

Comments on:

Emission Guidelines for Greenhouse Gas Emissions from Existing Electric Utility Generating Units;  
Revisions to Emission Guideline Implementing Regulations; Revisions to New Source Review Program  
Docket EPA–HQ–OAR–2017–0355

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Good morning. My name is Allison MacMunn and I am the national director of media relations at the American Lung Association. As you have heard today from our national president and CEO, the American Lung Association strongly opposes the proposed replacement for the Clean Power Plan, and the proposed changes that would weaken the New Source Review program. These proposals would allow more dangerous pollution to threaten the health of the people we serve.

Americans across the country are becoming all too familiar with the health consequences of climate change, from wildfire smoke and more smoggy days to severe storms. Everyone is at risk, but some are especially vulnerable, including people with lung disease and other chronic diseases, seniors, pregnant women, and babies and children. This hits home for me personally because I'm the mother of a 10-month-old baby, Hazel June.

The proposed replacement for the Clean Power Plan would not meaningfully reduce the carbon pollution that contributes to climate change. Unlike the Clean Power Plan, the ACE proposal wouldn't require any real reductions in carbon from power plants, and would only provide far fewer tools to clean up pollution.

The Clean Power Plan would reduce other dangerous pollutants from power plants alongside carbon. The ACE proposal would sacrifice these benefits. EPA's own estimate projects an additional 1,400 premature deaths under ACE in the year 2030 alone.

And EPA has also proposed to weaken its New Source Review program, which could mean more emissions of nitrogen oxides, sulfur dioxide, particulate matter and air toxics, including mercury, a powerful neurotoxin.

These two proposals would add dangerous pollution into the air that not only contributes to climate change, but also further harms health in communities that are already suffering. My family is from the Ohio Valley region in southern Indiana, which is surrounded by so-called super polluters. Beautiful farmland is boxed in between multiple power plants, and it's impossible to ignore the brown film hovering just above the horizon. I've seen the impacts of air pollution firsthand, as many in my hometown suffered from severe asthma attacks and symptoms made worse by air pollution. Many of my childhood friends missed countless days of school and were unable to fully participate in sports and even band class. My beloved grandparents each had COPD, and it pained me to watch them struggle to breathe knowing that the smoke stacks surrounding our little community made their symptoms worse.

Today, I fear for the health and safety of my family still living in this area, including my young niece and nephew.

Clean air is the only safe thing to breathe into our lungs. We know a lot about air pollution, but we still have a lot to learn. However, we do know that tools to clean up carbon pollution will also help reduce other dangerous pollutants including particle pollution and mercury. Particle pollution has been found to cause lung cancer, for instance. And witnessing the ever-present plumes of smoke on the horizon throughout my childhood, I have to wonder if other health conditions I see in the community might be linked to this air pollution, as some new studies have suggested. The spikes in dementia? Childhood friends dying far too young from cancer? I, myself, was diagnosed with thyroid cancer in my early 30s. Could this be related? We may have a lot to learn about the extent of harm associated with air pollution, but we also have a moral responsibility to take action. What we do know is that air pollution and climate change aren't only an issue for Hoosiers, both impact us all, and if we do not take swift and meaningful action, the health and future of all Americans, including our children, remain at risk.

EPA's proposals would reverse much-needed progress toward addressing climate change, and make it permanently easier for power plants to pollute surrounding communities. EPA's mission is to protect human health and the environment. I fail to see a single way that the ACE or NSR proposals would further that mission. EPA's own projections show that they would literally kill people.

I struggled as a teenager in Indiana to understand why such dangerous levels of air pollution were allowed. And now, as an adult, I'm terrified that the EPA would even consider proposals that would put our health and lives at greater risk. If I can't understand it, how will I explain to my daughter why the Environmental *Protection* Agency is not *protecting* our lives? Could you explain this to your children? How can anyone accept that 1,400 deaths in the year 2030 alone, deaths that could have been prevented, is possibly acceptable. This is not normal. This is not okay.

To protect the health of all Americans – especially the most vulnerable among us – EPA must reject this proposed replacement, and instead fully implement and enforce the Clean Power Plan. EPA must also reject the proposal to weaken the New Source Review requirements that prevent areas from being burdened by even more toxic air pollution. My family's health, everyone's health, depends on it. Thank you.