

Comments of Paul G. Billings
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On

The U.S. Environmental Protection Agency's Listening Session on the
Upcoming Oil and Natural Gas Methane Rule
Docket ID No. EPA-HQ-OAR-2021-0295

June 15, 2021

Good afternoon, I am Paul Billings – spell name - National Senior Vice President of Public Policy for the American Lung Association. Thank you for inviting public input on future methane rules and for the opportunity to speak today.

The American Lung Association is the oldest voluntary health organization in the United States. More than 26 million Americans have asthma, including 6.1 million children. Chronic Obstructive Pulmonary Disease or COPD affects 16.4 million adults. This past year, the COVID-19 pandemic made all of us more aware of the importance of lung health. We know that exposure to air pollution worsens lung disease and we know that climate change is making air pollution worse.

We are encouraged that the Biden Administration is highlighting responding the pandemic, combating climate change and prioritizing environmental justice. Cleaning up pollution from the oil and gas industry is a critical step to achieving the President's goals.

Earlier this month, the American Lung Association joined with 14 leading health, medical and nursing organizations in a letter to Administrator Michael Regan. We urged EPA to "adopt more stringent measures to reduce the emissions of methane and associated pollution from both new and existing oil and gas operations. Such measures would help to slow climate change and convey significant health benefits by reducing pollution of the air, land, and water."

We are seeing the health impacts of the oil and gas industry pollution on communities adjacent to operations and far away. Methane is a dangerous greenhouse gas. Eighty-six times more potent than carbon pollution, it is making our planet warmer, and we are suffering from the impacts of climate change including:

- Extreme weather patterns, such as heat and severe storms, that cause injury, increase physical and mental illness, and reduce access to healthcare;
- Wildfires and dangerous smoke that spreads for thousands of miles, aggravating heart and lung conditions;
- Increased risk of exposure to vector-borne diseases due to lengthening of warm seasons and expanding geographic ranges for vectors like ticks, mosquitoes and other disease carrying insects;
- Increased risk of exposure to waterborne pathogens and toxins that can cause a variety of foodborne and waterborne illnesses;
- Longer and more intense allergy seasons; and
- Increased levels of ozone and particulate air pollution that contribute to asthma attacks, cardiovascular disease and premature death;

The American Lung Association's annual State of the Air Report found more than 40% of Americans—over 135 million people—are living in places with unhealthy levels of ozone or particle pollution.

Rural counties like Eddy County, NM and Uintah County, Utah, where oil and gas development has boomed, have more ozone pollution than many cities and both saw increases in this year's State of the Air report. These rural counties earned an F for ozone in 2021.

The burden of living with unhealthy air is not shared equally. People of color are over three times more likely to be breathing the most polluted air than white people. And, while every American's health is already at risk from climate change, the burden is not shared equally. Children, seniors, pregnant people, low-income communities, communities of color, people with disabilities, people who work outdoors and people with chronic disease disproportionately bear the health impacts of climate change and air pollution. As a result of numerous current and legacy racist policies and practices, people of color are disproportionately more likely to have multiple pre-existing health conditions, to face social disadvantages and environmental risks that make them more vulnerable to climate change.

We urge EPA to promulgate robust rules to curb methane pollution from oil and gas. We have the technology and the tools to cut methane from new and existing oil and gas operations by 65% of 2012 levels by 2025. EPA should require frequent inspections and prohibit routine venting and flaring. These commonsense steps are long overdue.

Finally, in Executive Order 13990 - Protecting Public Health and the Environment and Restoring Science To Tackle the Climate Crisis, President Biden directed EPA “to listen to the science; to improve public health and protect our environment; to ensure access to clean air and water; to limit exposure to dangerous chemicals and pesticides; to hold polluters accountable, including those who disproportionately harm communities of color and low-income communities; to reduce greenhouse gas emissions; to bolster resilience to the impacts of climate change; to restore and expand our national treasures and monuments; and to prioritize both environmental justice and the creation of the well-paying union jobs necessary to deliver on these goals.”

To answer the President's call, “to listen to the science; to improve public health and protect our environment” robust regulation of the oil and gas industry to cut methane pollution is required.

Thank you.