Committee on Domestic Justice and Human Development
3211 FOURTH STREET NE • WASHINGTON DC 20017-1194 • 202-541-3160
WEBSITE: WWW.USCCB.ORG/JPHD • FAX 202-541-3339

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Lisa P. Jackson
Administrator
U.S. Environmental Protection Agency
Washington, DC 20460

Subj: Docket ID No. EPA-HQ-OAR-2011-0044
Docket ID No. EPA-HQ-OAR-2009-0234

Dear Administrator Jackson:

I write on behalf of the United States Conference of Catholic Bishops ("Conference") to welcome and comment on recently proposed Mercury and Air Toxics Standards that would reduce hazardous air pollution from power plants. The Conference supports a national standard to reduce such pollution. Such standards should protect the health and welfare of all people, especially the most vulnerable members of our society, including unborn and other young children, from harmful exposure to toxic air pollution emitted from power plants.

While we are not experts on air pollution, our general support for a national standard to reduce hazardous air pollution from power plants is guided by Catholic teaching, which calls us to care for God's creation and protect the common good and the life and dignity of human persons, especially the poor and vulnerable, from conception until natural death. As we articulated in *Putting Children and Families First:* "For generations, the Catholic community has reached out to children… We have defended their right to life itself and their right to live with dignity, to realize the bright promise and opportunity of childhood."

Children, inside and outside the womb, are uniquely vulnerable to environmental hazards and exposure to toxic pollutants in the environment. Their bodies, behaviors and size leave them more exposed than adults to such health hazards. Furthermore, since children are exposed to environmental hazards at an early age, they have more extended time to develop slowly-progressing environmentally triggered illnesses.

It is well known that power plants are the largest source of mercury and other toxic air pollution in the United States. In addition to mercury and arsenic, power plants emit lead, other heavy metals, dioxins and acid gases. It is reported that even in small amounts these harmful air pollutants in the environment are linked to health problems, particularly in children before and after birth, the poor and the elderly. These problems apparently include asthma, cancer, heart disease, learning disabilities, brain damage, and other illnesses that adversely affect childhood development.

Toxic air pollution from power plants causes great harm to the environment, to the food chain, and to humans. Scientists tell us mercury emitted from power plants contaminates our lakes, streams, rivers and fish. People are primarily exposed to mercury by eating contaminated fish. This is of particular concern for pregnant women and their unborn and newborn children since mercury exposure can interfere with children's developing nervous systems, impairing their ability to think and learn. According to research, one out of six babies born in the U.S. has harmful levels of mercury in his or

her blood.[i] Fish advisories have been issued across the United States warning against fish consumption from local waters as a result of mercury contamination.[ii]

A national standard limiting mercury and other toxic air pollution represents an important opportunity to protect the health and welfare of all people, especially our children and poor and vulnerable communities. Applying such a standard would reduce emissions of mercury from power plants by 91 percent marking a significant step forward. Some may attempt to weaken this proposed standard. However, we believe we ought to take prudent and responsible action to protect our children.

We do not make these comments unaware of the broad economic reality. Our country continues to struggle with persistently high unemployment and stagnant economic growth that is not nearly sufficient to meet the needs of vulnerable workers and families. EPA's analysis finds that the employment impacts of this rule are expected to be small.[iii] Implementation of such a rule should attempt to mitigate the potential effects on the workforce and protect poor and vulnerable communities while maintaining a clear priority for health and well-being. EPA and others involved in implementing this rule should work to ensure that any additional costs generated by implementation of the rule are allocated according to capacity to bear such burdens. Poor and vulnerable people and their communities must not be asked to bear a disproportionate share of the effects of toxic air pollution or the cost burden of implementing such a rule.

While there are short-term costs involved in implementing this standard, the health benefits of such a rule outweigh these costs.[iv] Therefore, we welcome the EPA's proposal of a national standard to significantly reduce toxic air pollution and call upon our leaders in government and industry to act responsibly, justly, and rapidly to implement such a standard.

Sincerely,

Stephen E. Blaire

Most Reverend Stephen E. Blaire
Bishop of Stockton
Chairman, Committee on Domestic Justice and Human Development

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[i] See Kathryn R. Mahaffey et al., "Blood Organic Mercury and Dietary Mercury Intake: National Health and Nutrition Examination Survey, 1999 and 2000," *Environmental Health Perspectives*, 112, #5 (April 2004): http://ehp.niehs.nih.gov/members/2003/6587/6587.html, and Leonardo Trasande, et al., Public Health and Economic Consequences of Methyl Mercury Toxicity to the Developing Brain, *Environmental Health Perspectives*, Vol. 113, No. 5 (May 2005): p. 593; http://www.ncbi.nlm.nih.gov/pmc/articles/PMC1257552/pdf/ehp0113-000590.pdf. The 1-in-6 figure, taken from her peer-reviewed research, was used by Mahaffey in a presentation she made while she was the EPA's top mercury scientist. See http://www.epa.gov/waterscience/fish/forum/2004/presentations/monday/mahaffey.pdf.

[ii] American Lung Association, Emissions of Hazardous Air Pollutants from Coal-Fired Power Plants. Prepared by Environmental Health & Engineering, Inc., March 7, 2011, p.18. Available at: http://www.lungusa.org/assets/documents/healthy-air/coal-fired-plant-hazards.pdf

[iii] U.S. Environmental Protection Agency, Regulatory Impact Analysis for the Utility Air Toxics Rule, Final Report, March 29, 2010, p. 9-15. Available at: http://www.epa.gov/ttn/atw/utility/ria_toxics_rule.pdf

[iv] U.S. EPA ibid, p. 1-1