



July 6, 2021

The Honorable Michael Regan  
 Administrator  
 U.S. Environmental Protection Agency  
 1200 Pennsylvania Ave, NW  
 Washington, DC 20460

Comment in re: Docket EPA-HQ-OAR-2021-0257

Dear Administrator Regan:

The undersigned health, medical, nursing and healthcare organizations write in strong support of the United States Environmental Protection Agency's (EPA) proposed reconsideration of the unfounded revocation of California's Advanced Clean Cars waiver. The action taken by the previous administration to revoke California and states' authority was unfounded and contrary to the public health protections provided by the Clean Air Act. To protect the health of the patients, members and communities we serve from transportation pollution, we urge you to restore the waiver as quickly as possible.

The ability of states to follow stronger standards to reduce vehicle pollution is critical for public health. The Clean Air Act authorizes the State of California to develop and enact pollution

controls for motor vehicles that are stronger than federal standards in order to ensure public health protections are tailored to address the severe pollution impacts in that state. California is required to apply to U.S. EPA for a waiver to implement its own standards, all of which have ultimately been granted. No waiver had ever been revoked, and the Clean Air Act provides no process for doing so.

The Clean Air Act also provides other states the option of enacting these more protective standards, meaning the proposed reconsideration will ensure the benefits of cleaner and zero-emission vehicles are realized beyond California. To date, 13 states and the District of Columbia have utilized this option,<sup>i</sup> with Nevada, Minnesota and Virginia now in the process of adopting these more health-protective standards. Not only does this reduce air and climate pollution in states that follow the stronger standards, it drives innovation and reduces vehicle pollution for the entire nation.

EPA must restore California's Advanced Clean Cars waiver to ensure the strongest possible tools are available to protect public health in the face of urgent health crises resulting from air pollution and climate change. The American Lung Association's "State of the Air" 2021 report found that over 40 percent of all Americans live in areas impacted by unhealthy levels of ozone and/or particle pollution. The report details that people of color are three times more likely to live in areas with the worst pollution. California has made significant progress in cleaning the air, but still faces extreme pollution challenges that threaten the health of tens of millions of residents.<sup>ii</sup> California must be allowed to use its Clean Air Act authority to implement vehicle pollution controls, and all states must have the option to follow those more protective standards to protect the health of their residents.

The health impacts of air pollution are well documented by U.S. EPA and through decades of peer-reviewed scientific research. Children, seniors, people living with respiratory or cardiovascular illnesses, pregnant people, lower income communities and communities of color are at greater risk from the negative health effects of poor air quality. These impacts range from asthma attacks in children and adults, worsening of COPD and other lung health conditions, heart attacks and strokes, pre-term birth and low birth weight in babies, and premature death. Breathing particle pollution can also cause lung cancer.<sup>iii</sup>

The transportation sector is the leading source of carbon emissions and of ozone- and particle-forming emissions of oxides of nitrogen (NOx). The California Advanced Clean Car program was adopted to address these pollutants through standards that phase in advanced vehicle technologies and gradually reduce emissions of greenhouse gas emissions from combustion-powered vehicles. US EPA's proposal represents a critical step in returning to protection of public health as envisioned by the Clean Air Act.

Driven by greenhouse gas emissions, climate change impacts make it harder to maintain the tremendous air quality and public health gains made over five decades of implementation of the Clean Air Act. Beyond increasing air quality burdens due to rising temperatures, drought conditions and the increasingly frequent and intense wildfires, climate change contributes to and amplifies a wide range of risks and health disparities, including heat-related illnesses and deaths, changes in vector-borne diseases like Lyme disease and West Nile Virus, water and food-borne illnesses, mental health impacts and disaster-related displacement. In fact, U.S.

EPA recently expanded the list of health-related climate change indicators, including the addition of cold-related deaths, increasing conditions for pollen growth/allergies and changes in home energy use due to temperature changes.<sup>iv</sup>

In the best interest of public health, we support U.S. EPA moving to quickly reverse the inappropriate revocation of state authority and allow states the full complement of tools available to protect their citizens from transportation pollution. We further urge the agency to transition quickly to working closely with the California and the states to develop the strongest possible future standards to significantly reduce all harmful pollutants. We also urge U.S. EPA to restore lost emission benefits caused by the previous administration's actions. Lastly, we call on U.S. EPA to work with the Biden Administration to facilitate the rapid and widespread deployment of zero-emission transportation coupled with non-combustion renewable energy.

Thank you for your consideration of our position. We look forward to working with you to advance U.S. EPA's mission to protect human health.

Sincerely,

Allergy & Asthma Network  
Alliance of Nurses for Healthy Environments  
American Academy of Pediatrics  
American Lung Association  
American Public Health Association  
Association of Schools and Programs of Public Health  
Asthma and Allergy Foundation of America - Michigan Chapter  
Asthma and Allergy Foundation of America  
Breathe Southern California  
Children's Environmental Health Network  
Emphysema Foundation of America  
Hartford Radiation Oncology Associates  
Health Care Without Harm  
Healthy Air and Water Colorado  
Kindred Healthcare  
Maternal and Child Health Access  
Montana Chapter of the American Academy of Pediatrics  
Montana Health Professionals for a Healthy Climate  
Montana Public Health Association  
National Association of Pediatric Nurse Practitioners  
National Environmental Health Association  
National Hispanic Medical Association  
National League for Nursing  
National Medical Association  
Patient Services, Inc.  
Public Health Institute  
Regional Asthma Management and Prevention  
San Francisco Bay Physicians for Social Responsibility

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<sup>i</sup> California Air Resources Board. States that have Adopted California's Vehicle Standards under Section 177 of the Federal Clean Air Act. [https://ww2.arb.ca.gov/sites/default/files/2019-10/ca\\_177\\_states.pdf](https://ww2.arb.ca.gov/sites/default/files/2019-10/ca_177_states.pdf)

<sup>ii</sup> American Lung Association. "State of the Air" 2021. April 2021. [www.Lung.org/sota](http://www.Lung.org/sota)

<sup>iii</sup> American Lung Association. "State of the Air" 2021: Health Impact of Air Pollution. April 2021. <https://www.lung.org/research/sota/health-risks>

<sup>iv</sup> US EPA. Climate Change Indicators in the United States. Updated May 2021. <https://www.epa.gov/climate-indicators>