



NATIONAL WILDLIFE FEDERATION

South Central Regional Center
44 East Avenue, Suite 200
Austin, Texas 78701

512.476.9805
FAX 512.476.9810
www.nwf.org

Contact: Susan Kaderka, Kaderka@nwf.org
512-610-7752 (office); 512-296-3058 (cell)

Testimony of

**Susan Kaderka, Regional Executive Director
National Wildlife Federation, South Central Region**

To

**Environmental Protection Agency
Dallas, Texas**

January 14, 2011

Re: Docket ID No. EPA-HQ-OAR-2010-1033

Thank you for the opportunity to comment today on behalf of National Wildlife Federation's four million members and supporters, of whom 200,000 reside here in Texas. The National Wildlife Federation strongly supports the Environmental Protection Agency's actions to correct Texas' flawed air permitting program by providing federal permits for new construction or modification of plants that emit significant amounts of greenhouse gases. We believe this is the time for swift and effective action to cut global warming pollution, and it is both appropriate and necessary for the Environmental Protection Agency (EPA) to step in where our state government has refused to take action.

Many here today will address what they think the regulation of greenhouse gas emissions will mean to Texas businesses. I want to focus my testimony on what the failure to regulate them will mean to the state's natural environment, to the fish and wildlife we are blessed with and to the habitats that support them. The fact that Texas is the largest emitter of greenhouse gas emissions among the 50 states should be reason enough to take action. But equally compelling should be the realization of what is at stake here in Texas if no action is taken and carbon levels in the atmosphere continue to climb at expected rates.

Most Texans are only a generation or two removed from a more rural way of life and we cherish our state's diverse landscapes and abundant fish and wildlife resources. From the Piney Woods of East Texas to the Davis Mountains of West Texas, from the productive waters of the Gulf Coast to the great plains of North Texas, we honor our rich natural heritage and want to hand it on to our children and their children.

If the climate change that is already occurring is allowed to continue unabated, future generations will inherit a very different Texas. **Rising sea levels** will threaten the incredibly productive wetlands and estuaries of the Texas Gulf coast, inundating large areas of wetlands that provide habitat for millions of migratory birds and waterfowl and upsetting the delicate balance of fresh and salt water that today supports commercially and recreationally important fisheries. **Stronger storms** will cause more flooding in urban areas like Houston, where it already floods when there's a lot of rain. The **droughts** that many areas of the state have experienced in recent years will become more frequent and more prolonged and larger portions of the state will turn to desert. The beautiful pine forests of east Texas may fall victim to **infestations of insects** like the pine bark beetle, which is already damaging forests in the western United States. In short, if we do nothing to reduce greenhouse gas emissions, the Texas we pass on to our grandchildren will be a very different place.

For the past 10 years, the National Wildlife Federation's regional office in Texas has worked with many partners to ensure that the state is managing its water resources in a way that meets the needs of both people AND wildlife and at the same time supports a growing economy. We believe this is what Texans want—not to make false choices between economic development and a healthy environment but to figure out how to have both. Global warming will make the job of wise water management very much harder. It will change the face of landscapes that people in Texas love, that define us as a state and as a people.

We at the National Wildlife Federation are profoundly disappointed that our state leaders have failed to demonstrate the vision required to meet the challenge of global warming. In particular we deplore the state's refusal to join 49 other states who are developing implementation plans to comply with Clean Air Act provisions regarding greenhouse gas emissions. The people of Texas deserve better than this. We applaud and affirm EPA's decision to step into the breach.

EPA's Tailoring Rule is critical step forward. We thank you for all your efforts in developing and implementing these critical regulations to address a challenge that threatens our environment, our communities, and our economy.