authorities under the Regulatory Flexibility Act (RFA), 5 U.S.C. §§ 601 et seq., and under Executive Order 13272 which helps implement the RFA. The RFA requires Advocacy to assist regulatory agencies during all stages of the rulemaking process to mitigate the potential adverse impact of the rules on small entities while achieving their regulatory objectives, and the Executive Order requires agencies to notify Advocacy of any proposed rules expected to have a significant economic impact on a substantial number of small entities and to consider any comments Advocacy submits on the rule. The RFA and Executive Order both require agencies to respond to Advocacy comments in their final rules and note any resulting changes. Advocacy plays a similar role with respect to certain designated agencies as a member of what are known as "SBREFA panels." The Small Business Regulatory Enforcement Fairness Act of 1996 (SBREFA)[5] amended the RFA to require the Environmental Protection Agency, the Occupational Safety and Health Administration, and the Consumer Financial Protection Bureau to convene panels with officials from Advocacy, the Office of Management and Budget, and the rule-writing agency whenever the agencies develop rules for which an initial regulatory flexibility analysis is required. The panels must develop information solicited from small entity representatives and other sources concerning the potential impacts of the agency proposal; consider alternatives that minimize burdens on small entities; and prepare a report with recommendations to the agency head for consideration in the proposed rule. 5 U.S.C. § 609(b)-(e).

One of the ways that Advocacy fulfills these statutory responsibilities is by convening roundtable meetings for representatives of small businesses and government agencies. Advocacy invites roundtable participants, typically by email, but it is Advocacy's policy to welcome participation by

[5]Pub. L. No.104-121, title II.

any interested party other than the press.[6] According to Advocacy, it hosted 32 roundtables in Fiscal Year 2012 and 21 roundtables in Fiscal Year 2013.[7] The roundtables typically focus on specific proposed agency regulations and stakeholders provide information about the potential economic impacts of the proposal and identify less burdensome alternatives. Advocacy often uses the results of these roundtables (and other information) as the basis of formal comment letters it submits to the proposing agency, for example disagreeing with the agency's impact analysis and urging less burdensome alternatives; it submitted 26 such letters in FY 2013[8] to which agencies must, by statute, respond. 5 U.S.C. § 604(a)(3). In Advocacy's view, the concerns articulated by small business representatives at roundtables are influential; for example, according to Advocacy, after a roundtable regarding the Employee Benefits Security Administration's guidance on brokerage windows, the Administration issued revised guidance addressing the small business concerns. See Report on the Regulatory Flexibility Act, FY 2012, above, at 7. And after attending an Advocacy roundtable that addressed proposed revisions to Occupational Safety and Health Administration ("OSHA") noise standards, OSHA withdrew the rule and pledged to conduct additional stakeholder outreach before proceeding. See Report on the Regulatory Flexibility Act, FY 2011 at 4.

Applicability of the Federal Advisory Committee Act

FACA establishes requirements for "advisory committees" to the federal government, defined as relevant here as "any committee, . . . panel, task force, or other similar group . . . which is established or utilized by one or more agencies, in the interest of obtaining advice or recommendations for . . . one or more agencies or officers of the Federal Government . . .." 5 U.S.C. App. II, § 3(2). Congress enacted FACA in 1972 "to enhance the public accountability of advisory committees and to reduce wasteful expenditures" that "result only in worthless committee meetings and

[6]Advocacy roundtable invitations and agendas state in part: "Roundtable meetings are open to all interested persons, with the exception of the press, in order to facilitate an open and frank discussion about small business-related issues. Agendas and presentations are available to all, including the press. Anyone who would like to receive roundtables agendas or presentations, or be included in the regular distribution, should forward such requests to [Advocacy]."

[7]SBA Office of Advocacy, *Report on the Regulatory Flexibility Act, FY 2012* at 4; *Report on the Regulatory Flexibility Act, FY 2013,* at i.

[8]*Report on the Regulatory Flexibility Act, FY 2013, supra, at i.*

biased proposals". Pub. Citizen v. U.S, Dep't of Justice, 491 U.S. 440, 459 (1989). Similarly, FACA's purpose was to "ensure that new advisory committees be established only when essential [;] . . . that their creation, operation, and duration be subject to uniform standards and procedures; that . . . the public remain apprised of their existence, activities, and cost; and that their work be exclusively advisory in nature." Id. at 446.

For advisory committees covered by the act, FACA requires, among other things, that their meetings be open to the public; that timely notice of meetings be published in the Federal Register; that interested parties be allowed to attend, appear before, or file statements with the advisory committee; and that detailed minutes of advisory committee meetings be kept. In addition, for advisory committees established by agency heads, the agency must, as applicable, ensure that committee membership is fairly balanced in terms of points of view represented and functions to be performed and ensure that the recommendations of the committee are not inappropriately influenced by the agency or any special interest but rather reflect the committee's independent judgment. 5 U.S.C. App. II, § 10. Because Advocacy does not apply these FACA requirements to its roundtables, we examined whether the statute applies to these groups and their activities.

1. Is Advocacy a FACA "Agency"?

As noted above, whether Advocacy roundtables are advisory committees subject to FACA depends in part on whether they have been "established or utilized by one or more agencies . . .." (emphasis added). Thus as a threshold issue, we examine whether Advocacy is an "agency" for purposes of FACA.

FACA defines "agency" by incorporating the term's general definition in the Administrative Procedure Act (APA). 5 U.S.C. App. II, § 3(3). With exclusions not relevant here, the APA defines "agency" as "each authority of the Government of the United States, whether or not it is within or subject to review by another agency . . .." 5 U.S.C. § 551(1).

Advocacy believes it is an "agency" for purposes of FACA. Citing the foregoing APA definition, Advocacy states that it is an "authority of the Government of the United States" and not covered by any of the exclusions. Advocacy Letter to GAO at 2.

Yet as the courts have recognized, "the law on the simple question of what is an [APA] agency is quite complex." Lee Constr. Co. v. Federal

Reserve Bank, 558 F. Supp. 165, 172 (D. Md. 1982). Likewise, the courts have acknowledged that "[a]ny general definition [of "agency" under the APA] can be of only limited utility . . . [when] confronted with one of the myriad organizational arrangements for getting the business of the government done. . . .The unavoidable fact is that each new arrangement must be examined anew and in its own context." Washington Research Project, Inc. v. HEW, 504 F.2d 238, 245-46 (D.C. Cir.1974), cert. denied, 421 U.S. 963 (1975)(citations omitted).

Courts have taken somewhat different approaches to what constitutes an "agency" under the APA. The seminal case is Soucie v. David, 448 F.2d 1067 (D.C. Cir. 1971), which involved what was then called the Executive Office of the President's Office of Science and Technology (OST). The lawsuit sought the release of an OST document under the Freedom of Information Act (FOIA). Because the FOIA and APA definitions of "agency" were identical at the time of the lawsuit, the court looked to interpretations of the APA in determining whether OST was an "agency" under FOIA. The court found that while the meaning of "agency" under the APA was "not entirely clear," it "apparently confers agency status on any administrative unit with substantial independent authority in the exercise of specific functions." 448 F.2d at 1073 (emphasis added). Because OST evaluated federal science programs previously evaluated by the National Science Foundation, in addition to its non-"independent" responsibilities in advising and assisting the President, the court found OST had "substantial independent authority" and "must be regarded as an agency subject to the APA and [FOIA]." Id. at 1075.

The court in McKinney v. Caldera, 141 F. Supp. 2d 25 (D.D.C. 2001), applied the Soucie test and found that the office of the Judge Advocate General of the Army (JAG) was not an APA "agency" because it lacked "substantial independent authority." Although JAG supervised the Army's military justice system, performed appellate review of court martial trials, and furnished legal services, the court focused on the fact that JAG's duties flowed from the authority of the Secretary of the Army. This rendered JAG insufficiently independent, the court ruled, notwithstanding that the APA contemplates the possibility of an "agency" within an "agency."

Other courts have framed the APA "agency" definition slightly differently, looking to whether an entity can take "final and binding action." This standard is based in part on the Soucie "substantial independent authority" test but also on the APA's legislative history indicating Congress intended covered agencies to have "final and binding" legal

authority. In Dong v. Smithsonian Institution, 125 F.3d 877 (D.C. Cir. 1997), cert. denied, 524 U.S. 922 (1998), for example, the court looked to whether the Smithsonian Institution was:

> "a part of government which is generally independent in the exercise of [its] functions and . . . by law has authority to take final and binding action affecting the rights and obligations of individuals, particularly by the characteristic procedures of rule-making and adjudication."

Id. at 881 (emphasis added). The court found that the Smithsonian was not an APA "agency" under this standard because while it exercised authority, the authority was not sufficiently "substantial." Although the Smithsonian is closely linked with the federal government, receives federal funding, has certain police powers to protect its physical plant, and publishes regulations in the Code of Federal Regulations, the court noted that it does not make binding rules of general application, determine rights and duties through adjudications, issue orders, or perform regulatory functions.[9]

Still other courts determining APA agency status have focused on whether an entity is one of the "centers of gravity" in the exercise of administrative power "where substantial 'powers to act' . . .are vested'" (see, e.g., Lee Constr. Co., above, 558 F. Supp. at 174, holding Federal Reserve Bank of Richmond was APA agency based on substantial delegated decision-making authority from Federal Reserve System Board of Governors), or whether the entity has "authority in law to make decisions" (see, e.g., Washington Research Project, Inc. v. HEW, above, 504 F.2d at 248, holding that the Department of Health, Education, and Welfare (HEW) peer review groups for grant applications were not APA agencies because they only recommended grants to a National Institutes of Health entity, which, in turn, made recommendations to the HEW Secretary).

[9]*Dong* involved whether the Smithsonian was an "agency" under the Privacy Act, which in turn adopts the definition of "agency" under FOIA. See 5 U.S.C. § 552a(a)(1). FOIA incorporated the APA "agency" definition until 1974, at which point Congress broadened the core APA "agency" definition for FOIA purposes, but the portion of the *Dong* court's analysis cited here focuses on whether the Smithsonian was agency under the pre-1974 version of the APA.

Applying these authorities and considering Advocacy's views, we conclude that Advocacy is an "agency" under the APA, and thus under FACA, because it possesses the requisite "substantial independent authority." First, it acts with independence. Although Advocacy is an "agency" within an "agency" (SBA), as noted, it has distinct statutory authorities and responsibilities and a separate statutory charter; a separate line-item budget request; its head can appear in court appeals to speak to the rulemaking agency's compliance with the RFA; and it does not have to obtain clearance of its comments and testimony. Unlike JAG in the McKinney case, above, which the court found was not an "agency" because its duties derived from the Army Secretary, the Chief Counsel's duties are related to but distinct from the SBA Administrator.

Second, Advocacy's authorities and duties under its organic statute, the RFA, and Executive Order 13272 are "substantial." As noted, it is responsible among other things for identifying and advocating the views and concerns of small entities throughout the Executive Branch and for developing proposed changes in the policies and procedures of federal agencies in order to further the interests of small business. Although it does not issue regulations, conduct adjudications, or otherwise take traditional "final and binding action," its views and recommendations must, by law, be accorded considerable weight. Taken as a whole, we believe it has substantial authority under the case law.

2. Are Advocacy's Roundtable Groups FACA "Advisory Committees"?

Having found that Advocacy is a FACA "agency," we examine whether its roundtables are FACA "advisory committees." As noted, FACA defines this term in part as "any committee, . . . panel, task force, or other similar group . . . which is established or utilized by one or more agencies, in the interest of obtaining advice or recommendations for . . . one or more agencies or officers of the Federal Government . . .." 5 U.S.C. App. II, § 3(2). Because of Advocacy's particular statutory responsibilities, notably to identify and communicate concerns of small businesses and entities, Congress clearly contemplated that Advocacy would have a close relationship with small business. Its mission virtually requires consultation with these entities to obtain data, opinions and possible advice, and one way it has chosen to do this is by holding roundtable meetings.

In Advocacy's view, its roundtables are not FACA advisory committees. It believes the roundtables help it achieve its mission;[10] indeed, Advocacy maintains that without the discussions that occur at roundtables, its "ability to fulfill its . . . statutory obligations would be severely curtailed." Advocacy Letter to GAO at 2. Explaining its position that these activities do not trigger FACA, it states:

> "[a] lthough the definition [in] FACA is broad, FACA does not apply to all committees, meetings, or groups. . . . In enacting FACA, Congress was concerned with formally organized advisory committees which the President or an executive department or official directed to make recommendations on identified governmental policy for which specific advice was sought. It was not intended to apply to all amorphous, ad hoc group meetings; only groups having some sort of established structure and defined purpose constitute advisory committees within the act."
>
> Advocacy Letter to GAO at 3 (citations omitted).

We agree with Advocacy that under the case law, not every group that provides information or advice to a federal agency is a FACA "advisory committee." Although no single aspect of a group's creation, structure or activities is controlling, most courts have focused on the formality, structure, and continuity of the group and whether the group is brought together to provide advice or recommendations as group rather than as a collection of individuals. As the Supreme Court explained in Public

[10]According to Advocacy: "Advocacy holds numerous roundtable discussions with small business stakeholders to educate them about ongoing legal and regulatory developments across the federal government and discuss their effect on small entities. Roundtable attendance varies from meeting to meeting, and staff encourages wide public participation by encouraging invitees to forward roundtable invitations to interested parties to attend or to call in if in-person attendance is not practicable. On many occasions, officials from federal agencies and Congress attend Advocacy roundtables to provide information regarding agency activities and approaches and to pose questions to small entities and their representatives directly. Roundtables on specific topics also provide a platform for small businesses to provide their views on specific practices, policies and regulations promulgated by various government agencies. Roundtables also serve to inform Advocacy staff of a wide variety of practical and economic challenges small businesses might be facing as a result of federal policies. Advocacy's roundtables are particularly useful for the office because they allow staff to witness and foster dialogue among various stakeholders, including small businesses, their representatives, policymakers, and public interest groups. These conversations often shed light on what are usually complex questions that deserve thorough consideration, on often very short notice, by Advocacy staff in their own evaluation of the impact of regulations on small entities."

Advocacy Letter to GAO at 1-2.

Citizen, above, Congress did not design FACA to cover every formal or informal consultation between a government agency and a group rendering advice; such a literalistic reading would cover "far more groups and arrangements than Congress could conceivably have intended." 491 U.S. at 464-65.

Several early cases addressed whether an informal or "ad hoc" group such as Advocacy's roundtables was an advisory committee. The court in Food Chemical News v. Davis, 378 F. Supp. 1048 (D.D.C. 1974), considered whether two "informal" meetings of distilled spirits industry representatives, convened by the head of the Bureau of Alcohol, Tobacco and Firearms (BATF) to obtain advice on draft regulatory amendments, were subject to FACA. Noting that the act's purpose was to control the advisory committee process and to open to public scrutiny the manner in which government agencies obtain advice from private individuals, the court held it was "undisputed that [BATF] utilized an ad hoc committee of industry representatives in order to obtain advice. Such a relationship . . . clearly comes within the terms of . . . [FACA]." Id. at 1051.

The following year, the same court considered whether bi-weekly meetings held at the White House and attended by selected groups invited by the President's Assistant for Public Liaison were subject to FACA. In Nader v. Baroody, 396 F.Supp. 1231 (D.D.C. 1975), the court concluded that the groups were not advisory committees, relying on two characteristics of the meetings: the absence of a specific request for advice on a matter of government policy and the lack of formal organization or continuity.

The Second Circuit Court of Appeals considered Food Chemical News and Nader in National Nutritional Foods Association v. Califano, 603 F. 2d 327 (2d Cir. 1979). The Califano court determined that FACA applied to a single meeting between six officials from the Food and Drug Administration and six obesity experts "to assist the FDA in selecting the best course of action 'for regulating the production and promotion of [weight reduction products]. . . .'" Agreeing with the rulings of both previous cases, the court found the facts of Food Chemical News to be closer to the case before it because FDA had called on specific individuals to provide group advice on a particular proposed regulation and relied on the group advice.

The element of "group advice" continued to play a key role in the seminal case of Association of Am. Physicians and Surgeons, Inc. v. Clinton, 997 F. 2d 898 (D.C. Cir. 1993) (AAPS), involving the Clinton Administration's

Health Care Reform Task Force. The D.C. Circuit Court of Appeals held in AAPS that "a group is a FACA advisory committee when it is asked to render advice or recommendations, as a group, and not as a collection of individuals." Id. at 913 (emphasis in original). "[A]n important factor in determining the presence of an advisory committee [is] the formality and structure of the group," the court held, laying out three criteria needed to implicate FACA: "an organized structure, a fixed membership, and a specific purpose." Id. at 914. Characterizing variation in these factors as a continuum, the court explained that at one end of the continuum is a "formal group of a limited number of private citizens who are brought together to give publicized advice as a group"—this group is covered—while at the other end of the continuum is "an unstructured arrangement in which the government seeks advice from what is only a collection of individuals who do not significantly interact with one another." Id. at 915.[11] See also Freedom Watch v. Obama, 807 F. Supp. 2d 28 (D.D.C. 2011) (applying AAPS criteria; finding colorable claim of FACA coverage based on fixed group membership and formation for specific policy purpose); Citizens for Responsibility and Ethics in Washington v. Leavitt, 577 F. Supp. 2d 427, 432 (D.D.C. 2008) (same; finding no FACA coverage where "[t]he groups had no formal organizational structure . . . . Attendees conveyed their own opinions regarding their individual areas of expertise" and "[n]o group report or other collaborative work product was created."). But see Aluminum Co. of America v. National Marine Fisheries Service, 92 F. 3d 902 (6th Cir. 1996) (cautioning against rigid application of AAPS criteria).

Implementing regulations issued by the General Services Administration (GSA), the agency responsible for administering FACA government-wide, rely in part on this case law in defining what constitutes a FACA advisory committee. In issuing its final FACA management rule in 2001, GSA "recognize[d] that the broad definition in the Act of an 'advisory committee' might be interpreted to extend coverage by the Act to any gathering of two or more persons from whom . . . Federal officers or agencies seek advice or recommendations. However, in the cases discussed above, the courts have rejected such a broad reading . . . ." 66 Fed. Reg. 37728, 37730 (July 19, 2001). GSA's regulations therefore exempt from FACA regulation "[a]ny group that meets with Federal

[11]The *AAPS* court remanded the case to determine whether a particular working group of President Clinton's Health Care Reform Task Force was a FACA advisory committee under these criteria.

official(s), including a public meeting, where advice is sought from the attendees on an individual basis and not from the group as a whole. . . ." 41 C.F.R. § 102-3.40(e). GSA regulations further state that development of consensus among meeting participants does not in itself convert the group to a FACA committee, nor does the presence of trade association or other organization representatives affect whether advice is obtained "on an individual basis." 41 C.F.R. Parts 102-3, Subpart A, App. A, Key Points and Principles II, III.

Applying these authorities and considering Advocacy's views, we conclude that Advocacy's roundtables are not FACA advisory committees. First, we recognize that roundtable participants are not random attendees but rather invited representatives of a particular "group"—the small business community—whose concerns and perspective it is Advocacy's very mission to identify and advocate.[12] As noted, however, Advocacy invites anyone (except the press) with an expressed desire to attend and thus there is no structured or fixed membership in a "roundtable group."

Nor is group consensus sought from roundtable participants. Under the standards in AAPS, 603 F.2d at 913, the group's activities are not expected to, and do not appear to, benefit from the interaction among the participants. Rather, as contemplated by the GSA regulations, information is solicited from participants as individuals (including individuals representing trade associations), although a consensus may develop. See 41 C.F.R. Part 102-3, Subpart A, App. A, Key Point II ("The development of consensus among all or some of the attendees at a public or similar forum does not automatically invoke FACA."). As in Leavitt, above, no group report or other collaborative work product is created. And as in American Society of Dermatology v. Shalala, 962 F. Supp. 141 (D.D.C 1996), there is no attempt to create consensus among participants either overall or on any aspects of the issue under consideration. See id. at 148 (among the "main factors leading to the Court's determination that the panels fall into the non-advisory committee end of the [AAPS] continuum [is] . . . the absence of any attempt to achieve consensus.").

[12]As summarized in recent testimony, Advocacy was "created . . . to be a voice for small business within the federal government. . . [and] advances the views, concerns, and interests of small business. . .." Testimony of Dr. Winslow Sargeant, Chief Counsel for Advocacy, U.S. Small Business Administration, before the House Committee on Small Business, Subcommittee on Investigations, Oversight and Regulations (Mar. 14, 2013).

Nor does Advocacy's submission of comment letters based on information obtained at roundtables establish that it convened the roundtable to obtain a group consensus. While Advocacy's position in a comment letter may represent a consensus of views expressed at a roundtable, that consensus appears to be a function of the fact that many of the participants, as small entities, share common concerns.

Finally, according to Advocacy, it only obtains data and information from roundtable participants, not policy advice or recommendations. It is Advocacy itself that develops policy recommendations, it told us, based on information it obtains at roundtables and elsewhere and using its own judgment and expertise. Even if advice and recommendations were offered at roundtables, however (a small business representative recommending a regulatory policy change based on its impact on small business, for example), in our view, this would not outweigh the other factors indicating that the roundtables are not covered advisory committees.[13]

Conclusions

Advocacy is an "agency" under FACA first because it meets the statutory definition of this term in FACA and the Administrative Procedure Act incorporated by reference: it is an "authority of the Government of the United States, whether or not it is within or subject to review by another agency" and not subject to statutory exemption. In addition, Advocacy has the type of "substantial independent authority" and other indicia of "agency" status that courts interpreting the APA definition have required. However, Advocacy's roundtable groups are not FACA "advisory committees" because they do not have an organized or fixed structure; there is no attempt to reach consensus about an agency regulation or policy but instead viewpoints are sought from individual participants; and it is only data and information, according to Advocacy, rather than advice or policy recommendations, that participants provide.

[13]Because we conclude that Advocacy's roundtables are not FACA advisory committees for the reasons discussed here, we did not determine whether the additional FACA element was met of the roundtables being "established or utilized by" Advocacy. 5 U.S.C. App. II, § 3(2).

Appendix IV: GAO Contact and Staff Acknowledgments

GAO Contact	Cindy Brown Barnes (202-512-8678), brownbarnesc@gao.gov.
Staff Acknowledgments	In addition to the contact named above, Kay Kuhlman and Triana McNeil (Assistant Directors), Kristeen McLain (Analyst-in-Charge), Emily Chalmers, William Chatlos, John McGrail, Lauren Nunnally, Roberto Pinero, Jena Sinkfield, Jack Wang, and Carrie Watkins made key contributions to this report.

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February 14, 2024

The Honorable Roger Williams
Chairman
Committee on Small Business
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Nydia Velazquez
Ranking Member
Committee on Small Business
U.S. House of Representatives
Washington, D.C. 20515

Re: Statement for the Record Before the United States House of Representatives Committee on Small Business, "Burdensome Regulations: Examining the Impact of EPA Regulations on Main Street"

Dear Chairman Williams and Ranking Member Velazquez:

JCN applauds Chairman Williams for holding this important hearing exploring the unique and detrimental impact that regulations – particularly environmental regulations -- have on small businesses across America.

My name is Alfredo Ortiz and I serve as Chief Executive Officer of the Job Creators Network.

JCN is a nonpartisan organization founded by entrepreneurs who believe that many government policies are getting in the way of the economic freedom that helped make this country prosperous.

JCN provides business leaders and entrepreneurs with the tools to become the voice of free enterprise in the media, in Congress, in state capitals, in their communities, and their workplaces – allowing them to hold politicians accountable to job creators and their employees.

According to the U.S. Small Business Administration's Office of Advocacy small businesses employ almost half – 46.4 percent – of America's private sector employees.[1] Truly America's job creators, small businesses accounted for 62.7 percent of net new jobs from 1995 to 2021.[2] According to the JCN Small Business IQ poll, an index tracking overall small business optimism, 89 percent of all small business owners have fewer than 20 employees.[3] For these businesses, which are the lifeblood of our nation's economy, federal regulation is an anchor that impedes their ability to grow their business and create jobs.

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[1] U.S. Small Business Administration, Office of Advocacy, "What's New With Small Business?" (March 2023).
[2] Id.
[3] John McLaughlin and Scott Rasmussen, "December 2023 Job Creators Network Foundation Small Business Monthly Poll," at 6.

From the day President Biden took office through February 9 federal agencies have issued 774 final rules at a cost of $451.7 billion, and 286.7 million paperwork hours.[4] These numbers are mind-numbing and hard for the average person to process. But for America's small businesses, the costs of complying with federal regulations are felt daily in their businesses.

According to a recent study, businesses with fewer than 50 employees pay $14,700 per employee to comply with federal regulations as compared to $12,200 per employee for businesses with 100 or more employees.[5] When it comes to environmental regulation, the difference in regulatory compliance costs is significantly greater between small and large companies, with businesses employing less than 50 employees paying $6,000 per employee while businesses with 100 or more employees pay $1,800 per employee.[6]

Congress recognized the disproportionate impact of regulations on small businesses by enacting the Regulatory Flexibility Act of 1980 and then passing the Small Business Regulatory Enforcement and Fairness Act of 1996, which amended the RFA to close certain loopholes and ensure that federal agencies properly consider the costs and impacts of a proposed regulation on small business before finalizing it.

As this Committee has demonstrated through its work, time and again, federal agencies have failed to comply with the letter and spirit of the RFA to the detriment of millions of small business owners across the country.

For this reason, JCN supports H.R. 7198, the Prove It Act, bipartisan legislation recently introduced by Representatives Brad Finstad, Yadira Caraveo, and Nathaniel Moran that would rein in executive overreach by bolstering existing law that federal agencies have been side-stepping at the expense of small businesses.

Specifically, their bill would force federal regulators to follow the letter and spirit of the RFA and consider the costs new government red tape would have on Main Street businesses. It would ensure small businesses and organizations representing their interests have a seat at the table when government regulators are weighing whether a proposed rule would have a negative impact on entrepreneurs. And it would empower small businesses and their defenders to challenge certifications by federal agencies that claim a proposed rule would not significantly impact a substantial number of small businesses.

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[4]Dan Goldbeck, Week in Regulation, Regulatory Costs Spike Back Up American Action Forum, Feb. 12, 2024 https://www.americanactionforum.org/week-in-regulation/regulatory-costs-spike-back-up/ (website last visited February 13, 2024).

[5] Nicole V. Crain and W. Mark Crain, "The Cost of Federal Regulation to the U.S. Economy, Manufacturing, and Small Business," A Study Conducted for the National Association of Manufacturers, at 4, October 2023.

[6] Id.

Small businesses would subsequently be exempt from any rule in which an agency fails to meaningfully participate in the petition and review process.

The Prove It Act would fulfill a key pillar of Job Creators Network's American Small Business Prosperity Plan, an eight-point policy playbook to jumpstart the small business economy.

Small business regulatory protections are in dire need of restoration. Enactment of The Prove It Act would be a step in the right direction and we urge the Committee to consider and pass this important legislation.

Sincerely,

Alfredo Ortiz
Chief Executive Officer
Job Creators Network

Regulations, Small Business and Environmental Justice
House Committee on Small Business, written testimony

Lemir Teron, PhD
Associate Professor
Howard University
Department of Earth, Environment & Equity

There should be little doubt that small businesses thrive when environmental regulations are conceived and developed in an atmosphere of transparency and in which proper safeguards and enforcement means are enacted. Strong regulations enable small firms to operate on a more even playing field with large business that can often chalk up lax environmental regulations and the "right to pollute" as a standard process within the business cycle. With smart regulation, not only are ecologies strengthened, but so are conditions for labor, local economies and the overall health of communities.

There are a cadre of Federal resources devoted to aid small firms' compliance with state and Federal environmental statutes, including the Office of Small and Disadvantaged Business Utilization, Compliance Assessment Centers and a host of other Federal and state level resources. This is further undergirded by the legal framework designed to aid small businesses and help them shape the regulatory making processes enacted under the Small Business Regulatory Enforcement Fairness Act and the Regulatory Flexibility Act, respectively. When regulatory policies are accessible, and supporting bodies and resources are adequately funded, the regulatory climate consequently benefits everyone.

Environmental regulations make the marketplace safter for us all; not only do they increase confidence that products are safe for users, but also help ensure that products and services are manufactured, developed and delivered in a manner that's beneficial for workers and that the communities in which they are processed and consumed in are protected. Strong standards also help in the competitive space amongst firms, as businesses -- small and large alike -- can act with increased security knowing they are insulated from competitors who'd seek to reduce cost through dangerous methods, engage in excessive polluting or cutting corners which may expose workers to unsafe conditions

Strong regulations are crucial in protecting marginalized communities from being further harmed by industrial pollution. That the consequences of environmental pollution have acted within the context of the long and brutal legacy of environmental racism and inequality is well documented. The uneven vulnerability to air pollution and acts of "super" polluters -- those industrial polluters responsible for a lion's share of air pollution -- exemplifies this. It should be no surprise, to anyone, on the committee or otherwise, as to whose neighborhoods carry the burden for these discharges: disproportionately African American and low income communities. Recent research has revealed that the environmental and public health consequence of large polluting facilities exposes frontline communities, which are disproportionately composed of African American and other groups that have historically been socially, politically and economically marginalized, to dangerous levels of pollution that undermine their life quality and public health on a daily basis. Additionally, these communities carry steep energy burdens (the percent of take home pay that goes towards heating and cooling needs). Not only do labor from these communities often bear the brunt of dangerous work, in a bonanza of insufficient environmental protections, these communities become clustered with suites of polluting facilities that expose the young and old, impoverished and well off, to life harming substances. Though cliché, it's disingenuous and inaccurate to advance tropes regarding regulations being designed to target or disrupt small firms. Of the 20,000+ industrial facilities that have EPA reporting responsibilities, a third of both toxic releases and GHG emissions originate from only about 100 firms, and the list is dominated by large firms which are amongst the most powerful corporations in the world, not the small businesses that anti-regulation advocates feign.

Strong and clear environmental regulations center healthy environments, human livelihoods and dignity and advance the interests of the nation's economic engine: labor. Notwithstanding claims espousing otherwise, the threat to US workers and small businesses aren't imposed by environmental regulations, but the absence of them -- which undermines both public and environmental health. Anti-regulatory activity compromises worker safety, and has historically been driven by the interests of large firms. In a democratic, just and moral society, our regulatory environment shouldn't subsidize harmful actions of the large and powerful under the illusory cloak of protecting small business.

What happens in the absence of regulations? And who benefits from operating in an anti-regulatory climate? It's certainly not those environmental justice communities, cited on the frontlines of polluting industries. Nor is it workers, whose safety gets compromised when the absence of strong regulation and safety measures makes them expendable. Mostly benefiting from an anti-regulatory and safety environment, are large firms and their related interests, the control and management of which are often based and far removed from the local communities that are most directly impacted from industrial pollution which regulations are designed to protect against.

While history is filled with those that proclaim the disastrous impacts of industry harming and job 'killing' regulation, the historical record doesn't bear this out. Prominent examples abound. Notwithstanding those that crusaded against car safety measures, automobile safety efforts save innumerable lives annually, and have spurred innovations which ultimately help the auto industry and small firms through indirect and induced job growth. More recently, dissenting voices have railed against energy sector regulation which decreases pollution levels and clean air in power plants: not only do local airsheds in fenceline communities improve with regulation, lessening incidents of cancer and respiratory illness, but controls also help stave off climate change Furthermore, energy efficiency and the transition to renewable energy technologies all increase opportunities for energy independence, economic development and local autonomy. Why is it that many of those who seemingly espouse those ideals, under the guise of anti-regulation, often fight against the clearest pathways towards them? The irony abounds.

It's critical, for the sake of workers, vulnerable communities and small businesses to resist those voices that dangerously oppose any and all calls for environmental regulations which champion the right to pollute using the shield of being small business friendly

There is reason to be, cautiously, hopeful. Environmental regulations, which not only safeguard communities and workers also spur innovation, workforce and economic development. And when operating in concert with targeted efforts to address economic disparities prevalent in marginalized communities, such as the Justice40 initiative, and its commitment of providing substantial environmental and climate programming resources and benefits to 'disadvantaged' communities, can mean massive economic, health and environmental gains for these communities, that ultimately benefit all of society. As the EPA further concentrates its efforts to combat climate change and environmental inequality, the opportunity for an energy transition, that is more locally controlled, just and which advances the interests of small business and local communities is substantial. Recent and projected job growth in the renewable energy sector provides a clear vision as to what this can look like. Groups like Climate Jobs New York , an alliance of over 2 million labor union members whose dual focus is aligned around work that confronts climate change while combating economic inequality offer a template of what a just and equitable renewable energy economy can aspire to.

The US will continue to push forward efforts to combat climate change and a host of related threats ranging from extreme heat and superstorms, vulnerable agriculture and food systems, flood-prone cities and energy system vulnerability. Strong regulations that work in concert with renewable energy transitions, and that

centers labor and communities that have suffered due to long histories of inequality, are vital in moving the nation and planet forward. As regulations protect the lifeblood of small firms, workers, communities, economies and environments, all of us are better for it. As is the nation.

Congress of the United States
Washington, DC 20515

July 17, 2023

The Honorable Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW, Mail Stop 1301A
Washington, DC 20460

Dear Administrator Regan,

We write as Members of Congress who represent—or are otherwise concerned about—communities around the country impacted by dangerous levels of ethylene oxide (EtO) emissions. In 2019, many of us formed the bipartisan U.S. House of Representatives EtO Task Force to advocate for tightening emissions standards for EtO sterilization facilities. In the Senate, we have consistently encouraged the agency to share critical public health information with communities located near EtO facilities, as well as to strengthen public health protections through regulatory action. We all welcome the U.S. Environmental Protection Agency's (EPA) recently proposed Clean Air Act rule strengthening emissions monitoring and control requirements at EtO sterilization facilities, and we appreciate your engagement with the EtO Task Force and other concerned Members as you developed the proposed rule. As many of us have worked on this issue for years and represent impacted communities, we write to provide comments on the proposal.

First, we appreciate EPA implementing many of the EtO Task Force's requests throughout the process of developing the proposed rule. We especially commend EPA for putting public health at the forefront of its considerations by conducting a residual risk review to support the proposal —in line with the May 2021 report by EPA's Office of Inspector General that made the same recommendation. We also appreciate EPA's efforts to engage affected communities as it developed the proposed rule, and we urge EPA to make community engagement a core component of its process as it finalizes and implements the rule. For example, including in the final rule the proposed requirement for sterilizers to obtain a Title V operating permit would ensure that affected communities can comment on compliance.

We recognize that EPA aims to address both fugitive and stack emissions in its proposed rule, both of which have been demonstrated to contribute pollution to our communities. However, we would like to reiterate our position that fugitive emissions cannot be confidently accounted for without a requirement for ambient air monitoring. As we saw in Willowbrook, IL, it was only after ambient air monitoring was conducted that we fully understood the significant role fugitive emissions played in community exposure. Given strong evidence that fence-line monitoring is a proven method for verifying the effectiveness of emission control equipment and detecting fugitive emissions, we encourage you to include requirements for fence-line monitoring in the final rule.

We have also heard concern from our community stakeholders that offsite storage warehouses

are excluded from regulation under the proposed rule. We share the concern that this loophole could create a perverse incentive for industry to use these offsite facilities as secondary aeration rooms for off-gassing EtO-sterilized medical equipment — skirting requirements for health-protective emission controls and monitoring, while failing to provide a clear picture of the extent of EtO being emitted into communities. Warehouse facilities have been a major source of fugitive emissions at EtO sites in Georgia. We must learn from this experience and apply health-protective requirements for all facilities that pose potential exposure to neighboring communities. As such, we ask that you clarify in the final rule whether offsite storage warehouses are covered facilities, and ask that the agency explore all regulatory options for addressing emissions from these facilities.

Communities have been exposed to unmonitored and largely uncontrolled EtO pollution from sterilization facilities for far too long. EPA's proposed rule, which is slated to become final in March 2024, should come as no surprise to industry stakeholders. EPA's proposed 18 month compliance timeline beginning in March 2024 provides more than enough time for sterilizers to purchase and install the equipment needed to monitor and control EtO emissions pursuant to the rule. Given the dangerous risk EtO exposure continues to present to communities, we urge EPA to consider adopting a shorter compliance timeline in the final rule.

Thank you again for proposing a rule tightening emissions standards for EtO sterilization facilities. We believe this rule will make significant progress in making public health the touchstone for EtO sterilization facility regulations and reducing dangerous EtO emissions. We also applaud the EPA's efforts to engage and work with other agencies to fully address the public health implications of EtO emissions. We thank you for considering our comments in our joint effort to reassure communities that the air they breathe is safe. We look forward to working together throughout this process as the rule is finalized and implemented.

Sincerely,

Bradley Scott Schneider
Member of Congress

Richard J. Durbin
United States Senator

Thomas R. Carper
United States Senator

Tammy Duckworth
United States Senator



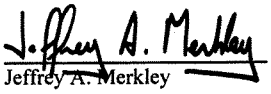
Steve Cohen
Member of Congress



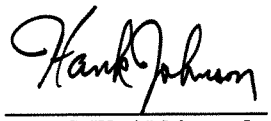
Bernard Sanders
United States Senator



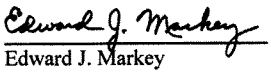
David Scott
Member of Congress



Jeffrey A. Merkley
United States Senator



Henry C. "Hank" Johnson, Jr.
Member of Congress



Edward J. Markey
United States Senator



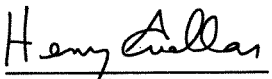
Sean Casten
Member of Congress



Lauren Underwood
Member of Congress



Troy Carter
Member of Congress



Henry Cuellar
Member of Congress

Raphael Warnock
United States Senator

Chris Van Hollen
United States Senator

Cory A. Booker
United States Senator

John P. Sarbanes
Member of Congress

Diana DeGette
Member of Congress

Jan Schakowsky
Member of Congress

Robin L. Kelly
Member of Congress

Nanette Diaz Barragán
Member of Congress

Jason Crow
Member of Congress

Emanuel Cleaver, II
Member of Congress

Joaquin Castro
Member of Congress

Jennifer L. McClellan
Member of Congress

Robert Garcia
Member of Congress

Mike Quigley
Member of Congress

Raja Krishnamoorthi
Member of Congress

Alexandria Ocasio-Cortez
Member of Congress

Nydia M. Velázquez
Member of Congress

Earl Blumenauer
Member of Congress

Jerrold Nadler
Member of Congress

Suzanne Bonamici
Member of Congress

Colin Z. Allred
Member of Congress

Raúl M. Grijalva
Member of Congress

Sheila Jackson Lee
Member of Congress

Summer Lee
Member of Congress

Jasmine Crockett
Member of Congress

Al Green
Member of Congress

Environmental Protection Agency
EPA Docket Center (EPA/DC)
Mail Code 28221T
1200 Pennsylvania Ave. NW
Washington, DC 20460

Subject: Comments for National Emission Standards for Hazardous Air Pollutants (NESHAP): Ethylene Oxide Emissions Standards for Sterilization Facilities Residual Risk and Technology Review

Docket ID No. EPA-HQ-OAR-2019-0178

Submitted: June 27, 2023

Dear EPA Staff,

The undersigned legislative members of the Texas House and Senate are concerned about the communities in our state affected by Ethylene Oxide (EtO) sterilization facilities. We welcome the opportunity to comment on the proposed EPA rule to curb the hazardous emissions these sterilization plants pose to our Texas workers and neighboring families.

We understand the proposed rule is estimated to cut both fugitive and stack emissions of EtO from these plants by as much as 80 percent when the rule is implemented. Though we appreciate this projected goal, we would like the following measures included in the rule to help ensure the end results of this action meet its intended outcome:

1. **Require Fenceline Monitoring:** Fenceline monitoring is a reliable and useful tool to understand the amount of fugitive, controlled and uncontrolled emissions coming from commercial sterilizers. Both the workers within the plants and the communities surrounding the facilities need to be assured that they are protected. Fenceline monitoring is a proven method, as evidenced in other facilities, for verifying the effectiveness of emission control equipment in detecting fugitive emissions.

2. **Inclusion of Off-site Storage Warehouses:** The proposed rule covers EtO emissions from commercial sterilizers and their on-site warehouses and other on-site storage areas. The proposed rule, however, does not cover **off-site** warehouses and/or storage areas. We are concerned that off-site warehouses, not included in the rule, could be used as a secondary aeration area for off-gassing sterilized equipment, skirting the health-protective emission controls and monitoring that is to be required at the primary facilities. High levels of fugitive emissions have been discovered in off-site warehouses in other parts of the country. Many, if not all, off-site warehouses are not regulated by the Clean Air Act and do not contain the emissions controls systems necessary to capture residual EtO that is off-gassed from newly sterilized equipment. Evidence suggests that off-site storage warehouses can generate significant hazardous EtO emissions. For example, in 2019, the Georgia Environment Protection Division issued a notice of violation to Beckon, Dickinson and Company, a medical sterilization company, for operating an off-site warehouse in Covington without an air quality permit.[1] Therefore, we request that off-site storage facilities be included in the rule.

[1] Statement from Georgia EPD Regarding BD Notice of Violation. (2019, December 20). Environmental Protection Division. https://epd.georgia.gov/press-releases/2019-12-20/statement-georgia-epd-regarding-bd-notice-violation

3. **Shorten the Implementation and Compliance Timeline:** Communities have long awaited the development of this new EtO rule, having faced decades of hazardous and carcinogenic pollution from these facilities. The EPA has proposed an 18-month timeline for the installation of pollution controls once the final rule is issued. Every month these controls are not installed poses an increased risk to plant workers and surrounding communities. We would like to propose an expedited timeline of no more than 6 months for implementation to protect the public's health and safety.

4. **EPA must continue to require that all EtO commercial sterilizers be covered in the final rule:** We are grateful that EPA requires both major and area source commercial sterilizers to comply with the requirements of the proposed rule. It is especially important for states like Texas, since the Texas Commission on Environmental Quality's (TCEQ) cancer risk estimate for EtO is far below EPA's. We urge EPA to keep this requirement in the final rule in order to protect the health and safety of communities like ours.

Finally, since many of these facilities are located in underserved communities of color where English is not spoken as a first language, we would request that multilingual information on the facilities and surrounding risks to neighboring communities be made available.

We thank the EPA for considering our comments on this important rule to tighten the emissions standards for EtO sterilization facilities. We look forward to seeing the finalization of this rule and its implementation to protect the families and communities of Texas.

Sincerely,

Texas State Senators:

Senator Carol Alvarado, District 6

Senator José Menéndez, District 26

Senator Sarah Eckhardt, District 14

Senator Judith Zaffirini, District 21

Senator Roland Gutierrez, District 19

Senator Nathan Johnson, District 16

Texas State Representatives:



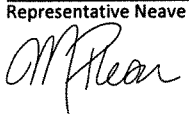
Representative Salman Bhojani, District 92



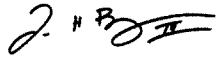
Representative Neave Criado, District 107



Representative John Bryant, District 114



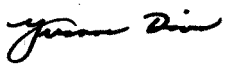
Representative Mihaela Plesa, District 70



Representative John Bucy III, District 136



Representative Ana-Maria Ramos, District 102



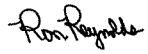
Representative Yvonne Davis, District 111



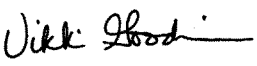
Representative Richard Raymond, District 42



Representative Jessica González, District 104



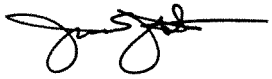
Representative Ron Reynolds, District 27



Representative Vikki Goodwin, District 47



Representative Toni Rose, District 110



Representative Julie Johnson, District 115



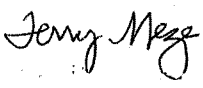
Representative Chris Turner, District 101



Representative Venton Jones, District 100



Representative Gene Wu, District 137

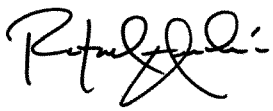


Representative Terry Meza, District 105

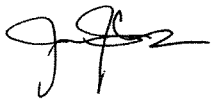


Representative Erin Zwiener, District 45

Additional Texas State Representatives:



Representative Rafael Anchia, District 103



Representative Jarvis Johnson, District 139



February 14, 2024

The Honorable Roger Williams
Chairman
Committee on Small Business
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Nydia Velazquez
Ranking Member
Committee Small Business
U.S. House of Representatives
Washington, D.C. 20515

Dear Chairman Williams and Ranking Member Velazquez:

On behalf of the National Mining Association (NMA), the American Exploration and Mining Association (AEMA), and the Essential Minerals Association (EMA), we commend your leadership in examining the impact of the U.S. Environmental Protection Agency's (EPA) burdensome regulations on small businesses and the communities they support.

Our associations represent small and large businesses across the entire U.S. mining industry – from exploration and active mining to mine closure and reclamation. Our combined approximately 2,500 members explore for and mine the raw materials needed for *nearly every* industry and consumer product. The coal, metals, and nonmetal minerals our members produce form the building blocks of our nation's agriculture, energy, infrastructure, manufacturing, defense, high-tech, and medical supply chains. The mining industry also plays a critical role in supporting this Administration's ambitious national priorities[1] and investing in local communities.

As you examine the impact of EPA's burdensome regulations on small businesses in today's hearing, we urge your consideration of the following:

1.) **Recognize the importance of small mining companies and the businesses they support in the communities in which they operate.**

The mining industry supports nearly 500,000 direct jobs and more than 800,000 indirect jobs nationwide.[2] The financial contributions of the mining industry are also significant. According to a recent U.S. Geological Survey report, domestically mined mineral raw materials contribute

[1] The White House, Fact Sheet: Securing a Made in America Supply Chain for Critical Minerals (Feb. 22, 2022), *available at* https://www.whitehouse.gov/briefing-room/statements-releases/2022/02/22/fact-sheet-securing-a-made-in-america-supply-chain-for-critical-minerals/ (last visited Jan. 31, 2024). ("Critical minerals provide the building blocks for many modern technologies and are essential to our national security and economic prosperity.")

[2] National Mining Association, 2023 Mining Facts, at 4, *available at* https://nma.org/wp-content/uploads/2022/04/FINAL-NMA-Mining-Facts-2023.pdf (last visited Feb. 14, 2024).

$105 billion to the U.S. economy. Additionally, the value added to the U.S. gross domestic product by major industries that consume processed mineral materials is $3,840 billion.[3]

Because many mine projects are located in rural, economically disadvantaged areas with limited job opportunities and public services, a mining operation can become a community's, and even a region's, best and often only opportunity to improve the quality of life for everyone. Many mining companies make substantial financial investments in their local communities to build or improve schools, upgrade roads, utility, and internet services, subsidize medical services, offer vocational training to prospective employees, and provide scholarships and other educational opportunities for their workforces. These investments represent positive contributions to the communities in which they operate, in addition to the state and local taxes the mines pay, which create positive returns not only for the company but for the entire region.

Many of our members are also classified as small businesses. These small mining companies create jobs and economic opportunity in communities that often need these investments most. Unfortunately, EPA's crushing regulatory agenda has made it more difficult and expensive for these small businesses to operate. This has created a ripple effect, harming not just our small business miners, but also the small indirect industries that rely on the mining industry.

2.) Champion clear, predictable, and reasonable regulations.

The U.S. mining industry is one of the most regulated industries on the planet. Comprehensive environmental and health and safety regulations, at the federal, state, and local levels, govern nearly every inch of a mining operation. We strongly support reasonable regulations that protect the environment and health and safety while also ensuring tat domestic natural resource development is viable and globally competitive. Clear, predictable, and reasonable regulations provide certainty and clarity that are crucial for mining operations. This is especially important considering the significant time, investment, and effort required to successfully permit and construct a mining or processing operation. All of this requires a vast investment that miners must pay over a period of years or even decades before seeing any revenue in return once operations begin. Mining entities must have long term clarity and certainty that regulations will not make their operation impossible or nonviable before making those investments to produce vital mineral resources domestically.

3.) Provide oversight of EPA's required economic impact analysis on small businesses and compliance with the Regulatory Flexibility Act (RFA), the Small Business Regulatory Enforcement Fairness Act (SBREFA), and the Administrative Procedure Act (APA).

Finally, we urge the Committee to exercise its oversight authority to ensure EPA conducts required economic impact analyses and complies with the statutes requiring the consideration of impacts on small businesses. Under this administration, EPA has either glossed over or ignored altogether the economic impact analysis on small businesses and the subsequent notice and comment process that is required under the RFA, SBREFA, and the APA. Quite often in a proposed rule, the agency will include a cursory acknowledgement that the rule will not have a substantial impact on a significant number of small businesses but fail to undertake a serious, thorough review of the impact on small businesses.

One such example was the June 28, 2021, proposed rule on reporting and recordkeeping requirements for per-and polyfluoroalkyl substances (PFAS) under the Toxic Substances

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[3] U.S. Department of the Interior, U.S. Geological Survey, Mineral Commodity Summaries 2024 at 4, *available at* https://pubs.usgs.gov/periodicals/mcs2024/mcs2024.pdf (last visited Feb. 14, 2024).

Control Act (TSCA). When EPA initially certified that the proposed rule would not have a significant impact on a substantial number of small businesses, the Small Business Administration's Office of Advocacy (SBA-OA) called EPA to task. As a result of evidence provided by (SBA-OA), EPA was forced to amend the estimated costs from the proposed rule from $10.8 million to $875 million.[4] SBA contends that even the updated figures were still inadequate, and EPA should have started over by re-proposing the rule.

Following this episode, EPA has taken more steps to adhere to SBREFA, but these efforts could only be described as symbolic. SBA-OA has repeatedly criticized EPA for underestimating the impact of proposed rules, cutting corners or disregarding feedback from small businesses. To note one example among many: In the August 9, 2023, EPA proposed rule "Revisions to Air Emissions Reporting Requirements," SBA's Office of Advocacy again called out EPA for cutting procedural corners that will ultimately cost small businesses dearly. While the agency did seek greater input from small businesses on the impact of greater emissions reporting, the agency subsequently ignored this input, resulting in a proposed rule that does not provide small businesses with the necessary tools to comply. Penalties for noncompliance under the Clean Air Act can be severe. As a result, small businesses are left to figure out for themselves whether they must comply with the rule, how to do so, and then shoulder the increased costs.[5]

We encourage the Committee to exercise its oversight duties and make sure the RFA, SBREFA and the APA are being faithfully observed. Sadly, EPA is not alone among agencies giving short shrift to these laws. The federal government should not overlook the impact on small businesses to push new rules out the door as quickly as possible.

We appreciate the Committee's support of the small businesses that will create jobs, strengthen our communities, and provide the energy and materials that are the foundation of our economy. We look forward to continuing to work with you.

Sincerely,

National Mining Association
American Exploration and Mining Association
Essential Minerals Association

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[4] Comments of the U.S. Small Business Administration Office of Advocacy, TSCA Section 8(a)(7) Reporting and Recordkeeping Requirements for Perfluoroalkyl and Polyfluoroalkyl Substances; Notice of Data Availability and Request for Comment; Docket ID No. EPA-HQ-OPPT-2020-0549; at 3, *available at* https://advocacy.sba.gov/wp-content/uploads/2022/12/Comment-Letter-TSCA-PFAS-Recordkeeping-and-Reporting-IRFA-12.19.22-508c.pdf (last visited Feb. 14, 2024).

[5] Comments of the U.S. Small Business Administration Office of Advocacy, Revisions to the Air Emissions Reporting Requirements, 88 Fed. Reg. 54,118 (August 9, 2023), Docket ID. EPA-HQ-OAR-2004-0489, at 4, *available at* https://advocacy.sba.gov/wp-content/uploads/2023/11/Comment-Letter-Revisions-to-the-AERR-508.pdf (last visited Feb. 14, 2024). ("The requirement that small entities comply regardless of the availability of the necessary emissions estimation tools is extremely problematic...Unless EPA provides greater accommodations to small entities in the absence of the promised tools, the impacts on small entities would be severe.")

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Natural Gas Vehicles for America

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Hon. Roger Williams
Chairman
House Committee on Small Business
Rayburn House Office Building

Hon. Nydia Velázquez
Ranking Member
House Committee on Small Business
Rayburn House Office Building

Chairman Williams and Ranking Member Velásquez,

NGVAmerica respectfully submits this statement for the record in response to the Committee's February 15, 2024 hearing titled *"Burdensome Regulations: Examining the Impact of EPA Regulations on Main Street."* Our interest in this hearing concerns the U.S. EPA proposed Phase 3 Heavy Duty Greenhouse Gas Regulations.[1] We appreciate the Committee's interest in reviewing the impact that these and other regulations will have on small businesses.

NGVAmerica submitted extensive comments on EPA's Phase 3 notice. Our comments addressed ways in which the EPA can amend its proposal and regulations to account for the benefits of natural gas trucks that operate on renewable natural gas, a low-carbon and sometimes carbon-negative transportation fuel. The majority of motor fuel used by natural gas vehicles is renewable natural gas and this fuel if given credit under EPA's vehicle regulations would provide a lower-cost and better performing solution for many businesses operating trucks to transport goods. If this solution were incorporated into EPA's rules it would lower the cost of compliance and enable fleets that already have invested in natural vehicles and fueling to continue to benefit from those investments. It also would benefit small businesses that purchase used vehicles on the secondary market, because natural gas vehicles provide a 1:1 substitution for diesel vehicles and benefit from a widely available, truck-friendly fueling network.

As currently written, the EPA's regulations do not account for upstream emissions, not from batteries, vehicle production, fuel production or vehicle production. The EPA previously indicated that it intended to require an assessment of upstream emissions associated with electric vehicles as part of its vehicle regulations but has more recently indicated that it does not plan to pursue such treatment. While we have no position on the necessity of accounting for upstream emissions from batteries or electric vehicles, we do take issue with not providing credits for lower-carbon fuels. The reality is that not providing credits for the emission benefits of lower carbon fuels is the same as penalizing the vehicles that operate on lower-carbon fuels because these vehicles will have to

[1] Docket ID No. EPA-HQ-OAR- 2022-0985, Greenhouse Gas Emissions Standards for Heavy Duty Vehicles—Phase 3; 88 FR 25926 (April 27, 2023).

acquire offsets or emission credits from other vehicles to satisfy future, more demanding tailpipe standards.

Eventually the only way a manufacture would be able to continue to offer natural gas vehicles or other internal combustion engines is to acquire emission offsets from electric or fuel cell vehicles, since the regulations ignore the emission benefits of operating vehicles on lower carbon fuels. While it may be feasible to purchase emission credits this will increase costs and require that natural gas subsidize the cost of other more costly technologies such as battery electric vehicles and fuel cell trucks.

The issues described here are explained in greater detail in our comments where we ask EPA to expressly provide a carbon correction factor for renewable natural vehicles. This carbon correction factor would adjust the regulated emissions based on the average carbon intensity of fuel consumed while also factoring for the amount of lower carbon fueled consumed relative to conventional natural gas consumed.

We welcome the opportunity to discuss this matter more with the committee. A copy of our comments is available in the EPA docket here: https://www.regulations.gov/comment/EPA-HQ-OAR-2022-0985-1522.

Sincerely,



Matthew Brownlee
Director, Federal Government Affairs

U.S. Chamber of Commerce

1615 H Street, NW
Washington, DC 20062-2000
uschamber.com

February 14, 2024

The Honorable Roger Williams
Chairman
Committee on Small Business
U.S. House of Representatives
Washington, DC 20515

The Honorable Nydia Velazquez
Ranking Member
Committee on Small Business
U.S. House of Representatives
Washington, DC 20515

Re: Statement for the Record for the Hearing, "Burdensome Regulations: Examining the Impact of EPA Regulations on Main Street"

Dear Chairman Williams and Ranking Member Velazquez:

Thank you for holding the hearing today on how burdensome regulations impact Main Street. My name is Natalie Kaddas and I am the CEO of Kaddas Enterprises in Salt Lake City, Utah. I also serve as the Chair of the Small Business Council at the U.S. Chamber of Commerce. Currently, 96% of Chamber member companies have fewer than 100 employees and 75% have fewer than 10. The Small Business Council works to ensure the views of small businesses are integrated into the Chamber's policy-making process.

My manufacturing company in Salt Lake City specializes in manufacturing thermoform plastic products for the energy, transportation and aerospace industries. Our largest source of revenue is our patented designs of BirdguarD™ products, designed to protect birds and other animals from electrocution. Our products also aid greatly in energy resilience by preventing wildlife-caused power outages.

There are roughly 33.1 million small businesses in the U.S. that comprise over 99% of all U.S. businesses, represent 43.5% of America's GDP, and account for 62% of net job creation since 1995. The power of innovation and entrepreneurship has spurred remarkable growth since the COVID-19 pandemic in the face of high inflation, worker shortages, and high interest rates. Unfortunately, the crushing burden of federal regulation threatens this small business growth.

The most recent estimate pegs compliance with federal regulations at more than $3 trillion per year. According to the National Association of Manufacturers ("NAM"), that cost exceeds the entire annual economic output of the manufacturing sector. That NAM study estimates a burden of $28,000 per employee per year for manufacturers of our size, which is more than double of all other companies, of similar size, in other industries.

Forty-four years ago, the Regulatory Flexibility Act ("RFA") was enacted seeking to correct the disproportionate burden by encouraging federal agencies to transparently consider the impact of new regulations on small businesses and to minimize negative impacts without compromising the underlying regulatory objectives. When President Carter signed the RFA into law, he stated that "small businesses are vital to the growth and to the future of our country" and that regulations "can impose a disproportionate and unfair burden on small businesses."

Even though the Office of Advocacy at the U.S. Small Business Administration ("SBA"), the independent office responsible for overseeing regulators' compliance with the RFA, is trying to convince federal regulators to comply with the RFA, the Office's efforts at times seem futile. The National Federation of Independent Business ("NFIB") reviewed comment letters from the Office of Advocacy from January 1, 2021 – January 1, 2023, and found 28 instances where the Office of Advocacy cited agencies for lack of RFA compliance. Those public letters unveiled loopholes in the law that regulators use as excuses to bypass and misrepresent the costs of regulatory proposals because (a) there is no way to go to court to challenge even the most absurd "certifications" that a proposal will not harm small businesses and (b) agencies only publish what they characterize as the direct impact on regulated firms, disguising the actual harm to small businesses.

One of the most egregious failures to consider small business and issue inadequate "certifications" required by the RFA has arisen in the series of Waters of the United States ("WOTUS") rulemakings promulgated by the U.S. Environmental Protection Agency ("EPA") and the U.S. Army Corps of Engineers ("Corps"). Rather than seek appropriate input from small businesses on how to manage wetlands permitting in a way that would be both environmentally protective and sensitive to impacts on small businesses, EPA and the Corps "certified" under the RFA in 2014 – that their proposed WOTUS rule would not have a "significant economic impact on a substantial number of small entities." Now, ten years later, after the U.S. Supreme Court has sharply rejected the agencies' claims of authority to impose wetlands permitting requirements, the agencies have yet to formally consider small business views, as required by the RFA, on how wetlands can be defined without unduly burdening small businesses.

Agency exploitation of interpretations of the RFA loophole that limit it to requiring consideration of small business impacts for directly regulated businesses is apparent in the ongoing Basel III Endgame rulemaking. Bank regulators published their perceived economic impact on large banks but were not transparent about how new mandates will make small business loans more expensive.

Legislation is pending that will close those real or apparent loopholes and allow for meaningful small business input in the federal regulatory process. The urgency for Congress to act was described before this Committee several weeks ago when former CBO Director Douglas Holtz-Eakin explained that costs from regulatory mandates issued under the Biden Administration are 50% greater than under any previous administration.

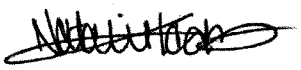
H.R. 7198, the Prove It Act, sponsored by Representative Finstad, Representative Moran, and Representative Caravaro, strengthen the RFA to avoid agency evasions by allowing small businesses to directly challenge an agency's "certification" and by requiring agencies to be fully transparent about how regulations will impact the small business community.

The U.S. Chamber of Commerce, along with 47 national trade and membership organizations representing small business owners, along with over 100 local and state chambers of commerce ask that members of this Committee update the RFA and close real or apparent loopholes that shut-out small business input. Furthermore, we respectfully ask members of this Committee to sign on as co-sponsors to H.R. 7198 and that the Committee take up the legislation.

Minimizing red tape will enable small businesses to do what they do best – drive innovation, bolster communities, and create jobs.

Please do not hesitate to contact Tom Sullivan, the Chamber's Vice President for Small Business Policy, if you have questions or comments regarding the content of this statement for the record.

Sincerely,



Natalie Kaddas
CEO, Kaddas Enterprises, Inc.
Chair, Small Business Council
U.S. Chamber of Commerce

Attachment: February 1, 2024 Letter on Small Business Input in Federal Rulemaking
cc: Members of the House Committee on Small Business

February 1, 2024

The Honorable Roger Williams
Chairman
Committee on Small Business
U.S. House of Representatives
Washington, DC 20515

The Honorable Jim Jordan
Ranking Member
Committee on the Judiciary
U.S. House of Representatives
Washington, DC 20515

The Honorable Nydia Velazquez
Ranking Member
Committee on Small Business
U.S. House of Representatives
Washington, DC 20515

The Honorable Jerrold Nadler
Ranking Member
Committee on the Judiciary
U.S. House of Representatives
Washington, DC 20515

Re: Small Business Input in Federal Rulemaking

Dear Chairmen Williams and Jordan and Ranking Members Velazquez and Nadler:

On behalf of millions of small businesses across the country, we urge legislative action to strengthen the meaningful input of small businesses in federal regulatory processes and ensure the intent of the Regulatory Flexibility Act is fulfilled.

The Regulatory Flexibility Act (RFA) of 1980 was signed into law after a bipartisan coalition of small businesses, community leaders, and elected representatives confronted the danger of imposing burdensome red tape on American small businesses. Upon signing the RFA into law, President Carter stated that "small businesses are vital to the growth and to the future of our country" and that regulations "can impose a disproportionate and unfair burden on small businesses."

The RFA sought to correct this disproportionate burden on small businesses by encouraging federal regulatory agencies to transparently consider the impact of new mandates on small businesses and to minimize negative impacts without compromising the underlying regulatory objectives.

Unfortunately, loopholes in the RFA allow federal regulators to bypass the law's requirements and misrepresent the costs of new mandates on small businesses because (a) transparency requirements only apply to businesses *directly* regulated and (b) judges may not punish agencies for ignoring small business concerns.

Federal agencies have on numerous occasions failed to comply with requirements under the RFA. In 2023, the National Federation of Independent Business (NFIB) reviewed comment letters from the Office of Advocacy at the U.S. Small Business Administration (SBA), the independent office responsible for overseeing compliance with the RFA, from the 117th Congress and found 28 instances where SBA's Office of Advocacy cited agencies for lack of RFA compliance. SBA's Office of Advocacy found agencies often improperly certify that rules will not have a significant economic impact on a substantial number of small entities, only consider

the direct costs on small businesses, or misrepresent the costs on small businesses from regulation.

For example, SBA's Office of Advocacy found the Department of Labor's analysis of the impact of its independent contractor rule "deficient" because it "severely underestimate[d]" the economic impacts of the rule on small business; and "failed to estimate any costs" for small businesses to reclassify independent contractors as employees.

Agency exploitation of the loophole that only requires publishing small business impacts for *directly* regulated businesses is apparent in the ongoing Basel III Endgame rulemaking. Bank regulators published their perceived impact on large banks but did not publish how new mandates will make small business loans more expensive.

The Environmental Protection Agency/Army Corps of Engineers Waters of the United States (WOTUS) final rule is a case study in agency misrepresentation of a regulation's costs on small businesses. In their rule, the agencies certified the rule "will not have a significant economic impact on a substantial number of small entities." For decades, bipartisan administrations have claimed that revising the WOTUS definition will not harm small businesses. Yet the millions of farmers, homebuilders, and other industries heavily dominated by small businesses render such a "certification" implausible. Moreover, they highlight a major problem – small businesses lack the legal recourse to force regulators to take them seriously and judges' hands are tied when it comes to holding agencies accountable to small business concerns.

Unfortunately, the concerns raised in this letter are not new. In fact, SBA's Office of Advocacy has sought to close the loopholes over the past 40 years but has not been successful.

Our concern that small businesses are being shut out of the regulatory process are amplified by recent data showing the growth of federal red tape. The National Association of Manufacturers' most recent study on the cost of regulation shows that the cost per employee to comply with federal regulations is three times greater for small firms than the average costs for manufacturers. Former CBO Director, Douglas Holtz-Eakin recently testified before the Small Business Committee that the costs from regulatory mandates currently being issued are fifty percent greater than under any previous administration.

At a time when we are counting on small business growth to enrich communities and bolster America's economy, we cannot afford to bury free enterprise under red tape emanating from Washington.

We urge the Committee to prioritize legislation that strengthens and closes loopholes in the Regulatory Flexibility Act.

We thank you for your leadership to create an environment where small businesses can operate, invest and grow. We look forward to working with you on ways to reduce red tape and burdens for small businesses.

Sincerely,

National

Alliance for Chemical Distribution
American Bakers Association
American Bankers Association
American Chemistry Council
American Farm Bureau Federation
American Foundry Society
American Hotel and Lodging Association
American Land Title Association
American Road & Transportation Builders Association
Associated Builders and Contractors
Associated Equipment Distributors
Associated General Contractors of America
Associated Wire Rope Fabricators
Brick Industry Association
Consumer Bankers Association
Consumer Brands Association
Council for Responsible Nutrition
FMI - The Food Industry Association
Independent Electrical Contractors
Independent Lubricant Manufacturers Association
Independent Petroleum Association of America
Innovative Lending Platform Association
International Franchise Association
International Sign Association
Job Creators Network
Leading Builders of America
Metals Service Center Institute
National Association for Surface Finishing
National Association of Home Builders
National Association of Insurance and Financial Advisors
National Association of Wholesaler-Distributors
National Automobile Dealers Association
National Federation of Independent Business (NFIB)
National Funeral Directors Association
National Mining Association
National Parking Association
National Retail Federation
National Roofing Contractors Association
National Rural Electric Cooperative Association
National Small Business Association (NSBA)
National Stone Sand & Gravel Association
National U.S. India Chamber of Commerce
Small Business & Entrepreneurship Council
Small Business Investor Alliance
The Toy Association
Treated Wood Council
U.S. Chamber of Commerce

Alabama

Albertville Chamber of Commerce
Central Baldwin Chamber of Commerce

Arizona

Chandler Chamber of Commerce
Greater Flagstaff Chamber of Commerce
Greater Phoenix Chamber
Lake Havasu Area Chamber of Commerce
Nogales Santa Cruz County Chamber of Commerce
Northwest Valley Chamber of Commerce
Tucson Metro Chamber

Arkansas

Holiday Island Chamber of Commerce

California

Buellton Chamber of Commerce
Carlsbad Chamber of Commerce
Coalition of California Chambers - Orange County
Fremont Chamber of Commerce
La Verne Chamber of Commerce
Long Beach Area Chamber of Commerce
Los Angeles Area Chamber of Commerce
Palos Verdes Peninsula Chamber of Commerce
Rancho Cordova Area Chamber of Commerce
San Juan Capistrano Chamber of Commerce
Western States Trucking Association
Yorba Linda Chamber of Commerce

Colorado

Alamosa County Chamber of Commerce
Denver Metro Chamber of Commerce
Greater Woodland Park Chamber
Vail Valley Partnership

Florida

Coral Gables Chamber of Commerce
Lakeland Chamber of Commerce

Georgia

Habersham County Chamber of Commerce
Murray County Chamber of Commerce

Guam

Guam Chamber of Commerce

Idaho

Boise Metro Chamber of Commerce
Jerome Chamber of Commerce
Pocatello-Chubbuck Chamber of Commerce, Inc.

Illinois

Dixon Chamber of Commerce & Main Street
Edwardsville/Glen Carbon Chamber of Commerce
GLMV Chamber of Commerce
Greater Rockford Chamber of Commerce
Joliet Region Chamber of Commerce & Industry
Sauk Valley Area Chamber of Commerce
The Greater Springfield Chamber of Commerce
West Suburban Chamber of Commerce & Industry

Indiana

Crossroads Chamber Indiana
Indiana Chamber of Commerce
South Bend Regional Chamber

Iowa

Quad Cities Chamber of Commerce

Kansas

Grant County Chamber of Commerce
Greater Topeka Chamber

Louisiana

Greenwood Chamber of Commerce

Maryland

Talbot County Chamber of Commerce

Massachusetts

Metro South Chamber of Commerce

Michigan

Battle Creek Area Chamber of Commerce
Detroit Regional Chamber
Hartland Area Chamber of Commerce
Jackson County Chamber of Commerce
Oscoda-AuSable Chamber of Commerce

Minnesota

Greater Mankato Growth
Minnesota Chamber of Commerce

Mississippi

Hancock County Chamber of Commerce

Missouri

Greater Kansas City Chamber of Commerce

Montana
Billings Chamber of Commerce
Montana Chamber of Commerce

Nevada

Vegas Chamber

New Jersey

New Jersey State Chamber of Commerce

New York

Capital Region Chamber
North Country Chamber of Commerce
Sullivan County Chamber of Commerce

North Carolina

The Caldwell Chamber

North Dakota

Greater North Dakota Chamber

Oklahoma

Broken Arrow Chamber of Commerce
Edmond Area Chamber of Commerce

Oregon

Canby Area Chamber of Commerce
Gresham Area Chamber of Commerce
Lincoln City Chamber of Commerce
Oregon Business & Industry
Roseburg Area Chamber of Commerce

Pennsylvania

Blair County Chamber of Commerce
Columbia Montour Chamber of Commerce
Hanover Area Chamber of Commerce
Harrisburg Regional Chamber
Huntingdon County Chamber of Commerce
Lancaster Chamber of Commerce
Pennsylvania Chamber of Business and Industry
Pittsburgh Airport Area Chamber of Commerce
Schuylkill Chamber of Commerce

South Carolina

Greater Columbia Chamber of Commerce

Texas

Alvin-Manvel Area Chamber of Commerce
Coppell Chamber of Commerce
Irving Hispanic Chamber of Commerce

Utah

ChamberWest Chamber of Commerce
Salt Lake Chamber
St. George Area Chamber of Commerce

Virginia

Central Fairfax Chamber of Commerce
Loudoun County Chamber of Commerce

Washington

Burlington Chamber of Commerce
Greater Lake Stevens Chamber of Commerce
Mercer Island Chamber of Commerce
Pullman Chamber of Commerce & Visitor Center
Shelton-Mason County Chamber of Commerce

Wyoming

Casper Area Chamber of Commerce
Greater Cheyenne Chamber of Commerce
Riverton Chamber and Visitors Center
Rock Springs Chamber of Commerce
Wyoming State Chamber of Commerce

cc: Members of the Committee on Small Business
Members of the Committee on the Judiciary