



Chairman Shelly Moore Capito
Senate Environment and Public Works
410 Dirksen Senate Office Building
Washington, DC 20510

Ranking Member Sheldon Whitehouse
Senate Environment and Public Works
410 Dirksen Senate Office Building
Washington, DC 20510

Dear Chairman Capito and Ranking Member Whitehouse:

Thank you for the opportunity to provide comments for the record following the February 19 hearing, "Improving the Federal Environmental Review and Permitting Processes." The American Lung Association offers the following short comment, and we highlight a letter (attached) signed by fourteen national health organizations from December of 2024. We urge the Committee to ensure that health voices are considered when discussing changes to the nation's permitting processes.

We want to address a frequent talking point that is often used during conversations around building out new energy sources: the idea that we can't have both economic prosperity and a clean, healthy environment. This is a false choice. The nation has enjoyed much cleaner air, for example, since the passage of the Clean Air Act in 1970 while GDP has continued to go up. There's still a lot of work to do, but children today are breathing easier than children 55 years ago, while cities across the country simultaneously saw economic growth.

Public health laws like the Clean Air Act and the National Environmental Policy Act (NEPA) are foundational in protecting and improving health for families nationwide. The ability under these laws to ensure that polluting new or expanded facilities do not add to the burden of pollution in an area is crucial, particularly for communities that are facing increased pollution that would impact their health. Furthermore, the right of communities to have a meaningful say in local projects that impact them is fundamental. Families with children that go to school near the site of a new power plant, for example, have a right to make their voice heard. Simply put, we oppose efforts that would curtail that right.

Lastly, we cannot address permitting improvements without also addressing the chaotic downsizing happening across federal agencies. As Ms. Pavia shared in her remarks, lack of funding, staffing shortages and agency coordination were cited as bigger barriers to new source deployment than the fundamentals of NEPA. Over the past two months, thousands of federal workers have been fired, placed on leave or otherwise prevented from doing their jobs. For successful improvements to the permitting process to truly happen, there must be a solid federal workforce to implement policies.

We urge the Committee to reject the notion that we can either have economic prosperity or clean air, and to instead chart a path towards policies that greater support the buildout of clean energy technology while also protecting the vital right of every person in the country to clean air.



December 2, 2024

Dear Senator/Representative:

With proposals to reform energy permitting processes under discussion, the undersigned health organizations write to share concerns over potential public health impacts. Our organizations support a transition to renewable, non-combustion energy sources and recognize the importance of ensuring that clean energy can be deployed in an efficient way. We are concerned, however, that some of the policies under discussion would have harmful long-term public health impacts and hinder public participation.

Dependence on fossil fuels has worsened air quality and intensified climate change. Burning fossil fuels emits particle pollution, nitrogen oxides and volatile organic compounds, and results in the formation of ground-level ozone pollution. Air pollution can trigger asthma attacks, worsen respiratory diseases, and cause heart attacks, strokes, cancer and even premature death. With daily reminders about the devastating impacts of climate change, such as longer and more intense storms, flooding, wildfires and extreme heat, it is imperative that fossil fuel combustion is phased down, not reinforced. A transition to zero-emissions electricity and transportation will deliver the most health and climate benefits.

We believe that health and equity must be centered in any policy adopted to transform and update energy permitting processes. To that end, as the undersigned groups evaluate policies, we will do so with an emphasis on the following principles.

- New energy projects should not be permitted if they will significantly contribute to local air pollution. Oftentimes, energy projects are sited in areas already facing elevated air pollution, and new projects should not increase the burden of pollution.
- Communities that will be most impacted by a proposed project must be heard and they must have a seat at the table early and often. Information about the project – including its approval or denial – should be made publicly available, easily accessible and easy to understand, including in multiple languages when necessary.
- Should an individual or a community want to oppose a granted permit, there should be ample time to file a challenge. Arbitrary changes to shorten statute of limitations, or provisions that default to approval, would leave the concerns of communities unheard.

Unfortunately, policies under consideration as part of discussions about energy permitting include trade-offs that threaten to lock in pollution and uproot longstanding processes of public engagement and judicial review. The undersigned health organizations are deeply concerned about expediting review of projects without adequate environmental and human impact analyses.

Everyone deserves access to clean, healthy air. The ability of the public to engage in decisions involving the air and health in their communities is a pillar of the regulatory process. Prioritizing health and health equity, particularly in communities that are already overburdened by poor air quality, must be the starting point for any discussions of new energy permitting processes.

We urge you to safeguard the health of those who face the greatest burden of air pollution and climate change and heed the principles above as conversations continue.

Sincerely,

Allergy & Asthma Network
Alliance of Nurses for Healthy Environments
American Lung Association
American Public Health Association
Asthma & Allergy Foundation of America, MidStates Chapter
Asthma and Allergy Foundation of America
Carolina Advocates for Climate, Health, and Equity
Children's Environmental Health Network
Climate Psychiatry Alliance
George Mason University Center for Climate Change Communication
Georgia State Medical Association
Health Care Without Harm
Idaho Clinicians for Climate and Health
Medical Students for a Sustainable Future
Missouri Chapter of the American Academy of Pediatrics
Missouri Public Health Association
Medical Society Consortium on Climate and Health
National Association of Pediatric Nurse Practitioners
National Association of Pediatric Nurse Practitioners, San Francisco Bay Area Chapter
National League for Nursing
Oncologists United for Climate and Health - International
Physicians for Social Responsibility
Physicians for Social Responsibility Maine
Physicians for Social Responsibility Pennsylvania
Physicians for Social Responsibility Texas Chapter
San Francisco Bay Physicians for Social Responsibility
Vermont Climate and Health Alliance