

Harold P. Wimmer  
National President and  
CEO

May 1, 2017

Samantha Dravis and Ryan Jackson  
Regulatory Reform Task Force  
U.S. Environmental Protection Agency  
William J. Clinton Building  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Re: Comments on EPA actions implementing Executive Order 13777, "Enforcing the Regulatory Reform Agenda." Docket ID No. EPA-HQ-OA-2017-0190.

Dear Ms. Dravis and Mr. Jackson:

The American Lung Association appreciates the opportunity to comment on U.S. EPA's actions to implement Executive Order 13777. EPA has requested input on regulations that may be appropriate for repeal, replacement, or modification. The Lung Association urges EPA to recognize the importance of retaining and enforcing a number of lifesaving, health-science-based safeguards under the Clean Air Act. We reiterate our request that EPA extend the comment period for 60 days until July 15, 2017.

**The Clean Air Act is one of the nation's greatest public health laws.** The standards and safeguards adopted to implement the Act have led to significantly cleaner and healthier air for all Americans, saving tens of thousands of lives each year. These benefits will continue into the future, unless the standards and safeguards are weakened or their implementation is ignored or unfunded. **The Lung Association urges you to recognize and protect these well-established benefits** when reviewing recommendations for repeal, replacement or modification.

The Lung Association further urges you to ensure that any recommendations to alter the regulations currently in place go through a separate transparent, public and accessible review and comment process consistent with the Clean Air Act, a process that is at least as open and thorough as the process required to initially develop and adopt the regulations.

Decades of evidence show the nation has successfully reduced dangerous air pollution thanks to safeguards and standards under the Clean Air Act. Cleaner air reduces the burden on the health and the risk to the lives of millions of Americans. Cleaner air keeps them out of the emergency room and hospital and enables them to continue to attend school and work. The cost of repealing these clean air protections would be high.

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Since 1970, when a bipartisan Congress strengthened the Clean Air Act, the nation has reduced the emissions of some of the most widespread and dangerous air pollutants by more than 70 percent. At the same time, the U.S. economy grew by 240 percent, the population grew by 50 percent and the use of energy increased by 44 percent. <sup>1</sup>

A 2011 peer-reviewed study calculated that the steps put in place to clean up air pollution between 1990 and 2010 prevented 160,000 premature deaths in 2010, and that the annual benefit would grow to 230,000 lives saved in 2020. The study estimated every \$1 spent in cleaning pollution generated \$30 in benefits.<sup>2</sup>

The standards and safeguards that provide those benefits each included extensive reviews, including of the science and of technology, and involved a public comment process. Some went through repeated reviews, multiple public hearings and extended comment periods.

Solid science provided the foundation of this process. Published, peer-reviewed research informed decisions about complex issues in the standards and safeguards. The reviews explored the evidence based in epidemiological, toxicological, and clinical studies, using research from the U.S. and around the world. For technological requirements on sources of pollution, EPA reviewed and incorporated the best approaches and technology currently in use.

For decades, the American Lung Association has submitted comments on these proposals to EPA that express support for the need to adopt strong, protective standards to comply with the requirements of the Clean Air Act. Since many of these standards may now be under review, the Lung Association submits these comments again to discuss the abundant evidence for their need and to underscore their expected benefits. In many cases, the Lung Association urged EPA to adopt even stronger standards and safeguards for public health than EPA eventually adopted.

Below is a list of the comments attached to this document, each submitted to the previous dockets. In many, public health and medical groups have joined with the Lung Association in submitting these comments.

- [Comments from Health and Medical Groups on the Midterm Evaluation of Light-Duty Vehicle GHG Emission Standards](#) (September 26, 2016)
- [Comments from Health, Medical & Nursing Organizations to EPA on Methane Information Collection Request](#) (August 2, 2016)
- [Comments to EPA on proposed revision to the Cross-State Air Pollution Rule](#) (Feb 1, 2016)
- [Health Groups Comments on Proposed Methane Standards](#) (December 4, 2015)
- [Comment From More Than 600 Health and Medical Professionals Urging EPA to Adopt Strong Methane Standards](#) (December 4, 2015)
- [Comment from national health and medical groups to EPA on the ozone standard: National Health and Medical Groups support strong ozone standard](#) (March 17, 2015)
- [Comment from more than 1,000 Health and Medical Professionals re: urging EPA to adopt most protective ozone air quality standards](#) (March 17, 2015)
- [Comment from Health and Medical Groups on EPA's Clean Power Plan](#) (December 1, 2014)

- [Health and Medical Partners' Technical Comment on EPA Carbon Pollution Standards for New Power Plants](#) (May 9, 2014)
- [Comments to the EPA on the proposed New Source Performance Standards for Wood-burning Devices](#) (May 5, 2014)
- [Tier 3 Cleaner Gasoline and Vehicles Standards with 8 health and medical groups](#) (July 1, 2013)
- [Comment from health and medical professionals: Cleaner gasoline and vehicle standards](#) (July 1, 2013)
- [American Lung Association and National Medical and Health Partners on EPA's Proposed Particle \(Soot\) Standard](#) (August 31, 2012)
- [Letter from individual medical and health professionals on EPA's Proposed Particle \(Soot\) Standard](#) (August 31, 2012)
- [Comment to the Environmental Protection Agency with environmental groups on: Proposed Mercury and Air Toxics](#) (August 4, 2011)
- [Comment to Environmental Protection Agency re: Clean Air Transport Rule](#) (October 1, 2010)

Sincerely,



Harold P. Wimmer  
National President and CEO  
American Lung Association

CC: Sarah Dunham, Acting Assistant Administrator for Air U.S. Environmental Protection Agency

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<sup>1</sup> U.S. EPA, [Air Pollution Emissions Trends Data](#), 2016; U.S. Department of Commerce Bureau of Economic Analysis, [GDP and the National Income and Product Account Historical Tables](#), 2016.

<sup>2</sup> US. EPA. [Benefits and Costs of the Clean Air Act 1990-2020, the Second Prospective Study](#), April 2011.