

February 7, 2020

Mick Mulvaney

Director

U.S. Office of Management and Budget

725 17th St., NW Washington, DC 20503

Dear Mr. Mulvaney,

Physicians for Social Responsibility (PSR) is a national organization of 24 chapters and 39 student-led chapters of medical professionals with the goal “to create a healthy, just, and peaceful world for both the present and future generations.” At Wayne State University School of Medicine, in the heart of Detroit, Michigan, PSR’s goal is to improve the environmental health of the city in order to provide a better quality of life for all of Detroit’s residents. As physicians in training, it is our responsibility to advocate for healthy living conditions for Detroit residents to decrease the incidence of preventable medical issues.

Detroit, the Motorcity, is home of three of the top ten auto companies in the world. As such, it is “ground zero” for experiencing the detrimental effects of relaxed environmental regulations on vehicles.

As future physicians of this community, we are asking for national vehicle emission regulations that will allow persons of every socioeconomic background to live in healthy and safe environments. This begins with policy-makers implementing and enforcing strict vehicle emission standards under the Clean Air Act. We would like to maintain the 2012 greenhouse gas and fuel economy standards and have them strictly enforced. We also disagree with the Administration’s recent attack on state authority, as we support the retention of California’s authority to set and additional states’ authority to adopt stricter standards.

For the medical school curriculum, we spend part of our first two years learning about social determinants of health. Many people in Detroit are already at risk of poor health due to cumulative risks from industrial pollutants, contamination, poverty, and lack of healthcare coverage. Ironically, several Detroit communities are vulnerable to a lack of access to health care due to a lack of affordable transportation options while suffering directly at the hand of traffic-related emissions. These conditions contribute to a devastating infant mortality rate of 14.2 per 1,000 live births in the city of Detroit compared to the Michigan state average of 6.8 per 1,000.¹ Additionally, the mortality rate of black babies is significantly higher than white babies at 14.6 and 4.8 per 1,000, respectively for the state of Michigan. The effects of vehicle emissions disproportionately impact people of low socioeconomic status and people of color, ensuring that the worst

effects of air pollution and climate change will be incurred by the most vulnerable populations.² The proposed SAFE rule will worsen these disproportionate impacts on vulnerable populations.

At one of the nation's busiest international crossings between Detroit and Windsor, there are plans to construct another bridge which would increase vehicle traffic through the area.³ This traffic would further exacerbate the effects of vehicular emissions on Detroit's residents. Additionally, the Marathon Refinery Plant in Southwest Detroit had two unplanned toxic emission incidents in 2019. Weakened vehicle emission standards would directly increase emissions from vehicle tailpipes and indirectly induce more emissions from oil refineries due to increased demand for gasoline. This air pollution would exacerbate already elevated levels of asthma^{5,6}, and pulmonary and cardiac hospitalizations⁴ in Detroit.

The proposed SAFE rule would vastly increase greenhouse gas emissions in the next decade compared to the , contributing to global climate change. The impacts of climate change, including increasing temperatures exacerbate health impacts such as heat-related illness and death.⁴ Similarly, vulnerability to poor air quality is often intensified by increasing temperature, especially in the summer months in Detroit. This is such a dangerous problem that alerts are sent to mobile phones warning residents to take protective measures, such as avoiding strenuous outdoor activities.

Vehicle emissions are exacerbating climate change and negatively impacting air quality, thereby aggravating pre-existing medical conditions and quality of life. Under the Clean Air Act, the EPA has a duty to ameliorate the endangerment of public health from vehicle pollution, which the SAFE provisions fail to do. We are on track to reduce refinery emissions and the impacts of climate change, and any standard that does not adequately protect communities from those factors —whether that's a strict flat line or marginal emissions reductions requirements so small as to be virtually meaningless —is a “rollback” of critical environmental protections that endangers the health of the most vulnerable, especially here in the Motor City.

For these reasons, we ask the administration to abandon its flawed “SAFE” proposal, to vigorously enforce the 2012 vehicle emission standards, and to respect California's authority to set, and other state's ability to adopt, rigorous greenhouse gas emission standards more protective than the federal standard.

Sincerely,

Ashton Lewandowski, President

Kyle Bonner

Zainab Almusawi

Kafa Alshohatee

Ciara Ivanics

Casey Korhonen

Statement from Nakia Allen, Wayne State University Patient, Population, Physician, Professionalism Director:

Covering the impact of the environment on health is essential to curriculum dedicated to addressing the needs of populations. As a pediatrician and course director for Population, Patient, Physician and Professionalism (P4) at Wayne State University School of Medicine in Detroit, Michigan, I would be negligent if I did not include information about issues such as how the quality of air and water impact our patients. With increasing rates and adverse outcomes of respiratory diseases like asthma and the yet unknown consequences of elevated lead levels from aging pipes carrying water, our zip codes are becoming health risks that need to be mitigated. Equipping tomorrow's physicians with the appropriate knowledge and empowering them to action is a step in the right direction.

Nakia Allen, MD FAAP

Population, Patient, Physician and Professionalism Course Director, Wayne State University School of Medicine

References:

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- 4) The Great Lakes Integrated Sciences + Assessments Center. (2014, June 03). The Potential Impacts of Climate Change on Detroit, Michigan. Retrieved from http://glisa.umich.edu/media/files/projects/DCAC/DCAC_Climate_Impacts.pdf
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- 6) Center for Disease Control and Prevention. (2019, May). Most Recent National Asthma Data. Retrieved from https://www.cdc.gov/asthma/most_recent_national_asthma_data.htm