

TOPLINE ANALYSIS OF EPA BENEFITS-BUSTING PROPOSAL

Former EPA Administrator Scott Pruitt's cost-benefit analysis proposal must be analyzed in conjunction with his "restricted science" proposal. Together, they will deliver a one-two punch that could cripple the agency's ability to implement and enforce the nation's landmark environmental laws, like the Clean Air Act, Clean Water Act, Safe Drinking Water Act, and more.

Our country's environmental laws use varying approaches to "cost-benefit analysis," recognizing that EPA must balance different social, ecological, and economic factors in different kinds of ways for different environmental threats. How we decide to reduce toxic air pollution from oil refineries *should* be different from how we decide to control nutrient pollution from wastewater treatment plants. The one constant is that nearly every approach directs EPA to prioritize environmental and public health protections ahead of industry profits and other economic factors. In contrast, this proposal suggests that the agency's current leadership is pushing for the adoption of the strictest form of cost-benefit analysis across the board. This is something EPA does not have the authority to do.

The ultimate goal of the proposal is to establish anti-environmental norms that will bind future EPA action. For example, the proposal suggests the agency's political appointees would like to ban EPA from considering the full scope of real-world benefits of environmental protections by ignoring their enormous "co-benefits." Rules that limit mercury pollution from power plants or that cut down on their heat-trapping greenhouse gases also deliver other co-benefits by improving overall air quality and help people with asthma, other respiratory conditions, and heart disease. By ignoring those benefits, the agency's current leadership would put a corporate-friendly thumb on the scale of EPA's cost-benefit analyses, now and years into the future.

The benefits-busting proposal is designed to sell short and even disregard the massive benefits of environmental safeguards, making them more vulnerable to attack by conservative politicians and their corporate special interest benefactors.

The process for developing the biased benefits-busting proposal was rigged, with public interest organizations shut out of the discussion. This includes the rushed review process at the White House Office of Information and Regulatory Affairs (OIRA), which claims to take meetings with all stakeholders but rebuffed at least one public interest organization that wanted to meet about the proposal.