

Comments at EPA Hearing on CAA Cost-Benefit Proposal

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Good afternoon, my name is Vijay Limaye, and I want to thank EPA for organizing this public hearing on the agency's proposal on accounting for costs and benefits in Clean Air Act rulemakings. I'm trained as a PhD environmental epidemiologist and I'm also a former EPA scientist. My work focuses on better understanding the harmful effects of air pollution and climate change on human health. At EPA, I worked on air pollution and health science data and policy. I now work as a climate and health scientist at the Natural Resources Defense Council.

For EPA to undermine the quantification of benefits of clean air amid our national public health crisis is unconscionable. This proposal is intended to hamstring the agency's ability to pass effective clean air protections in the future, and to help this country reckon with the scientific reality and economic dangers of climate change.

Through this proposal, EPA leaders are undermining science and continuing to deny the major health threats of climate change and air pollution, to the detriment of us all. The Clean Air Act is the tool we need to address these problems. We must strengthen, not undermine it. A new report¹ released by NRDC highlights the landmark achievements of the Clean Air Act to protect our health. Since its passage by Congress 50 years ago, this law has delivered on its intent to reduce air pollution, improve health, and extend lifespan for people all around the country.

Through this proposal, EPA is preparing to weaken the Clean Air Act by denying the truth that fossil fuels drive both deadly air pollution and the climate crisis. But climate change is here and now. It's fueling environmental changes like extreme weather and wildfires; it's contributing to dangerous heat waves, air pollution episodes, and infectious disease outbreaks. Climate-sensitive events like these are expected to increase in frequency, intensity, duration, and/or areal extent in the future. Moreover, they pose a wide array of direct and indirect threats to human health and the economy. Some communities are more vulnerable to the ways that climate change harms our health, and others lack the economic capacity to prepare for and adapt to these effects, which are projected to increase in future decades. These health effects have real consequences, both in people's pain and suffering and in associated costs that are largely absent from our accounting of climate change-related damages.

The projected future health and economic burden of climate change will be enormous if climate pollution continues unchecked and communities are not prepared. But these costs are not only a future concern, they are already burdening American families. I led a 2019 peer-reviewed scientific analysis² in collaboration with an economist from the University of California, San Francisco to estimate the health costs of climate-sensitive events across the United States that all occurred during just one year, 2012. Using public data and EPA valuation methods, we found that just a sample of those events-- from wildfires and wildfire smoke in Washington and Colorado, outbreaks of infectious disease in Michigan and

¹ Natural Resources Defense Council. 2020. "Clearing the Air: The Benefits of the Clean Air Act." NRDC. May 5, 2020.

<https://www.nrdc.org/sites/default/files/iec-benefits-costs-us-air-pollution-regulations-report.pdf>.

² Limaye, Vijay S., Wendy Max, Juanita Constible, and Kim Knowlton. 2019. "Estimating the Health-Related Costs of 10 Climate-Sensitive U.S. Events During 2012." *GeoHealth* 3 (9): 245–65. <https://doi.org/10.1029/2019GH000202>.

Texas, heat wave in Wisconsin, air pollution and allergenic pollen in Nevada and North Carolina, extreme weather in Ohio, harmful algal blooms in Florida, and Hurricane Sandy's impacts in New York and New Jersey-- inflicted huge harms on the health of the American people: about 900 deaths, 21,000 hospitalizations, and 18,000 emergency room visits. We estimated the economic toll of deaths and illness at a staggering \$10 billion-- those damages are the types of costs currently missing from EPA's analyses.

EPA proposes that it exercise its "subject matter expertise" in determining how important the non-quantified benefits or costs may be-- I want to note this definition is overly subjective and open to arbitrary and biased decision making. EPA proposes to analyze only the endpoints for which the scientific evidence indicates there is a clear causal or likely causal relationship between pollutant exposure and effect, but for many health effects linked to historically high levels of climate-warming carbon dioxide and other greenhouse gas pollution in the atmosphere, EPA has not yet assessed causality because its leaders do not even acknowledge that the climate crisis is real and a threat to our health and the economy.

EPA must support more comprehensive analyses of the health costs of climate change and the health and economic co-benefits of climate action within Clean Air Act rulemakings and cost-benefit analyses should better account for the substantial and growing health costs of climate change. Our research shows that actions to achieve pollution reductions today could help us avoid or reduce tens or even hundreds of billions of dollars in future health costs.

EPA's proposal is without merit and it should be withdrawn. Thank you.