

**Comments of Harold P. Wimmer
National President and CEO
American Lung Association**

On Proposals by the U.S. Environmental Protection Agency for:

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

October 1, 2018

Thank you for this opportunity to comment on these proposals today. My name is Harold Wimmer, and I am the National President and CEO of the American Lung Association. The American Lung Association is the leading organization working to save lives by improving lung health and preventing lung disease, through research, education and advocacy. Two of our key strategic imperatives are to improve the air we breathe and to reduce the burden of lung disease on individuals and their families. I'm here today because these proposals threaten both of those imperatives.

The American Lung Association opposes the proposals presented as the Affordable Clean Energy rule and the revisions to the New Source Review Program. Together, these proposals abandon much-needed public health safeguards against power plant pollution, placing the health of all Americans at risk, and especially the health of those who are most vulnerable, including children, older adults, and people with asthma and lung disease, whom the Lung Association serves and represents here today.

EPA's proposed replacement for the Clean Power Plan is dangerous. It is a departure from meaningful progress. The urgency of protecting public health from the impacts of climate change increases with each passing day—and so does the necessity of implementing and enforcing strong limits on carbon pollution from power plants as outlined in the Clean Power Plan. The Lung Association urges EPA to reject the proposed rule and implement the Clean Power Plan.

EPA's own analysis of the proposal found that it could result in up to 1,400 more premature deaths, 120,000 more asthma attacks, and up to 64,000 missed days of school annually in 2030, all of which would be prevented under the Clean Power Plan. That finding echoes an independent analysis completed by researchers at Harvard, Syracuse and Boston University that found that this approach could cause more harm than doing nothing at all.

In addition to the immediate damage that this proposal would cause to human health, it fails to address the pollution causing climate change. That will have lasting health consequences. The longer our nation's leaders delay cleaning up the pollutants driving climate change, the greater the health costs will be from degraded air quality and more extreme weather threats, such wildfires, hurricanes, and flooding.

Just over three years ago, I had the privilege of joining President Obama at the White House at the announcement of the final Clean Power Plan, with one of our board members, Dr. Sumitra Khatri, who has spent her career treating patients impacted by lung disease. Dr. Khatri's patients in Cleveland face the dangers that climate poses to Americans with lung diseases like asthma, chronic obstructive pulmonary disease (COPD), and lung cancer.

Her patients and others with lung diseases will face increased risk of harm from climate change under these proposals. Approximately 26.5 million Americans have asthma, including 6.1 million children; 11.3 million adults have COPD; more than 230,000 will be diagnosed with lung cancer this year. These Americans and their families deserve to have the nation adopt stronger, more effective measures to protect them from the threats to their lives and to their future. We urge EPA to withdraw this proposal.

Thank you.