



October 24, 2018

Andrew Wheeler, Administrator
EPA Docket Center
Environmental Protection Agency
Mail Code 28221T
Air and Radiation Docket
Attention Docket ID No. EPA-HQ-OAR-2018-0283
1200 Pennsylvania Avenue, NW Washington, DC 20460

Dear Administrator Wheeler,

On behalf of the American Academy of Family Physicians (AAFP), which represents 131,400 family physicians and medical students across the country, I write in response to the [proposed rule](#) titled, "Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks" (SAFE Vehicles Rule)" as published by the Environmental Protection Agency (EPA) in the August 24, 2018 *Federal Register*.

In recognition of the numerous and serious adverse health consequences resulting from pollution, greenhouse emissions from human activities, climate change, and ozone layer depletion, the AAFP recommends strong action on all public and private levels to limit and correct the pollution of our land, atmosphere and water. Reducing the standards for vehicle emissions while simultaneously repealing states' *Clean Air Act* authority will increase pollution and harm health. **The AAFP urges the EPA and the National Highway Traffic Safety Administration (NHTSA) to uphold the current emission, efficiency and technology standards and maintain state flexibility to implement standards through the *Clean Air Act*.**

Implementing the current standards will continue to curb vehicle emissions. Pollution from vehicle emissions degrades air quality and [directly harms health](#). The World Health Organization (WHO) estimates [4.2 million deaths](#) worldwide can be contributed to ambient air pollution. Fuel combustion from vehicles and transportation is a leading source of air pollution impacting human health. Fuel combustion from vehicles accounts for [28.5% of total greenhouse gas emissions](#) and is the leading source of emissions in the United States.

Vulnerable populations, like the elderly, children, and those who live near high-traffic areas, are more likely to be harmed more often and more deeply by air pollution. Long-term air pollution can cause premature morbidity in the [elderly](#). [Children and others who spend more time outside](#) are also less likely to report respiratory symptoms, have an increased risk of hospitalization and an increased dependence on medication due to poor air quality. People who [live](#) near heavily-trafficked roads or busy highways are exposed to higher levels of pollution and experience more

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negative health effects from pollution than those who do not live near heavily-trafficked areas. [Traffic pollution](#) can cause asthma attacks in children, leads to the onset of asthma and can cause premature death from cardiovascular diseases. [Adults](#) are also affected by vehicle pollution, which is linked with an increased risk for dementia and poor cognition.

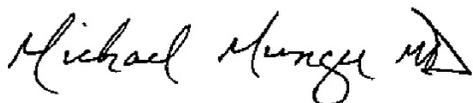
The AAFP also recognizes clean air, free from pollution, as a social determinant of health. As physicians, we treat patients who are impacted by poor air quality associated with excessive pollution. Socioeconomic status, race and where people live also impact exposure to and the harm from vehicle pollution. Low income, [urban areas](#) have higher levels of pollution when compared to high income urban areas. [People of color](#) are also more likely to be exposed to higher levels of pollution in urban areas.

Modifying air quality standards will also increase greenhouse gas emissions and air pollution contributing to climate change. Weaker standards allowing for less fuel-efficient vehicles will contribute to an increase in fossil fuel use. Burning [fossil fuels](#) is a direct cause of the increasing levels of carbon dioxide (CO₂), which exacerbates 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](#) harm marginalized populations, children and the elderly.

Eroding current vehicle emissions, efficiency and technology standards adopted in 2012 will harm both the short- and long-term health of Americans. Decreasing air pollution is crucial to mitigate negative health effects and prevent death from poor ambient air quality. In addition, reducing reliance on fossil fuels can slow the impact of climate change. The AAFP strongly urges the EPA and NHTSA to uphold the current emission, efficiency and technology standards. Doing so will allow states to implement standards through the *Clean Air Act* that will keep Americans and others healthy for generations to come.

We appreciate the opportunity to provide these comments. Please contact Kait Perry, Population Health Strategist, at 913-906-6000 or kperry@aafp.org, with any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "Michael Munger MD". The signature is written in a cursive style with a stylized "M" at the end.

Michael L. Munger, 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.