

Testimony for the Proposed Rule Revising the NSPS for GHG Emissions from New, Modified, and Reconstructed EGUs on behalf of the American Lung Association

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Good morning. My name is Laura Kate Bender, and I am the National Director of Advocacy for the American Lung Association's Healthy Air Campaign. The American Lung Association's mission is to save lives by improving lung health and preventing lung disease. Our organization represents millions of Americans with lung disease, including the more than 6 million children with asthma and more than 12 million adults with chronic obstructive pulmonary disease. I'm here today to speak in strong opposition to EPA's proposed revisions to the New Source Performance Standards for greenhouse gas emissions from new, modified, and reconstructed fossil fuel-fired power plants.

We oppose the drastically higher emissions limit in the proposed rule. We support EPA's proposal to retain the basis for the endangerment finding established in the 2015 rule and see no justification for changing that determination. You'll hear more today from my colleagues as well as receive written comments.

Since 2012, my colleagues and I have collectively testified before EPA more than a dozen times on the urgent need to clean up carbon pollution from power plants. That's just in-person testimony from Lung Association staff - to say nothing of the many health professionals, colleagues at other national and local health and medical organizations, and people whose health has been personally impacted by air pollution and climate change that we've recruited to speak before you.

We spoke at EPA in 2012 in favor of the then-proposed standards for carbon pollution from new power plants. At the time, my colleague Paul Billings said, "Scientists warn that the buildup of carbon pollution will create warmer temperatures which will increase the risk of unhealthy smog levels. Any increase in smog means more childhood asthma attacks and complications for those with lung disease." We called for a strong standard to limit carbon from new power plants in order to help protect public health from these impacts.

Fast forward almost seven years and here we are, not only failing to move forward, but actually moving backward. I know it is profoundly frustrating to everyone in the room who understands the need to act. So I want to highlight a few things that have changed between then and now.

In the years since 2012, the impacts of climate change have become all too real for Americans all over the country. Our comments in 2012 focused on the impacts of warmer temperatures on air quality. Today, millions of Americans have firsthand experience with the health impacts of wildfire smoke after experiencing dangerous levels of particle pollution in their own neighborhoods.

And that particle pollution is even more dangerous than we previously understood. Growing research about the health effects from particulate matter confirmed the sweeping array of health harms from this pollution and add some new ones to the list. These health harms now include premature death; short- and long-term respiratory and cardiovascular harm; lung cancer; likely harm to the nervous system; possible developmental harm and risk of low birthweight and premature birth; and possible development of diabetes. Many of the populations face increased risk, including nonwhite groups and people with low socioeconomic status face, as well as people who are obese and people with certain genetic variants.

Americans are also noticing the impacts of extreme heat, which also has implications for lung health. The Lancet medical journal found late last year that heatwaves are more frequent and lasting longer, and more Americans are being exposed to extreme heat, which can worsen chronic lung, heart and kidney conditions and cause heat stroke and heat exhaustion. And of course, for people in Puerto Rico, Houston, North Carolina, and other communities hit hard by natural disasters, the climate impacts of extreme storms are not just hypothetical. Not only do disruptive extreme weather events cut people off from their medical care, they also expose people to lung health dangers in flooded areas.

One more thing that has changed since 2012: a recent report from the Intergovernmental Panel on Climate Change made it clear that a world warmer than 1.5 degrees Celsius above pre-industrial temperatures is not a livable option. The need to act is more urgent than ever – not only because the

nation has not made sufficient progress, but also because scientists now know that the consequences will be more dire than was previously understood.

And yet in the face of overwhelming evidence that climate change presents dangerous and sweeping consequences for human health, this administration has proposed a litany of actions that would make it harder to prevent these harms. EPA has proposed repealing the Clean Power Plan, replacing it with a rule that could actually be worse for health than doing nothing, undermining standards that limit mercury and other air toxics from power plants, rolling back successful limits on greenhouse gasses from vehicles, allowing unlimited super-polluting trucks on the road, and censoring the science that shows the health harms of air pollution. This proposal to gut the existing limits on carbon pollution from new, modified and reconstructed power plants is the latest action that would increase dangerous pollution from power plants.

In 2012 when the NSPS was first under consideration, we called for a CO₂ standard tighter than 1000 lb/MwH, reflecting achievements of the best performing plants in operation at that time. EPA today is considering a standard that allows nearly twice as much carbon pollution. While EPA is proposing to maintain its 2015 finding that greenhouse gasses endanger human health, the agency is asking for input on whether that finding should be dramatically weakened. Any finding that exempts major sources of pollution from regulation for that pollutant would be absurd.

Climate change is a public health emergency, and EPA must fulfill its mission to protect human health by maintaining the current New Source Performance Standards for greenhouse gas emissions from new, modified, and reconstructed sources. Thank you.