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Distributional Analysis**

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Working Paper Series

Working Paper # 05-09
December, 2005



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Benefits and Costs from Sulfur Dioxide Trading: A Distributional Analysis

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* The authors wish to thank Douglas Latimer, currently with EPA Region 8, for providing us with the Source-Receptor Matrix Model and for insightful conversations about how to use the model. We are grateful to seminar participants at Harvard and the 2004 AERE Summer Workshop for helpful comments and to Denny Ellerman and Nathaniel Keohane for providing us with cost data. The opinions and conclusions expressed are those of the authors and not the United States Environmental Protection Agency.

Abstract

Policy-makers and others interested in environmental justice (EJ) are concerned that poor and minority communities are disproportionately exposed to pollution. Title IV of the 1990 Clean Air Act Amendments required the dirtiest coal-fired utilities to cap their SO₂ emissions at 5.8 million tons per year starting in 1995. At the same time, there was a major regulatory regime change with respect to the regulation of coal-fired utilities, shifting from command-and-control emission standards to a system of tradable allowances. In this paper, we examine the distribution of costs and health benefits across different regions and socioeconomic groups associated with the air quality improvements mandated under Title IV. We examine data on the 148 coal-fired utilities which were regulated under Title IV and find as expected that the monetary benefits of reduced SO₂ emissions under Title IV greatly outweigh the costs: we estimate benefits of nearly \$56 billion and costs of just \$558 million. Not unexpectedly the net benefits are positive in every EPA region, but are highly concentrated. We find that nearly 90% of the benefits and costs of the overall reductions under Title IV are concentrated in 4 regions – the northeast, north central, mid-Atlantic, and southeast. Furthermore, when we examine the socio-economic distribution of net benefits, we find that the poor received slightly lower benefits on average from Title IV, which could raise some EJ concerns, if the poor purchase as much electricity as the rich. On the other hand, the African-American and Hispanic communities received a disproportionately larger share of the benefits relative to their costs. Hence our study indicates that there are no significant EJ concerns raised by Title IV.

Key Words: air quality, Clean Air Act Amendments, environmental justice, benefits, costs, trading

Subject Matter Classifications: Air Pollution, Benefit-Cost Analysis, Distributional Effects, Pollution Control Options and Economic Incentives

I. Introduction

Prior to the passage of Title IV of the 1990 Clean Air Act Amendments (CAAA), there had been a lively debate involving Congress, the Environmental Protection Agency (EPA), and academics, about the need for reducing sulfur dioxide (SO₂) emissions due to the problem of acid rain. In addition to domestic pressure, Canada was putting political pressure on the U.S. to decrease acid rain. Just after the passage of the CAAA the U.S. and Canada signed the Canada-United States Air Quality Agreement, aimed at controlling transboundary acid rain. How damaging is acid rain? The National Acid Rain Precipitation Assessment Program found that acid rain causes minor damage to crops and modest damage to aquatic life in acidified lakes and streams. Burtraw et al (1997) estimate the expected environmental benefits from recreational activities, residential visibility, and morbidity to be about \$13 per capita in 1990.

On the other hand, SO₂ also combines in the atmosphere with ammonia to form sulfates – fine particulates (PM_{2.5}) – which have been shown in several studies to contribute significantly to pre-mature mortality. Thus, even if acid rain has only a marginal environmental impact, reductions in SO₂ emissions have additional (and potentially much larger) health benefits, through reduced pre-mature mortality. EPA (2003) estimates that the human health benefits of the Acid Rain Program will be roughly \$50 billion annually, due to decreased mortality, fewer hospital admissions and fewer emergency room visits, by the year 2010.

Coal from fossil-fuel fired electric utilities accounts for most of SO₂ emissions in the United States. Title IV of the 1990 CAAA set an annual 9 million ton cap on SO₂ emissions from all fossil fuel fired electric utilities. This cap, which is to be fully achieved by 2010, requires the affected electric utilities to reduce their aggregate SO₂ emissions by 10 million tons below their 1980 levels. Along with requiring substantial SO₂ reductions Title IV also abandoned the

command-and-control approach to the regulation of utilities, where utilities were required to meet individual emission standards set by regulators, in favor of a more flexible, cost-efficient tradable permit approach. This more flexible approach made the substantial SO₂ reduction politically feasible and is widely believed to have led to tremendous cost savings relative to the command-and-control approach. Keohane (2003) estimated that the system of allowance trading resulted in cost savings between \$150 million and \$270 million annually, compared to a uniform emissions-rate standard.

Title IV allows permits to be bought and sold freely anywhere in the continental United States.¹ Allowing permits to be bought and sold freely may inadvertently create a divergence between the people who are paying for the SO₂ reductions and those that are benefiting from the reductions. Morgan and Shadbegian (2003) find that the SO₂ trading program may have inadvertently resulted in some environmental injustices – mainly higher levels of emissions in disproportionately poor and minority areas.²

In this paper we extend the work of Morgan and Shadbegian by examining the spatial distribution of the costs and benefits associated with air quality improvements that occurred during the first year under Title IV of the CAAA. The air quality improvements are measured relative to the level of emissions under the former command-and-control regime, which allowed a greater level of emissions. We examine the spatial distribution of the costs and benefits both in

¹ The only time a plant would be prevented from buying allowances to emit more SO₂ would be if that plant was located in a county which was in violation of the National Ambient Air Quality Standard (NAAQS) for SO₂, which were set at levels to prevent local adverse health outcomes. However, this has rarely posed a problem for permit trading since the Title IV cap requires a significantly greater reduction of aggregate SO₂ emissions than what is required to meet the NAAQS for SO₂.

² According to the Office of Environmental Justice at EPA, environmental justice exists when “no group of people, including racial, ethnic, or socioeconomic group, ... bear[s] a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations.”

terms of the states and regions being affected and the socio-economic composition of the affected population.

The vast majority of dollar-valued benefits from air pollution abatement arise from the impact of airborne particulates (PM_{2.5}) on premature mortality. A 1995 EPA study reports that of the estimated \$22.2 trillion worth of benefits derived from the Clean Air Act of 1970, reductions in particulate-related mortality contributed more than \$20 trillion. We use a spatially-detailed air pollution dispersion model (the Source-Receptor Matrix) to evaluate the impact of SO₂ emission reductions from each plant on county-level concentrations of particulates during Phase I of Title IV. Using existing evidence on the connection between particulate exposures and mortality, we translate the reductions in secondary particulate concentrations in each county in the U.S. into the dollar benefits from reductions in pre-mature mortality.

Who pays for the improvements in air quality? One possible answer is “nobody”, if efficiency improvements resulting from the new emissions trading system (e.g. more flexible production switching, less uncertainty about regulatory requirements) outweigh the additional abatement costs on a plant-by-plant basis. A more likely scenario is that some plants face higher costs of abatement, which are passed along to their customers. If some plants increase their emissions and buy additional allowances, the population affected by the worsening air quality will be “paying” some of the costs of the greater air quality improvements near other plants that reduced their emissions in order to sell the allowances.

Arrow et al (1996) argue that along with a cost-benefit analysis measuring the aggregate net benefits from a regulation, a good analysis will also examine the distributional consequences. In this paper we compare the overall net health benefits that were achieved under Title IV along with the spatial distribution of those net benefits to test whether there were unforeseen

consequences of the regulatory change in terms of adverse impacts on particular regions or socio-economic groups. The findings will indicate whether these distributional impacts are of only second-order importance compared to the overall net benefits, or whether they are sufficiently large for policy-makers to take them into account when considering future market-oriented regulatory reforms.

Using data for the 148 dirtiest coal-fired utilities we find, as expected, that the aggregate benefits in 1995 caused by reductions in SO₂ emissions under Title IV greatly exceed their costs: we estimate benefits of \$56 billion (a bit larger than EPA's estimates of total benefits of \$50 billion by 2010) and costs of only \$558 million. Therefore, the net benefits from the SO₂ reduction are roughly \$55 billion or \$100 in benefits for every \$1 in abatement costs. The net benefits are positive in every EPA region, but are highly concentrated. We find that nearly 90% of the benefits and costs of the overall reductions under Title IV are concentrated in 4 regions – the northeast, north central, mid-Atlantic, and southeast. In terms of the socio-economic distribution of net benefits, we find that minority groups (African-Americans and Hispanics) receive a greater share of the benefits than of the costs. The poor are the only group raising any environmental justice concerns, receiving a slightly higher share of the costs than of the benefits. However this assumes the poor purchase as much electricity as the rich, but most likely they purchase less.

The rest of the paper is organized as follows. In section II we present background information on Title IV of the CAAA of 1990. Section III contains a brief survey of the literature on studies examining various aspects of the Title IV trading program and various aspects of environmental justice. Section IV describes the methodology we use to estimate both the health benefits and the costs of SO₂ abatement under Title IV and section V describes our

sample of plants. In section VI we discuss our findings and we end with some concluding remarks in Section VII.

II. Title IV: Background Information

Title IV of the CAAA completely changed the way coal-fired utilities were regulated in the U.S. Prior to Title IV utilities were regulated by a command-and-control regime that targeted the sulfur content of the coal used at each individual plant. Title IV established a cap-and-trade program that set a cap on total SO₂ emissions, distributed allowances among generating units equal to that cap, and allowed plants to freely trade these allowances among their own units, to sell them to other plants, or to bank them for future use. The only requirement faced by a plant under the trading program is that it must have enough allowances at the end of the year to cover each ton of SO₂ emitted that year. Thus, the allowance trading program instituted by Title IV provides much greater flexibility to achieve any given emission standard because utilities which face high marginal abatement cost may purchase SO₂ permits from utilities which face lower marginal abatement costs.

The goal of Title IV was to reduce aggregate SO₂ emission levels to approximately 9 million tons by 2010, roughly half of the 1980 level. The reduction was to be achieved in two phases. Phase I (1995-1999) targeted the dirtiest 110 power plants (with 263 generating units). These generating units, called the Table A units, were required to reduce their emissions to 7.2 million tons per year starting in 1995, 6.9 million tons per year in 1996, and then 5.8 million tons per year from 1997-1999. The Table A units emitted 8.7 million tons of SO₂ in 1990 and only emitted 4.5 million tons in 1995 (roughly 50% less). The number of allowances a unit received was based on its average 1985-1987 heat input times an average emission rate of 2.5 lbs of SO₂

per million BTUs of heat input. Each allowance gave a unit the right to emit one ton of SO₂, and the unit could only emit an amount of SO₂ equal to the number of allowances held.³

Phase II, which began in the year 2000, brought the smaller generators – generators that have an output capacity of 25 megawatts or greater – under the cap-and-trade system.⁴ In addition to imposing constraints on the smaller and cleaner units, the Table A units were required to make additional reductions in their SO₂ emissions – reducing their overall emissions by another 3.4 million tons, down to 2.4 million tons by 2010. Annual allowance allocations to each unit were based on an average emission rate of 1.2 lbs of SO₂ per million BTUs of heat input, a much stricter standard than the 2.5 lbs during Phase I.

In 1995 SO₂ emissions dropped dramatically. Phase I units emitted a total of only 4.9 million tons, a reduction of 4.6 million tons – 3.2 million tons more than was required.⁵ In fact, SO₂ emissions started to decrease right after the passage of Title IV, even before the trading system was in place. Several explanations have been offered for the pre-1995 reduction. Plants may have complied early in order to pass on to consumers the additional cost of low-sulfur coal or the cost of installing scrubbers. Some states amended their State Implementation Plans (SIPs) requiring utilities to reduce their emissions before the first year of Phase I. The most likely explanation is that railroad deregulation made it cheaper to transport low-sulfur coal to Midwest electric power plants, the geographic area that experienced the most reductions in SO₂ emissions between 1985 and 1993 (Ellerman and Montero, 1998).

Another important feature of the SO₂ allowance market is that allowances that are not used in one year may be banked and used in any subsequent year. That is, a plant may reduce

³ Generating units face a fine of \$2000 for each ton of SO₂ emitted for which they do not have an allowance.

⁴ Some of these smaller generators ‘opted’ into Phase I, under the “substitution” and “compensation” provisions, and are included in this analysis.

emissions below their annual allocation and deposit the extra allowances in an emissions bank. These “banked” allowances are perfect substitutes for future year allowances, and may be used or sold. Banking during Phase I could help plants adapt to the more stringent limits imposed under Phase II by smoothing the required reductions over time. This explanation is borne out by experience: plants banked over 11.5 million allowances during Phase I (1995-1999), then used 1.2 million of these banked allowances in the first year of Phase II (2000), followed by 1.08 million allowances in 2001 and another 650,000 million allowances in 2002. This suggests that the extra abatement during Phase I was intentional (rather than being an unexpected result of lower than expected prices for low-sulfur coal).

III. Literature Review

A. SO₂ Trading Program

Long before the advent of emissions trading, Gollop and Roberts (1985) estimated that a cost-effective allocation of pollution abatement across electrical utilities would result in a nearly 50% reduction in pollution abatement costs, suggesting potentially large savings from emissions trading. Since the passage of the 1990 CAAA, many papers, including Joskow et al (1998), Schmalensee et al (1998), Carlson et al (2000), Keohane (2003), and Shadbegian and Morgan (2003) have examined various aspects of the actual SO₂ allowance trading program including its cost savings, environmental effectiveness, spatial patterns of abatement, pollution control innovations, and the efficiency of the banking of permits. The potential success of any pollution permit-trading program depends on the efficiency of the market of the tradable permits. Joskow et al (1998) assess the efficiency of the market for SO₂ permits by comparing the price of permits

⁵ Phase I units include all 263 Table A units plus 111 units that ‘opted’ into Phase I – see Section V Sample Coverage below for details.

auctioned by EPA between 1993 and 1997 with private market indices. Joskow et al find that by the end of 1994 these prices were virtually identical and thereby conclude that the private market for tradable permits was relatively efficient. Schmalensee et al (1998) also conclude that the private market for tradable permits was relatively efficient by noting the growth in the level of the trading volume in the market: 1.6 million, 4.9 million, and 5.1 million allowances were traded in 1995, 1996, and 1997, respectively.

Keohane (2003) estimates that using a system of tradable allowances resulted in annual cost savings between \$150 million and \$270 million compared to a uniform emissions-rate standard. However, Carlson et al. (2000) conclude that the large decrease in abatement costs during the beginning of Title IV relative to the original estimates resulted more from a technological change that reduced the cost to switch to low sulfur coal and the decrease in the price of low sulfur coal rather than the ability to trade permits per se. Shadbegian and Morgan (2003) examine the impact of the stringency of SO₂ regulations on the productivity of electric utilities. They find that regulatory stringency had a significantly negative effect on productivity prior to Title IV, but that during Title IV regulatory stringency had only small insignificant negative impact on productivity.

B. Distribution of Pollution

During the past decade there has been an increasing number of studies that examine various aspects of environmental justice – polluting plants’ location decisions, expansion decisions of hazardous waste facilities, fees paid to communities to “host” facilities, plant emissions, and regulator decisions – in a formal multiple regression framework. Previous anecdotal evidence (see GAO, 1983 and United Church of Christ, 1987) suggests that firms tend to locate their polluting plants in areas with a greater percentage of poor people and minorities.

However, Been and Gupta (1997) examining the location decisions of commercial hazardous waste treatment storage and disposal facilities (TSDFs) find mixed evidence of environmental injustice. In particular, they find no statistical evidence that TSDFs were more likely to be sited in neighborhoods that were disproportionately African Americans at the time of siting and that poor neighborhoods are actually negatively correlated with TSDF sitings, but they do find evidence that TSDFs were more likely to be sited in disproportionately Hispanic areas.

Wolverton (2002a), examining the location decisions of toxic waste emitting plants in Texas, shows that if one considers the socioeconomic characteristics of the community at the time the plant is sited, that contrary to the anecdotal evidence, race does not matter and poor communities actually attract disproportionately *fewer* polluting plants – a finding similar to Been and Gupta.

Hamilton (1993, 1995) examines whether exposure to environmental risk is related to socioeconomic characteristics of a neighborhood and political activism. Specifically, Hamilton examines the relationship between the net capacity expansion decisions of commercial hazardous waste facilities and race, income, education, and voter turnout (level of political activity).

Hamilton finds that the decision to expand net capacity is not significantly related to any of the socioeconomic variables, but is significantly negatively correlated with voter turnout. On the other hand, Jenkins, Maguire, and Morgan (2004) show that counties with greater percentages of minority residents receive lower “host fees” for the siting of landfills, while richer counties receive higher host fees, results consistent with the idea of environmental injustice.

Three additional studies examine the relationship between pollution emissions and the socioeconomic characteristics of communities to assess the validity of the claim of environmental injustice: Arora and Cason (1999), Wolverton (2002b), and Gray and Shadbegian (2004). Arora and Cason examine 1993 TRI emissions for the entire U.S. finding evidence of

racial injustice only in non-urban areas of the south. Wolverton (2002b) examines the relationship between TRI releases and socioeconomic characteristics of communities in Texas and finds that plants tend to reduce TRI releases *more* in minority neighborhoods than in non-minority neighborhoods, exactly the opposite of the claim of environmental racism. Gray and Shadbegian (2004) examine the relationship between SO₂, PM₁₀, BOD, and TSS emissions of pulp and paper mills and socioeconomic variables finding mixed results.⁶ For all four pollutants Gray and Shadbegian find that plants with a greater percentage of poor nearby emit more pollution, a result consistent with environmental injustice, but that plants with more minorities nearby actually emit *less* pollution, a result inconsistent with environmental injustice.

Finally Becker (2003), using establishment-level data on manufacturing plants from the U.S. Census Bureau's Pollution Abatement Costs and Expenditures (PACE) survey, examines the relationship between air pollution abatement expenditures and community demographics. Becker finds that, after controlling for a number of plant-level characteristics and levels of federal, state, and local regulation, communities with higher homeownership rates and higher per capita income enjoy greater pollution abatement activity from their nearby plants.

IV. The Benefits and Costs of Cleaner Air

A. Benefits from Cleaner Air

We identify the benefits of reducing SO₂ emissions (SO2BEN) from a given source with the change in mortality risk from exposure to ambient particulate concentrations caused by those SO₂ emissions. These health benefits are measured using a simplified linear damage function, based on estimated parameters from the appropriate literature:

⁶ BOD (biological oxygen demand) and TSS (total suspended solids) are two commonly used measures of water pollution.

$$\text{SO2BEN} = \text{SO2DIFF} * \text{AIR_QUAL_TC} * \text{HEALTH_CHG} * \text{POP} * \text{VSL}.$$

AIR_QUAL_TC is the transfer coefficient – the change in air quality (ambient particulates) per unit change in SO₂ emissions (SO2DIFF). HEALTH_CHG is the change in mortality risk to the affected population due to the changes in air quality. POP is the size of the affected population, and VSL is the dollar value placed on reducing pre-mature mortality.

We measure the changes in air quality at any given location using the Source-Receptor (S-R) Matrix Model, as described in Latimer (1996) and Abt (2000). The S-R Matrix model was originally calculated using the Climatological Regional Dispersion Model (CRDM). The model incorporates data on pollution emissions from 5,905 distinct sources in the U.S., along with additional sources from Mexico and Canada.⁷ The S-R Matrix relates emissions of specific pollutants from each source to the resulting ambient concentrations of each pollutant in every county in the U.S. Specifically, the S-R Matrix provides a set of transfer coefficients which yield county-by-county changes in annual average pollutant concentrations for each one ton change in emissions of a particular pollutant from a particular source. The S-R Matrix transfer coefficients are a function of many factors including wet and dry deposition of gases and particles, chemical conversion of SO₂ and nitrogen oxide (NO_x) into secondary particulates, effective stack height, and several atmospheric variables (wind speed, wind direction, stability, and mixing heights). We use the impact of SO₂ emissions on ambient concentration of PM_{2.5} in each county to measure AIR_QUAL_TC.

Our measure of HEALTH_CHG concentrates on the long-term mortality effects of

⁷ Emissions sources in the U.S. combine ground-level sources, county-level sources and individual sources. Ground-level sources were estimated for each of the 3,080 contiguous counties, while elevated sources were grouped according to effective stack height. Point sources with an effective stack height greater than 500 meters were modeled as individual sources of emissions. All the sources in the same county that had an effective stack height less than 250 meters were grouped together into a single county-level source, as were those with effective stack heights between 250 meters and 500 meters. In total there were 5,905 U.S. sources modeled in the S-R matrix (ground-level sources were also aggregated at the county level).

particulate matter (PM_{2.5}) – an assumption consistent with past studies (Rowe et al., 1995; Levy et al., 1999). Since our study focuses on the benefits of reduced SO₂ emissions we concentrate on the health benefits from lower concentrations of secondary particulates that result from SO₂ emissions. We use the findings from the American Cancer Society study, the most comprehensive analysis of long-term mortality effects from air pollution to date (Pope et al., 2002). They find approximately 4% higher mortality rates in people exposed to a 10 µg/m³ increase in PM_{2.5} concentrations (95% confidence interval: 1%, 8%). We assume that the point estimate is applicable to the secondary particulates formed from SO₂ (Pope et al. found similar numbers for sulfate particles in their study).⁸

Our estimate of the exposed population, POP, is based on county-level data from the 1990 Census of Population. This data identifies the total number of people living in each county (and hence the number affected by the average ambient pollution concentrations in that county). In addition, it provides information on the socio-economic characteristics of each county's population (e.g. income, age, race), which helps us examine issues of environmental justice.

Finally, to place a dollar value on pre-mature mortality, we use a recent EPA (1997) benefit-cost analysis that estimated the value of a statistical life (VSL). The EPA study pooled contingent valuation and wage-risk studies to produce a central estimate of \$5.4 million (in 1995 dollars) per life saved. Note that our calculations assign constant values of the VSL and HEALTH_CHG terms for the entire population. Each exposed person faces the same average dollar harm from exposures to particulates, allowing for neither differences in sensitivities for

⁸ Chay and Greenstone (2003a, 2003b) examine the effect of particulate exposures on infant mortality, and obtain impacts of a similar magnitude, measured in terms of increased mortality rates.

different populations nor differences in valuation.⁹ Note also that the very large estimates we obtain for the benefits of reducing SO₂ emissions could be interpreted as a combination of these two factors: one could get smaller benefits by assuming either smaller health effects or a lower VSL.

B. Costs of Cleaner Air

There are three options (or combinations of options) available to plants to comply with Title IV: installing a scrubber, switching to low sulfur coal, or buying allowances. Our measure of SO₂ abatement cost (COST) is based on the method each plant actually used to comply with Title IV. Based on Ellerman et al (1997) we have the total cost of abatement for each of the 374 Phase I units (plant-boiler observations) affected by Title IV. In 1995, the average cost per ton of “switching” and “scrubbing” is \$153 and \$265 respectively, while the average cost of a permit is \$128.50.¹⁰

We assume that all of the additional costs of abatement are passed along to the utility’s customers, and further assume that all customers live within the state where the utility is located.¹¹ We use the 1990 Census of Population to allocate each plant’s abatement costs equally to all people living within that state, with the different socio-economic groups receiving benefits and costs proportional to their share in the overall population.

V. Sample Coverage

Phase I of Title IV regulated the emissions of 263 generating units (the Table A generating units) owned by 110 plants. An additional 38 “substitution and compensation” plants (111 generating units) “opted into” Phase I, bringing the final total to 374 generating units. Our

⁹ Our data would readily permit the calculation to differ in sensitivity and valuation for different subpopulations – if one could generate a consensus on how to quantify such differences, a politically charged issue that we avoid here.

¹⁰ We would like to thank Denny Ellerman for providing us with this data.

¹¹ If we had data on cross-state electricity sales, we could adjust our cost calculations to reflect this.

sample consists of all 148 plants and their 374 generating units. The geographic distribution of these plants – heavily concentrated in the Midwest – is shown in Figure 1.

In Table 1 we present information on SO₂ emissions and the allocation of SO₂ allowances obtained from the EPA's Allowance Tracking System (ATS).¹² The 148 plants in our sample emitted a total of 9.5 million tons of SO₂ during 1990, the year Title IV was passed. By 1995, our 148 plants had reduced their SO₂ emissions by 4.6 million tons from their 1990 levels, cutting them almost in half, although Title IV had only required them to reduce emissions by 15%, to 8.1 million tons.

VI. Distribution of Benefit and Costs

In Table 2 we present the health benefits and abatement costs associated with the actual 1995 SO₂ emissions reductions: counterfactual SO₂ emissions minus actual emissions. The counterfactual emissions in 1995 are those we would have observed in the absence of the 1990 CAAA and are the same as those presented in Ellerman et al (1997). As expected, the aggregate benefits in 1995 resulting from reductions in SO₂ emissions from the 1995 counterfactual levels far outweigh their costs: we estimate benefits of nearly \$56 billion and costs of only \$558 million. An alternative assumption on abatement costs, that the actual cost of a ton of abatement is equal to the permit price (\$128.5 in 1995), results in total abatement costs of only \$496 million. In either case these increased abatement costs are dwarfed by the increased benefits from the SO₂ reduction, which are roughly 100 times as large.

The net benefits are positive in every region, however they are highly concentrated across regions. Not surprisingly, given the concentration of the plants in the Midwest and the pattern of airflow from west to east, the benefits that result from the large reductions in emissions are highly concentrated geographically in the east. Table 3A contains the distribution of benefits and

costs across the 10 different EPA regions. As shown in Figure 2, the overwhelming majority of the net benefits (89%) are concentrated in four regions (2, 3, 4, and 5). In addition, three of these regions (3, 4, 5) pay a very large percentage of the overall costs (90%). Regions 4, 5, and 7 all pay a higher percentage of the costs than they receive in terms of health benefits. Region 5 (the North Central states) is the biggest relative loser, paying 45% of the costs while only receiving 26% of the benefits. On the other hand, Regions 1 (New England) and 2 (NY and NJ) are the biggest relative winners, only paying 0.2% and 1.2% of the costs while receiving 6% and 17% of the benefits, respectively.

In Table 3B we compare the net benefits per capita in each region and this leads to a somewhat different ranking of relative winners and losers than what we observed with the shares of benefits and costs. Regions 1-5 each derive more than \$249 per capita net benefits. Region 3 (the mid-Atlantic states) receives the highest level of net benefits, \$502 per capita, followed by regions 2, 1, 5 and 4. Interestingly region 5, which was the biggest relative loser in terms of shares of benefits versus shares of costs, does reasonably well in terms of net benefits (nearly \$300 per capita), due to the relatively large population in region 5 (and because benefits are much larger than costs in absolute magnitude).

To examine whether or not there are any environmental justice concerns surrounding the SO₂ trading program we consider the distribution of benefits and costs received by different demographic groups. To do this, we used the demographic composition of every county in the U.S., assuming that everyone in the county was equally affected by changes in pollution and by changes in electricity prices, to calculate the fraction of national benefits and national costs received by each group. Table 4A shows the per capita benefits, costs, and net benefits for the total population and for five different demographic groups: African-Americans, Hispanics, poor

¹² We would like to thank Denny Ellerman for providing us with this data.

(the population living below the poverty line), kids (the population under the age of 6), and elders (the population over the age of 65). Table 4B then shows the ratio of benefits to costs for the different groups. The results show that both the Hispanic and African-American communities received a much larger share of the benefits than the costs, although this arises for different reasons. The African-American community pays costs similar to the overall population yet receives 20% higher benefits, while the Hispanic community receives roughly half the amount of the average per capita benefits, but pays only 30% of the average costs. Kids and elders received roughly the same share of benefits and costs as the overall population. On the other hand, the poor received slightly less of the benefits than of the costs from SO₂ reductions, which could raise some environmental justice concerns if the poor purchase as much electricity as the rich.

To further examine the distribution of benefits and costs along demographic lines, we calculated them separately for each plant in our sample, asking whether that plant's changes in emissions led to a disproportionately large increase in costs (relative to benefits) for any of these groups. For each group we then calculated the fraction of plants that had disproportionately large costs relative to benefits. These numbers are presented in Table 5. A number greater than 50% indicates that changes in emissions had negative effects more often than positive ones on that demographic group. Since these calculations are not weighted by plant size, they need not give the same results as those in Table 4. The results are, on the whole, reasonably similar to those in Table 4, although we do not see the poor being disadvantaged here (only kids show a disproportionately negative effect). As in Table 4, the African-American and Hispanic communities do quite well – only 25% and 10% of the plants have a negative effect on these communities respectively. Therefore we conclude that there are no significant environmental

justice concerns raised by Title IV, however as noted above, the poor received slightly less of the benefits than of the costs from SO₂ reductions.

VII. Concluding Remarks

In this paper we analyze plant-level information on fossil fuel fired electric utilities to examine the distribution of costs and health benefits associated with the air quality improvement achieved by Title IV of the 1990 CAAA. We examine the distribution of benefits and costs both in terms of the regions being affected and the socio-economic composition of the affected population.

Our results suggest that, as expected, the aggregate health benefits in 1995 caused by reductions in SO₂ emissions under Title IV greatly exceeded their costs. We estimate benefits of \$56 billion and costs of only \$558 million leading to \$55 billion dollars of net benefits from the SO₂ reductions. The net benefits are positive in every region of the country, but are highly concentrated across regions. In particular, nearly 90% of the benefits and costs are concentrated in regions 2-5 representing the northeast, north central, mid-Atlantic, and southeast. Maryland, Ohio, Pennsylvania, Washington DC, and West Virginia are the biggest winners in terms of per capita net benefits – all have per capita net benefits of \$500 or above. Six other states have net benefits greater than \$350 per capita: Delaware, Indiana, Kentucky, New Jersey, Tennessee, and Virginia.

In terms of the socio-economic distribution of net benefits, we find very little if any evidence for environmental justice concerns. The African-American and Hispanic communities receive a substantially greater share of the benefits associated with SO₂ abatement under Title IV than they do of the costs (higher benefits for the African-American community, lower costs for the Hispanic community). The poor do have a slightly higher share of costs than benefits

(assuming they purchase the same amount of electricity as the rich), the only (weak) evidence supporting any environmental justice concerns.

REFERENCES

- Abt Associates, "The Particulate-Related Health Benefits of Reducing Power Plant Emissions," prepared for Clean Air Task Force (October 2000).
- S. Arora and T. N. Cason, "Do Community Characteristics Influence Environmental Outcomes? Evidence from the Toxic Release Inventory", *Southern Economic Journal* **65**, 691-716 (1999).
- K. Arrow, M.L. Cropper, G.C. Eads, R.W. Hahn, L.B. Lave, R.G. Noll, P.R. Portney, M. Russell, R. Schmalensee, V.K. Smith, and R.N. Stavins, "Is There a Role for Benefit-Cost Analysis in Environmental, Health, and Safety Regulation?" *Science*, 272:221-222 (12 April 1996).
- Becker, R. A., "Pollution Abatement Expenditure by U.S. Manufacturing Plants: Do Community Characteristics Matter?" *Center for Economic Studies Working Paper* no. 03-18, (2003).
- V. Been, "Locally Undesirable Land Uses in Minority Neighborhoods: Disproportionate Siting or Market Dynamics," *The Yale Law Journal* **103**, 1383-1421 (1994).
- V. Been and F. Gupta, "Coming to a Nuisance or Going to a Barrios? A Longitudinal Analysis of Environmental Justice Claims," *Ecology Law Quarterly* **24**, 1-56 (1997).
- Burtraw, D., A. Krupnick, E. Mansur, D. Austin, and D. Farrell, "The Costs and Benefits of Reducing Acid Rain", Resources for the Future Discussion Paper 97-31-REV, Washington, D.C.: Resources for the Future (1997).
- C.P. Carlson, D. Burtraw, M. Cropper, and K. Palmer, "SO₂ Control by Electric Utilities: What are the Gains from Trade?," *Journal of Political Economy* **108**, 1292-1326 (2000).
- K. Chay and M. Greenstone, "The Impact of Air Pollution on Infant Mortality: Evidence from Geographic Variation in Pollution Shocks Induced by a Recession," *Quarterly Journal of Economics*, 1121-1167 (2003a).
- _____, "Air Quality, Infant Mortality, and the Clean Air Act of 1970," NBER Working Paper 10053 (2003b).
- A. D. Ellerman, R. Schmalensee, P. Joskow, J. Montero, and E. Bailey, Emissions Trading Under the U.S. Acid Rain Program: Evaluation of Compliance Costs and Allowance Market Performance., MIT Center for Energy and Environmental Policy Research, 1997.
- A. D. Ellerman, and J. Montero, "The Declining Trend in Sulfur Dioxide Emissions: Implications for Allowance Prices," *Journal of Environmental Economics and Management*, **36**, 26-45 (1998).
- J. Evans, S.K. Wolff, K. Phonboon, J. Levy, K. Smith, "Exposure Efficiency: An Idea Whose Time Has Come?" Paper for the Scientific Group on Methodologies for the Safety Evaluation of Chemicals (SGOMSEC 14), November 1999.

F. M. Gollop, and M.J. Roberts, "Cost Minimizing Regulation of Sulfur Emissions: Regional Gains in Electric Power," *Review of Economics and Statistics*, 81-90 (1985).

W. B. Gray and R. J. Shadbegian, "Optimal Pollution Abatement – Whose Benefits Matter and How Much," *Journal of Environmental Economics and Management* 47, 510-534 (2004).

Government Accounting Office, *Siting of Hazardous Waste Landfills and Their Correlation with Racial and Economic Status of Surrounding Communities*, GAO, Washington DC (1983).

J. Hamilton, *Politics and Social Costs: Estimating the Impact of Collective Action on Hazardous Waste Facilities*, *Rand Journal of Economics* 24, 101-125 (1993).

J. Hamilton, "Testing for Environmental Racism: Prejudice, Profits, Political Power?," *Journal of Policy Analysis and Management* 14, 107-132 (1995).

E. Helland and A. B. Whiford, "Pollution Incidence and Political Jurisdiction: Evidence from the TRI," presented at the American Economic Association Meetings (January 2001) and the Western Economic Association Meetings (July 2001).

R. Jenkins, K. Maguire and C. Morgan, "Host Community Compensation and Municipal Solid Waste Landfills," *Land Economics* (forthcoming 2004).

P.L. Joskow, R. Schmalensee, and E. Bailey, "The Market for Sulfur Dioxide Emissions," *The American Economic Review* 88, 669-685 (1998).

N. Keohane, "What Did the Market Buy? Cost Savings Under the U.S. Tradable Permits Market Program for Sulfur Dioxide", Yale Center for Environmental Law and Policy Working Paper ES #33 (2003).

D. A. Latimer, "Particulate Matter Source-Receptor Relationships Between All Point and Area Sources in the United States and PSD Class I Area Receptors," prepared for EPA, OAQPS (September 1996).

J. I. Levy, J.K. Hammitt, Y. Yanagisawa, J.D. Spengler, "Development of a New Damage Function Model for Power Plants: Methodology and Applications," *Environmental Science and Technology* 33: 4364-4372 (1999).

C. Morgan and R. Shadbegian "Environmental Justice and Emission Trading: Evidence from the Electric Utility Industry," Presented at Resources for the Future (February 2003), EPA's National Center of Environmental Economics Seminar Series (March 2003) and Clark University (April 2003).

C. A. Pope III, R. T. Burnett, M. J. Thun, E. E. Calle, D. Krewski, K. Ito, G. D. Thurston, "Lung Cancer, Cardiopulmonary Mortality, and Long-term Exposure to Fine Particulate Air Pollution," *Journal of the American Medical Association*, 287, 1132-1141 (2002).

R.D. Rowe, C.M. Lang, L.G. Chestnut, D.A. Latimer, D.A. Rae, S.M. Bernow, D.E. White. The New York Electricity Externality Study Volume I: Introduction and Methods. Empire State Electric Energy Research Corporation: New York, 1995.

R. Schmalensee, P.L. Joskow, A.D. Ellerman, J.P. Montero, E.M. Bailey, "An Interim Evaluation of Sulfur Dioxide Emissions Trading," *Journal of Economic Perspectives* **12**, 53-68 (1998).

R. Shadbegian, W. Gray, and J. Levy, "Spatial Efficiency of Pollution Abatement Expenditures," presented at the Western Economic Association Meetings (June 1999), NBER Environmental Economic Meetings (April 2000), International Atlantic Economic Association Meetings (October 2000), and U.S. E.P.A. National Center for Environmental Economics (October 2000).

R. Shadbegian and C. Morgan, "Environmental Regulation in the Electric Utility Industry: Are There Productivity Gains From Emissions Trading?" Presented at the International Atlantic Economic Association Meetings (October 2002) and the Western Economic Association Meetings (July 2003).

H. Sigman, "The Pace of Progress at Superfund Sites: Policy Goals and Interest Group Influence," *Journal of Law and Economics*, **44**, 315-344 (2001).

U.S. Environmental Protection Agency, "The Benefits and Costs of the Clean Air Act, 1970 to 1990," October, 1997.

United Church of Christ, Toxic Waste and Race in the United States, UCC: Commission for Racial Justice (1987).

U. S. Environmental Protection Agency, EPA Acid Rain Program 2001 Progress Report, <http://www.epa.gov/airmarkets/cmprpt/arp01/2001report.pdf>, November 2002.

U. S. Environmental Protection Agency, Effects of Acid Rain: Human Health, <http://www.epa.gov/airmarkets/acidrain/effects/health.html>, November 2003.

W. K. Viscusi and J.T. Hamilton, "Are Risk Regulators Rational? Evidence from Hazardous Waste Cleanup Decisions," *American Economic Review* **89**, 1010-1027 (1999).

A. Wolverton, "Does Race Matter? An Examination of a Polluting Plant's Location Decision," U.S. Environmental Protection Agency, National Center for Environmental Economics mimeo (2002a).

A. Wolverton, "The Demographic Distribution of Pollution: Does neighborhood Composition Affect Plant Pollution Behavior?," U.S. Environmental Protection Agency, National Center for Environmental Economics mimeo (2002b).

Table 1 – Phase I Units

	Phase I Units*
SO ₂ Emissions in 1990 (tons)	9,468,183
SO ₂ Emissions in 1995 (tons)	4,902,778
Allowances in 1995	8,076,472
Boilers	374
Plants	148

* = Includes all Phase I units – the 110 Table A plants (263 units) plus the 38 “Substitution and Compensation” plants (111 units)

Table 2 – Benefits and Costs

Benefits	\$55.94 billion
Costs	\$0.56 billion
Net Benefits	\$55.38 billion

Table 3A – Percentage Distribution of Benefits and Costs Across Regions

Region	STATES	BENEFIT	COST
1	CT,MA,ME,NH,RI,VT	6.21%	0.19%
2	NJ, NY	16.84%	1.24%
3	DC,DE,MD,PA,VA,WV	23.69%	15.36%
4	AL,FL,GA,KY,MS,NC,SC,TN	22.05%	30.33%
5	IL,IN,MI,MN,OH,WI	26.19%	44.74%
6	AR,LA,NM,OK, TX	2.82%	0.00%
7	IA,KS,MO,NE	2.07%	8.14%
8	CO,MT,ND,SD,UT,WY	0.11%	0.00%
9	AZ,CA,NV	0.02%	0.00%
10	ID,OR,WA	0.00%	0.00%

Table 3B – Average Dollar Per Capita Distribution of Benefits and Costs Across Regions

Region	AVERAGE BENEFIT	AVERAGE COST	AVERAGE NET BEN
1	256.2	0.1	256.1
2	354.7	0.2	354.4
3	505.5	3.3	502.2
4	252.7	3.5	249.2
5	303.7	5.2	298.5
6	51.3	0	51.3
7	93.2	3.7	89.5
8	7.5	0	7.5
9	0.3	0	0.3
10	0.3	0	0.3

**Table 4A -- Benefits and Costs Across Different Populations
(average per capita \$1995)**

DEMOGRAPHIC GROUP	BENEFITS	COSTS	NET BENEFITS
TOTAL	213.1	2.1	211.0
AFRICAN-AMERICANS	253.6	2.1	251.5
HISPANICS	102.0	0.6	101.4
POOR	202.8	2.2	200.6
KIDS	204.9	2.0	202.9
ELDERLY	220.8	2.2	218.6

Table 4B -- Benefit/Cost Ratio Across Different Populations

DEMOGRAPHIC GROUP	Benefits/Costs
TOTAL	100
AFRICAN-AMERICANS	121
HISPANICS	180
POOR	93
KIDS	100
ELDERLY	99

**Table 5 – Distribution of Benefits and Costs Across Different Populations
(% of Plants with Cost Share>Benefit Share)**

DEMOGRAPHIC GROUP	Cost Share>Benefit Share
AFRICAN-AMERICAN	25%
HISPANIC	10%
POOR	48%
KIDS (6 and under)	52%
ELDERLY (65 and older)	43%

Figure 1
Distribution of Plants in Database
(148 Plants; scale=1995 SO₂ emissions in tons)

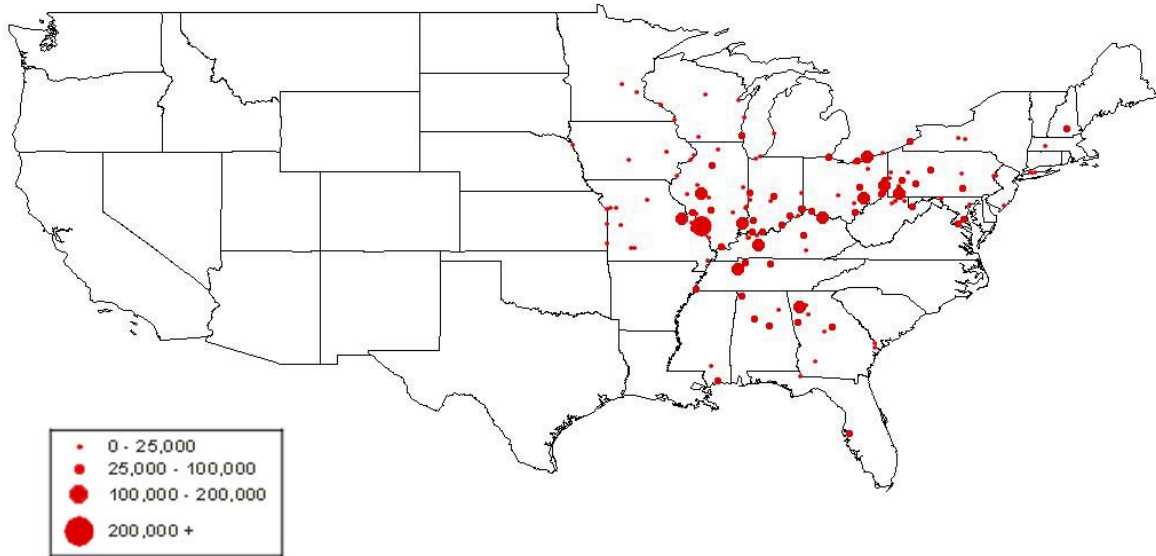


Figure 2
Geographic Distribution of Net Benefits

