

## Testimony for the Clean Power Plan Federal Plan and Model Rule Hearing

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Good morning. I am pleased to offer comments today supporting the Clean Power Plan's model rules and federal plan. My name is Paul Billings and I am Senior Vice President, Advocacy for the American Lung Association. The American Lung Association is the nation's oldest voluntary health organization. Our mission is to save lives by improving lung health and preventing lung disease.

Today is World COPD day. It is a day when we raise awareness about Chronic Obstructive Pulmonary Disease. COPD is the term we use to describe emphysema and chronic bronchitis. For everyone, but especially people with chronic lung disease, climate change is a major public health threat. Communities across the country are already experiencing its impacts, including more dangerous ozone and particle pollution in the air they breathe.

The Clean Power Plan is a major step forward to protect public health from the impacts of climate change. The Lung Association was proud to support the Clean Power Plan, and is now working in states across the country to ensure that the rule is implemented in a way that maximizes the benefits to human health.

Protecting health means not only reducing the carbon pollution that causes climate change, but also ensuring that EPA's projections for health benefits that will come from reducing other dangerous air pollutants alongside carbon are achieved. These benefits include preventing up to 3,600 premature deaths, preventing 90,000 asthma attacks and avoiding 300,000 days missed from work and school each year starting in 2030.

As I have testified before, clean, healthy air is personal for me and my family. My wife and I are blessed to have two active daughters. Our youngest, who runs track. She is a sprinter. She has asthma, and hot, smoggy days make it harder for her to breathe. Smog-induced asthma can mean more than the difference between winning and losing a race. It can be much more serious, leading to wheezing and struggling for breath. In my wife's fifth grade class in Wheaton, Maryland, there are too many children with asthma who are at risk from air pollution. Their families, my family and millions of others with asthma, COPD and other chronic conditions need states write and implement strong plans to reduce carbon emissions and reduce other dangerous air pollutants at the same time.

It is critical that EPA finalize a strong federal plan as a backstop for any states that do not comply with the Clean Power Plan, as well as a strong model rule to provide guidance to the states that will comply..

The American Lung Association will submit detailed comments to the docket, so I will focus my remarks now on two aspects of the model rule and federal plan: the importance of preventing leakage and of ensuring that states switch to cleaner, alternative energy sources that best protect lung health.

We support EPA's commitment to ensure that the reductions in carbon emissions are "real, and not just apparent." We were glad to see that EPA recognized that some actions could result in leakage, or additional emissions that come as side-effects of actions in the plans. We support EPA providing the strongest possible tools for states to use in the model plan and in the federal plan to prevent additional carbon emissions.

We are concerned about aspects of the plans that would encourage states to use sources of energy that have harmful health impacts.

In the model rules for rate-based plans, EPA would allow states to take credit for using biomass and waste-to-energy as alternatives to coal and natural gas. The American Lung Association opposes burning biomass or waste to provide electricity because of the emissions of harmful air pollutants that they produce, including particulate matter and possible air toxics from waste products. The Clean Power Plan should not encourage states to transition from burning one harmful source, like coal, to burning another harmful source, like waste products. We are pleased that the federal plan would not allow these fuel options and encourage EPA to strengthen the model rule to eliminate them as well.

We are pleased that under the Clean Energy Incentive Program, EPA will provide incentives to states to adopt early the cleanest alternative sources, wind and solar. Both are fully capable of adding great capacity to our energy supply while not adding additional harmful pollution to the air we breathe.

On behalf of millions of Americans with chronic lung disease, on World COPD Day, we appreciate this opportunity to provide comments on EPA's proposed model rule and federal plan. We call on you to finalize strong plans that will drive a shift to cleaner energy sources that best protect health from harmful air pollution. Thank you.