



American Public Health Association

Working for a Healthier World

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November 24, 2008

Re: Docket ID No. EPA-HQ-OAR-2008-0318

BY E-MAIL

The Honorable Stephen Johnson
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

Dear Administrator Johnson:

The American Public Health Association (APHA) submits this brief statement in response to the Advanced Notice of Proposed Rulemaking (ANPR) for “Regulating Greenhouse Gases under the Clean Air Act”, published in the Federal Register on July 30, 2008. This letter has also been submitted into the official docket (Docket ID No. EPA-HQ-OAR-2008-0318) on this ANPR.

On page 44428 of the Federal Register Notice, the agency writes, “EPA invites comment on all issues relevant to making an endangerment finding, including the scientific basis supporting a finding that there is or is not endangerment under the CAA, as well as the potential scope of the finding (i.e., public health, welfare, or both).”

The APHA Climate Change Committee, comprised of more than sixty public health professionals, students and climate change and health experts, has advised the organization on the science and policy of climate change and health. On the recommendation of this committee, APHA concludes that greenhouse gas emissions are a direct and immediate threat to the “public health or welfare” of American citizens. The APHA emphasizes the threat of climate change having a disproportionate effect on those who already suffer from health disparities in this country, including low-income families and communities of color. In addition, the APHA is concerned that American citizens with respiratory disease, the very young and the aged are at greater risk of harm from the climate change effects of greenhouse gases.

Our conclusion is based on numerous studies, including the EPA's Technical Support Document on Endangerment and Synthesis and Assessment Product 4.6, that show that a variety of health problems are anticipated to become more frequent or severe with changing climate, including: heat stress; health impacts associated with flooding and other extreme weather events; respiratory illnesses associated with aeroallergens, wildfires, and ozone air pollution; and water and foodborne diarrheal diseases. Table ES-3 in the Technical Support Document concludes that unless there is new investment in strengthening public health countermeasures,

“hot temperatures and extreme weather are likely to cause increased adverse health impacts from heat-related mortality, pollution, storm-related fatalities and injuries, and infectious diseases.”

The APHA also notes that in developing countries around the world, public health is and will be threatened by climate change impacts on vector-borne diseases such as malaria, food supplies and nutrition, water access and quality, population displacement, as well as the health problems listed above.

The anticipated effects of climate change, both in the United States and abroad, clearly include serious threats to human health. The international community, in the 4th Assessment Report of the Intergovernmental Panel on Climate Change (IPCC), has reached scientific consensus that recent significant changes in climate are attributable to anthropogenic greenhouse gases.

The APHA therefore recommends that the Administrator make a finding of endangerment of public health for the six greenhouse gases covered by the Kyoto protocol - carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), as well as the two additional air pollutants identified as significant greenhouse gases in the IPCC 4th Assessment Report, black (elemental) carbon and tropospheric ozone. In making this finding, EPA must also make provision for the addition of greenhouse gases that new science may also show to be significant contributors to global climate change.

Sincerely,



Georges C. Benjamin, MD, FACP, FACEP (E)
Executive Director, American Public Health Association

Cc: Robert D. Brenner, Robert J. Meyers, Margo T. Oge, Steve Page