**June 12 2019**

**OMB Meeting – final ACE rule**

**Molly Rauch**

**Public Health Policy Director, Moms Clean Air Force**

[**mrauch@momscleanairforce.org**](mailto:mrauch@momscleanairforce.org)**, 202-744-4790**

Moms Clean Air Force is an organization of more than one million moms and dads in every state fighting air pollution and climate change for the sake of our children’s health. We supported the Clean Power Plan and strongly oppose the proposed replacement plan, or ACE. We submitted thousands of comments into the docket opposing this plan, and several of us delivered testimony at the public hearing in Chicago in opposition to the plan.

Climate change is a global public health crisis. A consensus of the world’s scientists resoundingly confirms that climate change directly threatens the health and wellbeing of Americans. It is also a major threat to the stability of the US economy and to our national security.

Climate change is caused by anthropogenic emissions of greenhouse gases. It is fueled by carbon dioxide, methane, and other greenhouse gas emissions from people. This pollution is endangering our health and welfare. Under the Clean Air Act the EPA has a decisive and clear legal obligation to limit the pollution that endangers our health and welfare. Yet the ACE plan does not fulfil this legal obligation. The ACE plan represents a basic failure to achieve any meaningful emissions reductions. Our million-plus members oppose this plan because it does nothing to meaningfully limit climate pollution, and our children’s lives are on the line.

The obligation is certainly a legal one, and that is significant. But it’s also a moral one. As parents, we have a moral obligation to protect our children’s health and future. The do-nothing approach of this administration is a stunning abdication of a basic parental instinct. As parents we are here to formally register our opposition, yet again, to this approach.

Millions of children in the United States are already suffering from asthma, the most common chronic disease of childhood and the leading cause of missed school days. Climate change will make asthma worse.

As doctors and nurses from around the world are telling us, climate change brings other major health problems as well. It will increase risk of heart disease and lung problems for children, the elderly, and all Americans.

The Trump administration’s own analysis found that the Clean Power Plan could prevent an estimated 90,000 childhood asthma attacks and as many as 4,500 early deaths each year. Replacing the Clean Power Plan with this ACE proposal will harm our children’s health. This proposal would lead to over 1,000 additional deaths from air pollution in 2030 alone, relative to the Clean Power Plan, according to the EPA itself.

The Clean Power Plan was designed to cut emissions by more than 30 percent over 2005 levels. Based on the proposal, the ACE rule would cut emissions by at most a few percent and at worst could even lead emissions to increase if utilities run their coal plants more. This is unacceptable.

The window to take action is closing. Bold and decisive action to cut emissions is needed now.

Since the comment period for this proposal has closed (10/30/18), a flood of scientific assessments and analyses have added to the overwhelming evidence that climate change threatens our health and wellbeing, and requires urgent, aggressive action immediately. I will highlight three of them.

1

The Administration’s own **Fourth National Climate Assessment**, released by the Trump administration on Black Friday — a launch that seemed calculated to bury the congressionally mandated report, which highlighted the findings of dozens of experts at 13 federal agencies that harmful man-made climate change is underway and growing worse. The National Climate Assessment compiled compelling new evidence of the serious damage to public health, the economy, and natural resources that climate change has already inflicted throughout the United States. It emphasized that the degree of future harm depends on whether effective efforts are taken now to mitigate greenhouse gas emissions. The report predicted substantial damage to health absent aggressive greenhouse gas reductions, affirming unmitigated climate change will increase heat deaths, and diseases such as West Nile, Zika, and Lyme will spread. Moreover, climate change will cause substantial net damage to the US economy, in the range of hundreds of billions of dollars, or more than 10% of GDP, by the end of this century.

2

The **Lancet Countdown** is an annual report that tracks the health impacts of global climate change. It is published by the world’s oldest and most prestigious peer-reviewed medical journal, based in London. The 2018 report was released in December 2018, and tracks 41 indicators across health and climate change. The report warns of overwhelming impacts on work productivity, vector borne disease, and food security worldwide, if nothing is done to address this problem. Doing nothing, the report warned, threatens both human lives and the viability of the national health systems we all depend on, with the potential to disrupt core public health infrastructure and overwhelm health services. Here in the US, extreme heat is already worsening chronic conditions, increasing healthcare costs, and, according to the Lancet, contributing to more than 1 billion lost labor hours each year.

3

Peer-reviewed research published in **Nature Climate Change** in April of this year -- and written by EPA scientists -- analyzed in unprecedented detail the costs of climate change in the US. It concluded that unmitigated climate change would cause thousands of additional heat and pollution-related deaths in the United States each year by 2050, and would cost the US economy as much as $500 billion each year in economic damages by 2090.

Finally, and although this was available in October before the comment period closed, I feel it’s essential to also highlight, again, the IPCC’s special report on “Global Warming of 1.5 ℃.” This report -- constructed by 91 scientists from 40 countries, who analyzed over 6,000 scientific studies *--* found that climate harms would rise significantly with increased warming of 1.5 degrees Celsius from pre-industrial levels, which is just a half-degree more than the warming already observed. The IPCC concluded that rapid reductions in emissions are required by 2030 in order to avoid even worse impacts. We have just 12 years to make massive and unprecedented changes to global energy infrastructure to limit global warming to moderate levels.

These reports and many others underscore EPA’s decisive legal and moral obligation to limit the pollution that endangers our health and welfare. The ACE plan does not fulfil this obligation. Instead, it fails to achieve any meaningful emissions reductions, and leaves our children vulnerable to grave health and economic damages from runaway climate change. Moms and dads across the country find this unacceptable.