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**Testimony of Heather Taylor-Miesle, Deputy Legislative Director
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Thank you for the opportunity to testify today on NRDC's funding priorities for the Department of Interior (DOI), Environmental Protection Agency (EPA), and related agencies. I am Heather Taylor-Miesle, the co-chair of the environmental community's budget and appropriations working group and the Deputy Legislative Director of NRDC. NRDC is a non-profit environmental organization with over 1.2 million members and e-activists across the country.

Although NRDC supports many programs in the environment agencies, today's testimony will focus on newly authorized programs that will make an immediate impact on our nation's challenge to address climate change with minimal federal investment. Specifically, NRDC believes that the committee should consider fiscal year 2009 (FY09) funding for the following programs:

- \$25 million for EPA for the research of policy needs associated with the development of a renewable fuels standard;
- An addition \$5 million more than the President's request for the EPA to finish their proposed rules for regulating geological sequestration of carbon dioxide (CO₂), build the internal capacity and expertise to administer these rules, and carrying out research in areas that need further clarification;
- \$6 million for the DOI to carry out a Carbon Dioxide Sequestration Capacity Assessment;
- \$15 million for the DOI to incorporate climate change consideration in the resource management planning process; and
- \$20 million for the Center for Disease Control and Preparedness (CDC) to address the health impacts of climate change.

In addition to the priorities outlined in this testimony, NRDC also supports the environmental community's Green Budget recommendations (www.saveoureenvironment.org), including requests for the following programs for FY09:

- \$403 million for the Land and Water Conservation Fund;
- \$500 million for EPA enforcement programs;
- \$8 million for the Office of Environmental Justice;
- \$52 million for Energy Star;
- \$1.1 billion for the Clean Water State Revolving Fund;
- \$866 million for the Drinking Water State Revolving Fund

Congress should reject the Administration's request to disinvest in these fundamental programs. Although it is imperative that Congress take steps to address climate change, it is also important to ensure that proven bedrock programs in the environmental agencies continue to receive adequate federal investment.

The realities of climate change are moving to the forefront of the public consciousness as we consider the environment, public health and economic impacts of a warming planet. There is a strong scientific consensus that much of climate change is man-made and that the time to address this problem is now. Rather than provide federal investment needed to address this challenge in response to the growing body of scientific evidence and public awareness, the current Administration has continually proposed spending cuts for environmental programs. Fortunately, Congress has consistently rejected these proposals and has in fact authorized several new regulatory and research programs that begin to address this immediate need. If funded appropriately, these initiatives could pave the way for future climate legislation that should limit the amount of CO₂ produced in the U.S and provide for a cleaner energy path for our future.

RENEWABLE FUEL STANDARD

The Energy Independence and Security Act (EISA) of 2007 establishes a roadmap to increase the volume of renewable fuels required under the renewable fuel standard (RFS) of the Clean Air Act to 36 billion gallons per year by 2022. The RFS charges EPA with regulating new types of biofuels, such as those produced from cellulosic plant material.

EISA has far reaching impacts in requiring EPA to coordinate with the Department of Energy (DOE) and the Department of Agriculture (USDA) to assess greenhouse gas and other air emissions and water quality impacts over the full lifecycle of biofuel production. Lifecycle analysis as defined in the Act includes all stages of fuel and feedstock production and distribution, from feedstock generation or extraction through the distribution and delivery to the use of the finished fuel to the ultimate consumer. It is essential that this precedent setting analysis be credible, robust, and based on the best available science to ensure biofuels produce real reductions in global warming pollution, and do not cause more harm than good.

Not only must EPA consider the infrastructure associated with the transportation and storage of these new fuels, it must also take appropriate action to ensure that there are no negative health or environmental impacts. Meeting these objectives will include the permitting and monitoring of new feedstock production to ensure effective implementation of the Act's important wildlife habitat, native ecosystem, and public land protections, regulating new facilities, transporting new fuels, emergency response procedures, testing new fuels for toxicity, anti-backsliding provisions, and extensive inter-agency and cross-government coordination.

EISA also requires EPA to report to Congress every three years on current and future impacts of the RFS on the environment and resource conservation in the U.S. and abroad including (1) air quality, effects on hypoxia, pesticides, sediment, nutrient and pathogen levels in waters, acreage and function of waters, and soil environmental quality; (2) soil conservation, water availability, and ecosystem health and biodiversity, including impacts on forests, grasslands, and wetlands; and (3) growth and use of cultivated invasive or noxious plants and their impacts on the environment and agriculture.

Achieving these goals will require significant additional resources for activities such as development of the RFS rule, new research and technology development, and broad interagency

coordination to ensure constant evaluation of how the development of biofuels will impact the environment, economy, and public health.

NRDC urges the Appropriations Committee to provide \$25 million for the necessary work associated with EPA implementation of the RFS and related policy and assessment reports.

REGULATING GEOLOGICAL SEQUESTRATION OF CO₂

More than 50 percent of the electricity consumed in the United States is produced from coal. Coal has the highest uncontrolled carbon dioxide emission rate of any fuel and is responsible for 33 percent of the CO₂ (as well as other harmful emissions) released into the atmosphere. Coal gasification with carbon capture and disposal (CCD) technologies are essential if continued use of coal is to be reconciled with preventing dangerous global warming. These technologies could prevent 100 billion tons of CO₂ from escaping coal plants in the next 50 years, but the technology must be regulated in order to ensure that sequestration is done in a safe, effective manner.

In late 2007, EPA announced that it would publish a proposed rule by the summer of 2008 for regulating geological sequestration of CO₂. We welcome this rulemaking which, if carried out properly, will aid in the safe and diligent sequestration of CO₂ from anthropogenic sources. We are concerned, however, that the Agency's budget request for FY09 essentially maintains current funding levels for the underground injection control (UIC) program, which is developing the proposed rule and will be tasked with implementation when it is promulgated.

The Agency should be devoting careful attention to drafting of adequate regulations, building internal capacity and expertise, and carrying out research in areas that need further clarification. Additionally, we believe that the Agency should be assisting state regulatory agencies in a similar fashion to understand and implement the regulations effectively. We therefore recommend that the Agency receive at least \$5 million more for development and implementation of the proposed rule. We also hope that the safety research authorized in Title VII, Subtitle B, Sec. 707 of EISA does not delay the promulgation of the proposed rule but is used instead to coordinate with and leverage existing research under the DOE Regional Partnerships' Phase III and other early injection projects in order to supplement and refine existing knowledge.

USGS GEOLOGICAL CO₂ STORAGE CAPACITY ASSESSMENT

Title VII, Subtitle B, Sec. 711 of EISA directs the Secretary of Interior to carry out a comprehensive capacity assessment of geological CO₂ storage capacity for the U.S. Although a preliminary national atlas (NATCARB) already exists, geographical coverage is sporadic, and the accuracy of the estimates vary by region. Moreover, even though a methodology was eventually formulated, the capacity estimates were not made using a rigorous and uniform process. Only detailed, local studies will be able to conclusively prove whether a specific injection site is capable of safely sequestering the CO₂ from a particular power plant. A reliable capacity map will not only reveal where those more detailed studies should be carried out, but also refine estimates of total capacity, storage safety and economics. This is an important effort

that will enable policy makers and operators in a carbon-constrained world to safely and economically assess the potential of sequestering carbon dioxide underground. The U.S. should be looking to match the quality of mapping efforts carried out in Australia and that are currently underway in China. We therefore recommend that Section 711 of EISA be funded at no less than \$6 million annually.

NATURAL RESOURCES AND HUMAN HEALTH

Since their inception, our federal land management agencies have dealt with a number of dynamic challenges in their charge as stewards of the nation's ecological treasures. The increase in global temperatures is expected to disrupt ecosystems and result in loss of species diversity, as species that cannot adapt die off. The first comprehensive assessment of the extinction risk from global warming found that more than one million species could be committed to extinction by 2050 if global warming pollution is not curtailed. Augmenting these predictions are the increasingly pervasive realities of widespread drought and the presence of invasive species through out the U.S. These dramatic changes will require a change in the resource management planning and implementation process and significant federal funding.

The first priority in carrying out such investment is to reverse the recent pattern of mismanagement of the tight resources the agencies have available to them. The administration continues to support proposals that would undermine fundamental protections as afforded by the National Environmental Policy Act (NEPA). For example, we oppose the extension of a Forest Service grazing rider that would permit livestock grazing to occur without environmental review, including within designated wilderness areas.

Global warming directly threatens the health of all Americans, but the burdens of global warming will fall especially on certain vulnerable populations, including children who are at greater of worsening allergies and asthma from pollen levels; the elderly who are at greater risk from heat waves; people living in poverty who are especially vulnerable to extreme weather events; and members of racial and ethnic minority groups who suffer particularly from air pollution made worse by rising temperatures. Scientists are reporting changing patterns of mosquito, tick, and flea-borne diseases, degradation of food and water supplies, more extreme weather events, and other hazards. CDC is ideally placed to lead the charge in planning and developing programs to respond to these challenges. An additional \$20 million is needed for CDC's National Center for Environmental Health to support its work in developing a national climate-health coordinating center, further scientific research into how to prepare our nation's public health system to cope with the inevitable effects of global warming, and to offer funding support and guidance to state and local preparedness efforts.

CONCLUSION

By investing in research, planning and regulatory programs now to address global warming, Congress can lay the groundwork for future policy and pave the way for a cleaner energy future.