



Scott Pruitt, Administrator,  
United States Environmental Protection Agency  
1200 Pennsylvania Avenue N.W., Washington, DC, 20460  
May 15, 2017

RE: Comment on Executive Order 13777: Enforcing the Regulatory Reform Agenda Docket ID:  
EPA-HQ-OA-2017-0190: **EPA's protections save American lives and money, particularly around coal-fired electricity**

Dear Administrator Pruitt:

Executive Order 13777, "Enforcing the Regulatory Reform Agenda," establishes a federal policy "to alleviate unnecessary regulatory burdens" in an attempt to create jobs and reduce unnecessary burdens on the American people. The Executive Order is motivated in large part by the assumption that regulations are bad for the economy, when in fact decades of peer-reviewed scientific data demonstrate otherwise.

The primary mission of the EPA is to protect human health and the environment. The two facets of this mission, achieved through regulation based on sound science and data, work together to achieve lasting and meaningful improvements in the quality of life for the American people. Humans are dependent on healthy and abundant natural and ecological systems in order to provide clean air, clean water, safe shelter, and healthy work environments. The benefits of science based EPA regulation far outweigh the burdens or costs, and protections afforded by the EPA through its regulatory framework in turn lead to increased economic prosperity for all Americans.

Some Industrial and business interests claim that environmental protections are an economic burden, seeking to undo regulations necessary to implement these programs. A clear case is the coal industry, where the real costs of generating electricity are far greater than can be justified by the relatively low market price of electricity sold to consumers by this sector. Externalized costs of the air and water pollution the industry generates lead to asthma, respiratory disease, heat failure, and cancer – often at elevated rates in the low income and minority communities that are disproportionately located near polluting facilities. If these externalities were included in the cost of electricity, costs from coal could be 3 times higher than they are today.<sup>1</sup> The protections afforded by the Clean Air Act are literally the only thing that keeps the health costs of the coal industry from being much higher.

A majority of Americans and businesses support increased environmental regulation to protect the natural systems upon which we all depend. With more than 117 million Americans having "at risk" drinking water, new rules proposed by the EPA in 2014 were supported by more than 80% of small business owners, with more than 70% agreeing that clean water is necessary to support jobs and a strong economy.<sup>2</sup> The Clean Air Act and its implementing regulations have helped avoid more than 160,000 premature deaths, 130,000 heart attacks, millions of cases of

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<sup>1</sup> [http://www.chgeharvard.org/sites/default/files/epstein\\_full%20cost%20of%20coal.pdf](http://www.chgeharvard.org/sites/default/files/epstein_full%20cost%20of%20coal.pdf)

<sup>2</sup> [http://asbcouncil.org/sites/default/files/asbc\\_clean\\_water\\_poll\\_report\\_july2014\\_sv\\_final\\_140721v2sm.pdf](http://asbcouncil.org/sites/default/files/asbc_clean_water_poll_report_july2014_sv_final_140721v2sm.pdf)

respiratory problems such as acute bronchitis and asthma attacks, and 86,000 hospital admissions on an annual basis.<sup>3</sup> This in turn saves billions in health care costs for Americans,<sup>4</sup> and leads to better work productivity by preventing more than 13 million lost workdays on an annual basis.<sup>5</sup> And while projected costs of compliance for the Clean Air Act are expected to reach an annual value of \$65 billion by 2020, the benefits, including lives saved, increased productivity, job creation, and reduced health care costs, are expected to exceed \$2 *trillion* in the same time frame, or a benefit to cost ratio of more than 30 to 1.<sup>6</sup>

Study after study has shown that the benefits of EPA protections - like those implemented under the Clean Air Act, Clean Water Act, and Safe Drinking Water Act - far outweigh the costs or regulatory burdens of such programs. These same regulations have been shown by multiple independent and EPA studies to not only protect the environment, but also reduce illness and mortality, reduce health care costs, and in fact stimulate the economy.

Instead of pursuing an agenda to reduce regulatory burdens, the EPA should instead be seeking ways to enhance environmental protections. The EPA should review the extensive science and data that supports more robust regulations to protect public health, and utilize this information to maintain and expand the existing regulatory framework to better protect the American people and American economy.

Thank you for the opportunity to comment.

James McCaffrey  
Partnership for Policy Integrity

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<sup>3</sup> <https://www.epa.gov/clean-air-act-overview/benefits-and-costs-clean-air-act-1990-2020-report-documents-and-graphics>

<sup>4</sup> Office of Management and Budget 2013 Study, since redacted from government websites.

<sup>5</sup> <https://www.epa.gov/clean-air-act-overview/benefits-and-costs-clean-air-act-1990-2020-report-documents-and-graphics>

<sup>6</sup> <https://www.epa.gov/clean-air-act-overview/clean-air-act-and-economy>