



Docket ID No. CEQ-2019-0003

The Medical Society Consortium on Climate and Health opposes the current proposal to update The National Environmental Policy Act (NEPA). For the last half century, the National Environmental Policy Act (NEPA) has assured that wherever they live, people can weigh in on decisions about plans that will affect health of their children and every member of their community. The *Declaration of National Environmental Policy* in the Act states that the federal government must use all practicable means to create and maintain conditions under which people and nature can exist in productive harmony.

In practice, it requires that all federal agencies assess the environmental impacts of their proposed policies and projects with an approach that is interdisciplinary and evaluates environmental and related social and economic effects of proposed actions and must provide opportunities for public review and comment. The kinds of situations are:

- decisions on permit applications,
- federal land management actions,
- constructing highways and publicly-owned facilities.

The changes proposed all serve to undermine confidence that the law will continue to protect our health. Here's how:

First, the proposed changes would eliminate consideration of the cumulative impacts of proposed projects. There is no reasonable justification for this change. Many negative health impacts are cumulative and effort should be made up front to define them.

Second, the proposed changes would allow project sponsors to hire their own handpicked consultants to do environmental impact studies instead of a neutral third party.

Finally, the new rule would eliminate the obligation to disclose how projects contribute to climate change. Such a change ignores the reality that our health and safety now depend on adopting policies in the next five to ten years that support the stability of our climate and the livability of our communities in both the short and longer term. The severity of heat waves, storms, floods, and air pollution are directly impacted by changes in land use, the built environment, and infrastructure. Decisions about highways, pipelines, drilling operations, woodlands, and developments that create more impermeable surface or decrease wetlands are examples of policies that can have serious long-term as well as short term impacts. Some projects are problematic



precisely due to the changing conditions associated with climate change, such as longer heat waves, heavier rainfall, sea level rise, and more powerful storms.

Climate change places everyone at risk, but people who live near major highways or in fence line communities are already breathing fumes or experiencing poor air quality that contribute to poor health and puts them on the front lines of negative impacts of climate change. Some of these adverse effects can occur within the timeline of a single pregnancy; some can have a cumulative affect on the development of a child's lungs or the health of local residents over a period of years. Unless addressed, climate change exposure would perpetuate the environmental injustice that has already burdened under-represented people and communities.

In the face of the health emergency created by climate change, the United States is faced with critical decisions that will determine whether we adopt the policies that are needed to protect the health of our population and the well-being of our children and grandchildren for the rest of this century and beyond. Our success depends on facing, not ignoring, the changing climate and ensuring that there is meaningful input from affected communities and based on complete and objective information.

The existing policy that embraces public input on cumulative and climate related impacts along with neutral third party analysis could not be more important than it is right now.

Mona Sarfaty, MD MPH
Executive Director
Medical Society Consortium on Climate and Health¹

¹ ***About the Medical Society Consortium on Climate and Health***

The mission of the Medical Society Consortium on Climate and Health representing societies with 600,000 physician members is to inform the public and policy makers about the harmful health effects of climate change on Americans, and about the immediate and long-term health benefits associated with decreasing greenhouse gas emissions (i.e., heat-trapping pollution) and other preventive and protective measures.