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Testimony for
EPA Hearing on Repeal of Greenhouse Gas (GHG) Standards for Fossil Fuel-fired
Electric Generating Units (EGUs)
As Prepared for Delivery

Good morning. My name is Liz Scott and I'm the Senior Director for Nationwide Clean Air Advocacy at the American Lung Association. I am calling on EPA to withdraw the proposed rule repealing greenhouse gas standards for fossil-fuel power plants. I would like to begin by thanking EPA for expanding the public hearing opportunities beyond the initial 4 hours. I think it's clear from a high demand for speaking slots that the public has a stated interest in this proposal and deserves to be heard.

This proposal follows a long list of agency actions taken over the past several months to remove health protections. EPA is reinterpreting Clean Air Act statute to serve the agency's new focus of saving industry money, instead of following what the drafters of the Clean Air Act intended which has always been to protect public health.

In the proposal, EPA claims that if all carbon emissions from new and existing power plants were eliminated, there would be no meaningful effect on climate change. This is false. U.S. power plants are a major contributor to the greenhouse gases that cause climate change. The finalized 2024 rule on carbon pollution from power plants was estimated to reduce 1.38 billion metric tons of carbon pollution through 2047, along with thousands of tons of particulate matter, sulfur dioxide and nitrogen oxide pollution. That's not just a number on paper, it's associated with real-world health benefits. In 2035 alone, the rule was estimated to avoid 1200 premature deaths, 1900 cases of asthma onset, 360,000 cases of asthma symptoms, 48,000 school absences and 57,000 lost workdays. That's \$370 billion in public health benefits that are now foregone due to EPA repealing that 2024 rule.

EPA saying that reducing carbon emissions wouldn't have an impact on climate change is contrary to the conclusions drawn by scientists, researchers and experts in the field climate change. The Fifth National Climate Assessment released in 2023 reiterated that the warming experienced over the industrial era is unequivocally caused by greenhouse gas emissions from human activities, and that US is warming faster than the global average. The authors say, "The choices the US and other countries make now will determine the trajectory of climate change and associated impacts for many generations to come." With this proposed rule, EPA is showing the world – and it's own residents – that the US does not

care to be a partner in ensuring health is protected from increasing frequency of climate disasters.

Health professionals and scientists around the world agree that climate change is the biggest health threat of this century. As with most public health threats, it requires a multi-faceted response. Even if EPA's conclusion that eliminating all carbon emissions from power plants would have no meaningful affect were true, it is not an acceptable argument for eliminating all EPA actions on reducing carbon emissions. You don't throw away the entire toolbox based on the perceived efficacy of one tool.

This proposal is another example of EPA abandoning its mission – a mission that is clearly stated in statute. The Clean Air Act grants EPA the authority and responsibility to protect health from sources of pollution that endanger public health or welfare. EPA must abandon this proposal and return to its mission of protecting human health.