

U.S. Environmental Protection Agency Hearing on the Proposed Stay of  
Emissions Standards for New, Reconstructed, and Modified Sources in the Oil and Natural Gas Sector

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Good morning. My name is Laura Kate Bender, and I am the director of advocacy for the American Lung Association's Healthy Air Campaign. 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.

As you heard from my colleague earlier this morning, **the American Lung Association strongly opposes the proposed two-year delay of the requirements for reducing harmful emissions from new, expanded and modified sources within the oil and natural gas industry.** My colleague shared health impacts that result from volatile organic compounds and resulting ozone pollution. I'd like to share some additional health impacts specific to climate change.

EPA has identified the oil and gas industry as the "single largest contributor to United States anthropogenic methane emissions." Methane gas is a potent driver of climate change, which is already impacting Americans' health. These impacts are projected to worsen, putting our lungs at increased risk.

**First, ground-level ozone is likely to worsen in some locations.** Higher temperatures make it more likely that the precursor gases, including VOCs, will react to form ground-level ozone. Ozone causes asthma attacks and respiratory distress. It may also increase cardiovascular harm, risk of harm to the central nervous system, and risk of low birth weight in newborns. And, ozone can cause premature death.

**Also, climate change can increase the likelihood of wildfires and drought conditions, which create dangerous particulate matter.** We've seen in recent years a number of blazes in the West that have showcased the risks from wildfire smoke. For example, in September 2014, California had reported nearly 5,000 wildfires that year—1,000 *more than usual*—before fire season had even begun. In July of 2015, more than 700 fires in Alaska and Canada were blowing smoke that created unhealthy air pollution in Minneapolis and Colorado. Dust storms, driven by drought, also produce high levels of particulate matter.

Even short-term exposure to such levels of particulate matter threatens human health. As EPA concluded in 2009, short-term increases in particle pollution cause premature death and cardiovascular harm, including more heart attacks, especially among the elderly and in people with heart conditions. They also cause increased respiratory harm, including increased severity of asthma attacks in children.

Thanks to EPA and the Clean Air Act, the nation has come a long way in reducing harmful levels of ozone and particle pollution. But climate change is poised to stymie progress and even undo it. As EPA noted in a 2009 report, climate change has "the potential to make U.S. air quality management more difficult."

**Finally, extreme weather represents another threat to respiratory health.** Many U.S. cities, such as Chicago and Milwaukee, have experienced increased death rates from episodic heat waves in recent years. Hotter temperatures can increase the risk of heat stroke, heat exhaustion, and hospitalization for cardiovascular and respiratory diseases.

Increased risk of dangerous hurricanes threatens not only damage and death directly, but also from the resulting disruption in communities. Hospitals, clinics, medical care and public health services may be blocked from serving their patients and communities.

According to recent assessments, the nation has experienced increased heavy rainfall and flooding since 1991. Flooding causes premature deaths, often through drowning, but the aftermath of flooding expands the burden. Water damage leaves behind lingering risks including dampness and mold, chemicals and sewage spread through flood waters, and contaminated debris, all of which put lung health at risk.

I'd also like to share some comments from my colleague, Dr. Anne Mellinger-Birdsong, a physician and epidemiologist who works with the American Lung Association in Georgia. She couldn't be here in person today, so I wanted to close with her words:

"The proposed rule delay published in the June 16 Federal Register notes that this proposal will have a disproportionate impact on children. It then goes on to say that this impact is limited since the proposal is for a two-year delay.

"Two years in the life of a child is a long time. Children grow and develop a lot in the first two years of life. Teenagers continue to grow and form their lungs until they reach adulthood. Delaying this rule for two years will have a significant impact on children from infancy through their teen years. Those who are exposed to two extra years of air pollution will suffer greatly. It is not 'limited' for them.

"The original rule notes that methane is a significant contributor to the formation of ground-level ozone. Ozone is known to cause asthma attacks in children.

"The original rule notes that methane is one of the most significant contributors to the greenhouse gases that cause climate change. Climate change will have a disproportionate impact on children, due to their increased vulnerability to air pollution, extreme weather events, and wildfires, and their increased exposure to the vectors that carry infectious diseases.

"The original rule notes that methane has a long lifetime in the atmosphere, so it will continue to contribute to ozone formation and climate change for decades.

"So even though two years sounds short, it will have effects that persist for decades and will cause significant harm to the children of the United States."

Thank you.