

As Prepared for Delivery  
Comments of Liz Scott  
National Director, Advocacy, Healthy Air  
American Lung Association  
On  
The U.S. Environmental Protection Agency  
Federal Implementation Plan Addressing Regional Ozone Transport for the 2015 Ozone National  
Ambient Air Quality Standard  
Docket ID No. EPA-HQ- OAR-2021-0668

April 21, 2022

Good afternoon. My name is Liz Scott – SPELL NAME – and I’m the National Director of Advocacy for the American Lung Association’s Healthy Air Campaign. Thank you for the opportunity to speak on this important proposal that could result in millions more Americans being protected from dangerous pollution.

I support the proposal to clean up interstate pollution to help address the non-attainment areas for the 2015 ozone standards. I strongly recommend that EPA expand the proposal to include more sources, including major industrial sources, in more areas and reducing the time that polluters have to comply. It especially shouldn’t take long for power plants to run pollution controls that already have been installed. EPA has the opportunity to take a health-protective approach by quickly finalizing more stringent standards that will address long overdue pollution clean-up. The Lung Association looks forward to providing more robust written comments, but my colleagues and I will each be speaking today on a particular section of this proposed rule.

I recently moved back to Maryland after a decade of exploring other states and districts. I grew up in Bel Air, Maryland, about 30 miles north of Baltimore, and most of my family is still there. In fact, my sister, brother-in-law and 9-month-old nephew are moving back there at the end of the month. My nephew Lucas is the first grandchild, so you can imagine all of the attention shown towards him. Everyone is taking steps to make sure he grows up to be a healthy kid. While everyone else is looking to the food he eats or the toys he chews on, I’m thinking about the air he’s breathing. Harford County, Maryland – my nephew’s new home – received an F for ozone pollution in the American Lung Association’s “State of the Air” report that was released today. I care deeply about finalizing a strong ozone transport proposal because not only will it mean Maryland is a good neighbor to surrounding states, but it will also clean up the air that my nephew is breathing and protect him from the health impacts that are associated with ozone pollution.

I want to talk now on a few specifics of the proposal, the first being the proposed trading framework. We’ve unfortunately seen that inadequate caps, banked allowances and price decreases have made it a more attractive option for polluters to simply buy emissions allowances instead of running pollution controls. This results in the continued spewing of pollution, oftentimes in communities that are already disproportionately burdened by unhealthy air. We appreciate that the Agency is finally addressing this

failed framework and we recommend an option that prioritizes pollution clean-up in heavily burdened areas.

The EPA also requested comments on how to look at some of the non-monetized portions of the proposal, including climate benefits. We strongly support EPA including these benefits. The Agency can and should work with data scientists that work on air pollution, climate change and health to develop a framework that can quantify climate co-benefits, including health, climate and ecosystem benefits. One option could be to develop a range of health and economic benefits in terms of dollars per ton of each pollutant reduced and then assessing a cumulative benefit from there.

We know that reducing NO<sub>x</sub> pollution will also reduce greenhouse gas emissions as well as improve health outcomes. Less NO<sub>x</sub> will result in less ozone and particle pollution in the air which means better respiratory and lung health. Now that I've painted a picture of what is possible, let me also end with a call for urgency for EPA to use all of its authority under the Clean Air Act to address air pollution. If the EPA does not adequately address greenhouse gas emissions, conventional air pollution and all of the health risks that come with it will worsen.

Finalizing the strongest rule that holds polluters accountable will improve air quality, leading to immediate health benefits. I urge EPA to strengthen and finalize this proposal to control emissions from the full suite of sources that put public health at risk from NO<sub>x</sub> and ozone pollution.

Thank you for your time.