



The Honorable Michael S. Regan
 Administrator
 U.S. Environmental Protection Agency
 1200 Pennsylvania Avenue NW
 Washington, DC 20004

Re: Support for California Advanced Clean Cars II Waiver, Docket ID No. EPA-HQ-OAR-2023-0292

The undersigned health, medical and nursing organizations call on the United States Environmental Protection Agency (EPA) to approve California's waiver to implement the Advanced Clean Cars II (ACC II) regulation without delay.

Californians face the most difficult air pollution challenges in the United States. The American Lung Association's "State of the Air" 2023 report found that California is home to six of the ten

most ozone-polluted cities in the United States, including the top four.¹ Despite decades of progress in reducing air pollution, Californians still face risks associated with unhealthy air, including asthma attacks, strokes, heart attacks, lung cancer and premature death. Low-income communities and communities of color face disproportionate burdens and disparities in health impacts. Traffic pollution is known to contribute to these health harms, including premature death, increased risk of asthma onset in children and adults and increased risk of respiratory infection in children.²

The federal Clean Air Act provides California with the authority to enact more-health protective standards, and it requires EPA to approve waivers for state standards that are at least as protective of public health as applicable Federal standards. The Clean Air Act also provides states with the ability to opt into California's more health-protective standards. The ACC II waiver meets this test. EPA must approve the waiver so that California and affiliated states can implement ACC II without delay.

Following years of public process, the California Air Resources Board (CARB) adopted the ACC II standards in 2022 to ensure cleaner and zero-emission technologies are increasingly included on new passenger vehicles. Implementation of the ACC II program is a key part of California's plan to meet the health-protective National Ambient Air Quality Standards (NAAQS). The ACC II program was included in the 2016 California State Implementation Plan (SIP) for Ozone and more recently covered in the 2022 SIP. ACC II was also a significant focus of the 2022 California Climate Change Scoping Plan for achieving statutory greenhouse gas emission reductions. To support their own clean air and climate efforts, a dozen states have also now opted into the ACC II program to reduce local emissions.

The health and medical community in California participated in the development and adoption of the ACC II program, and health experts across the nation have called on their own states to bring the benefits of the program home. The program is a priority health intervention to ensure cleaner technologies are implemented on new cars while an increasing share of the new car market transitions to zero-emission, with the final result being 100 percent sales of zero-emission technologies by 2035. Now, we call on EPA to approve the ACC II waiver to ensure the benefits of these technologies move forward without delay.

In California alone, the rule is poised to provide significant public health benefits, including:

- \$12.9 billion in monetized public health benefits by 2040;
- Approximately 1,300 lives saved;
- Hundreds of hospitalizations for respiratory and cardiovascular issues avoided; and
- Hundreds of asthma-related emergency department visits avoided.

The American Lung Association's 2023 "[Driving to Clean Air](#)" report found that the nationwide benefits of 100 percent zero-emission passenger vehicle sales coupled with clean, non-combustion energy could result in \$978 billion in cumulative public health benefits by 2050, saving 89,300 lives and avoiding 2.2 million asthma attacks across the nation.³

¹ American Lung Association. State of the Air 2023. April 2023. www.lung.org/sota.

² Health Effects Institute. Special Report 23. A Special Report of the HEI Panel on the Health Effects of Long-Term Exposure to Traffic-Related Air Pollution June 2022. <https://www.healtheffects.org/publication/systematic-review-and-meta-analysis-selected-health-effects-long-term-exposure-traffic>

³ American Lung Association. Driving to Clean Air: Health Benefits of Zero-Emission Cars and Electricity. June 2023. <https://www.lung.org/clean-air/electric-vehicle-report/driving-to-clean-air>

To ensure that California continues to make progress toward attainment of health-protective air quality standards, and to protect communities throughout the United States, we urge EPA to approve the waiver for the California ACC II regulation without delay. Please contact William Barrett with the American Lung Association at William.Barrett@Lung.org for any additional information.

Signed,

Allergy & Asthma Network
Alliance of Nurses for Healthy Environments
American Academy of Pediatrics
American Academy of Pediatrics, California
American Academy of Pediatrics, Colorado
Chapter
American Academy of Pediatrics, DC
Chapter
American Academy of Pediatrics, Utah
Chapter
American College of Physicians
American College of Physicians California
Services Chapter
American Lung Association
American Public Health Association
Arizona Chapter of the American Academy
of Pediatrics
Asthma and Allergy Foundation of America
Asthma Coalition of Los Angeles County
California Nurses for Environmental Health
and Justice
California Medical Association
Center for Climate Change and Health
Children Now
Children's Environmental Health Network
Climate Health Now
Climate Psychiatry Alliance
Connecticut Health Professionals for
Climate Action
Greater Boston Physicians for Social
Responsibility
Health Care Without Harm
Maryland Chapter, American Academy of
Pediatrics
Medical Society Consortium on Climate and
Health
Medical Students for a Sustainable Future
Mississippi Chapter of the American
Academy of Pediatrics
Montana Chapter of the American
Academy of Pediatrics
Mothers & Others For Clean Air
NAHN Golden Gate Chapter (SF Bay Area)

National Association of Pediatric Nurse
Practitioners
National Environmental Health Association
National League for Nursing
National Medical Association
Nevada Chapter, American Academy of
Pediatrics
NH Chapter of the American Academy of
Pediatrics
Oncology Advocates United for Climate and
Health International
Philadelphia Solar Energy Association
Physicians for Social Responsibility
Physicians for Social Responsibility
Pennsylvania
Physicians for Social Responsibility/Maine
Physicians for Social
Responsibility/Sacramento
Public Health Institute
Regional Asthma Management &
Prevention (RAMP)
San Francisco Bay Physicians for Social
Responsibility
SCAAP
St. John's Community Health
Texas Physicians for Social Responsibility
The Massachusetts Chapter of the
American Academy of Pediatrics
Virginia Clinicians for Climate Action
Washington Chapter of the American
Academy of Pediatrics
Washington Physicians for Social
Responsibility