Institute *for* Policy Integrity
NEW YORK UNIVERSITY SCHOOL OF LAW

Health & Environmental Benefits Under Threat from Recent Environmental Deregulatory Actions

Last updated March 5, 2019

Billions of dollars in annual benefits to public health and wellbeing are at risk from the Trump Administration's deregulatory efforts, which have targeted many economically justified environmental regulations through suspensions, repeals, revisions, and other actions. This table lists the maximum value of the estimated benefits of selected rules,[1] as reported in the original regulatory actions. These estimates reveal the economic losses that the American public would experience, should these rules be eliminated entirely. For information on litigation related to many of these rules, see our deregulatory litigation tracker.

Agency	Original Actions[2]	Summary of Original Action	Original Estimate of Maximum Net Benefits[3] at Risk (2017$[4])	Original Estimate of Maximum Gross Benefits[5] at Risk (2017$)	Categories of Monetized Benefits	Other Unquantified but Potentially Significant Benefits[6]	Steps in Deregulatory Process Taken To Date[7]
Environmental Protection Agency (EPA) / Nat'l Highway Traffic & Safety Administration	GHG Emissions & Fuel Efficiency Standards for Cars (aka CAFE standards) (10/15/2012)	Reduces greenhouse gas (GHG) emissions and improves fuel economy for light-duty vehicles for model years 2017 and beyond	$17.87 billion annually	$23.94 billion annually	• Avoided damages from climate change • Fuel savings • Health benefits from particulate matter (PM) reductions	• Health benefits from reductions in ozone, PM and other criteria pollutants • Other social benefits • Environmental benefits due to reductions of impacts of eutrophication in coastal areas	Proposed reconsideration (08/21/2017) Proposed replacement (08/24/2018)
EPA	Performance Standards for New Residential Wood Heaters (03/16/2015)	Applies updated emission limits that reflect the current best systems of emission reduction; eliminates exemptions over a broad suite of residential wood combustion devices; strengthens test methods as appropriate; and streamlines the certification process	$8 billion dollars annually	$8 billion dollars annually[8]	• Health benefits from PM reduction, including avoided premature deaths	• Avoided climate damages from black carbon • Avoided ecosystem damages • Reduced exposition to hazardous air pollutants (HAPs) and volatile organic compounds (VOCs)	Proposed amendments (11/30/2018)

[1] Some other rules with public health and environmental benefits are not included in this table. We chose to exclude rules that did not have any monetized benefits or positive net benefits.
[2] Proposed or final rules that have been targeted in deregulatory actions.
[3] Net benefits are the rule's monetized benefits minus the rule's monetized costs. Agencies may have calculated a range of estimates for both monetized benefits and monetized costs. To demonstrate the worst-case scenario that could result from deregulation, this table reports the maximum net benefits at stake. In instances where the agency did not provide net benefits calculations in the rulemaking, the net benefits equal the high-end estimate of any monetized benefits minus the low-end estimate of any monetized costs.
[4] Adjusted to 2017 dollars from original dollar year of analysis, https://data.bls.gov/cgi-bin/cpicalc.pl.
[5] Gross benefits reflect all of the rule's monetized benefits; in other words, no compliance costs have been subtracted from this estimate; however, cost savings may be counted as benefits.
[6] Many of the health and environmental benefits of regulations are difficult or currently impossible to quantify or monetize. Nonetheless, these effects may be significant and federal guidelines dictate that they should be taken into consideration.
[7] The Institute for Policy Integrity has submitted comments on several of these deregulatory actions when they were in the proposal stage. In addition, advocates have brought litigation challenging several of these deregulatory actions. Policy Integrity has submitted amicus briefs in some of those cases. Policy Integrity did not represent any of the parties.
[8] Costs are approximately $47 million in 2017$, so there are over $100 in benefits for every $1 in costs.

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EPA / Army Corps of Engineers	Clean Water Rule incl. definition of Waters of the United States (06/29/2015)	Ensures protection for the nation's public health and aquatic resources and defines the scope of protected waters under the Clean Water Act	$149 million annually	$583 million annually	• Water quality improvements • Avoided environmental impacts from pollution • Other ecological benefits, as measured by people's willingness to pay to protect wetlands and other aquatic resources	• Health benefits (e.g., from reduced exposure to pollutants associated with concentrated animal feeding operations' manure) • Other ecological benefits (e.g., reduced eutrophication)	Intent to review and rescind or revise (03/06/2017) Proposed repeal, proposed stay (02/06/2018) Proposed rescission (07/27/2017) Delay of effective date (02/06/2018) Proposed repeal and replacement (07/12/2018) Proposed revision (02/14/2019)
EPA	Clean Power Plan/ GHG Emissions Guidelines for New Power Plants (10/23/2015)	Reduces GHG emissions from existing power plants	$49 billion, in the year 2030	$52 billion in 2030	• Avoided damages from climate change • Health co-benefits, including avoided premature mortality from PM and ozone exposure	• Health benefits from reductions in ambient nitrogen dioxide (NO_2) and sulfur dioxide (SO_2) • Health benefits from reductions of mercury deposition • Ecosystem benefits associated with emissions reductions • Reduced visibility impairment	Proposed repeal (10/10/17) Proposed replacement (08/31/2018)
EPA	2015 Ambient Ozone Standards (10/26/2015)	Increases ozone standards to protect public health and welfare	$15.26 billion in 2025	$32.69 billion in 2025	• Reduced incidence of premature mortality from exposure to ozone and particulate matter (PM) • Reduced incidence of morbidity from exposure to ozone and PM	• Health benefits from reduced exposure to ozone • Reduced incidence of morbidity from exposure to NO_2	Attempted delay of compliance date, extended timeline for nonattainment areas (06/28/2017) No designation of non-attainment areas (11/16/2017) Standards finalized (12/06/2018)[9]
EPA	Effluent Limitations Rule for Power Plants (11/03/2015)	Protects public health and the environment from toxic metals and other harmful pollutants, including nutrients, by strengthening the technology-based effluent limitations guidelines and standards for the steam electric power generating industry	$79.97 million annually	$585 million annually	• Reduced morbidity and mortality from exposure to nitrous oxides (NO_X), SO_2, and PM • Avoided damages from climate change	• Reduction of long-term exposures and sub-lethal ecological effects • Ecological benefits from reduced sub-lethal chronic effects of toxic pollutants on aquatic life • Mitigating impacts to aquatic and aquatic-dependent wildlife population diversity and community structures • Reducing exposure of wildlife to pollutants • Reducing the potential for the formation of harmful algal blooms	Proposed delay of compliance dates (06/06/2017) Delay of compliance dates (09/18/2017)

[9] The 2015 final rule was supposed to take effect on Oct. 1 2017.

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EPA	Methane and VOCs New Source Performance Standards for Oil & Natural Gas Sources (06/03/2016)	Improves implementation of the current new source performance standards for oil and gas-generated power plants, setting standards for both methane and volatile organic compounds (VOCs)	$181 million in 2025	$736 million in 2025	• Avoided damages from climate change	• Reductions in VOC and HAP emissions • Reductions in methane as a precursor to global background concentrations of tropospheric ozone	Proposed reconsideration (10/15/2018)
EPA	GHG Emissions Standards for Methane from Landfills (08/29/2016)	Achieves additional reductions in emissions of landfill gas and its components, including methane, by lowering the emissions threshold at which a landfill must install controls	$66 million in the year 2025	$192 million in the year 2025	• Improvements in air quality • Reduced potential for health effects associated with exposure to air pollution related emissions • Avoided damages from climate change	• Health benefits from reduction in exposure to HAP, ozone, and PM	Stay for 90 days until reconsideration(05/31/2017) Proposed rule to change compliance schedule (10/30/2018)
EPA	GHG Emissions & Fuel Efficiency Standards for Trucks (10/25/2016)	Reduces GHG emissions and fuel consumption from new medium- and heavy-duty vehicles and engines	$26 billion in 2040	$75 billion in 2040	• Avoided damages from climate change • Health benefits from PM reduction	• Benefits from reductions in: o Chronic and subchronic bronchitis cases o Strokes and cerebrovascular disease o Low birth weight o Pulmonary function o Chronic respiratory diseases other than chronic bronchitis o Non-asthma respiratory emergency room visits o Limited visibility o Household soiling	Proposed repeal of Emission Requirements for Glider Vehicles, Glider Engines, and Glider Kits (11/16/2017)[10]

[10] Even though the proposal would just repeal coverage for one segment of the industry, that exemption could significantly affect the fleet mix, leading to severe environmental and health consequences. Furthermore, since a replacement for the car emissions and fuel efficiency standards has been proposed, there is no reason to believe that a similar replacement will not be proposed for trucks/heavy-duty vehicles. Therefore, it is still appropriate to consider the maximum benefits of the original rule when assessing the risk from deregulatory efforts. *See* Institute for Policy Integrity. Comments on the Irrational Failure to Consider the Environmental Costs or the Implications of Grandfathering of the Proposed Repeal of Emissions Requirements for Gliders; and EDF et al. Comments of Environmental Defense Fund, the Environmental Law & Policy Center, and WE ACT for Environmental Justice on the Environmental Protection Agency's Proposed Rule, Repeal of Emission Requirements for Glider Vehicles, Glider Engines, and Glider Kit.

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Dept. of Energy	Energy Conservation Standards for General Service Lamps (03/17/16)	Amends energy conservation standards for general service lamps to achieve the maximum improvement in energy efficiency that is technologically feasible and economically justified	$654 million annualized	$654 million annualized	• Avoided damages from climate change • Benefits from NO_X reductions • Consumer savings	• None listed	Proposed revisions (02/11/2019)
Dept. of the Interior	Methane Waste Prevention Rule (aka Venting and Flaring rule) (11/18/2016)	Reduces waste of natural gas from venting, flaring, and leaks during oil and natural gas production	$203 million in 2026	$424 million in 2026	• Cost savings from the sale of natural gas • Avoided damages from climate change	• Improvements in quality of life for nearby residents • Reduction of VOCs • Reduced production of NO_X and PM	Proposed postponement of compliance dates (06/15/2017) Proposed further postponement (10/04/2017) Final delay of compliance dates (12/08/2017) Revised rule (09/28/2018)
Dept. of the Interior	Stream Protection Rule (12/20/2016)	Better protects water supply, surface water and groundwater quality, streams, fish, other wildlife, and related ecosystems from the adverse impacts of surface coal mining operations and provide mine operators	$28.99 million annually	$341 million annually	• Annual employment gain • Decrease in coal prices • Avoided damages from climate change	• Restoration of streams • Improvements in water quality • Improvements in reforestation	Eliminated after Congress invoked Congressional Review Act (11/17/2017)