



February 24, 2026

Kristin Salimeno
Bureau of Air Quality
Connecticut Department of Energy & Environmental Protection (DEEP)
79 Elm Street Hartford
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RE: Comments on Connecticut Department of Energy & Environmental Protection's (DEEP'S) proposed revision to its State Implementation Plan (SIP) demonstrate attainment of the 2008 ozone NAAQS for Southwest Connecticut and to establish associated motor vehicle emissions budgets (MVEBs)

My name is Ruth Canovi and I am the Director of Advocacy for the American Lung Association in Connecticut. The American Lung Association is the oldest voluntary public health association in the United States, currently representing the more than 36 million Americans living with lung diseases. The Lung Association works to save lives by improving lung health and preventing lung disease through research, education and advocacy.

As an organization focused on protecting lung health, we are very concerned about the quality of air we all breathe. For over twenty years we have been releasing our annual State of the Air Report which looks at two dangerous pollutants – ozone pollution and particulate matter pollution – to track our progress in cleaning up our air and to educate the public about the health risks of exposure to air pollution.

Ozone gas is a powerful lung irritant. When it is inhaled into the lungs, it reacts with the delicate lining of the small airways, causing inflammation and other damage that can impact multiple body systems. Ozone exposure can also shorten lives. Ozone has a serious negative effect on the respiratory system, both in the short term and over years of exposure. When ozone levels are high, many people experience breathing problems such as chest tightness, coughing and shortness of breath, often within hours of exposure. Ozone can cause premature death for higher risk individuals, as well as immediate breathing problems including asthma attacks. It can cause a host of health harms over long-term exposure, including: development of new cases of asthma in children, damage to the airways, development of COPD (chronic obstructive pulmonary disease) and increased allergic response.

Beyond the respiratory impacts, ozone exposure can also potentially increase the risk of metabolic disorders, impact the central nervous system, increase the likelihood of reproductive and developmental harm, and possible cardiovascular effects.

The American Lung Association offers the following comments on Connecticut Department of Energy & Environmental Protection (DEEP)'s proposed SIP revision to demonstrate attainment of the 2008 ozone NAAQS for Southwest Connecticut and to establish associated motor vehicle emissions budgets (MVEB). The proposal also outlines contingency measures if the region fails to attain by July 20, 2027.

We find the following issues with the proposal:

- **Modeling uncertainty** arising from EPA's deregulatory measures and rollbacks which threaten the validity of the attainment demonstration.
- **Good Neighbor obligations** remain inadequately enforced; Connecticut's attainment relies heavily on upwind state reductions of ozone precursors – NO_x and also VOCs .
- **Weak contingency measures** that rely solely on MVEB reductions may not meet CAA requirements.
- **Climate-driven ozone formation** is not adequately considered.
- **Long history of nonattainment** demands stronger federal action to protect public health.
- **Need for improved public engagement**, especially for over-burdened communities.

1. Attainment Modeling Based on Prior EPA Modeling Assumptions

DEEP's attainment analysis leans heavily on EPA's 2023 photochemical grid modeling, which was based on then-current control programs. However, DEEP acknowledges that the future impacts of current EPA's deregulatory agenda on ozone levels are "yet to be determined."

If EPA weakens industrial or vehicle emissions controls, the modeling may be overly optimistic.

Placeholder assumptions may underestimate the public health burden of persistent ozone exceedances.

We ask that DEEP use updated modeling that incorporates potential deregulatory scenarios (including the recent repeal of Endangerment finding and GHG emissions from vehicles) and robust sensitivity analyses to avoid over-promising attainment and to accurately capture realistic air quality scenarios.

2. Heavy Reliance on Upwind Reductions (Good Neighbor Obligations)

Connecticut consistently demonstrates that 95% of its worst ozone days come from out-of-state emissions, particularly from upwind states in the NY-NJ-CT region.

The SIP concludes that attainment is possible only if upwind states fully implement and enforce their Good Neighbor obligations. This remains unresolved, as past federal rules were found insufficient by courts and EPA is proposing to rollback the 2024 Good Neighbor Plan that addressed interstate ozone transport to enable downwind states, including CT, to attain the 2015 ozone NAAQS.

Current EPA deregulatory trends may weaken cross-state NO_x controls, threatening public health in Connecticut by undermining the SIP's assumptions.

We urge EPA to expedite and strengthen the 2024 Good Neighbor Plan implementation and not rely on uncertain future upwind emission reductions.

3. Contingency Measures Appear Narrow and Vehicle-Only Focused

The SIP uses reductions in motor vehicle emissions budgets as its sole contingency measure – imposing slightly tighter VOC and NO_x caps if the region fails to attain by 2027.

Contingency measures under the Clean Air Act are intended to be prompt and sufficient; relying solely on MVEB tightening may fall short in helping SW CT attain the standard.

No stationary-source or area-source contingency measures were proposed, leaving vulnerabilities if mobile-source reduction potential is limited.

We ask DEEP to seriously consider a broader suite of contingency measures – including stationary-source NO_x controls, robust implementation, enhanced enforcement, or updated RACT requirements.

4. Incomplete Integration of Periodic Emission Inventory Lessons

EPA's recent approval of Connecticut's 2014 and 2017 periodic emission inventories included stakeholders comments urging integration of climate-related considerations into future inventories. EPA acknowledged the concern but took no action.

These inventories are foundational to SIP planning; failure to integrate broader emissions-trends analysis could weaken future ozone planning resilience.

In a warming climate, higher temperatures accelerate ozone formation – yet the SIP does not explicitly address climate-driven ozone increases.

We encourage DEEP and EPA to incorporate climate-driven ozone formation risks when projecting future emissions and required controls.

5. Connecticut's History of Reclassification and Persistent Nonattainment

Connecticut has been repeatedly reclassified – from marginal → moderate → serious → **severe** – as it failed to meet past ozone deadlines.

Repeated reclassifications indicate systemic insufficiency in federal and regional pollution transport controls.

Continued public health risk: repeated ozone exceedances increase respiratory disease rates, ER visits and cardiovascular stress.

We ask EPA to recognize the cumulative public health impacts and to strengthen federal baseline controls rather than leaning on states already heavily affected by transported pollution.

6. Limited Public Participation & Transparency Concerns

In related prior SIP actions, Connecticut sometimes received no requests for hearings even when significant changes were proposed.

For a severe nonattainment area, public engagement is essential. Limited participation may indicate inadequate outreach or technical barriers.

Communities disproportionately affected by ozone pollution may have been under-engaged.

We urge EPA and DEEP to enhance community engagement, including accessible technical summaries and targeted outreach to EJ communities.

Conclusion

Connecticut must take bolder steps to improve our air quality. The state has a long history of non-attainment of its ozone National Ambient Air Quality Standards. These standards are not arbitrary rules, but they are standards that should be based in science to protect public health. They can save lives.

Unfortunately, Connecticut is at the receiving end of pollution from other states, highlighting the need for strong EPA regulations like the Good Neighbor Rule. In addition, the changing climate is making it harder to clean up ozone – heat and sun are key ingredients to ground level ozone. As we see more intense hot sunny days, it is harder to reduce ozone. In addition, the state's Greenhouse Gas Inventory shows the state is not on track to meet its GHG emissions reductions goals.

The previous years have shown challenges in the policy landscape in adopting vehicle emissions standards. For decades Connecticut participated in the Advanced Clean Cars program, but failed to adopt the Advanced Clean Cars 2 and Advanced Clean Trucks program. We have serious concern that the reliance on reduced transportation emissions will not be sufficient for SW Connecticut to attain ozone NAAQS.

Thank you for your consideration.

Contact Info

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