



July 8, 2020

Andrew Wheeler  
Administrator, U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

**Re:** EPA-HQ-OAR-2020-0044-0001 “Increasing Consistency and Transparency in Considering Costs and Benefits in the Rulemaking Process”

Dear Administrator Wheeler,

On behalf of the 24,000 members of the Colorado Farm Bureau, I welcome the opportunity to express solid support for the Environmental Protection Agency’s proposed rule on cost-benefit analyses.

Agriculture in Colorado has been hit hard by often excessive regulation which drives up compliance costs and damages local economies, but provides only negligible economic benefits and vaporous future “savings.”

Nearly two years ago, the American Farm Bureau [sounded the alarm](#) before Congress on the need for environmental litigation reform. As was explained then, and remains true today, transparency and accountability are needed in the environmental regulatory regime. It is now even more urgent to ensure laws and regulations are more responsive and thereby better suited to protecting species and landscapes.

Farmers and ranchers in Colorado appreciate the need for sustainable practices; in fact, given that our livelihood depends on smart land use and conservation, we take this very seriously. The question is whether regulatory policies are helping or hindering the goal of producing more food while protecting the environment. A balance must be struck, and in a way that provides a real-world analysis of the true costs and benefits to regulatory action.

The EPA’s proposed rule recognizes that no one seems to know how costs and benefits are calculated. In fact, it is clear that often the process starts with the desired outcome, and works to rationalize the outcome through the selective use of facts and the massaging of statistics and economic impact analysis to ensure the process arrives at the desired endpoint. This uncertainty creates the perfect conditions for activists to petition for additional environmental impact statements, file frivolous lawsuits, and introduce new metrics in the middle of the permitting or rulemaking process.

This is a blueprint for constraining economic growth and opportunity and for undermining the ability of farmers and ranchers to make a living. We join with [several officials from Colorado](#) who





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*Promoting and protecting the future of agriculture and rural values.*

recognize the extent to which that regulatory burdens have increased, to the detriment of economic activity.

This proposed rule concerning cost-benefit analysis would help ensure existing law is enforced with clarity, precision, and predictability. The EPA needs to conduct itself competently, and with transparency and fairness. This will help establish trust in the agency and ultimately ensure environmental policy is more effective.

Sincerely,

A handwritten signature in black ink, appearing to read "Chad Vorthman".

Chad Vorthman,  
Executive Vice President

Zach Riley  
Director of Public Policy, National Affairs

