



Resolution of the Ozone Transport Commission On Monetizing Health Benefits in Rulemakings

WHEREAS, Congress established the Ozone Transport Commission (OTC) under Sections 176A and 184 of the federal Clean Air Act (CAA) to ensure the development and implementation of regional strategies to reduce ground-level ozone to healthy levels; and

WHEREAS, the adverse health effects of ground-level ozone are well documented, and despite significant reductions of ozone precursor emissions achieved to date, approximately 30 million residents of the Ozone Transport Region (OTR) continue to be exposed to unhealthy levels of ozone air pollution; and

WHEREAS, NO_x reduction emission strategies to reduce ground-level ozone have co-benefits in reducing emissions of fine particulate matter (PM_{2.5}), air toxics, and greenhouse gases; and

WHEREAS, the U.S. Environmental Protection Agency's (EPA's) Integrated Science Assessments have established causal links between ozone exposure and respiratory health effects and between PM_{2.5} exposure and cardiovascular health effects and total (nonaccidental) mortality; and

WHEREAS, benefit-cost analyses have been a key component of federal regulatory development for over 40 years, enabling EPA and other agencies to identify policy options likely to deliver the greatest net benefits; and

WHEREAS, on January 15, 2026, EPA promulgated the New Source Performance Standards (NSPS) Review for Stationary Combustion Turbines and Stationary Gas Turbines final rule, stating that, "EPA is no longer monetizing benefits from PM_{2.5} and ozone but will continue to quantify the emissions until the Agency is confident enough in the modeling to properly monetize those impacts;" and

WHEREAS, EPA cites a concern about epidemiological, economic, and methodological uncertainties as the reason for not monetizing health benefits from reductions in ozone and PM_{2.5} exposures; and

WHEREAS, there is some degree of uncertainty in all elements of a benefit-cost analysis, including the calculation of compliance costs; and

WHEREAS, reviews of CAA regulations have found that analyses conducted prior to rulemakings consistently overestimated compliance costs due to

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Michelle Manion
Executive Director

89 South St., Suite 602
Boston, MA 02111
(617) 259-2005
www.otcair.org

factors that are difficult to forecast in advance, including technological innovation and fuel costs; and

WHEREAS, health benefits that are not monetized are effectively weighted as zero, and while there is an uncertainty range in monetized health benefits from reduced exposure to PM_{2.5} and ozone, there is great confidence that the full range of those monetized benefits are positive and not zero.

THEREFORE, BE IT RESOLVED, that the members of the OTC urge EPA to resume monetizing PM_{2.5} and ozone health benefits as in past benefit-cost analyses conducted during the development of CAA regulations. The basis for monetizing those benefits is well-established by robust science that has been thoroughly peer-reviewed and its use in benefit-cost analyses is widely accepted as good economic practice. Any uncertainties are within reason for use in rulemakings and doing so is vastly preferable to discontinuing quantification of health benefits altogether, which would create the false assumption that benefits are zero.

Adopted by the Commission on June 3, 2026.