

Comments of William Barrett
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EPA Hearing on Repeal of Greenhouse Gas (GHG)
Standards for Fossil Fuel-fired Electric Generating Units (EGUs)
Docket Number: EPA-HQ-OAR-2025-0124
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Good morning. My name is Will Barrett. I am the Assistant Vice President for Nationwide Clean Air Policy with the American Lung Association.

I am speaking today in opposition to EPA's proposal to rescind its authority for regulating greenhouse gases and the remaining GHG standards for power plants. This latest action represents a further departure from health science, from the Clean Air Act, court rulings and the reality of climate emergencies facing – and threatening - all Americans.

The Lung Association and leading health and medical organizations are unified in strong opposition to EPA's devastating proposals that retreat from its mission to protect health.

The proposal comes despite the clear evidence that climate change – and greenhouse gases that accelerate it - represents a growing danger to public health and welfare.

Climate change is a health emergency above all – we need EPA to live up to its mission.

EPA is required by law to protect Americans from air pollution that endangers public health and welfare – including greenhouse gases that are driving climate change.

EPA's authority to regulate greenhouse gases was confirmed by the Supreme Court nearly two decades ago and has consistently been affirmed by the courts.

The endangerment finding is based on decades of scientific consensus. Climate change is real, driven primarily by human-caused emissions, and is harming both our health and the economy today.

Massive floods, droughts, extreme heat, wildfires, and hurricanes are harming our health, our communities, and our economy. Our annual State of the Air report documents the growing risks that climate change poses to our air quality progress.

These risks will only get worse if the American government retreats from its responsibility and undercuts its own authority to act to reduce greenhouse gases from power plants – a major source of harmful climate pollution.

Over my lifetime, there have been over 400 extreme weather and climate-related disasters, costing more than \$3 trillion. These costs are ignored in the EPA proposals, along with omitting the health damages certain to follow this proposal. The past three full years – 2023-2025 - represent the three years with the most \$1 billion disasters since 1980 – and there have already been a dozen through the first half of 2026.

The pace of increase in these events is alarming from a broad economic perspective and devastating for the increasing numbers of families, first responders and entire communities caught in the path.

Power plants are a major driver of greenhouse gas emissions that accelerate the warming of our planet and associated costly extreme events, health risk and deaths.

EPA must adhere to the law, to the science and to a basic contract with the American people to protect their health and their communities from the dangers posed by carbon pollution from power plants.

We urge EPA to listen to the overwhelming consensus of the peer-reviewed scientific literature, to rescind these proposals and return to the critical work of protecting American families against pollutants that threaten their health and welfare.