

Children's Health Protection Advisory Committee

FACA Members:

Melanie A. Marty, Ph.D., Chair
Cal/EPA, Office of Environmental
Health Hazard Assessment
1515 Clay St. 16th Floor
Oakland CA 94612
(510) 622-3154

Robert Amler, M.D.

Laura Anderko, R.N., Ph.D.

Henry Anderson, M.D.

John Balbus, M.D., M.P.H.

Sophie Balk, M.D.

David Carpenter, M.D.

Gail Cynthia Christopher, D.N.

Ed Clark, M.D.

Rochelle Davis

Janice Dhonau

Natalie Freeman, Ph.D., M.P.H.

Maida Galvez, M.D., M.P.H.

Gary Ginsberg, Ph.D.

LeRoy Graham, M.D., F.C.C.P.

Dan Hryhorczuk, M.D., M.P.H.

David Jacobs, Ph.D., C.I.H.

Woodie Kessel, M.D., M.P.H.

Amy D. Kyle, Ph.D., M.P.H.

Robert Leidich

Janet McCabe

Elise Miller, M.Ed.

Curtis Munoz

Janet Mostow, Ph.D.

Nsedu Obot Witherspoon, M.P.H.

Jonathon Patz, M.D., M.P.H.

Jerome Paulson, M.D., F.A.A.P.

Barbara Sattler, R.N., Dr.P.H., F.A.A.N.

Pamela Shubat, Ph.D.

Anne Turner-Henson, R.N., D.S.N

November 10, 2008

Stephen L. Johnson, Administrator
United States Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

RE: Advance Notice of Proposed Rulemaking, Greenhouse Gas
Docket # EPA-HQ-OAR-2008-0318

Dear Administrator Johnson:

The Children's Health Protection Advisory Committee submits this brief letter and the attached consensus letter previously sent on August 30, 2005, in response to the Advance Notice of Proposed Rulemaking (ANPR) for "Regulating Greenhouse Gases under the Clean Air Act", published in the Federal Register on July 30, 2008. We respectfully request it be introduced into the official docket 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)."

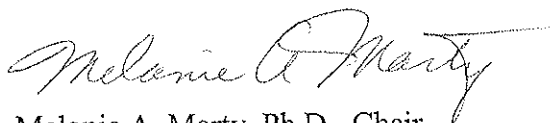
As stated in our August 30, 2005 letter, the CHPAC finds that greenhouse gas emissions are a direct and immediate threat to the "public health or welfare" of American citizens, and in particular to American children.

Our conclusion is based on studies that show increased vulnerability of children to a variety of health problems that are predicted to become more frequent or severe with changing climate, including heat stress, flooding, wildfires, and other extreme weather events, respiratory illnesses related to aeroallergens and ozone air pollution, and water and food-borne diarrheal diseases. While the degree of uncertainty of worsening in the United States under current projections of climate change varies by health outcome, a greater health burden related to heat stress and extreme weather events has the highest certainty according to the Technical Support Document on Endangerment and Synthesis and Assessment Product 4.6.

The committee also notes that in developing countries around the world, children's 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. Disadvantaged children in the United States will be vulnerable to many of these fundamental health problems as well.

We recommend that the Administrator make a finding of endangerment of public health, on the basis of these concerns for children's health, for all greenhouse gases that make a significant contribution to global climate change.

Sincerely,

A handwritten signature in cursive script that reads "Melanie A. Marty". The signature is written in dark ink and is positioned above the typed name and title.

Melanie A. Marty, Ph.D., Chair
Children's Health Protection Advisory Committee

Cc: Robert Myers, Principal Deputy Assistant Administrator, Office of Air
and Radiation

Attachment