



November 19, 2013

**VIA Electronic Mail**

Air and Radiation Docket and Information Center  
U.S. Environmental Protection Agency  
Mail Code 2822T  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460  
E-mail: a-and-r-Docket@epa.gov

**Re: Comments on Proposed Carbon Pollution Standards for New Power Plants  
Docket ID No. EPA-HQ-OAR-2013-0495**

Dear Sir or Madam:

The Public Health Institute (PHI) is pleased to submit comments in response to the U.S. Environmental Protection Agency's (EPA) proposed rule entitled "Carbon Pollution Standards for New Power Plants" (Docket ID # EPA-HQ-OAR-2013-0495).

PHI supports the basic premise of the EPA's proposed carbon pollution standards for power plants based on the Agency's clear recognition that carbon pollution is a major contributor to climate change and therefore endangers public health. The Public Health Institute applauds the Agency's initiative to put these regulations into place.

The Public Health Institute (PHI) is a non-profit organization based in California with over four decades of experience in improving health, well-being and quality of life for people in the US and around the world. PHI is home to more than 100 programs and projects across a range of health issues. Through our extensive programs, partnerships and networks, including in the organization's home state of California, we are working to address environmental factors that compromise public health, such as air pollution and climate change. PHI's work on environmental health and climate change is led by the Center for Climate Change & Health (the Center).

Through the Center, PHI is working to build upon California's leadership in addressing climate change to inform state and national approaches. PHI promotes adaptation and mitigation strategies that effectively address the impacts of climate change on health, while at the same time generating co-benefits for the health, agriculture, transport, urbanization and energy sectors.

## DISCUSSION

Pollution and climate change strike at the very underpinnings of health – air, food, water, and social and ecological stability<sup>1</sup> -- and have been described as the greatest health threat of the 21st century.<sup>2</sup> The impacts of air pollution and climate change are taking place now, will increase in severity as climate change proceeds, and will disproportionately hurt Americans in low income communities and communities of color, as well as the elderly and the very young.<sup>3</sup>

Carbon pollution is a major contributor to global warming which creates more ground level ozone – smog – with devastating effects for asthma sufferers. PHI is acutely aware of the impact of carbon pollution on air quality and public health, particularly for those most vulnerable among us. Some of the worst air quality in the country is in California’s Central Valley,<sup>4</sup> where PHI has extensive experience mitigating the harmful effects to health, particularly asthma.

If carbon pollution is not curbed, the consequences of air pollution on public health, quality of life, and demands on the health care system will become vastly worse.<sup>5</sup>

The impact of increased temperatures or extreme heat has been a focus of PHI’s work through our role in administering the California Environmental Health Tracking Program. We have been studying heat vulnerability and heat-related illness and death.<sup>6,7</sup> By 2050, in California alone, extreme heat, with the risk of corresponding health consequences, is predicted to affect anywhere from 1.7 to 28 million people.

By contributing to climate change, carbon pollution will also impact food security and nutrition, an issue that will be highlighted in the forthcoming IPCC report. According to

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<sup>1</sup> World Health Organization, *Climate Change and Health Fact sheet No. 266*, <http://www.who.int/mediacentre/factsheets/fs266/en/>

<sup>2</sup> “Managing the Health Effects of Climate Change : The Lancet.” Accessed August 21, 2013. [http://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(09\)60935-1/fulltext?\\_eventId=login](http://www.thelancet.com/journals/lancet/article/PIIS0140-6736(09)60935-1/fulltext?_eventId=login).

<sup>3</sup> Morello-Frosch, R. et al., *The Climate Gap: Inequalities in How Climate Change Hurts Americans & How to Close the Gap*, [http://college.usc.edu/geography/ESPE/documents/ClimateGapReport\\_full\\_report\\_web.pdf](http://college.usc.edu/geography/ESPE/documents/ClimateGapReport_full_report_web.pdf)

<sup>4</sup> American Lung Association, 2013. *State of the Air*, <http://www.lung.org/associations/states/california/assets/pdfs/sota-2013/sota-2013-full-report.pdf>

<sup>5</sup> IPCC, 1997 - R.T.Watson, M.C.Zinyowera, R.H.Moss (Eds), *The Regional Impacts of Climate Change: An Assessment of Vulnerability*, <http://www.ipcc.ch/ipccreports/sres/regional/index.php?idp=0>

<sup>6</sup> Knowlton K, Rotkin-Ellman M, King G, Margolis H, Smith D, Solomon G, Trent R, English P. 2008. “**The 2006 California Heat Wave: Impacts on Hospitalizations and Emergency Department Visits.**” *Environ Health Perspect*.

<sup>7</sup> Reid C, Mann K, Alfasso R, English P, et al. “Evaluation of a Heat Vulnerability Index on Abnormally Hot Days: an Environmental Public Health Tracking Study”, 120:715-720 (2012). *Environ Health Perspect* <http://dx.doi.org/10.1289/ehp.1103766>

the World Food Program and the International Food Policy Research Institute, by mid-century climate change could increase the number of malnourished children in the world by as much as 24 million.<sup>8</sup>

## **CONCLUSION**

Climate change is a complex challenge with multiple drivers. Regulating power plant emissions, alone, will not be enough. But as the first uniform national limits on carbon pollution from U.S. power plants, these are a critically important step. PHI recognizes the important role that the Agency's proposed clean air regulations can play to reducing the long term burden of climate change, both directly and indirectly. In addition, shifting to cleaner energy production will reduce the host of other air pollutants produced by burning coal, offering immense near term benefits to health.

At the Public Health Institute, we are committed to working with the EPA and other stakeholders to ensure that these standards will be effectively implemented, and to ensure a healthier future for all communities.

PHI appreciates your consideration of these comments on EPA's proposed carbon pollution standards for new power plants.

Sincerely yours,

Jennifer Miller, PhD  
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## **More Information about the Public Health Institute:**

The Public Health Institute (PHI) is a non-profit organization based in California with over four decades of experience in improving health, well-being and quality of life for people in the US and around the world. PHI is home to more than 100 programs and projects across a range of health issues. Through our extensive programs, partnerships and networks, including in the organization's home state of California, we are working to address environmental factors that compromise public health, such as air pollution and climate change. Our work on environmental health and climate change is focused through the Center for Climate Change & Health (the Center).

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<sup>8</sup> World Food Programme, *Climate Change and Hunger: Responding to the Challenge*, [http://www.ifpri.org/sites/default/files/publications/wfp\\_fightingcchunger.pdf](http://www.ifpri.org/sites/default/files/publications/wfp_fightingcchunger.pdf) ; International Food Policy Research Institute, *Building Climate Resilience in the Agriculture Sector of Asia and the Pacific*, [http://www.preventionweb.net/files/11486\\_BuildingClimateResilienceAgricultur.pdf](http://www.preventionweb.net/files/11486_BuildingClimateResilienceAgricultur.pdf)

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