



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

January 15, 2021

THE ADMINISTRATOR

John D. Graham, Ph.D.
Chair
Science Advisory Board
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Dear Dr. Graham:

Thank you for your December 16, 2020, letter which transmitted the U.S. Environmental Protection Agency Science Advisory Board report titled "Review of EPA's Reduced Form Tools Evaluation." Last year, the EPA's Office of Air and Radiation requested that the SAB review a 2019 EPA report titled "Evaluating Reduced-Form Tools for Estimating Air Quality Benefits." This EPA report was intended to demonstrate an approach to systematically evaluate and compare monetized health benefits estimated using full-form air quality models against those generated using available reduced-form tools.

The EPA appreciates the thorough review provided by the SAB and the constructive recommendations within the SAB report. We particularly appreciate the efforts of Dr. Jay Turner and the entire SAB Reduced Form Tools panel for their time spent in both thoughtful review of the EPA report as well as the constructive deliberations in responding to the specific charge questions posed by the EPA.

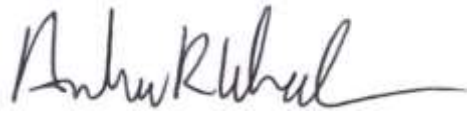
The final SAB report includes several recommendations intended to strengthen the scientific basis for any future agency assessments utilizing reduced-form tools. During the next several years, OAR expects to continue to evaluate how reduced-form tools, including an updated benefits-per-ton approach, can appropriately inform regulatory impact analyses when circumstances may advise their use. As the EPA stated in the November 12, 2020, public meeting of the chartered SAB, OAR will utilize these recommendations where appropriate to guide this continual evaluation of the suitability of reduced-form methods to estimate air quality and health benefits in future regulatory contexts. While all of the recommendations are expected to be valuable, we want to specifically and affirmatively acknowledge the SAB recommendation that it is "important to understand when RFT estimates can be helpful to guide decisions in the policy

development process and when they are too uncertain to be used to inform a decision” and the recommendation that the EPA directly evaluate the usefulness of RFTs in different parts of the regulatory decision process. OAR intends to do so.

As the work continues, within and outside of the EPA, to evaluate whether and how such tools can be fit to specific assessments, I thank you and the RFT panel again for the SAB’s thoughtful review of the EPA’s 2019 report “Evaluating Reduced-Form Tools for Estimating Air Quality Benefits.” The SAB advice will be valuable in ensuring that the EPA uses the best available science in the future when evaluating these alternatives to traditional full-form benefit estimation approaches.

The EPA appreciates the ongoing efforts of the SAB to provide scientific and technical input to help guide agency actions toward reaching public health and environmental goals.

Sincerely,

A handwritten signature in dark ink, appearing to read "Andrew R. Wheeler", with a long horizontal flourish extending to the right.

Andrew R. Wheeler



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WASHINGTON, D.C. 20460

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THE ADMINISTRATOR

Jay R. Turner, Ph.D.
Chair
Reduced Form Tool Review Panel
Science Advisory Board
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

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recommendation that the EPA directly evaluate the usefulness of RFTs in different parts of the regulatory decision process. OAR intends to do so.

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