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To: Lorraine D. Hunt OIRA ECON GUIDE/OMB/EOP@EOP
cc:
Subject: OMB Draft Guidelines for the Conduct of Regulatory Analysis and the Format of Accounting Statements

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March 27, 2003

Office of Information and Regulatory Affairs Lorraine Hunt
Office of Management and Budget, NEOB
Room 10202, 725 17th Street, NW
Washington, DC 20503

Dear Office of Information and Regulatory Affairs Hunt:

According to the Bush Administration, saving the life of someone 70 or older is worth only 63 percent as much as saving the life of someone younger. Twice this year, the White House Office of Management and Budget told the Environmental Protection Agency to apply that discounted value when considering whether new anti-pollution regulations were worth the costs they would impose on the polluting industries.

While it is standard federal practice to run such cost-benefit analyses, the OMB's conclusion that the lives of senior citizens are less valuable raises serious ethical and scientific questions.

You could just as well say life becomes more precious in one's final decades, and families might add you can't put a price on the role of grandparents.

But at the very least, many experts say an arbitrary distinction between the value of life of older and younger people is not "sound science," as the Bush Administration likes to say. It is a pretext to cut the value of health and safety standards in order to protect the industries that stand to gain from this White House initiative.

To this end, the new OMB analysis takes two egregious steps: It lowers the established EPA price tag of a human life from \$6.1 million to \$3.7 million and diminishes a senior citizen's life to \$2.3 million—nearly two-thirds that of rest of the population. What's worse, these calculations come from a 20-year-old analysis of Great Britain that its author has stated has no relevance to modern-day America.

The administration has already adopted the approach in formulating a weak rule that regulates pollution from snowmobiles, but the real damage is only just beginning. If the analysis is fully applied, regulations for air pollution, toxic waste cleanup, food labeling and other quality of life issues could be weakened or not even implemented at all—and we the public may never even know. Worst of all (and most ironic!), our senior citizens will feel the brunt of it since their health is the most vulnerable to

dirty air and unhealthy food.

A cost-benefit analysis that favors industries over strong public-health policies is always objectionable, but 63 cents on the dollar for the elderly is outrageous. We must tell Bush that we will not stand to see our health endangered and the inherent value of our senior citizens belittled by a faulty analysis.

Sincerely,

Clint Caughran