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2008 MAR II PM 2: 41 Pennsylvania Chapter

INDEPENDENT REGULATORY REVIEW COMMISSION

2658

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February 29, 2008

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Pennsylvania Chapter Rose Tree Corporate Center II 1400 N. Providence Road **Suite 3007**

Media, PA 19063-2043 Phone: 484/446-3000 800/337-2227

484/446-3255 Email: paaap@paaap.org www.paaap.org

Environmental Quality Board P.O. Box 8477 Harrisburg, PA 17105

Dear Environmental Quality Board,

ENVIRONMENTAL QUALITY BOARD

Executive Board

President David Turkewitz, M.D., FAAP Email: dturkewitz@wellspan.org

Vice President Maryellen Gusic, M.D., FAAP Email: mgusic@psu.edu

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Members at Large Sarah Springer, M.D., FAAP Email:

springers@pediatricalliance.com Pat Bruno, M.D., FAAP Email: pjbruno@geisinger.edu

Norman Fienman, M.D., FAAP Email: nfienman@pol.net

David McConnell, M.D., FAAP E-mail:

mcconnelldavem@atlanticbb.net

Allen Nussbaum, M.D., FAAP Email: Rnmd67@comcast.net Denise Salerno, M.D., FAAP E-mail:

Denise.Salerno@tuhs.temple.edu Renee Turchi, M.D., FAAP Email: Renee.Turchi@DrexelMed.edu

Immediate Past President Robert Cicco, M.D. Email: rcicco@aap.net

Executive Director Suzanne Yunghans Email: syunghans@paaap.org

As representatives of the Pennsylvania chapter of The American Academy of Pediatrics (AAP), we are writing to support proposed regulations to limit diesel vehicle idling to not more than 5 minutes in a 60 minute period (http://www.pabulletin.com/secure/data/vol38/38-2/45.html). The AAP is an internationally respected organization of over 60,000 pediatricians committed to the attainment of optimal physical, mental, and social health and well-being for all infants, children, adolescents, and young adults.

The AAP has previously published a policy statement pertaining to the health hazards of air pollution to children (AAP Committee on Environmental Health. Ambient air pollution: health hazards to children. Pediatrics 2004; 114: 1699-1707). This document points out the increased vulnerability of children to the adverse effects of air pollution. It is concerning that even though scientific reports demonstrate adverse health consequences near or below federal standards for airborne particulate matter and nitrogen dioxide, in 2004 nineteen counties in Pennsylvania did not meet the Environmental Protection Agency's standards for these pollutants. More needs to be done to preserve the health of the children of the Commonwealth.

Fine particulate air pollution can be inhaled into the lower respiratory tracts of even the youngest children and contributes to excess mortality and hospitalizations for lung disease. In children, lung function and lung growth can be detrimentally affected. Studies of nitrogen oxides, a marker for areas in which traffic is a dominant source of air pollution, demonstrate that pollution contributes to asthma exacerbations and bronchitis-like symptoms. More than 70% of fine particle emissions from traffic are attributable to commercial diesel-powered engines. These engines are also a major contributor of nitrogen oxide pollution. One of the explicitly enumerated recommendations of the AAP policy statement on air pollution states,

"Children's exposure to diesel exhaust particles should be decreased. Idling of diesel vehicles in places where children live and congregate should be minimized. Ongoing programs to fund conversion of diesel school bus fleets to cleaner alternative fuels and technologies should be pursued."

The Pennsylvania Chapter of The American Academy of Pediatrics supports the following concepts:

- a) that children are highly susceptible to adverse health effects from air pollution,
- b) that reducing diesel engine idling will result in a decrease in air pollution,
- c) that the Environmental Quality Board's proposed limits to diesel vehicle idling will benefit the health of the children of Pennsylvania.

We hope that this information assists the Commonwealth in its efforts to protect all of its citizens – especially its children.

Sincerely,

David Turkewitz, MD, FAAP

Chapter President

Kevin Osterhoudt, MD, FAAP

PA Chapter AAP - Point-Person on Environmental Toxicology