



January 17, 2013

Regional Greenhouse Gas Initiative
90 Church Street, 4th Floor
New York NY 10007

Re: Protecting Public Health by Lowering Carbon Pollution from Power Plants

Dear Participants of the Regional Greenhouse Gas Initiative:

We are the heads of the American Lung Associations that encompass the states of the Regional Greenhouse Gas Initiative (RGGI). We write today to urge the RGGI Participating States to lower the carbon pollution cap by 20-percent from current levels by 2020. We believe a reduction at this level is achievable in the time period and it sets the stage for achieving the 80-percent by 2050 cut scientists say we need.

There is no doubt that RGGI has played an important role moving the electricity sector in the region towards producing power from the most modern, and least toxic, power plants. However, the initial cap on carbon pollution was set too high to achieve a reduction in the risk of adverse health effects associated with power plant pollution. By lowering the cap, the Participating States have the opportunity to continue the pioneering spirit of the program and protect public health through reductions in power plant carbon pollution and reductions in other pollutants through increased energy efficiency.

As carbon pollution builds up in the atmosphere, scientists believe that it will likely lead to increased temperatures. The increase in temperatures can increase the risk for formation of ground level ozone or smog.

Ozone is a colorless, odorless gas that reacts chemically ("oxidizes") with internal body tissues, such as those in the lung. Ozone acts as a powerful respiratory irritant at the levels frequently found across the nation during the summer months. Breathing ozone may lead to shortness of breath and chest pain, wheezing and coughing; increased risk of asthma attacks; increased susceptibility to respiratory infections, and need for medical treatment and for hospitalization for people with lung diseases, such as asthma or chronic obstructive pulmonary disease (COPD) and premature death.

The most vulnerable individuals, including children, teens, senior citizens, people who exercise or work outdoors, and people with chronic lung diseases like asthma, COPD, and emphysema, are most in danger of being sickened by ozone. So-called "responders," otherwise healthy individuals who experience health effects at lower levels of exposure than the average person, are also susceptible to ozone. Children who grow up in areas of high ozone pollution may never develop their full lung capacity as adults. That could put them at greater risk of lung disease throughout their lives. In the RGGI States there are 8.8 million children, 5.3 million seniors, 900,000 children and 2.9 million adults with asthma and 1.9 million adults with other chronic lung diseases who are all at-risk to due breathing unhealthful levels of ozone pollution.

The U.S. Environmental Protection Agency (EPA) noted in their 2009 assessment of the impact of climate change on regional air quality in the United States that many studies “have demonstrated connections between meteorological variability and ozone concentrations and exceedances, implying the possibility of climate change leading to increasing ozone levels in some regions.”

EPA’s modeling showed “increases in summertime ozone concentrations over substantial regions of the country as a result of simulated 2050 climate change,” using the assumption that none of the precursor emissions decreased from “present day levels.” EPA ran multiple models and in each of them “climate change caused increased in summertime ozone concentrations” in “nearly every region of the country.” Other studies have found that the drop in precursor emissions will reduce the U.S. summer daily ozone, but that climate change will take much of that back. The so-called “climate change penalty” means that additional controls on emissions of ozone precursors that will be needed to reach the same level of ozone in the future than if the climate had not warmed. The penalty is substantial. Harvard, NASA and Argonne National Laboratory scientists estimated that to reach the same ozone concentrations in 2050 will take as much as a ten percent greater drop in precursors such as nitrogen oxides than if climate change was not a factor.

We recognize that the full impact of climate on ozone and other air pollutants is complicated. However, the best understanding shows that carbon pollution-aided climate change will increase the challenge to meeting future national air quality standards for ozone. The “climate change penalty” will add complications going forward.

In conclusion, the risks of carbon pollution on ozone levels and public health should provide the RGGI Participating States with another strong incentive to lower the carbon pollution cap for power plants. By setting stronger cap that is 20-percent below current levels, the RGGI Participating States can secure the long-term health of our children.

Sincerely,



Deborah Brown
President and CEO
American Lung Association of the Mid-Atlantic



Jeffrey Seyler
President and CEO
American Lung Association of the Northeast



Dennis Alexander
Regional Executive Director
LungUSA Territory (serving Maryland,
Washington, DC, Virginia and North Carolina)