

**FILED WITH
Executive Secretary****December 16, 2011****IOWA UTILITIES BOARD**

Comments of the Iowa Chapter of Physicians for Social Responsibility
Submitted in response to the Board Order issued September 2, 2011 NOI- 2011-0003,
Regarding Pending EPA Clean Air Standards on Coal Plant Planning.

The Iowa Chapter of Physicians for Social Responsibility (I-PSR) is a state based chapter of the national Physicians for Social Responsibility (PSR), representing over 35,000 members. PSR is the medical and public health voice working to slow, stop and reverse global warming and the toxic degradation of the environment. Broadly speaking, our mission is to prevent that which we cannot cure. Coal plants are front and center in the list of concerns for I-PSR members. Here in Iowa we have about 650 members and close relationships with colleagues in the medical and public health fields and other state based environmental groups.

All across its life cycle the coal industry releases unhealthy, toxic elements into our shared environment—all of which accumulate either in the environment, in our bodies, or in the atmosphere. Thus, I-PSR is pleased to have an opportunity to respond to inquiries about the impact of proposed EPA rulings on the release of hazardous air pollutants (HAP) and the clean air transport ruling (CATR).

PSR, like the Iowa Environmental Council (IEC) has done a thorough review of the medical and public health literature evaluating the effects of coal on human health. See, *Coal's Assault* available on the PSR web site.¹ Just as the toxic elements released by the coal industry continue to accumulate in the environment, the investigations and findings of public health harms continue to grow. Given the very thorough review on the recognized public health impacts of burning coal provided by the IEC in it's docket, I would only add a few comment for emphasis.

The clean air standards will address and markedly reduce mercury releases (among a number of targeted releases) from burning coal. I-PSR is concerned about mercury releases because there is no known safe lower limit of exposure to this neurotoxin. Its effects have been known for many decades, but concern is increasing due to its environmental ubiquity, persistence and the developmental effects observed and measurable even at very low levels of exposure. The United Nations Environmental Program (UNEP) published a Global Mercury Assessment in December 2002,² calling for immediate actions to reduce pollution. Since then, attention and concern about this environmental pollutant and its effects on our children and their future has only grown. I-PSR strongly urges the Iowa Utilities Board to seriously consider the costs of mercury exposure to the neurologic development of our children when considering the costs to Iowa in the future. Beyond concern for neuro-developmental impacts felt by individual children and their families, there are the cognitive-behavioral costs borne by our publically funded educational system when working with children affected by their exposure to mercury—whether in utero, infancy or young childhood.

¹Coal's Assault on Human Health. 2009. Lockwood, Welker-Hood, Rauch, Gottlieb.
<http://www.psr.org/resources/coals-assault-on-human-health.html>

²UNEP. Global Mercury Assessment, December 2002: www.chem.unep.ch/mercury/default.htm

I-PSR would also like to emphasize the substantial burden of health care costs borne by the public due to burning coal. The burden of diseases induced by the emissions released when burning coal are felt most intensely by the most vulnerable among us, our children, our elders, the chronically ill, and the already impoverished. Thus, all too often the most serious health impacts on individuals whether as cancers, or any number of cardio-respiratory system diseases, tend to be invisible. Because they may be closeted by their illness and/or marginalized status in our population, their suffering and the public costs tend to be overlooked. Within a society that sees itself as just, ethical and humane, these costs must be acknowledged, considered, and reduced.

Finally, I would only add that perhaps Iowans might assume the health impacts of burning coal as acceptable trade-offs if coal were the only way to provide necessary energy. Such costs could be overlooked if coal were easily and indefinitely available, if our well-being depended on coal. However, reality is very different. In fact, accessing shrinking coal reserves is increasingly environmentally destructive and economically costly; burning coal is inducing significant damage on our future well-being through its impacts on the climate and environment; and it is only one of many potential sources of energy for Iowa. Given these realities, the costs of burning coal cannot be considered acceptable. The coal industry must be required to pay its way; it must address and internalize the many costs currently externalized to the public. Most importantly, coal must make way for cleaner, more health supporting, renewable and sustainable sources of energy for Iowa.

Most Sincerely,
Maureen McCue MD PhD
Coordinator Iowa Chapter
Physicians for Social Responsibility