



AMERICAN PUBLIC HEALTH ASSOCIATION

For science. For action. For health.

April 20, 2018

The Honorable Scott Pruitt
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460-0001

Re: Repeal of the Clean Power Plan (Docket ID No. EPA-HQ-OAR-2017-0355)

Dear Administrator Pruitt:

On behalf of the American Public Health Association, a diverse community of public health professionals that champions the health of all people and communities, I appreciate the opportunity to comment on the U.S. Environmental Protection Agency's proposed repeal of the Clean Power Plan.

EPA's proposal to repeal of the Clean Power Plan will put the health of many Americans at risk. Repeal of the CPP contradicts EPA's own arguments which show that the health benefits of the Clean Power Plan significantly outweigh its costs. The original CPP proposal would prevent up to 4,500 premature deaths and 90,000 childhood asthma attacks every year across the United States, once fully implemented.^{1,2} The dollar value of these lives saved and health improvements from public health and climate benefits totals an estimated \$34 billion to \$54 billion per year in 2030, versus the estimated costs of \$8.4 billion³ – an investment in health and well-being that we cannot afford to lose. APHA urges EPA to implement the CPP, rather than weaken or repeal the many health protections it embodies.

Americans depend on EPA to protect their health and the environment. Three prior U.S. Supreme Court decisions (*Massachusetts v. EPA* in 2007⁴, *American Electric Power v. Connecticut* in 2011⁵, and *UARG v. EPA* in 2014⁶) have established the legal foundation for EPA's role in limiting greenhouse gases, by finding that carbon pollution endangers human

¹ US EPA, "Fact Sheet: Clean Power Plan: By The Numbers – Cutting Carbon Pollution from Power Plants" (2015), available at: <https://archive.epa.gov/epa/cleanpowerplan/fact-sheet-clean-power-plan-numbers.html> (accessed March 23, 2018).

² US EPA, "Regulatory Impact Analysis for the Review of the Clean Power Plan: Proposal" (2017), available at: https://www.epa.gov/sites/production/files/2017-10/documents/ria_proposed-cpp-repeal_2017-10.pdf (accessed April 10, 2018).

³ US EPA, "Fact Sheet: Clean Power Plan: By The Numbers – Cutting Carbon Pollution from Power Plants" (2015), available at: <https://archive.epa.gov/epa/cleanpowerplan/fact-sheet-clean-power-plan-numbers.html> (accessed March 23, 2018).

⁴ *Massachusetts v. Environmental Protection Agency*, 549 U.S. 497, 532 (2007).

⁵ *American Electric Power v. Connecticut*, 564 U.S. 410 (2011).

⁶ *Util. Air Regulatory Grp. v. EPA*, 134 S. Ct. 2427, 2444-2445 (2014).

health and welfare. As such, it is EPA's responsibility to regulate carbon pollution to protect public health.

The repeal of the Clean Power Plan would put tens of millions of Americans in greater danger from climate change-fueled extreme weather events, heat waves and air pollution episodes affected by wildfires and associated smoke pollution, among other health dangers. These climate change-fueled events would contribute to thousands of early deaths each year plus sicken thousands more. Not only do these health harms occur today, as supported by assessments of the state of scientific evidence documented by the U.S. Global Change Research Program⁷, but these health harms will also increasingly impact future generations. Repealing the CPP would remove the enormous health benefits that all Americans could enjoy from avoiding these harms, by limiting the heat-trapping emissions that cause climate change.

Furthermore, there are tremendous inequities in terms of those who suffer most from climate change's harmful effects. Government studies show that climate change-vulnerable groups of people include "those with low income, some communities of color, immigrant groups (including those with limited English proficiency), Indigenous peoples, children and pregnant women, older adults, vulnerable occupational groups, persons with disabilities, and persons with preexisting or chronic medical conditions."⁸ Climate change and air pollution especially impact children who are particularly vulnerable due to physiological differences. The harm done to children is an impact on the health of our future. Repeal of the CPP would effectively limit the health protections that the plan could afford, and instead exacerbate the health inequities of climate change's impacts.

We urge EPA to abandon any plan to repeal the Clean Power Plan and instead to focus on implementing the plan and developing additional safeguards to protect the public from the health impacts of climate change and dangerous air pollution.

Sincerely,

A handwritten signature in black ink that reads "Georges C. Benjamin". The signature is fluid and cursive, with the first name being the most prominent.

Georges C. Benjamin, MD
Executive Director

⁷ U.S. Global Change Research Program (USGCRP), "Climate Science Special Report: Fourth National Climate Assessment, Volume I," Wuebbles, D.J., D.W. Fahey, K.A. Hibbard, D.J. Dokken, B.C. Stewart, and T.K. Maycock (eds.) (2017), https://science2017.globalchange.gov/downloads/CSSR2017_FullReport.pdf; USGCRP, "Climate Change Impacts in the United States: The Third National Climate Assessment," Melillo, Jerry M., Terese (T.C.) Richmond, and Gary W. Yohe (eds.) (2014), <http://nca2014.globalchange.gov/>; USGCRP, "Impacts of Climate Change on Human Health in the United States: A Scientific Assessment" (2016).

⁸ USGCRP, "Impacts of Climate change on Human Health in the United States: A Scientific Assessment" (2016), chapter 9, "Populations of Concern", section 9.1.