



The Testimony of Victoria Goebel

March 18, 2019

Proposed Revised Supplemental Finding for the Mercury and Air Toxics Standards and Results of the Residual Risk and Technology Review Agency/Docket Numbers: EPA-HQ-OAR-2018-0794 FRL-9988-93-OAR RIN: 2060-AT99 Document Number: 2019-00936

Hello and thank you for the opportunity to speak out.

My name is Victoria Goebel and I am here today as a Christian, a representative of Young Evangelicals for Climate Action, and citizen who is deeply troubled by the attempt to alter the Mercury and Air Toxics Standard. I am here because my faith compels me to speak out against this reckless, dangerous action that will endanger countless lives and contribute to the degradation of God's creation.

Young Evangelicals for Climate Action (Y.E.C.A.) advocates for climate action in order to secure a healthy future for ourselves and our neighbors as an act of faithfulness to God. Mercury threatens my health, your health, and the health of our neighbors just as much as greenhouse gas emissions. It would be nothing short of irresponsible and unjust to not address these threats with smart, evidence-based action. Y.E.C.A. believes that we must work for alternatives to fossil fuel energy production that are just and equitable. The demands of justice and equity require that I speak out today and remind you of the disproportionate impacts of coal-fired mercury pollution on America's most vulnerable populations.

Mercury is a highly dangerous neurotoxin that can be ingested by pregnant women and result in irreversible brain damage in unborn children. Mercury can contribute to long-term impacts on a child's memory, cognitive function, language and fine motor skills. Other health impacts include damage to the nervous, digestive and immune systems as well as the eyes, lungs, and kidneys. **There are no known safe levels**

of mercury. Many pregnant women live in communities with varied access to health care and clean drinking water and are in close proximity to pollution sources such as coal-fired power plants. Studies conducted by the EPA prior to MATS found that 1 in 6 babies born in the U.S. had dangerous amounts of mercury. It is reported that this rule has saved 11,000 lives per year.

My commitment to Jesus Christ compels me to do all I can to protect vulnerable people, like unborn babies and pregnant women, from mercury poisoning. This is a concern for life.

This rule has been a tremendous success. Mercury pollution nationwide is down by 81% in just 8 years since its implementation. These standards have also been almost universally implemented by the energy industry with 99.9% of American utilities already in compliance. This is wonderful because mercury pollution has fallen dramatically without threatening a reliable supply of affordable energy.

There has been broad opposition to this change from both sides of the political aisle and even from electric utility groups. Edison Electric Institute and other utility groups have offered letters to the EPA opposing a MATS revision. The industry has reported that it spent \$18 billion to comply with the rule, which is less than the EPA projected.

Simply put, changing this rule makes no sense.

The broader consideration at play is one that could impact other regulations to protect our health. It is evident that the Trump Administration is seeking to exclude co-benefits and ancillary benefits from any cost-benefit analysis. This is a direct contradiction to the guidelines issued in 2003 by the Bush Administration which requires an analysis to consider any important ancillary benefits or risks. In this case, co-benefits include a variety of health benefits associated with reducing soot and smog. It makes no sense to ignore such benefits. Excluding these benefits from MATS considerations sets a dangerous, deadly precedent for future rule makers.

The very mission of the EPA is to “protect human health and the environment.” Altering MATS not only goes against my faith, but is directly opposed to the EPA’s mission. Simply put, this proposal is immoral and incompatible with the purpose of the EPA was intended to serve.

I respectfully ask the EPA to reconsider and not allow additional mercury pollution to be emitted into our air and water.