

June 25, 2012

The Honorable Lisa Jackson, Administrator
U.S. Environmental Protection Agency
Air and Radiation Docket and Information Center
Mail Code 2822T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Docket ID No. EPA-HQ-OAR-2011-0660

Dear Administrator Jackson:

We write to express support for the U.S. Environmental Protection Agency's (EPA) proposed Carbon Pollution Standard for New Sources. As physicians, we are concerned with the well-being of our patients, many of whom suffer from chronic lung, cardiovascular and other diseases. Our patients represent the millions of who live each day at risk of serious health impacts related to environmental conditions such as air pollution. The proposed carbon pollution standard is a key step in reducing harmful emissions that contribute to unhealthy air. We encourage the EPA to adopt the most protective carbon pollution standard possible.

Carbon pollution from electric generating units is a major contributor to global warming. Carbon dioxide (CO₂) emissions represent the largest percentage of greenhouse gas pollution,ⁱ with fossil fuel fired electric generating units contributing the largest share.ⁱⁱ As the amount of CO₂ in the atmosphere increases, solar radiation is trapped, raising the temperature of the earth.ⁱⁱⁱ

Increasing global temperatures are likely to create conditions favorable for of the creation of ground-level ozone (smog).^{iv} Projections indicate that changes in climate will likely increase risk of ozone formation,^v with the greatest impact in areas that already suffer from unhealthy levels.^{vi} While factoring in the impact of current rules to reduce ozone levels is difficult, scientific consensus indicates that ozone formation is likely to be higher in the absence of carbon pollution standards than it would be with standards in place. As EPA's own assessment made clear in 2009, the potential for climate change will make the work to clean up air pollution more difficult.^{vii}

Ozone pollution is known to exacerbate existing medical conditions, such as asthma, and chronic obstructive pulmonary disease (COPD), and disproportionately impact individuals under 18, over 65, , those living in poverty, and people who work or exercise outdoors.^{viii}

Ozone acts as a powerful respiratory irritant, causing inflammation of lung tissue, premature death,^{ix} shortness of breath,^x chest pain,^{xi} wheezing,^{xii} increased susceptibility to respiratory infections,^{xiii} risk of asthma attack,^{xiv} and need for medical treatment or hospitalization.^{xv} Further, children who are regularly exposed to high levels of ozone may experience reduced lung function and increased risk of lung disease in adulthood.^{xvi}

Our best science indicates that carbon pollution contributes to global warming. Warming creates an environment which will make it much harder to clean up ozone and other types of air pollution. The risks associated with ozone pollution are well-documented, and we need every available tool to reduce the risk for the general population, and especially those at greatest risk. We urge the EPA to adopt the strongest possible carbon pollution standard for new sources, and move quickly to adopt an equally strong standard for existing sources.

Sincerely,

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Note: references need to have complete citations.

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- ⁱⁱⁱ IPCC, 2007: Summary for Policymakers. In: *Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change* [Solomon, S., D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA.
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