August 7, 2025

Administrator Lee Zeldin
Environmental Protection Agency,
1200 Pennsylvania Ave NW, Washington, DC 20004
Washington, DC

Submitted via https://www.regulations.gov/document/EPA-HQ-OAR-2025-0124-0001

Dear Administrator Lee Zeldin,

Clean Air for the Long Haul Comments on Docket Number EPA-HQ-OAR-2025-0124: Repeal of Greenhouse Gas Emissions Standards for Fossil Fuel-Fired Electric Generating Units

Thank you for the opportunity to submit the following comments in reference to the Environmental Protection Agency's proposed rule on the "Repeal of Greenhouse Gas Emissions Standards for Fossil Fuel-Fired Electric Generating Units (GCUs)."

About the Clean Air for the Long Haul

Clean Air for the Long Haul ("the Cohort") is a nationwide coalition of environmental justice groups working collectively to advance environmental justice by seeking emissions reductions in the power and transportation industry sectors in the United States. Member organizations of the Cohort include: Alternatives for Community and Environment; Connecticut Coalition for Economic and Environmental Justice; Duwamish River Community Coalition; Green Door Initiative; New Jersey Environmental Justice Alliance; South Bronx Unite; Texas Environmental Justice Advocacy Services; West End Revitalization Association; WE ACT for Environmental Justice, and Wisconsin Green Muslims.

The Cohort creates and coordinates federal rulemaking campaigns, amplifies the voices and positions of overburdened communities, actively works to reduce and eliminate air pollution, and works to dismantle the legal and physical infrastructure that harm environmental justice communities. The Cohort also champions the urgent need for achieving emission reductions of toxic and greenhouse gasses (GHGs), adopting and enforcing climate justice policies, and actively combatting inequitable siting and permitting practices that perpetuate irreparable harms on Black, Brown, Tribal, Indigenous, and low income communities in the United States.

Disproportionate Impacts of Power Plants on Environmental Justice Communities

Our communities disproportionately shoulder the health and pollution burdens caused by the siting and operation of industrial facilities in their neighborhoods. Decades of public health data have shown that throughout the country, living near fossil fuel operations, including power plants greatly contributes to increased exposure to toxic air pollution and resulting higher rates of respiratory, reproductive and other health issues resulting in serious conditions such as cancer and ultimately, premature death.[1]

These fenceline communities are often Indigenous, low-income, and communities of color due to a legacy of discriminatory policies and practices. [2,3] This is well demonstrated in the St. John Parish in Louisiana, referred to as "Cancer Alley", a predominantly Black community.[4] In this region, the risk of developing cancer from air pollution in the census tracks closest to fossil fuels and petrochemical facilities is nearly 50 times the national average.[5] Unfortunately, there are many communities of color across the country, including those represented by the Clean Air for the Long Haul, with similar experiences of historic and current environmental injustice. Oil and gas infrastructure, in particular, has a disproportionate impact on Black people, resulting in elevated cancer risk, pregnancy complications, respiratory illness, and cardiovascular disease[6] as well as anemia, brain damage, eye, nose, and throat irritation, blood disorders, neurological disorders, and death.[7]

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[1] Jess Beagley. (2025). *Cradle to grave: The health harms of fossil fuel dependence and the case for a just phase-out*. Global Climate and Health Alliance. https://climateandhealthalliance.org/sdm_downloads/cradle-to-gravethe-health-harms-of-fossil-fuel-dependence-and-the-case-for-a-just-phase-out/

[2] Cushing, L. J., Li, S., Steiger, B. B., & Casey, J. A. (2023). Historical red-lining is associated with fossil fuel power plant siting and present-day inequalities in air pollutant emissions. *Nature Energy*, *8*(1), 52–61. https://doi.org/10.1038/s41560-022-01162-y

[3] Donaghy, T. Q., Healy, N., Jiang, C. Y., & Battle, C. P. (2023). Fossil fuel racism in the United States: How phasing out coal, oil, and gas can protect communities. *Energy Research & Social Science*, *100*, 103104. https://doi.org/10.1016/j.erss.2023.103104

[4] University Network for Human Rights. "Waiting to Die: Toxic Emissions and Disease Near the Louisiana Denka/DuPont Plant*,"* (2019), https://www.epa.gov/sites/default/files/2019-12/documents/waiting_to_die_final.pdf

[5] See footnote 4

[6] Tim Donaghy, Ph.D, and Charlie Jiang, Fossil Fuel Racism: How Phasing Out Oil, Gas, and Coal Can Protect Communities (April 13, 2021) https://www.greenpeace.org/usa/wp-content/uploads/2021/04/Fossil-Fuel-Racism.pdf at 4.

[7] NAACP, Fumes Across the Fence-Line: The Health Impacts of Air Pollution from Oil and Gas Facilities on African American Communities (November 2017)

Previous Cohort Comments on the 2023 Proposed Rule: Greenhouse Gas Standards and Guidelines for Fossil Fuel-Fired Power Plants

In August 2023, we submitted comments in opposition to the proposed rule "Greenhouse Gas Standards and Guidelines for Fossil Fuel-Fired Power Plants."[8] The rule erroneously adopted unproven false climate solutions and considered them a "Best System of Emission Reduction" (BSER). We define false solutions as technologies that are marketed as solutions to the climate crisis but instead increase pollution burden, expand fossil fuel infrastructure, and/or exacerbate health risks. In particular, we opposed the adoption of carbon capture and storage (CCS), hydrogen co-firing, and natural gas co-firing with coal. While hydrogen co-firing was ultimately removed as a BSER for new gas plants, the use of CCS and natural gas co-firing with coal remained in the final rule much to the disappointment of environmental justice advocates.[9,10]

In previous communications to the EPA,[11,12] we outlined concerns with these false solutions technologies and approaches in regards to the health and safety risks for workers[13] and communities as well as their ineffectiveness in reducing emissions.[14] With this, we determined the use of false solutions technologies were and still are largely incompatible with a clean energy transition and protecting environmental justice communities. While we acknowledged the emissions reductions from the rule, the Cohort considered the rule to be ultimately insufficient.[15] We maintain that the mass deployment of carbon management technologies and use of hydrogen co-firing and natural gas co-firing with coal is at best misguided and at worst actively

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https://naacp.org/resources/fumes-across-fence-line-health-impacts-air-pollution-oil-gas-facilities-african-american at 16.

[8] Comments Submitted on EPA's New Source Performance Standards for Greenhouse Gas Emissions From New, Modified, and Reconstructed Fossil Fuel–Fired Electric Generating Units; Emissions Guidelines for Greenhouse Gas Emissions From Existing Fossil Fuel–Fired Electric Generating Units; and Repeal of the Affordable Clean Energy Rule (Tishman Environment and Design Center (TEDC), The New Jersey Environmental Justice Alliance (NJEJA), Center for Earth, Energy & Democracy (CEED), and the Kean University John S. Watson Institute, August 2023), https://www.regulations.gov/comment/EPA-HQ-OAR-2023-0072-0890

[9] Baptista , A., & Johnson, D. (2023, December 18). *It's time we put an end to the carbon capture farce*. Common Dreams. https://www.commondreams.org/end-carbon-capture-farce

[10] *Clean air for the long haul statement on final EPA Power Plant Rules*. WE ACT for Environmental Justice. (2025, April 7). https://weact.org/updates/clean-air-for-the-long-haul-statement-on-final-epa-power-plant-rules/

[11] See footnote 6

[12] Comments Submitted on EPA's Existing Stationary Combustion Turbine EGUs Framing Questions for Stakeholder Input. (Tishman Environment and Design Center (TEDC), The New Jersey Environmental Justice Alliance (NJEJA), Center for Earth, Energy & Democracy (CEED), Kean University & WE ACT for Environmental Justice, May 2024),https://www.regulations.gov/comment/EPA-HQ-OAR-2024-0135-0080

[13] Gentry, P.R., House-Knight, T., Harris, A. *et al.* Potential occupational risk of amines in carbon capture for power generation. *Int Arch Occup Environ Health* 87, 591–606 (2014). https://doi.org/10.1007/s00420-013-0900-y

[14] U.S. Department of Energy, National Energy Technology Laboratory, "W.A. Parish Post-Combustion CO2 Capture and Sequestration Demonstration Project, Final Scientific/Technical Report". (March 31, 2020). https://www.documentcloud.org/documents/7010068-Petra-Nova-DOE-NETL-Report.html

[15] WE ACT for Environmental Justice. (2024, April 25). *Clean Air For the Long Haul Statement on Final Epa Power Plant Rules*. https://weact.org/updates/clean-air-for-the-long-haul-statement-on-final-epa-power-plant-rules/

detrimental to the pursuit of reducing greenhouse gas emissions and alleviating burdens on environmental justice communities.

Response to the Repeal of the final 2024 Greenhouse Gas Emissions Standards for Fossil Fuel-Fired Electric Generating Units "the Repeal"

While WE ACT and the Cohort did not support the final carbon power plant rule, it is imperative that the EPA continue to regulate and reduce carbon emissions from the power plant sector. We oppose the repeal of the GHG standards on the basis of EPA's claim that "fossil fuel-fired power plants do not contribute significantly to dangerous air pollution." According to the EPA's own data, power plants are a major source of carbon pollution with the sector contributing 25% of GHGs in the country, making it the second largest source.[16] Furthermore the EPA states,"every year pollution from power plants causes fine particle and ground level ozone-related premature deaths, new asthma cases and asthma exacerbations, heart attack, and lost school and work days." [17] Dismissal of the impact of fossil-fuel power plants is the dismissal of the EPA's own data, the findings of the scientific community, and the lived realities of frontline communities who face daily exposure to toxic pollution, elevated health risks, and climate-driven vulnerabilities.

Climate scientists, the Intergovernmental Panel on Climate Change as well as numerous other well respected and reputable bodies have emphasized the catastrophic impacts from each additional degree of warming the planet undergoes.[18] A comprehensive global assessment of high-intensity weather events between 1975 and 2008 revealed that 23 of nearly 9,000 major events reported in this period were responsible for 1.8 million deaths, an overwhelming toll of these deaths, 500,000 deaths, fell among impoverished communities.[19]As of mid-2025, the United States has experienced a significant increase in severe weather events, already resulting in an estimated $12 billion in damages between January and June.[20] The Cohort and environmental justice communities across this country are intimately familiar with the damages

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[16] U.S. Environmental Protection Agency Headquarters, O. (2025, March 31). *Sources of Greenhouse Gas Emissions* [Overviews and Factsheets]. https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions

[17] Environmental Protection Agency. (2025, February 26). *Human Health & Environmental Impacts of the Electric Power Sector*. EPA. https://www.epa.gov/power-sector/human-health-environmental-impacts-electric-power-sector#:~:text=Every%20year%2C%20pollution%20from%20power,of%20airborne%20emissions%20of%20mercury.

[18] Calvin, K., Dasgupta, D., Krinner, G., Mukherji, A., Thorne, P. W., Trisos, C., Romero, J., Aldunce, P., Barrett, K., Blanco, G., Cheung, W. W. L., Connors, S., Denton, F., Diongue-Niang, A., Dodman, D., Garschagen, M., Geden, O., Hayward, B., Jones, C., … Péan, C. (2023). *IPCC, 2023: Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Core Writing Team, H. Lee and J. Romero (eds.)]. IPCC, Geneva, Switzerland.* (First). Intergovernmental Panel on Climate Change (IPCC). https://doi.org/10.59327/IPCC/AR6-9789291691647

[19] Scovronick, N., Lloyd, S. J., & Kovats, R. S. (2015). Climate and health in informal urban settlements. Environment & Urbanization, 27(2), 657-678. https://doi.org/10.1177/0956247815596502

[20] Masters, J (2025, July 16) U.S. Socked with 15 billion-dollar weather disasters during the 1st half of 2025. Yale Climate Connections. https://yaleclimateconnections.org/2025/07/u-s-socked-with-15-billion-dollar-weather-disasters-during-the-1st-half-of-2025/#:~:text=The%20U.S.%20suffered%2012%20billion,U.S.%20that%20cost%20$9.5%20billion.

caused by the climate crisis because our communities are the ones that are and will continue to bear the brunt of these climate impacts.

EPA's own climate vulnerability assessment found that: 1) Hispanic and Latino individuals 43% more likely to live in areas with the highest projected labor losses; 2) Native American Individuals 48% more likely to live in areas that will be inundated due to sea level rise, and 3) Black Individuals are 40% more likely to live in the areas with the highest projected increases in mortality rates.[21] In cities like New York, home to Cohort members, WE ACT for Environmental Justice and South Bronx Unite, the New York State Disadvantaged Communities Criteria found most of the populations living in neighborhoods with high heat vulnerability (Heat vulnerability index-5 and/or Heat Vulnerability Index-4) live in environmental justice areas.[22] Extreme weather events such as extreme heat, exacerbate health disparities. For instance, Black and/or African-American communities are 34 percent more likely to reside in neighborhoods with the highest number of projected increases in childhood asthma diagnoses due to pollution and climate driven environmental changes.[23] This data makes it abundantly clear a power sector reliant on the combustion of fossil fuels poses inherent, unavoidable, and significant dangers to communities. We strongly endorse and advocate for our energy system to transition away from the use of fossil fuels that drive the climate crisis and towards clean, renewable technologies. Anything short of a rapid transition away from fossil fuel use will result in further catastrophic harm to our communities.

Alternatives to the Repeal

The Administration's Executive Order Reinvigorating America's Beautiful Clean Coal Industry and Amending Executive Order 14241 directed the EPA to take aim at regulations in Sec 6. Supporting Coal as an American Resource.[24] The administration cites regulations as the primary driver behind coal's decline both as an industry and as a job creator in the U.S. This is despite research demonstrating that the industry's decline is a result of wind, solar and even other fossil fuels such as natural gas outcompeting coal's cost and also demonstrating coal industry jobs have decreased for decades even when the industry itself was growing.[25] Evidence suggests that this approach of deregulation to increase coal production and jobs will ultimately be ineffective as the decline has simply been a function of market forces.[26]Instead, we assert that this directive will only serve to remove invaluable safeguards that mitigate public health burdens on environmental justice communities and limit emissions. For that reason, the Cohort

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[21] U.S. Environmental Protection Agency Headquarters. (2021, September). Climate Change and Social Vulnerability in The United States [Announcements and Schedules]. https://www.epa.gov/cira/social-vulnerability-report

[22] New York City Mayor's office of Sustainability. (2025). Environmental Justice in NYC: 2025 update. https://climate.cityofnewyork.us/wp-content/uploads/2025/04/EJNYC_Report.pdf

[23] See footnote 19

[24] Exec. Order No.14241 3 C.F.R, 90 FR 15517 (2025). https://www.federalregister.gov/d/2025-06380/page-15517

[25] Charles D. Kolstad. (2017). *What Is Killing the US Coal Industry?* | Stanford Institute for Economic Policy Research (SIEPR). https://siepr.stanford.edu/publications/policy-brief/what-killing-us-coal-industry

[26] Burke, A. (2025, April 17). Trump orders coal revival, but market favors natural gas. *NPR*. https://www.npr.org/2025/04/16/nx-s1-5359013/trump-orders-coal-revival-market-favors-natural-gas

recommends an alternative between the repeal of regulations and the maintenance of the status quo.

As previously noted, fossil fuel operations—including those addressed in this rule—pose serious threats to community health and safety, through harmful air pollution and their significant contributions to climate change. The Cohort finds both the current rule and the repeal to be insufficient in protecting environmental justice communities and the public as a whole. Specifically, the inclusion of false solutions technologies and natural gas co-firing with coal as BESRs was found to be incompatible with the interests of our communities. While these technologies would no longer be deployed in the event of this repeal, the Cohort emphasizes the need for effective proven technologies to be implemented to mitigate the immediate harms of operations and for the facilities to be rapidly phased out in favor of non-polluting energy sources such as renewables.

An alternative to what is currently in place and being proposed would be one that addresses both of these needs. To do this, we offer several key recommendations. EPA should incorporate a comprehensive environmental justice analysis that takes into account the cumulative impacts of emissions on environmental justice communities. As part of this process, the Agency must identify power plants located in overburdened environmental justice communities using the government's own existing tools and methodologies. There are a variety of tools and methodologies that can be adapted for this purpose, including EPA's own Power Plant Environmental Justice Screening Methodology,[27] the Center for Disease Control (CDC)/Agency for Toxic Substances and Disease Registry (ATSDR)'s Environmental Justice Index [28], and the Council on Environmental Quality (CEQ)'s Climate and Economic Justice Screening Tool.[29] As of writing this comment, the Power Plant Environmental Justice Screening Methodology and the Climate and Economic Justice Screening Tool have unjustly been removed from their respective government webpages. We call on EPA and CEQ to make these resources available again to the public and integrate their use into decision making and operations.

Furthermore, the EPA should address both existing and new facilities. EPA must regulate all carbon emissions from power plants regardless of fuel type. Previously, the EPA elected to address existing gas power plants into a separate rulemaking and there remains a critical need for that process to be completed. The Cohort also emphasizes the need for EPA to provide effective oversight of state compliance, with clear guidance and directives for the approval of state implementation plans (SIPs). In doing so, the EPA must not grant too much flexibility that

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[27] Environmental Protection Agency. (2024, December 6). *Power Plant Environmental Justice Screening Methodology | US EPA*. https://web.archive.org/web/20241206162540/https://www.epa.gov/power-sector/power-plant-environmental-justice-screening-methodology

[28]Center for Disease Control and Prevention. (2024, December 3). Environmental Justice Index. Place and Health - Geospatial Research, Analysis, and Services Program (GRASP). https://www.atsdr.cdc.gov/place-health/php/eji/index.html

[29] CEQ. (2024). *Climate and Economic Justice Screening Tool (CEJST)* (Version 1.1, pp. 10, 593172, 181187466, 12943, 604997576, 145, 38618, 0, 703950, 4598348, 339393, 233861, 51430952, 37314931, 341043)Harvard Dataverse. https://doi.org/10.7910/DVN/B6ULET

allows states to compromise its duty to uphold environmental justice and safeguard air quality, public health, and the environment for frontline communities living near gas plants. Additionally, the EPA should require that state plans demonstrate that the compliance approach adopted by each plant in an EJ community does not cause or contribute to adverse cumulative environmental or public health stressors in our communities. For the EPA to fulfill its obligations under the Clean Air Act, it must go further than what either the current rule or its potential repeal would accomplish.

Conclusion

In closing, we continue to uphold that environmental justice must be at the forefront in regulations for the power plant sector. The proposed rollback of this rule—alongside other critical regulations like the Mercury and Air Toxics Standards, vehicle emissions standards, and even threats to the Endangerment Finding—poses serious harm to environmental justice communities, who already face cumulative pollution burdens from multiple major sources. Moreover, this proposed rollback and attempt to prevent future regulations continues historical and current-day harms to environmental justice communities and propels the climate crisis. To serve the public interest, the EPA must adopt the most stringent standards possible to prevent these harms, not dismantle standards to allow unmitigated pollution.

Thank you for considering our input. We look forward to continuing to engage with the Agency and will continue to urge it to fulfill its mission of protecting the environment and public health.

Respectfully,

The Clean Air for the Long Haul