



Institute *for*
Policy Integrity

NEW YORK UNIVERSITY SCHOOL OF LAW

August 11, 2020

Dr. Thomas Armitage, Designated Federal Officer, EPA Science Advisory Board
armitage.thomas@epa.gov

Subject: Additional Comments on the SAB Review of the Proposed Rule “Increasing Consistency and Transparency in Considering Benefits and Costs in the Clean Air Act Rulemaking Process”

In addition to the previous written comments from Policy Integrity, we would now like to submit the 2017 piece published in *Science*, co-authored by EPA’s Al McGartland and Policy Integrity’s director Ricky Revesz, among others, and titled *Estimating the Health Benefits of Environmental Regulations*. The article explains that “assum[ing] that exposed populations have zero WTP for reduced exposure when there is some evidence of an adverse health effect but that evidence is not unambiguous . . . violates economic principles and is contradicted by findings. . . . The best quantitative weight for these less-certain health effects is not zero.” The article also offers advice on why assuming no population threshold is usually the best approach to dose-response relationships.

Respectfully,

Jason A. Schwartz, Legal Director
Institute for Policy Integrity

Attached: *Estimating the Health Benefits of Environmental Regulations* (2017)

Attached: *Estimating the Health Benefits of Environmental Regulations* (2017)

McGartland, A. R. Revesz, D.A. Axelrad, C. Dockins, P. Sutton, and T.J. Woodruff. 2017. Estimating the health benefits of environmental regulations. *Science* 357 (6350), 457-458. DOI: 10.1126/science.aam8204

Available at:

https://its.law.nyu.edu/faculty/profiles/representiveFiles/2017-08-04-Estimating.Health.Benefits.of.Environmental.Regulations_C5C65A72-CF57-3665-8F51526AE53F8B6F.pdf