Written Comment for Public Hearing on Draft Environmental Impact Statement for CAFE and HDPUV Standards (NHTSA Fuel Efficiency Standards for Cars and Light Trucks)

Docket No. NHTSA-2022-0075 at <u>https://www.regulations.gov/docket/NHTSA-2022-0075/</u> <u>document</u>

October 13, 2023

I'm Roselie Bright, ScD, with a doctor of science in epidemiology with a specialty in environmental health, earned at Harvard. I had a career as a federal epidemiologist. I'm retired and speaking for myself.

Overall, I appreciate the hard work that went into the Draft Environmental Impact Statement.

I have several points that would improve the Final Environmental Impact Statement:

1. For most of the pollutants, the model relies on other federal reviews, the most recent one having been published in 2021. We all know that federal reports involve extensive approval time periods before publication. Therefore, there was probably at least a year of significant publications that weren't reviewed for this DEIS. There has been a steep rise in the number of emissions epidemiology publications in recent years. Therefore, I strongly suggest an update to the DEIS and the public health effects model using recent literature.

2. To do this properly, the reviewer teams need to include scientists trained in environmental epidemiology. Appendix G lists people with environmental masters degrees, none with a public health emphasis. Evaluation of environmental epidemiology requires at least masters level training specifically in public health science. Please obtain an environmental epidemiologist to update the review of recent literature and extract important inputs into the public health effects model. Doing so might clear up some of my confusion for a few specific points:

- a. The effects of noise were dismissed because in some traffic situations, electric vehicles need to make artificial noise to alert pedestrians, even though overall, combustion engine vehicles are still much louder than electric vehicles. It is clear to me that as the combustion engine vehicles are replaced by electric vehicles, the overall noise produced by the fleet of vehicles will decrease. Where epidemiology comes into play is the fact that the most alarming studies of noise pollution are recent. At real-world traffic noise levels, they document the following adverse health impacts: increased blood pressure, heart disease, raised stress hormones, brain damage, cancer, and death [1-45].
- b. The emission health impacts listing in Table IV-26 is extensive, but omits several adverse health impacts that have been documented recently: lung cancer mortality; asthma onset in both children and adults; poor pregnancy outcomes, poor physical growth, school absences, and reduced cognitive abilities (autism, academic performance, dementia) [46-91].
- c. The list of specific pollutants leaves out platinum and palladium, which have been recently associated with asthma and promotion of inflammation [92-93].

3. NHSTA is required to conserve energy and is proposing less than the maximum conservation on the grounds of economic feasibility. The economics should be reconsidered in light of recent news of the exorbitant personal annual CEO compensations for the big three automobile manufacturers, 75 million dollars, combined [94]. I'm sure there is money for innovation that doesn't all need to be passed on to the consumer.

4. The CAFE model assumed that for electricity generation, the majority of sources would continue to be fossil fuel [Section 3.2.2.1].

- Please include in your analysis the impact of expanding home EV battery charging from home solar panels.
- I encourage the other federal agencies, and state and local governments, to accelerate their policies to replace fossil fuels with wind and solar for electricity generation. Doing so would make it even more clear that the CAFE and HDPUV standards should be maximally applied to encourage electric vehicle production.

5. Please do not let the fact that this document applies to a small fraction of total emissions deter you from regulating this sector as much as possible. All emissions count.

Thank you for this opportunity to comment.

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