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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:

I am concerned about the implications of the current application of OMB Draft Guidelines for the Conduct of Regulatory Analysis and the Format of Accounting Statements which is being supported by the Bush administration. This analysis discounts the value of the life of someone 70 or older to only 63 percent as valuable as the life of someone younger.

The fiscal benefits of this kind of skewed analysis are clear: the established EPA price tag of a human life is reduced from \$6.1 million to \$3.7 million.

However the core issue of the analysis is ethically questionable at best; and the application of this kind of analysis is without question dangerous to both our citizens and the environment.

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. It is unacceptable that polluting industries' interests are placed above that of our citizens.

While I understand that 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 moral and scientific questions.

As an American citizen who is not only the child of a senior citizen, but also a member of a community in which senior citizens' contributions are significant and invaluable, I find devaluing an elderly person's life not only unethical but not true to the contribution of seniors to their communities.

This sort of analysis merely provides a convenient 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.

Moreover, if this 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. Not only our senior citizens will feel the brunt of it but also our very young since their health is the most vulnerable to dirty air and unhealthy food. Indeed, we are all likely to pay too great a price in terms of our health. We all share the same environment.

A cost-benefit analysis that favors industries over strong public-health policies is always objectionable. Please protect the health and value of all our citizens and do not support an analysis which endangers health and belittles the inherent value of our senior citizens.

Sincerely,

Judith Romell