

Responses

Counting Clean Air's Costs

I found the article "The Costs of Clean Air: How Much Should They Count?" (QQ, vol. 2, no. 1) to be a good summary of the issues. However, the article could have carried the argument one step further. It assumed that the present rate and pattern of production is a given and therefore the benefits and costs to be assessed are the benefits of clean air and the costs of cleaning up the air. This is one way of viewing the problem.

However, one can also assume that a certain level of clean air is a given and then one would assess the benefits and costs of various economic products with the

fore this would argue for the maintenance of air quality standards that would minimize such damages.

Dwight Platt
Bethel College
North Newton, Kansas

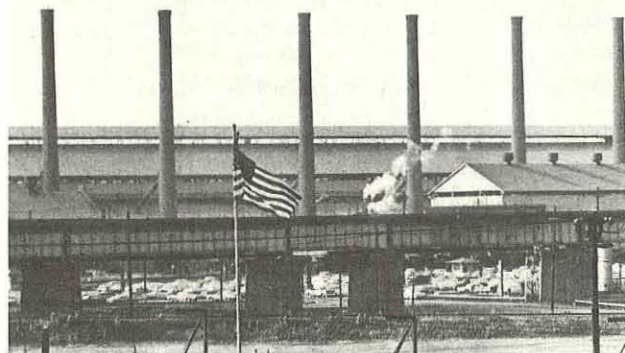
"The Costs of Clean Air: How Much Should They Count?" contains a common misperception concerning the operation of the regulatory process for limiting human exposure to ambient levels of certain substances in the general environment. In discussing the role that cost considerations ought to be permitted to play in setting National Ambient Air Quality Standards (NAAQS), the article characterized the establishment of the NAAQS as a *goal formation* process and, by impli-



U.S. Steel, Birmingham, Al., before

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costs of maintaining this air quality standard internalized. Therefore the costs to be assessed are not the costs of clean air, but the costs of various technological and industrial production activities. Many things that are technologically feasible are not done because the costs are too high. This might be true of other technologies if all costs were internalized. Such an assessment would encourage those technologies that satisfy human needs at the lowest cost (rather than ignoring certain costs because they are borne by society at large). This would allow the economic system to work most efficiently because it would be evaluating economic products.

If a particular agreed-upon air quality standard damages the health or life quality of some individuals in a society in order to produce economic benefits for others, then simple justice would call for some recompense. Either those benefiting from the technology that deteriorates air quality should pay damages or society as a whole should be willing to pay for those damages. Of course it is often difficult to be certain of the identity of those who have been damaged and sometimes even of those responsible for air quality deterioration. There-

cation, the establishment of specific emissions standards as a *goal implementation* process: "Defenders of the Clean Air Act in its current form argue that we should first form our political ideals, first set our standards for individual and community health and safety, and introduce considerations of cost only at the stage of implementation."

Why is this a misperception? Because it does not accurately reflect the integral role that the NAAQS play in structuring the process for regulating air pollution and in constraining the discretion that may be exercised in all subsequent stages. This is critical, for if the NAAQS were indeed merely "political ideals" or "common goals," then I might have much less objection to structuring the process by which they are established in order to ensure that certain values—such as the cost they will impose upon society—are not given undue weight. (I reject the notion that cost considerations either can or should be totally excluded from setting basic environmental standards such as the NAAQS even if such standards were recast to make them more nearly correspond to "goals.")

In fact, the establishment of an NAAQS for a particular pollutant determines the maximum level of the pollutant that will be permitted within any of the hundreds of air quality regions within the country by a specific date. In establishing specific emissions standards for individual major sources, or in developing state implementation plans which (at least until very recently) specified the precise level of emissions for hundreds or even thousands of individual point sources within a state and the precise techniques for their control, regulators are not free to treat the NAAQS as "goals." They are binding standards that, if not met, can subject the violator (an individual polluter or state) to serious financial penalties. In the "implementation phase," regulators can indeed "consider costs," but only in a very narrow sense. They can determine if the costs of meeting the NAAQS by the particular techniques specified will so incapacitate an industry that its financial viability is threatened. Otherwise, the plans must go forward.

"Costs should not be the determining factor in setting NAAQS. The standards should not be required to meet a rigid cost-benefit test. But costs do deserve to be explicitly considered. It is both impractical and undesirable to do otherwise."

What is missing from this process? Any meaningful ability at any stage within it to set priorities among pollutants or among the various media into which they can be discharged; to debate the value of pollution abatement versus other health-related social goals; or to consider the implications of shifting resources from programs directly affecting human health and welfare to those whose effect is much less direct (income maintenance programs, for example.)

Costs should not be the determining factor in setting NAAQS. The standards should not be required to meet a rigid cost-benefit test. But costs do deserve to be explicitly considered. It is both impractical and undesirable to do otherwise.

George Eads
School of Public Affairs
University of Maryland
College Park, Maryland

Evolution and Atheism

"The Case Against Creationism" by Professor Allen Stairs (QQ, vol. 2, no. 2) is the first treatment I have seen by an academic that gets anywhere near the real issue. He still doesn't quite reach it, however. Prof. Stairs quotes a creationist, Duane Gish, on the central

point: "Since evolution is a mechanistic, atheistic theory, it is a basic dogma of agnosticism, humanism, and atheism in general." This statement sounds hopelessly confused to Prof. Stairs, so he doesn't address it. Instead, he admits only that science may conflict with certain factual claims or certain "personal moral issues" raised by some (minority) religious groups. The idea that *science itself is atheistic*—that is, Western science as it has been defined since the 18th century—apparently strikes him as too philosophically naive to be taken seriously. Nevertheless this is precisely the issue; and many people—enough to pass legislation in many states—are likely to agree with the Fundamentalists that the attempt to account for all natural phenomena *without God* is obviously atheistic. When this attempt is extended to the study of man himself, the threat to moral values becomes even clearer. If philosophers think these conclusions do not follow, they had better start persuading. . . .

"Secular humanism" is not neutral, but an attempt to show that *religion is unnecessary* for moral behavior, in direct contradiction to the Bible. And Western science . . . is trying to show that nature can be fully explained without appealing to God at any point, even at the beginning. Religion is a matter of individual subjective feeling. It can safely be omitted from the curriculum, and left to the family. It is an "optional extra." If the Bible is a true guide to life, then this attitude is not neutral, but anti-religious. . . .

My own position is that creationism should be taught in the public schools, but in philosophy class rather than biology. The arguments for and against a First Cause, teleology in nature, consciousness or spirit as super-

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natural, life after death, and various ethical theories (both religious and secular) should all be discussed as objectively as possible, ignoring the howls of parents. . . . Whether the course is really "objective" and whether it belongs in the public schools should also be discussed in the course. Such a course is long overdue in our high schools, and it should be required for all students.

Richard J. Burke
Chairman, Department of Philosophy
Oakland University
Rochester, Michigan

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