

Regional Haze Hearing: Guidance and Talking Points
Spring 2023

Context: In April of 2023, EPA proposed a strong draft rule to limit pollution from coal plants and protect clear skies in our national parks. Over ten years in the making, this rule, known as the regional haze rule, is a monumental opportunity to reduce air pollution in Texas. Not only will it help clear the skies in Big Bend and Guadalupe Mountains – it will also protect millions of Texans from breathing toxic coal plant emissions. EPA is hosting a single hearing on the issue on Friday, May 19th, and we need your support. Continue reading to learn how you can come testify at the virtual hearing and ensure that EPA lives up to its promise to protect our national parks.

Hearing Details:

- Hearing Date: Friday, May 19th, from 1:00 - 7:00 pm CT
- Registration Information:
- To register for the hearing, [please visit EPA's sign-up page](#)
 - The last day to pre-register to present at the hearing is Tuesday, May 16, 2023
- Participants will select a 1-hour time slot in which they will deliver their testimony
- Each hearing participant will each be given 3 minutes to speak

Testimony Guidance and Talking Points:

Each speaker will be given approximately 3-minutes to present. The recommended testimony structure is as follows:

1. Introduction [30 seconds]: Who you are and why you are here today
 - a. Name
 - b. Position, Organization, and/or Location - this might be where in Texas you live, what organization(s) you work or volunteer with, your job title or professional role, or anything else to help EPA understand why this issue is important to you
 - c. I am here to urge you to finalize a strong regional haze rule to protect Texas' national parks from coal pollution

Ex: "My name is Emma Pabst, I am a Campaign Representative with the Sierra Club's Beyond Coal campaign, and I am here today to encourage you to finalize a strong regional haze rule to protect Texas' national parks from coal pollution."

2. Discuss the problem [1 minute and 30 seconds]: Share why you think EPA should limit pollution from coal plants and protect clear skies in our national parks. I recommend focusing on one angle, such as:
 - a. National Parks
 - i. Do you love visiting Big Bend and Guadalupe Mountains? Or do you hope to visit them one day? Share what makes these places special to you, and why it's important to protect their air quality.

1. Ideas: Talk about your favorite trip to one of these places, your childhood memories there, any negative experiences you had with air pollution, or any beautiful views you saw that could be hindered by air pollution
- b. Coal Pollution
- i. Do you live near a coal plant like W.A. Parish (Houston), Martin Lake (Tatum), Fayette (Austin)? Share why it's important to you that EPA limits these coal plant's pollution.
 1. Ideas: Talk about ways that you or your community struggle with air pollution. Do you know someone with asthma? Lung issues? Do you have trouble breathing when outside gardening, biking, or walking around your neighborhood?

Note: To supplement this portion of your testimony with evidence and data, please see the [additional facts and figures section](#) below.

3. Solutions [30 seconds]:
 - a. Ask: Please pass a strong regional haze rule to protect our national parks and Texans from coal pollution.
4. Wrap Up: Thank EPA for the opportunity to present.

If you are feeling nervous about your testimony or would just like someone to review it before you speak, please email or call Sierra Club's Emma Pabst at emma.pabst@sierraclub.org or (512) 228-9705. She is happy to edit your draft testimony or listen to you deliver it before the hearing!

Additional Facts & Figures

Context and Background:

- The federal Clean Air Act requires states to protect visibility in our national parks by reducing regional haze, a smoggy-like substance caused by sulfur dioxide pollution from power plants and industrial sources.
- Because the haze plan from the Texas Commission for Environmental Quality (TCEQ) was so inadequate, the law required EPA to step in to propose a robust federal plan
- EPA's proposed plan would require six of the largest Texas coal plants to collectively cut their sulfur dioxide pollution to 80,000 tons per year.
 - This would nearly halve the state's overall sulfur dioxide emissions from the biggest haze polluters.
- To learn more, please see [Sierra Club's press release](#) about the newly proposed rule

Haze Pollution in National Parks

- Haze pollution decreases visibility in Big Bend National Park by as much as 70% some days ([LINK](#))
- More than 80% of haze-causing pollution in Texas comes from coal and gas power plants ([LINK](#))
- Guadalupe Mountains National Park has 3,000-foot cliffs that are uniquely vulnerable to the negative consequences of muddy skies

Health Effects of Haze Pollution

- Texas coal plants emit more haze-causing sulfur dioxide than any other state in the country
- The proposed regional haze rule primarily regulates sulfur dioxide
- Sulfur dioxide is a dangerous chemical that can impair lung function, worsen asthma attacks, and put sensitive groups, like those with heart disease at extreme risk
- Sulfur dioxide also converts into fine particulate matter, which can travel long distances and create haze and unhealthy air across the state and country as well as for marginalized communities near coal plants

Coal Plants Implicated in the Regional Haze Rule

- EPA's proposed regional haze rule would require six of the largest Texas coal plants to collectively cut their sulfur dioxide pollution to 80,000 tons per year.
 - This would nearly halve the state's overall sulfur dioxide emissions from the biggest haze polluters.
- The most significant coal plants implicated in the rule are:
 - Martin Lake coal plant in East Texas
 - Parish coal plant near Houston
 - Fayette coal plant near Austin
- The rule will require both Martin Lake and Parish to install pollution control measures to reduce the amount of sulfur dioxide pollution released

- Martin Lake is the worst sulfur dioxide polluter in the entire country
 - Parish is the third-largest emitter of sulfur dioxide (SO₂) in the country
 - Parish is responsible for [177 premature deaths annually](#)
- The rule will require Fayette to run their current pollution control technology more efficiently
- A [2017 study](#) from a Professor of Environmental Medicine at New York University found that Texas could avert \$6.7 billion in health-related expenses by requiring updated pollution controls at Parish and 14 other power plants across the state