Chair Boscola and members, I’m sorry that I’m unable to join you for today’s hearing. Climate change is an important issue and one that we, at the Allegheny County Health Department (ACHD), have a great interest in because of its impact on the environment and health. Please accept this submitted statement as my testimony.

ACHD covers environmental health issues ranging from air and water quality to environmental justice. And although ACHD staff currently work in a variety of ways to address issues of climate change, we are also working diligently to understand the potential future impacts of increased climate shifts on public health issues and what we must do to address those consequences. Climate change poses a significant risk to the public’s health and its effects are far-reaching. It impacts a variety of public health functions ranging from air quality to vector borne illnesses. In a county where air quality is already a challenge and water volume and temperatures are changing rapidly (flooding, mold, legionella, etc.), having a climate change action plan is imperative. We recently received a grant to create a climate change plan for ACHD and will work with the National Association of City and County Health Officers to complete that plan in the coming year. We would be happy to share that with you once it is complete.

I am also happy to offer ACHD as a resource to you and the other members of this committee if there are issues related to the work that you’re doing for which we can be helpful. I look forward to working with you to assist in any way that we can.

Finally, in September, I had the opportunity to testify before officials from the U.S. Environmental Protection Agency and the National Highway Traffic Safety Administration opposing the agency’s proposed rule regarding Safer Affordable Fuel-Efficient Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks. Following is that testimony in its entirety:

Good morning. I am Dr. Karen Hacker, Director of the Allegheny County Health Department in Pittsburgh, Pennsylvania. Thank you for the opportunity to speak on this proposed regulation. The Allegheny County Health Department serves a county of over 1.2 million persons, providing and assuring a wide range of health and environmental services. The EPA authorizes the Allegheny County Health Department to enforce compliance with the Clean Air Act and other air laws.

I am here today to state emphatically that the Allegheny County Health Department strongly opposes the Safer Affordable Fuel-Efficient Vehicles Proposed Rule for Model Years 2021-2026 on behalf of all the residents we serve.
Here in Allegheny County, we recently met the national ozone standards for the second year in a row. However, we still have many challenges. Currently, Allegheny County remains out of compliance with the Clean Air Act for PM 2.5 and SO2, and we know that our continued ozone progress is dependent on current EPA emission controls.

Today, we know mobile sources are contributing more and more to ozone levels. In our county, NOx and VOC emissions from mobile sources are approximately half, and a third, respectively, of the total man-made contributions to ozone formation. Nationally, the transportation sector has surpassed the manufacturing and power generation sectors as the largest source of greenhouse gas (GHG) emissions in the nation. With climate change we expect ozone levels to rise; therefore, it is imperative that emission reductions continue for mobile sources. We cannot afford to backslide on this critical issue.

Ozone is known to trigger health problems, particularly for children, the elderly, and people with existing lung diseases. Only the EPA has the authority to control vehicular emissions. This rule change diminishes the most significant part of our ozone reduction strategy. We need the EPA to protect the public’s health by supporting the national health-based ozone standard. This is an evidence-based standard well researched and shown to protect the public’s health. We count on this rule – with its current standards and implementation dates – to meet air pollution and GHG reduction goals. The technologies are already available and cost-effective so there is no excuse. It is critical to retain the CAFE standards as set in 2012.

Finally, the Health Department strongly objects to the EPA and NHTSA proposal to withdraw California’s waivers for GHG emission standards and state authority to adopt and enforce these programs. Studies performed in 2005/2006 show that the California program provided significantly higher levels of pollution reduction than the existing federal mobile source emission control program. As a result of the PA Clean Vehicles Program, PA vehicles are now subject to the California LEV III standards, and we have benefitted as a result. We urge the EPA to maintain the California waiver. Pittsburgh and Allegheny County cannot afford losing the additional protection provided by these standards.

Thank you for allowing me to offer you this testimony. Please do not hesitate to contact me directly should you need anything related to the work that you’re doing for which we can be helpful. Again, I look forward to working with you to assist in any way that I can.