The Section 812 Benefit-Cost Analyses of the Clean Air Act



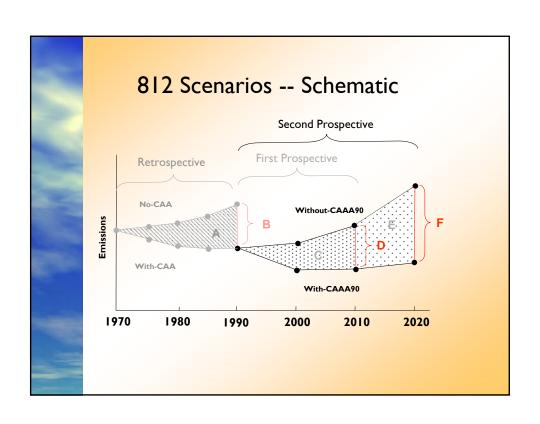
Jim DeMocker
Office of Policy Analysis and Review
Office of Air and Radiation

1990 Clean Air Act, Section 812

- ⇒ EPA "... shall conduct a comprehensive analysis of the impact of this Act on the public health, economy, and environment of the United States."
- Retrospective + biennial Prospectives
- Review by outside experts

 Advisory Council on Clean Air
 Compliance Analysis

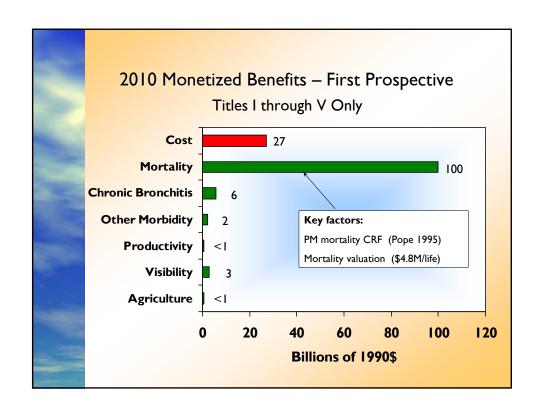


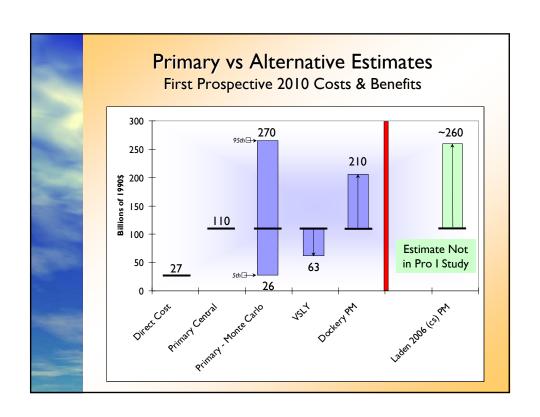


First Prospective 2010 Reductions

Endpoint	Incidences	% of Baseline
Mortality (30+)	23,000	1.00
Chronic Bronchitis	20,000	3.14
Chronic Asthma	7,200	3.83
Cardiopulmonary Hospitalizations	64,000	0.62 to 0.86
Asthma ERVs	4,800	0.55
Restricted Activity Days	12,000	
Work Loss Days	4,100,000	
Minor Illnesses	Millions	0.24 to 10.4







Council Closure Letter – First Prospective

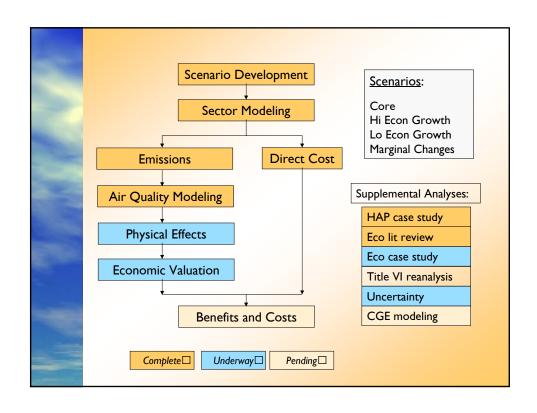
- ➡ "The Council believes that the [Prospective Study] is a serious, careful study that, in general, employs sound methods and data."
- "While we do not endorse all details of the study, we believe that the study's conclusions are generally consistent with the weight of available evidence."
- ⇒ Recommendations for Second Prospective:
 - Disaggregate Benefits and Costs by Title or Provision
 - ♥ Cost Uncertainty
 - ♦ Revise Mortality Risk Valuation Estimates
 - ♦ Increase Set of Ecosystem Benefits Valued
 - Stimate Exposure and Effects of Air Toxics

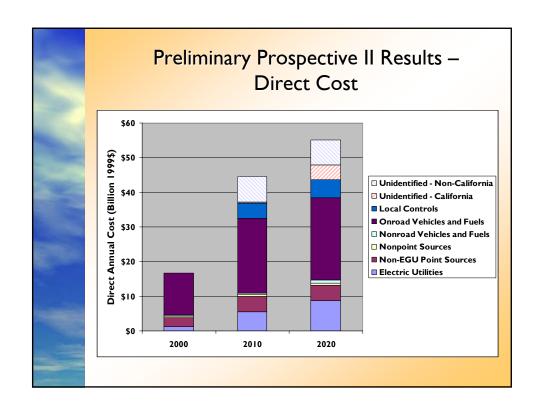
Council Letter – Second Prospective Blueprint

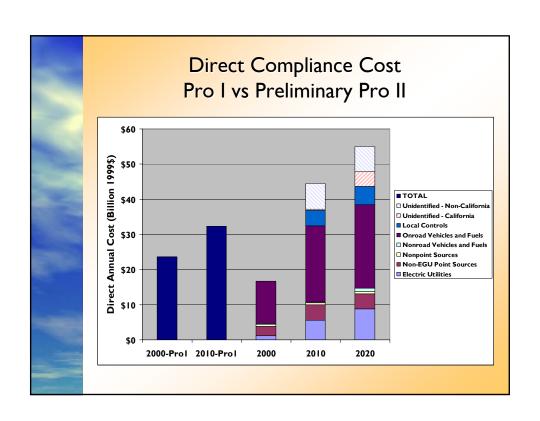
- ⇒ Recommendations for Second Prospective:
 - Implement Learning Laboratories
 - Disaggregation by Major Emitting Sector
 - Air Toxics Case Study
 - Scale Modeling
 - Discounting (inc. cessation lags)
 - Revise Mortality Risk Valuation Estimates
 - Sexpand Uncertainty Analysis, per NAS (2002)
 - Secological Effects Case Study
 - Consider Role of QALYs, but outside of BCA

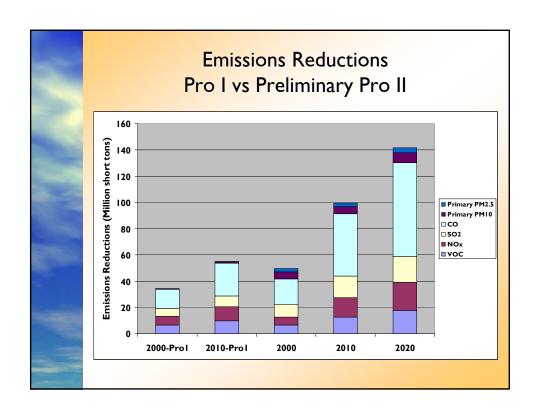
Council Letter - Second Prospective Blueprint

- ⇒ "The Council strongly advocates that the Agency continue to conduct these important benefit-cost assessments ..."
- "These analyses provide a rigorous example for other regulatory impact assessments and serve an important educational role for the Agency."
- "Information requirements identified in the 812 Analysis stimulate important research both inside and outside the Agency."
- ⇒ "The Council emphasizes that the 812 Analyses are not merely a
 perfunctory accounting exercise, but an ambitious and difficult
 enterprise that pushes the Agency to the frontiers of science
 in many different disciplines."









Looking Ahead

- ⇒ 812 studies are ongoing
 - Analytical system is state of the art
 - Rigorous external peer review by dedicated panels
 - ♦ Prospective II publication expected 2009
- Gain insights
 - Update answer to core question of overall value of CAAA90
 - Per Council—
 - Educational role and methods development (e.g., case studies)
 - Stimulate research and refine priority-setting (e.g., disaggregation)
- ⇒ Explore new opportunities
 - Derivative analyses, such as pollutant-specific \$/ton mapping
 - ♦ Reconsider Learning Laboratory initiative
 - Reconciliation of climate change and criteria pollutant assessments
- ⇒ www.epa.gov/oar/sect812