

Comments of the EPA Science Advisory Board on the Draft Report: Valuing Mortality Risk Reduction

(October 2, 2007)

1. Dr. Cathy Kling:

Comments on the SAB Advisory on EPA's Issues in Valuing Mortality Risk Reduction

This report is clearly written and entirely responsive to the charge questions. I have just a few comments here.

1. Page 3, first sentence of second paragraph. Replace "if not" with "in lieu of" i.e., "How should studies be combined in lieu of using meta-regression?"
2. Page 3, 3rd paragraph. Did the committee discuss the degree to which criteria for identifying appropriate populations from which to select studies might be suggested? It seems likely that there will often be a mismatch between the population being affected by a particular regulation and many of the studies used to produce VSL estimates. If study does not use the identical population from which to sample, does that mean it can provide no information on the appropriate VSL? How close must the population be?
3. Page 4, line five and six. I suggest replacing the last sentence with something like: "Expert elicitation when adequate empirical estimates are available would require that the expert combine mentally the results of dozens of studies. Such a process lacks transparency."
4. Page 5, second paragraph, line 3. Does the panel really mean that more than one estimate from a study should NEVER be selected? How about saying something like "...only one estimate NORMALLY should be selected..." ?
5. On pages 4 and 5 the committee provides a set of information and questions that they indicate RP and SP studies should provide answers to in order to be included among the studies used in the meta-analysis. I assume that the committee means that not only should the answers be provided within the study, but that based on the answers some studies would be excluded from the meta-analysis. So, for example a criterion that might be developed is that an SP study should be excluded if it does not perform a scope test, or if it does, that the scope test fails. As written, the advisory sounds like they are suggesting that the criteria be based strictly on whether certain information is reported (having done a scope test) rather than on possible outcomes (scope was shown to exist or not).
6. Page 6, first paragraph in answer to charge question #5. This is quite subtle, but twice in this paragraph, the term "we may" is used when I think a better term might be "the analyst may." As written, some might infer the committee ascribes to the views following the "we may" language.
7. Page 8, bottom. There is a hard line return that separates the charge question mid line.
8. Page 9, third bullet. There is an unnecessary end parenthesis.

9. Page 9, last bullet. Rather than point specifically to the approach of Smith et al in combining RP and SP, it might be better to simply suggest that work that combines RP and SP be funded. Something like; “Fund studies that assess the advantages and disadvantages of combining RP and SP to estimate VSLs.” You could stick “using structural approaches” in there as well if that was important to the committee.

2. Dr. Rebecca Parkin:

For this draft, I found:

- a) the original charge questions to the SAB Panel were adequately addressed in the draft report.
- b) the draft report is clear and logical, and
- c) the conclusions drawn were supported by appropriate information in the body of the draft report.

I do not have any substantive comments.

3. Dr. Rogene Henderson:

I briefly reviewed the letter and the report. The matter discussed is outside my field of expertise, so I can only make comments at a superficial level.

1. The report addresses the charge questions from the EPA.
2. The report appears to be clear and logical although the vocabulary used is foreign to me.
3. The conclusions and recommendations appeared to be supported by the body of the report.

4. Dr. Steve Heeringa:

I have reviewed the Valuing Mortality Risk Panel report. I am not particularly strong on the economic valuation concepts that are discussed in the paper but I was able to follow the presentation including the material in the appendix. I did not detect any substantive errors or inconsistencies and found that the report was responsive to the charge questions and appeared to reflect the best current state of knowledge and practice. I did have one minor editorial suggestion. The report uses many acronyms (WTP, RHS, ...) but there are occasions where the acronym is used before the full label, e.g. willingness to pay (WTP) is given and in a few cases there are acronyms with no prior explanation, e.g. RHS --> ("Right hand side"-an econometric term if there is one). The use of the acronyms should be reviewed to ensure that standard editorial guidelines are followed.