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*Submitted via [www.regulations.gov](http://www.regulations.gov)*

July 24, 2023

Administrator Michael Regan  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

**Re: Docket No. EPA–HQ–OAR–2023–0072, “New Source Performance Standards for Greenhouse Gas Emissions from New, Modified, and Reconstructed Fossil Fuel-Fired Electric Generating Units; Emission Guidelines for Greenhouse Gas Emissions from Existing Fossil Fuel-Fired Electric Generating Units; and Repeal of the Affordable Clean Energy Rule”**

On behalf of First Focus on Children, thank you for the opportunity to comment on the proposed rule concerning New Source Performance Standards for Greenhouse Gas Emissions from New, Modified, and Reconstructed Fossil Fuel-Fired Electric Generating Units; Emission Guidelines for Greenhouse Gas Emissions from Existing Fossil Fuel-Fired Electric Generating Units; and Repeal of the Affordable Clean Energy Rule. First Focus on Children is a bipartisan children’s advocacy organization dedicated to ensuring children and families are a priority in federal policy and budget decisions. As advocates for children, we are deeply committed to ensuring that all of our nation’s children are able to flourish in a healthy environment. Coal- and gas-fired power plants are a source of greenhouse gases that contribute to climate change and environmental health concerns among children. It is essential that we take action to reduce emissions from these sources. By strengthening our standards for natural gas and coal power plants, we can mitigate the potential health risks associated with exposure to air pollution and other harmful chemicals and reduce the impact of energy consumption on our climate. First Focus strongly supports the proposed standards.

### **Health Impacts**

Children across the country suffer from the complications of poor air quality. Coal- and gas-fired power plants emit toxic chemicals and greenhouse gases into surrounding communities, greatly contributing to air pollution and the climate crisis. Air pollution is directly linked to myriad health problems and is especially dangerous for children. Chronic exposure to polluted air causes respiratory,

cardiovascular, and immune system damage and exacerbates asthma.<sup>1</sup> Air pollution can cause life-long damage to children’s growing lungs, especially due to their propensity to spend more time outside.<sup>2</sup> Additionally, coal-fired power plants emit mercury, which can negatively impact children’s brain development.<sup>3</sup> The new regulations proposed by EPA mitigate some of these health impacts, especially for children living closest to these plants. The proposed improvements would protect children’s health and potentially prevent 38,000 health-related school absences annually.

## Climate Impacts

Gas- and coal-fired power plants contribute heavily to climate change, which has a profound impact on our children. Since their physiology is significantly different from adults’, children struggle with myriad health and other concerns created by the climate crisis and its impacts. Children lose fluids more quickly than adults due to their smaller size and greater surface area to mass ratio and play outside more frequently, making them more vulnerable to serious heat illness.<sup>4</sup> Additionally, natural disasters, now increasing in severity and frequency, leave a lasting impact. After disasters, children, especially those under the age of eight, are more likely to develop anxiety, depression, and post-traumatic stress disorder.<sup>5</sup> The mental toll of extreme weather can lead to difficulty concentrating, outbursts of anger, and mental health struggles that may follow them into adulthood. As the climate crisis worsens, our children can expect to have more health and safety challenges to contend with.

We are grateful that EPA is taking concrete steps to reduce greenhouse gas emissions with this rule. The new proposed standards will measurably reduce carbon pollution from these sources. The proposed rule will slash emissions by 617 million metric tons - equivalent to taking 137 million cars off the road. A win for the climate is a win for our children.

## Environmental Justice Impacts

While reducing carbon pollution has benefits for everyone, these standards have the power to take steps to correct injustices towards historically disadvantaged communities. Children of color and children from low-income communities often experience environmental injustices — a deadly form of discrimination where poor and minority communities are exposed to disproportionate amounts of pollution.

Companies target these areas knowing that systematic racism and a lack of enforcement will allow them to pollute freely. Research shows that nearly 40% of Americans living within three miles of a power plant are Black, putting them at an increased risk of the harmful effects of pollution.<sup>6</sup> Children in these

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<sup>1</sup> Prunicki, Mary et al. “Air pollution exposure is linked with methylation of immunoregulatory genes, altered immune cell profiles, and increased blood pressure in children.” *Scientific Report*, Vol. 11. February 18, 2021. <https://www.nature.com/articles/s41598-021-83577-3#citeas>.

<sup>2</sup> “Children and Air Pollution.” American Lung Association. April 17, 2023.

<https://www.lung.org/clean-air/outdoors/who-is-at-risk/children-and-air-pollution>.

<sup>3</sup> Wilf, Rachel and Madrid, Jorge. “New EPA rules help communities of color breathe easier.” Center for American Progress. April 20, 2012. <https://www.americanprogress.org/article/new-epa-rules-help-communities-of-color-breathe-easier/>.

<sup>4</sup> “Protecting children’s health before and after natural disasters: extreme heat.” U.S. Environmental Protection Agency. June 15, 2023. <https://www.epa.gov/children/protecting-childrens-health-during-and-after-natural-disasters-extreme-heat>.

<sup>5</sup> “Your child is at risk of mental health issues after a disaster.” Centers for Disease Control and Prevention. December 18, 2020. <https://www.cdc.gov/childrenindisasters/features/disasters-mental-health.html>.

<sup>6</sup> Israel, Brett. “Coal plants smother communities of color.” *Scientific American*. November 16, 2012. <https://www.scientificamerican.com/article/coal-plants-smother-communities-of-color/>.

areas experience higher rates of asthma, lead poisoning, certain cancers, and developmental issues.<sup>7</sup> Many of these chronic ailments will follow them throughout their life.

While this rule cannot undo decades of systemic racism, EPA's proposed standards offer a step in the right direction. Children in environmental justice communities deserve the same chance to thrive as their white peers. These measurable steps to reduce carbon pollution mark significant efforts to right historic and ongoing wrongs.

## **Conclusion**

Thank you for the opportunity to submit comments to this proposed rule. We are grateful that EPA is taking responsible steps to manage air pollution, stave off the climate crisis, and combat environmental racism. Please reach out to Abbie Malloy, Director, Health, Environmental, and Nutrition Policy, at [abbiem@firstfocus.org](mailto:abbiem@firstfocus.org) with any questions.

Sincerely,

A handwritten signature in black ink that reads "Bruce Lesley". The signature is written in a cursive, slightly slanted style.

Bruce Lesley  
President, First Focus on Children

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<sup>7</sup> Landrigan, Philip J., Rauh, Virginia A., & Palvez, Maida P. "Environmental justice and the health of children." Mount Sinai Journal of Medicine, Vol. 77(2). March 2010. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6042867/>.