

Comments from Liz Scott
Director, Federal Clean Air Advocacy, American Lung Association
Repeal of Greenhouse Gas Emissions Standards for Fossil Fuel-Fired Electric Generating Units
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As prepared for delivery

My name is Liz Scott and I'm the Director of Federal Clean Air Advocacy at the American Lung Association. The American Lung Association is the nation's oldest voluntary health organization. Our vision is a world free of lung disease, and we combine research, education and advocacy to help achieve that vision. Central to our mission is rooting our work in science. And on the topic of greenhouse gas emissions and climate change, science is overwhelmingly clear.

Before I go on, I do want to add my disappointment that EPA is only allowing one day for this public hearing. This repeal could have long-term, far-reaching consequences for communities across the country. The public deserves more than this rushed, expedited repeal.

As I said, the science on the impacts of greenhouse gas emissions on climate change is overwhelming. Report after report have shown unequivocally that human activity is warming the climate at an accelerated rate. Unfortunately, we have already seen what that warming is doing to communities across the country. Earlier this year, Los Angeles experienced deadly wildfires that grew intense in part because of extreme heat and dry conditions. In Phoenix, Arizona, there has already been a 17-day run of 100+ degree days. And tragically, extreme flooding brought on by volatile storms has claimed the lives of too many across the Southeast and most recently in Texas just this past weekend. The ten warmest years since 1850 have all occurred in the past decade, with last year, 2024, officially being the hottest year on record, dethroning 2023.

Climate change – fueled by greenhouse gas emissions – doesn't just create conditions for extreme weather and wildfires. It is also degrading air quality. Wildfires – that again, are becoming more frequent and extreme thanks to greenhouse gas fueled climate change – cause particle pollution levels to spike. This damages the lungs and other organs and body functions in both the short and long term. Additionally, warmer temperatures lead to the formation of more ground-level ozone pollution, or 'smog'. Ozone is formed when pollution from the power and transportation sector – like nitrogen oxides or volatile organic compounds – interact with sunlight. Hotter temperatures are leading to more ozone formation.

I want to use an example from the Lung Association's 2025 "State of the Air" report to highlight this point. Every year, we take data from air quality monitors and rank counties on their levels of two dangerous air pollutants, including ozone. Tulsa, Oklahoma was on the top 25 worst regions

for ozone this year, worsening from 31st to 19th worst. The “State of the Air” report covers the years 2021 through 2023. In 2021, Tulsa experienced record-breaking warm days in December. In 2022 the summer months averaged 3 degrees warmer than normal and 2023 brought more high temperatures, one day was at a 123-degree heat index, among the highest on record. Those hotter, drier temperatures contributed to Tulsa appearing on the most polluted list of ozone for the first time since 2016.

Lastly - the regulatory impact analysis accompanying this repeal admitted that the 2024 rule – if implemented – would avoid thousands of premature deaths. It goes even further by admitting that yes, this repeal will lead to *more* premature deaths – in 2035 alone, there will be up to 120 additional deaths from ozone and 1,100 premature deaths due to particulate matter exposure. I ask EPA – by knowingly increasing the risk of premature death how is EPA serving its mission to protect human health and the environment?

I urge the EPA to withdraw this unfounded and unsupported repeal.