



April 25, 2018

Scott Pruitt, Administrator  
EPA Docket Center  
Environmental Protection Agency  
Mail Code: 2822T  
Attention: Air Docket ID EPA-HQ-OAR-2017-0355  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Administrator Pruitt:

On behalf of the American Academy of Family Physicians (AAFP), which represents 129,000 family physicians and medical students across the country, I write in response to the call for public comments titled, “Repeal of Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units” as published by the Environmental Protection Agency (EPA) in the February 1, 2018 *Federal Register*.

The AAFP is very concerned that the EPA proposes to repeal the Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units, commonly referred to as the “Clean Power Plan.” It is the AAFP’s policy on climate change and air pollution to recognize the numerous and serious adverse health consequences resulting from pollution, greenhouse emissions from human activities, climate change, and ozone layer depletion. The AAFP therefore recommends strong action on all public and private levels to limit and correct the pollution of our land, atmosphere and water. **We strongly urge the EPA not to repeal the Clean Power Plan so that further health consequences resulting from carbon pollution can be avoided.**

Repealing the Clean Power Plan would lead to increased air pollution across the nation. Air and carbon pollution has negative health effects on many aspects of health and adversely impacts children, people with chronic disease and high-risk populations. Outdoor air pollution, including carbon pollution, exacerbates pre-existing asthma conditions as well as chronic obstructive pulmonary disease (COPD), and may lead to new cases of asthma. Children are more likely to experience asthma-related health episodes on high-pollution summer days than normal summer days. Short-term exposure to air pollution can increase the risk of stroke, heart attack, arrhythmia and heart failure; increased long-term exposure to air pollution in the Medicare population is correlated with an increased risk of death.

The AAFP’s policy recognizes access to clean air as a social determinant of health. As physicians, we treat patients who are impacted by the excessive heat and poor air quality associated with excessive carbon pollution. We understand that vulnerable populations are more likely to experience the negative health effects of air pollution which may increase if the Clean Power Plan is repealed. The elderly experience both immediate and long-term negative health effects of air pollution, including

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premature morbidity. [Children](#) spend more time outside and are less likely to report respiratory symptoms, putting them at higher risk of hospitalization and medication usage due to poor air quality.

Where individuals live may also adversely impact their health. For example, 68% of [African Americans](#) live within 30 miles of a coal-fired power plant and are hospitalized for asthma related health issues at three times the rate of white Americans. [People in poverty](#) are more likely to experience the negative health effects associated with air pollution exposure. Hispanics [and](#) Latinos are 51% more likely to live in areas with high or unhealthy levels of ozone when compared to their white counterparts.

Repealing the Clean Power Plan would also increase the greenhouse gas emissions and air pollution contributing to climate change. [Climate change](#) is an urgent public health issue with unprecedented ramifications associated with mental health, vector borne illness, healthy respiration, temperature-related death and illness, food safety and maldistribution, and water-related deaths and illnesses. These health effects disproportionately affect people of marginalized populations, children and the elderly.

[7 million deaths worldwide](#) can be attributed to indoor and ambient air pollution. Repealing the Clean Power Plan would further contribute to preventable death of Americans. The AAFP strongly urges the EPA to refrain from repealing the Clean Power Plan and continue with its implementation to keep Americans and others healthy for generations to come.

We appreciate the opportunity to provide these comments. Please contact Robert Bennett, Federal Regulatory Manager, at 202-232-9033 or [rbennett@aafp.org](mailto:rbennett@aafp.org) with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "John Meigs, Jr." followed by "MS".

John Meigs, Jr., MD, FAAFP  
Board Chair

#### **About Family Medicine**

Family physicians conduct approximately one in five of the total medical office visits in the United States per year – more than any other specialty. Family physicians provide comprehensive, evidence-based, and cost-effective care dedicated to improving the health of patients, families and communities. Family medicine's cornerstone is an ongoing and personal patient-physician relationship where the family physician serves as the hub of each patient's integrated care team. More Americans depend on family physicians than on any other medical specialty.