



National Association of County & City Health Officials

The National Connection for Local Public Health

October 5, 2017

Scott Pruitt  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20004

Re: Comments on “Reconsideration of the Final Determination of the Mid-term Evaluation of Greenhouse Gas Emissions Standards for Model Year 2022-2025 Light-duty Vehicles.” Docket ID No. EPA-HQ-OAR-2015-0827. Submitted via [www.regulations.gov](http://www.regulations.gov)

Dear Administrator Pruitt:

The National Association of County and City Health Officials (NACCHO), as a leader, partner, and voice for local health departments, writes in opposition to the Reconsideration of the Final Determination of the Mid-term Evaluation of Greenhouse Gas Emissions Standards for Model Year 2022-2025 Light-duty Vehicles. NACCHO maintains its previously established position that the standards for greenhouse gas emissions are neither too relaxed nor too stringent, and are designed to protect public health and wellbeing.

NACCHO is the voice of nearly 3,000 local health departments across the country that work every day to ensure the safety of the water we drink, the food we eat, and the air we breathe. Reconsidering the final determination of emissions standards risks weakening public health protections rooted in the Clean Air Act, thereby undermining the efforts of local health departments to serve their populations. Undoing existing regulations could expose millions of Americans to unsafe levels of air pollution, increasing the number of missed work and school days due to illness, hospitalizations for respiratory and cardiovascular distress, and premature deaths due to air pollution.<sup>1</sup> A rigorous, peer reviewed analysis, *The Benefits and Costs of the Clean Air Act from 1990 to 2020*, conducted by Environmental Protection Agency (EPA), found that the air quality improvements under the Clean Air Act will save \$2 trillion by 2020 and prevent at least 230,000 deaths annually.<sup>2</sup>

The EPA has also acknowledged the public health threats posed by greenhouse gases and the resulting increase in global temperature. Climate change has serious and far-reaching health implications for present and future generations. This well-documented trend can be expected to have both direct and indirect impacts on human health. For example, one direct impact is the exacerbation of respiratory conditions and allergies due to air pollution. Poor air quality increases ground-level ozone, which has been demonstrated to worsen asthma and result in higher incidence of “asthma-related hospital visits and premature deaths.”<sup>3</sup> An indirect impact would be increases in the risk from vector-borne infectious disease. Climate change is already changing the distribution of



some infectious disease vectors, including ticks that can carry the serious pathogens of Lyme disease, babesiosis, and Rocky Mountain Spotted Fever.<sup>4</sup>

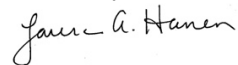
More intense and more frequent weather events may result in the most serious health impacts of climate change, threatening to “increase the number of people suffering from death, disease and injury from heat waves, floods, storms, fires and droughts.”<sup>3</sup> The recent series of hurricanes Harvey, Irma, Jose, and Maria represent a high-intensity year for tropical storms over the Atlantic.<sup>5</sup> While scientists agree that it is too early to determine whether current hurricane activity is measurably and directly related to climate change, this high level of activity fits in with the predictive model that by 2100, the destructive power of hurricanes will increase by threefold.<sup>6</sup>

Climate change may also cause social disruption, economic decline, and displacement of populations, all of which may substantially impact health.<sup>7</sup> Moreover, the health risks associated with climate change will not be shared equally among individuals, communities, and populations. Climate change will disproportionately burden the very young, older adults, people living with mental and physical disabilities, low-income people, and marginalized communities, exacerbating problems of social and environmental justice.<sup>7,8</sup>

Ensuring the incorporation of health in all policies, including transportation regulation, is paramount to protecting the populations most effected by climate change. These populations will likely turn to their local health departments as established resources for health services, and these local organizations may therefore bear some of the heaviest costs of poor air quality caused by lowered emissions standards.

In the five years between the initial determination of emissions standards and the mid-term evaluation finalized in January of this year, the record has continued to indicate that technology to reduce greenhouse gas emissions is readily accessible. The established decision to maintain current emissions standards was “based on the robust technical record including the draft TAR, input from the auto industry and other stakeholders, and updated analyses.”<sup>9</sup> NACCHO urges the Administrator to prioritize the health of current and future generations by maintaining the existing, reasonable, and protective emissions standards as determined by review of the evidence.

Sincerely,



Laura Hanen

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