

Comments from Laura Kate Bender
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Repeal of Greenhouse Gas Emissions Standards for Fossil Fuel-Fired Electric
Generating Units
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As prepared for delivery

Good morning. My name is Laura Kate Bender and I lead the American Lung Association's advocacy work. Thank you so much for taking the time to hear these comments today. As you've heard from our president and CEO and as you'll hear from others throughout the day, this proposal will harm health and cost lives. EPA's mission is to protect human health and the environment. That mission requires that the agency abandon this effort to repeal the greenhouse gas standards for power plants.

Climate change is a health emergency, and people across the nation are already experiencing devastating impacts from wildfire smoke, extreme heat, floods and storms. The Clean Air Act requires EPA to address air pollutants that affect human health, including greenhouse gases. The greenhouse gas standards are a critical tool for addressing climate change, and the agency's own analysis from 2024 finds that the measures taken under the greenhouse gas standards will benefit lung health in the immediate term too.

That's why the health community has supported cleaning up carbon pollution from the power sector for years. For example, in comments leading up to the 2024 rule, 105 health organizations at the national, state and local level urged EPA to finalize the standards. Our groups actually urged EPA to go further, including by covering much more of the existing gas fleet, based on what the law requires and what health science shows is necessary to protect people's health. That includes national and state chapters of the American Academy of Pediatrics, American Public Health Association and many more. And although we didn't get everything we wanted, we did celebrate the final rule because of its health benefits.

As you'll hear today, there is extensive scientific evidence showing that climate change unequivocally harms health of people in the U.S, and that greenhouse gases from the U.S. power sector are a leading driver of climate change. Yet in its press release announcing the proposed rollback, EPA said, "Unlike other air pollutants with a regional or local impact, the targeted emissions are global in nature. As a result, any potential public health harms have not been accurately attributed to emissions from the U.S. power sector." The Lung Association and other health organizations know that this doesn't make sense. We know how much the U.S. power sector is contributing to climate change, and we know what the health harms of climate change are. An extensive body of research led to the development of the social cost of carbon metric that monetized many of the impacts of climate change, including health harms.

With this proposal, EPA is arguing that "greenhouse gas emissions from fossil fuel-fired power plants do not contribute significantly to dangerous air pollution within the meaning of the statute." But courts have already upheld that they do. The United States is the second leading global emitter of greenhouse gas emissions, and power plants are the

second leading sector emitting them. If that's not a significant contribution to global climate change and its air quality impacts, it's hard to see what would be.

In addition to greenhouse gases, power plants emit air pollutants that can worsen local air quality and harm health. Burning fossil fuels results in emissions of fine particulate matter, nitrogen oxides, sulfur oxides and volatile organic compounds, which also contribute to the formation of ozone.

These pollutants can cause respiratory harm, including asthma exacerbations, inflammation of the upper and lower airways and even respiratory mortality. Health effects can also include cardiovascular harm, strokes, low birth weight in newborns, reproductive and developmental harm, increased risk of metabolic disorders, increased need for medical care and increased emergency room visits and premature death.

EPA's Regulatory Impact Analysis for the 2024 greenhouse gas standards was extensive. It analyzed both climate impacts avoided, based on the social cost of greenhouse gas metric, and the health benefits from reductions in additional power plant pollution. . This proposal to repeal the standards includes no such analysis, so we have to assume that all the lives saved and health benefits of the 2024 standards would be wiped out.

Simply put, if EPA finalizes this repeal, people will die preventable deaths. Kids will have asthma attacks that could have been avoided. We urge EPA to follow the science, follow the law and meet its mission of protecting human health and the environment. Do not repeal this rule.