

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 "<u>Driving to Clean Air</u>" 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. <u>www.lung.org/sota</u>.

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. <u>https://www.healtheffects.org/publication/systematic-review-and-meta-analysis-selected-health-effects-long-term-exposure-traffic</u>

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 <u>William.Barrett@Lung.org</u> 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