

**Testimony for the Clean Power Plan Federal Plan and Model Rule Hearing  
on behalf of the American Lung Association**

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Thank you. My name is Janice Nolen, and I am Assistant Vice President, National Policy, for the American Lung Association. I appreciate this opportunity to share our perspective on some aspects of the proposed Federal Plan and Model Rules under the Clean Power Plan. We will submit our complete comments to the docket.

The American Lung Association represents millions of Americans with life-changing lung diseases. Just to name a few, we speak up for the more than 7 million children with asthma and more than 11 million adults with chronic obstructive pulmonary disease. Recent years have showcased the risks that Americans, but especially people with lung disease, face from climate change.

For example, this year, the heat and drought fostered smoke from wildfire blazes. As the *Washington Post* noted, during the week of July 8<sup>th</sup>, more than 700 fires in Alaska and Canada were blowing smoke that created unhealthy air pollution in Minneapolis and Colorado (Fritz, 2015). Smoke from wildfires triggers asthma attacks and increases the risk that a person with COPD will need emergency care because she cannot breathe. Wildfire smoke can even shorten life. To battle events like this and keep them from increasing, we need to target emissions that worsen climate change.

Reducing carbon pollution using the emissions standards set in the Clean Power Plan can help us do that. We anticipate that states will be able to use the recommendations in these plans to reduce carbon emission even more than the Plan requires. We support EPA's effort to help the states develop and adopt effective plans to reduce their carbon emissions. Having model plans to use will help the states focus their time and effort on choosing the steps that work best for them.

My comments will focus on the proposed guidance for the Clean Energy Incentive Program. We strongly support the Program as a promising encouragement to all states to start now to invest in the clean renewable energy sources of wind and solar. We are pleased that EPA has the full CEIP in the federal plan. However, in the model plan, states can "opt out" of the broad opportunity for renewable energy and improved energy efficiency programs. We recommend that EPA incorporate the CEIP elements fully in the model plan rather than leaving this as an option for states to decide later.

In particular, we strongly support the Clean Energy Incentive Program's component that focuses on energy efficiency improvements in low income communities. Many residents in low income communities could benefit from having repairs done to their homes that can cut their energy bills and make their homes warmer. Communities will also benefit from additional jobs that would be created to fix these homes.

However, these communities remain at risk unless EPA acts to strengthen the proposals. While the energy efficiency incentives are welcome, EPA needs to do more in the model rule and the FIP to



ensure that low income communities don't continue to bear the oversized burden of pollution under this plan.

Low income communities have suffered the problems from pollution from our nation's coal-fired power plants for far too long. They've lived near these plants where they breathed the worst of the pollution, including toxic emissions like arsenic, lead and carcinogens like benzene, spewed uncontrolled for far too long. They are suffering more from changes that climate change brings, since research documents that air pollution harms poorer people more than those with higher incomes, in part, because they are more likely to have diseases like asthma that puts them at greater risk.

We remain concerned that some states will adopt a plan that does not recognize the continued disproportionate burden, and fails to reduce emissions from all sources. Each state plan should step up to make sure that the steps taken in their plans do not continue to disproportionately burden those who live near the plants. EPA should call on the states to address this issue specifically in their plans and develop some model approaches for the states to use and to be in the FIP that would recognize the concerns.

In closing, the Clean Energy Incentive Program offers great opportunities for advancing action that will meet the target of the Clean Power Plan, but the program needs to be stronger in the model rule and in the FIP so that they will best help the communities that they intend to serve. Thank you.