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**Written Testimony of Kevin Cromar, PhD
 American Thoracic Society
 Before the U.S. House
 Subcommittee on Interior, Environment,
 and Related Agencies
 Regarding FY2020 Funding and Policy Recommendations**

Program	FY2020 Recommendation (in millions)
Climate Protection	\$115.9
Federal Support for Air Quality Management	\$171.0
Federal Vehicle Fuels Standards/Certification	\$103.6
Categorical Grants: State and Local Air Quality Management	\$310.0
Categorical Grants: Tribal Air Quality Management	\$14.5
Diesel Emissions Reduction Grant	\$100.0
Categorical Grant: Radon	\$8.1
EPA Radon Program	\$3.3
Compliance Monitoring	\$111.3
Enforcement	\$268.1
Wildfire Coordination	\$15.0

Chair and Ranking member, my name is Kevin Cromar. I am the co-chair of the ATS Environmental Health Policy Committee and I am an Associate Professor at the Marron Institute of Urban Management, New York University. I am testifying on behalf of the American Thoracic Society regarding our recommendations on funding and policy issues facing clean air programs at the Environmental Protection Agency. I appreciate the opportunity to testify before the subcommittee.

I want to thank this committee for level funding for the majority of EPA Clean Air programs for FY2019. While FY19 saw an inelegant process, I am glad Congress and the Administration recognized the vital work being conducted by EPA Clean Air programs.

Clean Air = Good Public Policy

EPA Clean Air policies are good public policies and provide lasting health and economic benefits. Good policy decision-making by EPA, that has considered the economic costs and benefits of regulations, has resulted in a good return on investment; recent analysis shows that Clean Air Act protections has resulted in benefits that outweigh costs by 30 to 1. Reducing ambient air pollution has a direct impact on improving our nation's health.

Environmental Riders

The ATS joins our sister organizations in requesting that Congress reject any legislative riders that would weaken, delay or prevent the EPA from exercising its authority to preserve and protect environmental health. We are pleased that appropriators have

resisted calls to include legislative riders in the Interior/EPA appropriations bill. We encourage the subcommittee to continue to reject legislative riders.

Funding EPA Clean Air Programs

As you know, the Administration has not yet released its proposed budget for FY2020, so it is hard to respond to the President's priorities for the coming fiscal year, but I think we can safely look to earlier budgets to see that the work being conducted at the EPA is not highly valued by the Administration. That's a shame, because the EPA is doing good work in communities across the U.S., including my home state of Utah.

EPA Supports Local Air Efforts

I serve on the Utah Air Quality board – an appointed board with representation from state businesses, health, government and the environmental community. The board is charged with developing plans to protect and improve the air quality in Utah. As a board member, I am personally aware of the essential role the EPA Targeted Air Shed Grants played in reducing local air pollution. In 2016, Utah received a grant from the EPA to purchase 33 new school buses and initiated a Vehicle Repair and Replacement program to assist in repairing and replacing vehicles that fail to meet emissions standards. Collectively, these programs will remove approximately 131 tons of NOx emissions and 11 tons of PM emissions and 99 tons of non-methane organic gases over the life-time of these vehicles. In 2018, Utah received an additional \$3 million to address diesel truck emissions. While the program is still being implemented, it is expected that this program will prevent the emission of nearly 100 tons of air pollution annually. Based largely on the success of these EPA-funded efforts, the Utah state legislature is currently considering investing state funds to expand these and other similar programs.

State and local grants from EPA are an economically efficient way to help improve air quality in communities with severe air pollution issues – communities like Fairbanks, Alaska; Los Angeles, CA; Salt Lake City, Utah. Unfortunately, for the past two years, the Administration has proposed steep cuts to the EPA Clean Air local grants program.

The Administration has also proposed steep cuts in EPA Clean Air science programs, enforcement program, climate programs, and indoor air programs. I urge this subcommittee to see the wisdom in continued support for these valuable programs.

Rollback of EPA Clean Air Rules

While the proposed budget cuts are concerning, the Administration is taking other steps that threaten our nation's air quality – namely the roll back of existing EPA regulations. A non-exhaustive list of proposed rollbacks includes: the Clean Power Plan; the Mercury Air Toxics Rule; Wood Stove New Source Performance Standards; vehicle emission and fuel efficiency standards; and the Glider Kits rule, just to name a few.

As a Utah Air Quality board member, I know that we are counting on federal regulations to help us meet our air quality goals. Every EPA rollback means we lose an effective tool to reduce air pollution – but we still have the obligation to meet federal standards.

Most of the improvements in air quality in the last 10 years, as well as the anticipated gains at the state-level that are needed to meet federal air quality standards, are attributable to the implementation of federal regulations. Rolling back these regulations will not only worsen air quality at the national level, but it will make it much more difficult and economically costly for states to meet federal air quality standards by requiring them to focus on a narrow subset of emission sources for which they have jurisdictional authority. Therefore, we would encourage the EPA to fully consider the economic and health impacts on states that will result from de-regulatory efforts.

Flawed Cost/Benefit Analysis of Clean Air Regulations

Further, the Administration is significantly – and inappropriately – changing the process for estimating the cost effectiveness of clean air regulations. There are difficult policy decisions that have to be made in addressing environmental regulations but these decisions should always be informed by sound economic principles. Any efforts to distort the economic costs and benefits of regulatory or deregulatory actions, even if done so within the boundaries of what is legally acceptable, should be rejected in favor of objective economic analysis.

The Agency Inappropriately Applies a “Threshold Effect” for Particulate Matter Mortality Risk

In the Clean Power Plan Repeal RIA, the EPA inappropriately applies an arbitrary “threshold effect” to the health effects of exposure to PM_{2.5} pollution. The EPA uses two threshold scenarios to estimate the cost of exposure to PM pollution. The first scenario incorrectly assumes that the number of PM_{2.5}-attributable premature deaths falls to zero at PM_{2.5} levels at or below the annual NAAQS of 12 µg/m³. The second scenario assumes the number of PM_{2.5}-attributable premature deaths falls to zero below the lowest measured level of pollution in two specific epidemiology studies used to estimate mortality risks (5.8 µg/m³ and 8.0 µg/m³).

We find no logical or scientifically defensible basis for the decision to perform a sensitivity analysis based on categorizing health impacts and associated benefits that are expected to occur above and below a threshold set equal to the NAAQS (12 µg/m³). We are deeply concerned that this arbitrary non-scientific cut point will serve as a precedent to undervalue the health benefits that might be achieved from other policies that reduce air pollution emissions. Such a precedent would significantly compromise the health and well-being of the American people. We strongly encourage the EPA to discard this use of arbitrary cut-points as part of this, or any future, cost-benefit analysis, such as for the NAAQS.

The Agency Inappropriately Includes Non-Peer Reviewed Analyses by Non-Governmental Institutions

Prominent use of non-peer reviewed reports from consulting firms and others, such as the case in section 8.1 of the Clean Power Plan Repeal RIA, sets a dangerous precedent, and has no place in an RIA by the U.S. EPA. The statement that the "EPA is not basing any of its conclusions regarding the potential avoided cost and foregone benefits of repealing the CPP on these studies" does little to assuage our concerns regarding the precedent that is being established by inclusion of non-peer reviewed studies from non-governmental sources. These should be removed from this RIA, and similar non-peer reviewed analyses should not be included in future RIAs.

Wildfires and EPA

Wildfires are a growing public health and environmental threat in the U.S. The land impacted by wildfires, the smoke emitted from wildfires and the public health challenges created by wildfires has grown over the past 15 years. Wildland fires contribute up to a third of the annual average PM mass in the US and over 40 percent of new home construction since 1990 has been in the wildland-urban interface. There are many factors driving the growth of wildfires, including climate-forced droughts, temperature increases; and expansion of the urban-wildland interface. At present, wildfires and controlled burns have been the purview of the Department of the Interior's Bureau of Land Management with limited coordination and interaction with sister federal agencies.

While we know wildfire smoke is bad for human health, there are a lot of practical questions we don't know the answers to. Does going indoors protect you or your asthmatic child from smoke? Can you wear a mask or use an indoor air cleaner to abate exposures? What symptoms should people expect or be aware of in order to request help? How do we effectively communicate to the public about wildfire public health issues?

Responding to the challenges of wildfires requires a multidisciplinary, cross agency effort best moderated by the EPA given its prime air-health directive. The ATS recommends new \$15M EPA funding over the next 5 years for the following activities:

- \$5 million - Establishment of Wildfire Smoke Health Centers in Collaboration with US Forest Service Missoula Fire Sciences Laboratory
- \$7 million - Targeted EPA Research on Wildfire Smoke Exposure and Wildfire Smoke Policy
- \$3 million – Coordination of Interagency science, management and communication strategies for addressing wildfires including; land management, economic impacts and best practices to minimize wildfire risks.

In conclusion, I strongly urge the Subcommittee to increase funding for the wide range of effective EPA Clean Air science, enforcement and grants programs. I further recommend the committee provide an additional 15 million for the EPA to better respond to the growing public health and environmental challenges posed by wildfires. Communities across the country, including my hometown of Salt Lake City, will benefit from the Subcommittee's investments in EPA Clean Air Programs.