



San Diego Pediatricians for Clean Air and AAP-CA3 Climate Change & Health

AAP-CA3 Committee Co-Chairs:

Vi Thuy Nguyen, M.D.
Sally Kaufman, M.D.

SDPCA Co-Founders:

Sabrina Perrino, M.D.
Vivian Nguyen, M.D.
Sdpediatriciansforcleanair.com

Mission Statement:

AAP-CA3 Climate Change and Health Committee. Our mission is to simultaneously promote the health of both San Diego's children and its ecosystems by empowering children through education and outreach to protect their environmental resources and in turn improve their own physical and mental health. We support measures that combat climate change & promote a healthier environment for our children.

Administrator Michael Regan
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460
Regan.Michael@epa.gov

October 6th, 2021

To Administrator Regan,

The San Diego Pediatricians for Clean Air (SDPCA) urges the EPA to make available unleaded fuels at Montgomery-Gibbs Executive Airport (MYF) for the safety and wellbeing of our communities, schools, and children. We, the SDPCA, are an organization dedicated to protecting the welfare of children's health, especially safeguarding their respiratory health through clean air advocacy. The harmful effects of lead, at any level, have been repeatedly established.¹ Lead affects nearly all systems of the human body, causing decreased learning, memory, attention, weakness in the fingers, wrists, and ankle, miscarriages, decreased reproductive health, anemia, kidney damage, brain damage, death, and more.² Children are especially susceptible to the effects of even low levels of lead due to their developing nervous system and softer tissues.³ Lead further represents a unique danger to the physical and mental wellbeing of children as its effects can have permanent neurodevelopmental consequences such as reduced IQ, learning disabilities, growth stunting, seizures, hypertension, and stroke⁴—costly consequences because of long-lasting damage to the health of our children and also because of resultant elevated costs in health care, special education, and crime.⁵

While many sources of lead have since been regulated, one remains nearly unchecked: leaded aviation gasoline (avgas), which accounts for approximately half of all lead emissions into the air.⁶ Three studies have since linked elevated blood lead levels (BLL) to children in the vicinity of airports.^{7,8,9} The most recent, a study of the Reid-Hillview Airport in Santa Clara, demonstrated a significant, substantive, and dose-dependent link between children's BLL and proximity to the airport, position downwind from the airport, and the volume of air travel.⁹ Blood lead levels of children in Santa Clara were high enough to be considered comparable to children in Flint, Michigan.⁹ Despite this, Reid-Hillview is only ranked 34th in lead

¹ https://www.epa.gov/sites/default/files/2019-04/documents/leadimplementationbooklet_april2019.pdf

² <https://www.atsdr.cdc.gov/toxfaqs/tfacts13.pdf>

³ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4961898/>

⁴ https://www.sciencedirect.com/science/article/pii/S0887899420302782?casa_token=y5bHUB84AYIAAAAA:p1uXN6vdxnEN4ezWPhzq4KCrHU9Qd2xLrEe6r9o-8orcPmJ9v4tM-qt1_pWM7MhDv6gcMvRN

⁵ <https://ehp.niehs.nih.gov/doi/abs/10.1289/ehp.0800408>

⁶ <https://www.govinfo.gov/content/pkg/FR-2010-04-28/pdf/2010-9603.pdf>

⁷ <https://ehp.niehs.nih.gov/doi/10.1289/ehp.1003231>

⁸ https://www.researchgate.net/publication/316072809_The_Effect_of_Leaded_Aviation_Gasoline_on_Blood_Lead_in_Children

⁹ <https://news.sccgov.org/sites/g/files/exjcpb956/files/documents/RHV-Airborne-Lead-Study-Report.pdf>

producing airports, producing 745 pounds of toxic lead emissions annually.¹⁰

In our own community of San Diego, sits Montgomery-Gibbs Executive Airport (MYF), which, at 11th place, produces 1171 pounds of toxic lead emissions annually: more than 1.5 times the amount of lead emitted from the Reid-Hillview Airport.¹⁰ Within 1 mile of MYF, there are 5 schools (Grace Christian Elementary School and High School, Ellwood P Cubberley Elementary School, William H Taft Junior High School, Harry Wegeforth Elm School, and Will Angier Elementary School) and more than 900 residents under 5 years old, not including those that commute to these schools and the surrounding parks daily. In addition to the imminent health threat, the lead pollution of MYF is a clear case of environmental injustice; of the 10,545 people in a mile radius of the airport, over 55% belong to racial and ethnic minority groups and over 29% are considered low income.¹⁰

The threat is clear; the physical and mental wellbeing of 1000's of children and adults are being debilitated, through no fault of their own. Every day that passes while MYF offers exclusively leaded gasoline and emits toxic lead is another day in which the wonderful, exciting prospects of the young children in our communities are actively diminished. The need for unleaded fuels to be offered and lead aviation gasoline to be phased out is obligatory; trading dollars, cents, and inconvenience for the future of our children is no decision at all.

Respectfully submitted,

Dr. Rachel Ireland, Developmental Pediatrics
Dr. Vi Nguyen, Co-Founder SDPCA
Riley Gilbertson, Advocacy Intern

¹⁰ https://earthjustice.org/sites/default/files/files/top100leadpollutingairports_2021-08-23.pdf