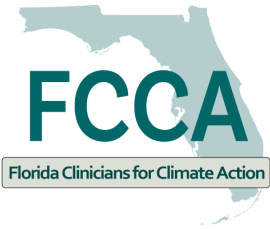


APPENDIX I-1

Florida Department of Environmental Protection
Division of Air Resource Management

Regional Haze SIP – Public Comments from the
Florida Clinicians for Climate Action



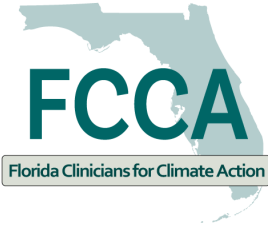
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FCCA Steering Committee:

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July 9, 2021

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Ashley Kung
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32301

Submitted via email to: Ashley.Kung@FloridaDEP.gov

Re: Health Organization Comments on Florida's Proposed Revisions Regional Haze State Implementation Plan for the Second Implementation Period

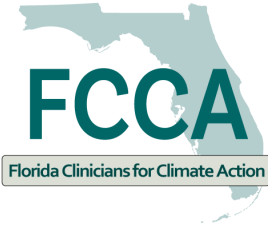
Dear Ms. Kung:

Florida Clinicians for Climate Action (FCCA) submits the following comments regarding the Florida Department of Environmental Protection's ("FL DEP") Proposed Revisions to Regional Haze State Implementation Plan for the Second Implementation Period.

FCCA is a network of health professionals concerned about climate-health impacts in Florida. FCCA includes over 200 doctors, nurses, pharmacists, medical students, and other public health professionals who advocate for equitable climate solutions. FCCA has a history of advocating for just policies that will reduce pollution so that all Floridians can enjoy a safe and healthy environment. We believe the proposed Florida Regional Haze State Implementation Plan (SIP) fails to protect both Floridians' health and our natural places, as it does not adequately control emissions from sugarcane field burning and will not result in reasonable progress towards improving visibility in Class I Areas, including the Everglades National Park.

Sugarburning, which takes place over eight months of the year, releases a number of harmful pollutants, including PM 2.5 and 10, ammonia, carbon monoxide, formaldehyde, nitrogen oxides, and sulfur dioxide. These pollutants have unequivocally been linked to negative health consequences, ranging from respiratory diseases to kidney disease to cancer, with children and the elderly most at risk. They additionally contribute to regional haze, which impacts visibility in the surrounding areas, including the Everglades, and pollute waterways through atmospheric deposition. The proposed SIP does not contain provisions to ensure that emission limitations on these harmful pollutants are permanent and enforceable. Emissions from sugarcane burning are completely left out of analysis of regional air pollution affecting Class I sites, as the sugar industry is not required to include them to comply with the Regional Haze Rule. These pollutants must be included in analyses and limits must be imposed in order to protect citizens' health and preserve our natural spaces so that they can be enjoyed by all.

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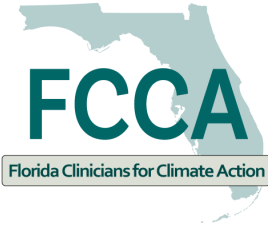
Additionally, current sugarcane burning regulations deny burn permits if the winds will blow these toxic pollutants towards the affluent Eastern Palm Beach County and Eastern Martin County, but there are minimal protections for the lower-income areas of the Glades communities in the west. These communities, primarily comprised of Black and Latinx households, disproportionately bear the brunt of air pollution, ranking on average in the 80th-100th percentile for cancer and respiratory health impacts as compared to other regional, state, and national census groups per the EPA's EJScreen mapping tool. Florida should ensure that the proposed SIP be revised to ensure that harms are minimized to the communities that already face more than their share of health impacts from human-driven environmental change.

Ultimately, FCCA supports a transition to a healthier method of processing sugarcane, "green harvesting," which eliminates the need to burn by using harvesters to separate the leaves and tops from the stalks. The leaves and tops can then be combined with other sugarcane waste products to produce electricity, biofuels, cattle feed, and more, making it a sustainable option that gives back while protecting the health of Floridians. Green harvesting is technologically feasible and does not require major expenditures, and has already been implemented in other nations around the world, from Australia to Zimbabwe. The SIP should emphasize this transition as an overarching goal to ensure a greener future for the state of Florida.

As clinicians, we are advocates for our patients as well as caregivers. It is our responsibility to promote policies that prioritize the health of Floridians, especially those disproportionately impacted by negative health outcomes. Today, air pollution remains one of the most serious threats facing national parks, endangering the health of park visitors, wildlife, and neighboring communities and compromising our views with hazy skies.

Unfortunately, the state's Regional Haze SIP does little to limit haze-causing air pollution.

Despite the tens of thousands of tons of controllable pollution from Florida sources including coal-fired power plants, sugarcane production, pulp and paper, and chemical facilities, among others, and the many opportunities for cost-effective controls, Florida improperly concludes that almost no new reductions in pollution are warranted.



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In order for Florida to fulfill its Regional Haze obligations under the Clean Air Act, we ask that the state revise the methodology used in source selection such that all polluting facilities are fully analyzed for reasonable progress in this planning period. This should include all coal-fired power plants as well as the sugar cane sector, encompassing both point and nonpoint sources, and reconsider additional or upgraded pollution control options for sources that were exempted from four-factor analysis to ensure that best available controls are required.

Signed,

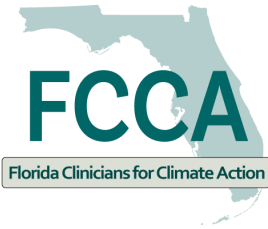
/s/ Cheryl Holder

Cheryl Holder, MD, FACP
Co-Chair

/s/ Ankush Bansal

Ankush Bansal, MD, FACP,
SFHM, CFLC
Co-Chair

Melissa Meehan Baldwin
Director



FLORIDA CLINICIANS FOR CLIMATE ACTION

Tuesday, April 27, 2021

Governor Ron DeSantis
400 S. Monroe Street
Tallahassee, Florida 32399

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RE: Please VETO HB 919/SB 1128 (Preemption), HB 539/SB 896 (Renewable Energy), and SB 88 (Farming Operations).

Dear Governor DeSantis,

We are members of Florida Clinicians for Climate Action (FCCA), a group of over 200 Florida physicians, nurses, and other health professionals, concerned about the ways that our changing climate affects public health. We write today to urge you to veto **HB 919/SB 1128** (Preemption Over Restriction of Utility Services), **HB 539/SB 896** (Renewable Energy), and **SB 88** (Farming Operations).

The Lancet medical journal has called climate change "[the biggest global health threat of the 21st century.](#)" but it also presents an opportunity to improve public health by transitioning away from harmful polluting fossil fuels.

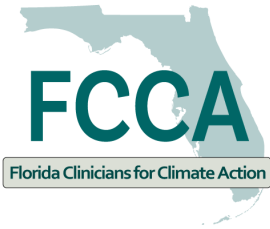
We are concerned that **HB 919/SB 1128** will allow harmful methane gas development to go unchecked. As health professionals, we know that poorly ventilated gas stoves can generate unhealthy levels of indoor air pollution, including formaldehyde, nitrogen oxide, and carbon monoxide. Nitrogen oxide has been linked to [damaged lung growth](#) in children, airway inflammation, increased asthma attacks and increased risk of [developing asthma in children](#). We agree with [The Wall Street Journal](#) that induction cooktops are safer and faster than gas or electric.

SB 896/HB 539 - 'Renewable Energy' would allow utilities to build mega-solar farms in any rural agricultural area without the consent or input of the local government. We are concerned that this legislation will disproportionately harm communities of color. The development of commercial solar infrastructure should be pursued in partnership with local communities, not in opposition.

SB 88: Farming Operations removes the ability of Florida residents who are harmed by Particulate Matter (PM2.5) pollution associated with the burning of pre-harvest sugar cane fields to take any recourse. Florida Clinicians for Climate Action supports transitioning to green harvest practices, which can improve air quality, reduce exposure to "black snow," and present additional revenue opportunities. Exposure to PM 2.5 is associated with an increase in [Covid-19 morbidity](#), and [lung cancer](#).

In 2019, you took a stand that you value local government authority. You vetoed a bill that would have forbidden local governments from banning single-use plastic straws writing, "These measures have not, as far as I can tell, frustrated any state policy or harmed the state's interests. In fact, the Florida Department of Environmental Regulation has encouraged Florida residents, schools and businesses to reduce plastic straw use..."

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We acknowledge your commitment to address sea level rise, via the Resilient Florida program. We note that the program will provide grants to local governments to combat the impacts of climate change. The program allows local governments to develop large-scale infrastructure projects to make communities more resilient to future disasters. Thus, local governments know the needs of their community including energy decisions. The Resilient Florida program is a step in the right direction, but it is not getting to the root of the problem, fossil fuel-driven climate change. Local governments should not be robbed of their jurisdiction to choose clean energy over fossil fuel energy.

In 2020, Florida suffered from a \$3.3 billion budget deficit in the wake of the COVID pandemic. Second to tourism, Florida's largest revenue source is from corporate income tax. Over 290 RE100 companies have committed to going 100% renewable, and one-quarter of Fortune Global 500 companies have pledged to be carbon-neutral by 2030. If you allow it to become law, **SB 1128** would sabotage Florida's ability to attract and retain corporations who seek to do business in states aligned with their clean energy goals.

The burning of fossil fuels threatens the viability of Florida communities through increases in carbon dioxide, sea level rise, heatwaves, and air pollution leading to health issues and economic problems. Local governments are closest to the concerns of and understand the health needs of people in their cities and towns. Big, distant, nanny governments should not stomp out energy decisions made by mayors, commissioners, and citizens.

It is for these reasons we ask you to **Veto SB 1128/HB 919; SB 856/HB 839 and; SB 88**.

Thank you for your attention and consideration of our important request. Please contact us if you have any questions or if we can serve as a resource on climate and its impact on health.

Sincerely,
FCCA Steering Committee:

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Signed on behalf of FCCA's Steering Committee

Melissa Meehan Baldwin
Director
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FCCAStaff@Ms2ch.org
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