

Quality review comments for the SAB Review of EPA's Draft Assessment entitled Use of Economy-Wide Models in Evaluating the Social Costs, Benefits, and Economic Impacts of Air Regulations:

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- 1) Were the charge questions to the committee adequately addressed?

Although no specifically called for in the charge, the report specifies that it is advising the EPA on the timeframe to address various potential improvements to the models. There was variability in how clearly such advice was given from question to question.

- 2) Are there any technical errors or omissions or issues that are not adequately dealt with in the draft report?

It should be noted that the California Economy has recently grown while energy use has fallen. These factors have traditionally been coupled and it should be noted that some policies may result in changes in employment in some sectors, and if there is a high burden of occupational risk in one sector, that would be another health shift. There should be more focus on non-mortality health endpoint. For example, there is increasing evidence of adverse neurological development for children exposed to air pollution during pregnancy. There should be a recommendation to keep watch for cost analyses for these endpoints. Other endpoints, such as asthma exacerbation should also be considered. Perhaps added to section 4.1.

- 3) Is the draft report clear and logical?

Section 3.4 could include an introductory paragraph better linking the questions and answer. In section 4.3, rather than just steering the reader to other sections a summary should be included. Section 6.5 states at the beginning that each topic discussed will include a suggested timeline. However the subsequent paragraphs could have specified the timelines more clearly.

- 4) Are the conclusions drawn or recommendations provided supported by the body of the draft report?

While the conclusions drawn were supported by the text, some additional points should have been brought forward to the letter to the Administrator. Specifically, when describing the many complexities in the first set of bullets, it should be noted that the U.S. economy resides within an international economy. The last sentence in the second set of bullets mentions sensitivity and uncertainty, however, more emphasis needs to be given to this topic. Finally, in the third set of bullets only mortality is mentioned as a cost. Other health endpoints need to be acknowledged.