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Subject: Comments on the Draft Guidelines

I am writing out of concern for some stated assumptions the OMB has made in regards to the cost benefit analysis for the proposed anti-pollution regulations under consideration. I am disturbed that the "value" of a person over the age of 70 is considered "less" than those under that age. Although I am not presently of that age, (I certainly hope to get there!), I do not think the government should be making such judgments. The idea that one life is manifestly more valuable than another solely based on age is a serious challenge to our ethical values as a society. If this idea is left unchallenged, I foresee additional troubling trends in calculating the "value" of various societal groups. If such reasoning is applied to other categories, would it mean that white people are more "valuable" than minorities because in general they make more money? Does a person with a college education deserve more "consideration" than high school graduate in considering the "value" of individuals?

The wrong-headed thinking this approach advocates will have serious implications to our EPA standards. I urge the OMB to drop this element of cost analysis.

Charles Darnell