



May 15, 2017

Comments on the Executive Order 13777 on Enforcing the Regulatory Agenda
EPA Docket: EPA-HQ-OA-2017-0190

Partners for a Healthier Community (PHC), the Public Health Institute of Western Massachusetts, provides skills, expertise and experience to create successful public health campaigns and sustainable system changes to improve health and well-being in Western MA. Through partnerships, we build on community assets and build community capacity to positively impact social determinants of health. PHC convenes the Pioneer Valley Asthma Coalition (PVAC), a community partnership founded in 2001 that works to improve the quality of life for individuals, families and communities affected by asthma. The PVAC was formed to address asthma and the environmental impacts that cause the onset or exacerbations of asthma. We represent a variety of groups including: healthcare organizations, health plan, local and state public health agencies, housing organizations, community agencies, academic institutions, community members, and a variety of community-based organizations.

We offer our comments on President Trump's Executive Order 13777 on Enforcing the Regulatory Agenda. The Executive Order establishes the "policy of the United States to alleviate unnecessary regulatory burdens placed on the American people."

In Springfield, MA, nearly 1 in 5 children and adults suffer from asthma. In Holyoke, MA, the rate for children is more than 1 in 4 children. There are direct links to asthma from air pollution—both indoor and outdoor.

Asthma has a strong impact on families and communities. Nationwide, it is the number one reason for children's absences from school. If children miss school their academic performance suffers—and their ability to succeed as an adult is compromised. Their parents have to stay home—missing work, losing jobs and suffering economic instability is common. A community with high rates of asthma will suffer economic consequences, as Springfield and Holyoke have done.

It is critical that we consider the burden of health impacts on children and adults as a vital part of any effort to determine how burdensome EPA regulations. The EPA has a critical role to protect public health and the environment.

Children are 100% of our nation's future. A nation without healthy, educated children will not ever be great.

We value the role of the **US EPA to use a science based strategy to protect public health and the environment.**

- We value clean air, clean water, protected lands and species. They sustain us and help keep our nation competitive among all developed nations. Those values and assets also strengthen our credibility internationally.
- To keep our nation healthy and competitive, the Administration should sustain its investments in the sciences and especially in understanding and protecting the highest risk and most exposed populations.

We strongly oppose the elimination of the EPA's **Office of Air and Radiation/Indoor Environments**

- Children breathe more air per pound of body weight than adults, and the pediatric asthma epidemic is continuing, causing millions of missed schools days annually, lower test scores, and higher health

care costs. Americans also spend 90% of their time INDOORS, and indoor air/environmental exposures are nearly always worse than outdoor exposures (IOM, NRC, EPA).

- The Administration, if it seeks to lower health care costs and keep Americans healthy, should expand, not eliminate, EPA's voluntary programs that help homeowners, schools, and offices promote and address problems with indoor air/environments, through guidance on improved facility siting, design, maintenance, repair, and use of green/less-polluting products, materials, and equipment indoors.
- The President and EPA should also promote a strong federal Infrastructure Bill that Includes Schools and Child Care Facilities, ramping up EPA guidance and grants programs that train and educate building owners and operators on preventing problems, and expanding environmental public health services for children at risk or with environmental exposures in these settings.
- Rebuilding school facilities will result in leveraging wins: more local jobs than building highways, more money in the local economy, better attendance and test scores, energy savings, and great photo-ops.

We strongly support the EPA's Office of Children's Health Protection, a federally unique and non-regulatory office at EPA which considers and advises the agency on risks to children's environmental health.

- The EPA should expand this office's resources so it can continue to assist the Administrator on topics affects vulnerable populations, collaborate with other agencies (CDC, ED, HUD, NIEHS) to advance children's environmental health research, and influence and or support programs to improve the places where all children live, learn, and play.

We strongly support the Office of Water Quality to provide oversight, education and enforcement of lead laws. There is no safe level of lead for children.

- The Office of Water Quality oversees drinking water quality including contaminants like lead, copper, other chemicals, and microbials. Schools on municipal systems are NOT required to test at the tap for lead or other contaminants; instead, EPA offers a voluntary "Train, Test, and Tell" (3Ts) program for assessing drinking water in schools. New York State legislature passed the first bill in the nation requiring all public schools to test at the tap for lead and remediate: the bill passed unanimously.
- Building on the nation's heightened awareness of lead poisoning of children and lead and other contaminants in drinking water systems, EPA should improve its drinking water quality standards for all settings (municipal, home, school/child care) and should strengthen the 3T's program. EPA should also expand its support for state drinking water quality programs and ensure states include oversight of school and childcare drinking water quality and provide federal assistance for the replacement of leaded pipes and fixtures in the highest risk and or lowest income communities.

We strongly support the Office of Chemical Safety and Pollution Prevention which regulates chemical hazards such as lead, asbestos, PCBs, mercury, pesticides

- We are concerned that the agency's current work on asbestos, lead, PCBs, mercury, pesticides, and pollution prevention efforts with the states is inadequate. As the average age of schools in the US is about 50 years, legacy toxics like lead, asbestos, PCBs and mercury are all present in most of the nation's schools, and as multiple national reports have shown (GAO, NCES), schools suffer from decades of deferred maintenance. Decayed facilities and or old buildings under renovation while occupied will release those legacy toxics and expose all occupants to those hazards. This is a factor in Springfield and Holyoke where we must address the hazards in our older school buildings.
- EPA must strengthen its Lead Safe Renovation Rule as it is applied to schools and improve its regulations and oversight on other legacy toxics present in old infrastructure.
- EPA's Pollution Prevention Program has helped states and cities develop robust green procurement programs, programs that now provide models and opportunities for local schools to find and use private sector, third party certified green products, materials, equipment and services that can save

them thousands of dollars. Both Springfield and Holyoke school systems have implemented green cleaning programs with the support of EPA funding. EPA should expand, not eliminate, this valuable program. EPA should not operate labeling programs that compete with the private sector “green labeling” programs that provide national and international leadership in this field.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Sarita Hudson". The signature is fluid and cursive, with the first name "Sarita" being more prominent than the last name "Hudson".

Sarita Hudson
Director of the Pioneer Valley Asthma Coalition
Director of Programs and Development, Partners for a Healthier Community