Aug 5th, 2025

Attn: Docket ID No. EPA-HQ-OAR-2025-0124

Lee Zeldin, Administrator

Office of the Administrator (1101A)
United States Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

RE: Repeal of Greenhouse Gas Emissions Standards for Fossil Fuel-Fired Electric Generating Units

To Administrator Zeldin and EPA staff,

The undersigned organizations represent and work with communities in industrial corridors throughout the country impacted by health-harming pollution from the power sector. They submit the following comments in response to the Environmental Protection Agency's (EPA) proposal to repeal all greenhouse gas (GHG) emission standards for fossil fuel-fired power plants.

Low-income communities and communities of color (i.e., environmental justice communities) host a wide range of polluting industries, including a disproportionate number of the nation's fossil fuel-fired power plants[1]. Many of these vulnerable communities are overburdened with pollution and co-located with fossil fuel infrastructure, such as refineries and pipelines[2]. Environmental justice communities also face the most significant risks from climate change, which combine with existing environmental exposures and social vulnerability to create detrimental long-term public health impacts from the power sector.[3]

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[1] Richmond-Bryant, Jennifer et al., "Disparities in distribution of particulate matter emissions from US coal-fired power plants by
race and poverty status after accounting for reductions in operations between 2015 and 2017," American Journal of Public Health 110, no. 5 (2020): 655-661; Boyce, James K. and Manuel Pastor, "Clearing the air: incorporating air quality and environmental justice into climate policy," Climatic Change 120 (2013): 801-814; Cushing, Lara J. et al., "Historical red-lining is associated with fossil fuel power plant siting and present-day inequalities in air pollutant emissions," Nature Energy 8, no. 1 (2023): 52-61.

[2] D. Jaffe, J. Putz, G. Hof, J. Hee, D.A. Lommers-Johnson, F. Gabela, J.L. Fry, B. Ayres, M. Kelp, M. Minsk Diesel particulate matter and coal dust from trains in the Columbia River gorge, Washington state, USA Atmos. Pollut. Res., 6 (6) (2015), pp. 946-952, 10.1016/j.apr.2015.04.004; International Tanker Owners Pollution Federation (ITOPF) Oil Tanker Spill Statistics [Online] Available at:
https://www.itopf.org/knowledge-resources/data-statistics/statistics/ (2022); (Accessed 19 March 2023)

[3] Climate change and social vulnerability in the United States: A focus on six impacts (U.S. EPA, 2021, EPA 430-R-21-003),

We strongly disagree with the EPA's determination that GHG emissions from fossil fuel-fired power plants do not contribute significantly to the endangerment of public health and welfare. We urge the EPA to fulfill its mission to protect human health and the environment by retaining the GHG emission standards for fossil fuel-fired power plants. EPA's mission must guide every regulatory decision the agency makes—particularly those, like the GHG emission standards, that have such profound consequences for public health and the nation's ability to respond to increasing weather-related disasters.

Protecting the Health and Welfare of Host Communities

The power sector remains a major contributor to GHG emissions and local air pollution. According to EPA's own 2023 assessment, the electric power sector accounted for about 33% of total U.S. primary energy consumption and about 30% of total U.S. energy-related CO_2 emissions[4]. In 2024, the power sector also contributed to GHG emissions growth, with a 3% uptick in electricity generation relative to 2023.[5]

In addition to emitting CO2, fossil fuel-fired power plants emit a range of harmful pollutants—including sulfur dioxide (SO_2), nitrogen oxides (NO_x), particulate matter (PM2.5 and PM10), volatile organic compounds, mercury, and other hazardous substances. These co-pollutants are linked to severe health impacts—including asthma, cardiovascular disease, cancer, and premature death. Vulnerable populations—such as children, the elderly, and those with existing respiratory conditions—are especially at risk[6].

Studies have repeatedly found that communities with relatively high poverty levels are more likely to host coal-fired power plants for several reasons, including utility companies pursuing the path of least resistance[7]. Across the country, natural gas plants are increasingly being built in densely populated areas with low-income

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https://www.epa.gov/cira/social-vulnerability-report.

[4] U.S. Environmental Protection Agency, Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2022, April 2024. Includes U.S. Territories; U.S. Energy Information Administration, Monthly Energy Review, Energy consumption by sector and Environment, April 2024, preliminary data for 2023.

[5] Gaffney, M., King, B., & Larsen, J. (2025, January 9). Preliminary US greenhouse gas estimates for 2024. https://rhg.com/research/preliminary-us-greenhouse-gas-estimates-for-2024/

[6] Cranmer, Z., Steinfield, L., Miranda, J., & Stohler, T. (2023). Energy distributive injustices: Assessing the demographics of communities surrounding renewable and fossil fuel power plants in the United States. Energy Research & Social Science, 100, 103050. https://doi.org/10.1016/j.erss.2023.103050

[7] E.D. McCoy Which Came First, Coal-Fired Power Plants or Communities of Color? Masters, University of Michigan, Assessing the disparate siting hypothesis of environmental injustice (2017) https://hdl.handle.net/2027.42/137941;I. Mikati, A.F. Benson, T.J. Luben, J.D. Sacks, J. Richmond-Bryant Disparities in distribution of particulate matter emission sources by race and poverty status Am. J. Public Health, 108 (2018), pp. 480-485, 10.2105/AJPH.2017.304297

communities and communities of color[8]. In northeastern states, the number of natural gas plants and the total net generation from natural gas in low-income communities and communities of color have increased over the years compared to other communities.[9] In California, almost half of the state's natural gas plants are in low-income communities, which are considered the most vulnerable due to exposure to multiple sources of pollution. Heard County, Georgia, hosts one of the nation's largest natural gas plants (with a high capacity per capita)[10]. The county is home to communities that experience high economic stress, along with multiple environmental risks such as increased exposure to air toxics and toxic water discharge.

By establishing a determination that GHG emissions from power plants do not endanger health and welfare, by proposing to repeal regulations such as the mercury and air toxics standards[11] for coal and oil plants and by allowing industry to bypass safeguards required by law[12], the EPA and the current Administration are removing protections for the most vulnerable populations who host power plant facilities. It compounds this mistake by failing to create and implement a climate change mitigation policy that would simultaneously reduce emissions of both GHGs and locally harmful GHG co-pollutants.

Protecting Communities Most at Risk from Climate Change

We know that reducing power sector GHG emissions is essential to limiting the impacts of climate change. Critically, the most severe harms from climate change fall disproportionately upon the most vulnerable communities—those least able to prepare for, and recover from, extreme weather events such as heat waves, poor air quality, flooding, and other climate-related impacts.

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[8] Cranmer, Z., Steinfield, L., Miranda, J., & Stohler, T. (2023). Energy distributive injustices: Assessing the demographics of communities surrounding renewable and fossil fuel power plants in the United States. Energy Research & Social Science, 100, 103050. https://doi.org/10.1016/j.erss.2023.103050

[9] Declet-Barreto, J., & Rosenberg, A. A. (2022). Environmental justice and power plant emissions in the Regional Greenhouse Gas Initiative states. PLoS ONE, 17(7), e0271026. https://doi.org/10.1371/journal.pone.0271026

[10] *Mapping County-Level exposure and vulnerability to the US energy transition*. (n.d.). Resources for the Future. https://www.rff.org/publications/working-papers/mapping-county-level-exposure-and-vulnerability-to-the-us-energy-transition

[11] National Emission Standards for Hazardous air pollutants: Coal- and Oil-Fired Electric Utility steam generating Units. (2025, June 17). Federal Register. https://www.federalregister.gov/documents/2025/06/17/2025-10992/national-emission-standards-for-hazardous-air-pollutants-coal--and-oil-fired-electric-utility-steam

[12] The White House. (2025, April 9). *Regulatory relief for certain stationary sources to promote American energy*. https://www.whitehouse.gov/presidential-actions/2025/04/rregulatory-relief-for-certain-stationary-sources-to-promote-american-energy/

EPA's own 2021 analysis[13] confirms that communities of color are particularly vulnerable to the greatest impacts of climate change, compounding the environmental injustices already faced due to the presence of polluting infrastructure like fossil fuel-fired power plants.

Global studies have shown that reducing emissions over the next 50 years could prevent about 4.5 million premature deaths, 1.4 million hospitalizations and emergency room visits, 300 million lost workdays, 1.7 million incidences of dementia, and 440 million tons of crop losses[14]. According to a 2021 NASA study, roughly two-thirds of these health and economic benefits would be realized even if only the United States reduced emissions.

Reducing GHG emissions from the power sector is a public health necessity. If developed and implemented correctly, maintaining and strengthening GHG policies and standards for fossil fuel power plants could allow the EPA to protect pollution communities and help ensure the transition to a pollution-free energy sector delivers tangible benefits to those most vulnerable.

Sincerely,

Center for Earth Energy & Democracy (CEED)

Deep South Center for Environmental Justice (DSCEJ)

Green Door Initiative (GDI)

Kean University

Los Jardines Institute (LJI)

New Jersey Environmental Justice Alliance (NJEJA)

The New School - Tishman Center for the Environment and Design

WE ACT for Environmental Justice

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[13] EPA report shows disproportionate impacts of climate change on socially vulnerable populations in the United States | US EPA. (2023, August 14). US EPA. https://www.epa.gov/newsreleases/epa-report-shows-disproportionate-impacts-climate-change-socially-vulnerable

[14] Mersmann, K. (2023, July 26). Reducing emissions to mitigate climate change could yield dramatic health benefits by 2030 - NASA. NASA. https://www.nasa.gov/earth-and-climate/reducing-emissions-to-mitigate-climate-change-could-yield-dramatic-health-benefits-by-2030/