

Robert Rutkowski <rutkowski@terraworld.net>
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To: Lorraine D. Hunt OIRA ECON GUIDE/OMB/EOP@EOP
cc: "George W. Bush" <president@WHITEHOUSE.GOV>, Nancy Pelosi <sf.nancy@mail.house.gov>
Subject: Comments on the Draft Guidelines

Lorraine Hunt, Office of Information and Regulatory Affairs
Office of Management and Budget
NEOB
Room 10202
725 17th Street, NW
Washington, DC 20503
Topeka, KS 66605-2086
202-395-7245 (fax)
OIRA_ECON_GUIDE@omb.eop.gov

Dear Ms.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. I am very concerned to see health endangered and the inherent value of senior citizens belittled by a faulty analysis.

Please tell the administration not to move forward with their guidance on cost-benefit analysis (known as the OMB Draft Guidelines for the Conduct of Regulatory Analysis and the Format of Accounting Statements). Emphasize that, as a matter of principle, one life should not be valued more than another. In addition, I voice concern that this analysis could water down anti-pollution regulations and harm the health of senior citizens.

In summary:

- The "OMB Draft Guidelines for the Conduct of Regulatory Analysis and the Format of Accounting Statements" determines that saving the life of an elderly person is worth less than saving the life of a younger person.

- As an American citizen who is the grandchild/child/relative of a senior citizen, I find that devaluing an elderly person's life is unethical and unmoral.

- The analysis proposes to devalue the life of a human over 70 to 2/3 that of the rest of the population and lowers the established EPA price tag of a human life from \$6.1 million to \$3.7 million.

- This is a mere 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.

- The OMB's conclusion that the lives of senior citizens are less valuable raises serious ethical and scientific questions.

- If 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 our senior citizens will feel the brunt of it since their health is the most vulnerable to dirty air and unhealthy food.

Thank you for the opportunity to bring these remarks to your attention.

Mindful of the enormous responsibilities which stand before you, I am,

Yours sincerely,
Robert E. Rutkowski, Esq.

cc:
Nancy Pelosi
Andrew H. Card, Jr.

2527 Faxon Court
Topeka, Kansas 66605-2086
P/F: 1 785 379-9671
E-mail: r_e_rutkowski@myrealbox.com