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To: Lorraine D. Hunt OIRA ECON GUIDE/OMB/EOP@EOP  
cc:  
Subject: Value life and environment

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May 5, 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 writing as Coordinator of Presbyterians for Restoring Creation to offer comments on the Office of Management and Budget (OMB) draft report to Congress on the Costs and Benefits of Federal Regulations. Presbyterians for Restoring Creation is a national, non-profit organization of Presbyterians dedicated to preserving the environment as God's creation. We have a moral mandate to care for that which God has created, people and the rest of creation alike. I appreciate the opportunity to comment on the OMB draft report prepared by the Office of Information and Regulatory Affairs (OIRA) draft report.

My response is regarding the OMB's proposed revisions to the guidance it provides agencies on how to conduct cost-benefit analysis. On behalf of Presbyterians for Restoring Creation, I strongly object to the overall effect I understand these revisions would have: to weaken environmental protections by lowering the value placed on saving human life.

In particular, federal agencies must never attribute a lesser value to the lives of senior citizens when conducting these analyses. The value of life when computing premature mortality should not discriminate based on age, race, creed or gender. All lives are created equally and should be treated as such when government agencies develop preventative health or technology standards for environmental protection.

Thank you.

Sincerely,

Rebecca Barnes-Davies