



Comments on the Proposed Repeal of the Clean Power Plan Hearing
Docket ID No. EPA-HQ-OAR-2017-0355

As California-based health and medical organizations, we strongly oppose the proposal to revoke the Clean Power Plan. Revoking the Clean Power Plan would give power plants a license to emit unlimited carbon pollution and would result in preventable harm to Californians' health. California has been a leader in developing sound climate change policies that support and reinforce actions taken by other jurisdictions. Together, these local, state and federal actions can prevent the worst impacts of climate change by reducing pollutants that threaten public health today and for generations to come. We urge the U.S. Environmental Protection Agency to begin work immediately to fully implement the plan, not revoke it.

When fully implemented, the Clean Power Plan would prevent 90,000 pediatric asthma attacks, 4,500 premature deaths, and hundreds of thousands of lost work and school days **each year**. If the Clean Power Plan is revoked, these are health consequences that would be knowingly permitted. That is unacceptable.

This action would put all Americans – but particularly the most vulnerable, including children, older adults, and individuals with chronic diseases – in harm’s way due to air pollution and climate change. Climate change impacts are deeply felt in California, from impacts to air quality, extreme weather events, droughts and wildfires and these impacts are borne most by those who can least afford them.

Revoking the Clean Power Plan would roll back important steps that directly reduce the emissions from power plants that cause those asthma attacks and premature deaths, and many other health harms. Without the Clean Power Plan, the nation will not only suffer from carbon emissions and climate change, but more emissions of harmful particulate matter, sulfur dioxide, nitrogen oxides, and other hazardous air pollutants, including mercury that comes from power plants. Sulfur dioxide emissions alone are expected to be 45 percent higher than they would have been under the Clean Power Plan.

Disturbingly, the Administration’s analysis supporting the proposal to revoke the Clean Power Plan offers two new, alternate ways of looking at the premature deaths resulting from these additional hundreds of thousands of tons of emissions. Both undercount the harm of the increased particulate matter by assuming that concentrations of this pollutant below a certain level are safe. The fact is, scores of medical experts have found that there is *no* known safe threshold for particulate matter. EPA’s alternate approaches fail to recognize the true health toll of pollution from power plants.

In addition to exposing Americans to increased levels of pollution from power plant emissions, revoking the Clean Power Plan would be a huge step backward in addressing climate change that would result in 23 percent more carbon pollution from power plants. Carbon pollution drives climate change, which poses a current and growing threat to the health and safety of all Americans, especially the most vulnerable.

In November, the Administration released a *Fourth National Climate Assessment Climate Science Special Report*, which found that “it is extremely likely that human influence has been the dominant cause of the observed warming since the mid-20th century. Over the last century, there are no alternative explanations supported by the evidence that are either credible or that can contribute more than marginally to the observed patterns.”

California has experienced catastrophic wildfires this year, including the most deadly fire in California history in the Northern California, killing 44 people, destroying nearly 5,000 homes and costing \$3 billion in damages. The Thomas Fire in southern California, currently the third largest fire in state history, has destroyed more than 1,000 structures and blanketed the area with deadly particle pollution for weeks.

From raging wildfires in the West to the destructive storms in the Southeast to sweeping heatwaves and the spread of diseases like Lyme disease, recent years have served as a very real reminder of the dangers Americans face from a changing climate. The United States must reduce emissions that worsen climate change – not go back to the days of unlimited carbon pollution from power plants.

The Clean Power Plan provides a major step forward to protect public health from dangerous power plant emissions and from the worst impacts of climate change. On behalf of all Californians, including those most vulnerable to health harms from air pollution and climate extremes, we urge EPA not to revoke the Clean Power Plan, and to instead move forward to fully implement this lifesaving protection.

Thank you.

Barbara Sattler, RN, DrPH, FAAN, Co-Founder
Alliance of Nurses for Healthy Environments

Kris Calvin, CEO
American Academy of Pediatrics – California

Soma Wali, MD, President
American College of Physicians – CA Services Chapter

Bonnie Holmes-Gen, Senior Director, Air Quality and Climate Change
American Lung Association in California

Dr. Scott Takahashi, PharmD, Co-Chair
Asthma Coalition of Los Angeles County

David LeDuc, President & CEO
Bonnie J. Addario Lung Cancer Foundation

Sean Liston, MD, President
Butter-Glenn Medical Society

Justin Malan, Executive Director
California Conference of Directors of Environmental Health

Ken Cutler, MD, MPH, President
California Conference of Local Health Officers

Stephanie Roberson, Senior Legislative Advocate
California Nurses Association

Kimberly Chen, Government Affairs Manager
California Pan-Ethnic Health Network (CPEHN)

Adele Amodeo, Executive Director
California Public Health Association – North

Sonal Patel, MD, Member, Board of Directors
California Society of Asthma, Allergies and Immunology

Michael Madison, MBA, RRT, RCP, President
California Society for Respiratory Care

Philippe Montgrain, MD, President
California Thoracic Society

Kevin Hamilton, RRT, Executive Director
Central California Asthma Coalition

Rachelle Wenger, Director, Public Policy & Community Advocacy
Dignity Health

Praveen Buddiga, MD FAAAAI
Family Allergy Asthma Clinic (Fresno)

Nicole Butler, Executive Director
Fresno Madera Medical Society

Kat DeBurgh, MPH, Executive Director
Health Officers Association of California

Carlos Bello, Chairman
Kern County Asthma Coalition

Fonda Winslow, Executive Director
Kern County Medical Society

Lynn Kersey, Executive Director
Maternal and Child Health Access (Los Angeles)

Kevin Hamilton, RRT, Co-Chair
David Pepper, MD, Co-Chair
Medical Advocates for Healthy Air

Jay Herbrand, Secretary
Merced Mariposa Asthma Coalition

Robert M. Gould, MD, President
**San Francisco Bay Area Chapter
Physicians for Social Responsibility**

Linda Rudolph, MD, MPH, Director
**Center for Climate Change and Health
Public Health Institute**

Matthew Marsom, Vice President for Public Policy & Programs
Public Health Institute

Joel Ervice, Associate Director
**Regional Asthma Management and Prevention (RAMP)
San Francisco Asthma Task Force**

Jim Mangia, MPH, President & CEO
St. John's Well Child and Family Center (Los Angeles)

Southern California Public Health Association